

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA

vs.

GERALD A. SANDUSKY

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)
)

Nos. CP-14-CR-2421-2011 &
CP-14-CR-2422-2011

Commonwealth Attorneys:

Defense Attorneys:

Frank Fina, Esquire

Joseph L. Amendola, Esquire

Norris E. Gelman, Esquire

**MOTION FOR AN EXTENSION OF TIME IN WHICH TO FILE THE
DEFENDANT'S BRIEF IN SUPPORT OF HIS POST SENTENCE MOTIONS**

TO THE HONORABLE JOHN M. CLELAND, SENIOR JUDGE SPECIALLY
PRESIDING, OF THE SAID COURT:

Counsels for Defendant, Gerald A. Sandusky, move this Honorable Court
for a two-week extension of time in which to file the Defendant's Brief in Support
of his Post-Sentence Motions, and in support they state:

1. This Court entered an Order requiring the Defendant's attorneys to file
their Brief in Support of Post-Sentence Motions on or before November 16, 2012.

2. Lead counsel in this case (Norris E. Gelman, Esquire) was retained
after sentencing and was then recovering from a heart attack and open heart
surgery. He was unable to work until mid October.

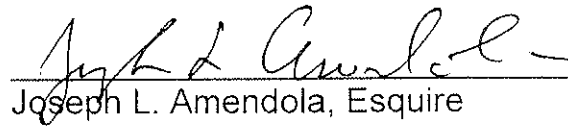
3. There is a vast amount of material to review from the discovery
information and the trial. Significant research has to be done to support the
Defendant's claims and counsel would be able to file a far more meaningful brief
if the short two week extension were to be granted.

4. The Defendant is presently in SCI Greene on his 30-60 year sentence.

5. The Commonwealth cannot be prejudiced by a two-week extension of time.

WHEREFORE, it is respectfully requested that this Honorable Court grant a two week extension of time in which to file the Defendant's Brief in Support of his Post-Sentence Motions from the date it is presently due (November 16, 2012) so that it would then be due on or before November 30, 2012.

Respectfully submitted,



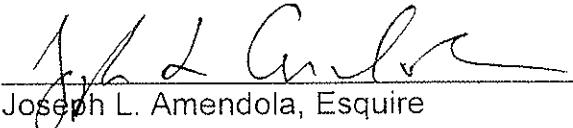
Joseph L. Amendola, Esquire
Co-Counsel for Defendant
110 Regent Court, Suite 202
State College, PA 16801
814-234-6821
I.D. No. 17667

Norris E. Gelman, Esquire
Lead Counsel for Defendant
2000 Market Street, Suite 2940
Philadelphia, PA 19103
215-574-0513
ID No. 14223

Date: November 13, 2012

VERIFICATION

I verify that the statements made in the foregoing are true and correct. I understand that false statements are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.



Joseph L. Amendola, Esquire

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Frank Fina, Esquire
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Norris E. Gelman, Esquire

CERTIFICATE OF SERVICE

AND NOW, this 13th day of November, 2012, I, Joseph L. Amendola, hereby certify that I have, this date, served a copy of the foregoing document, by:

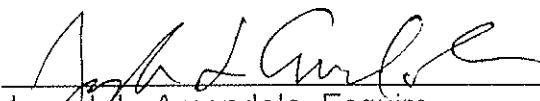
Hand Delivery

Hon. John M. Cleland, Senior Judge
c/o Ms. Maxine Ishler, Court Administrator
Centre County Courthouse
102 South Allegheny Street
Bellevue, Pennsylvania 16823

Mailed U.S. Mail, First-Class and Email

Frank Fina, Esquire
Office of Attorney General
Criminal Prosecutions Section
16th Floor Strawberry Square
Harrisburg, PA 17120

BY:



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