

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

COMMONWEALTH OF
PENNSYLVANIA,

vs.

GERALD A. SANDUSKY

CP-14-CR-2421-2011

CP-14-CR-2422-2011

**MOTION FOR LEAVE TO FILE AMICUS CURIAE IN SUPPORT
OF ALL MOTIONS TO QUASH DISCOVERY SUBPOENAS**

COMES NOW, the National Center for Victims of Crime, and moves this honorable Court, within its discretion, for leave to file as Amicus Curiae in support of all Motions to Quash discovery subpoenas filed in this action, attached hereto, and in support thereof states as follows:

1. The National Center for Victims of Crime (National Center), a nonprofit organization based in Washington, DC, is the nation's leading resource and advocacy organization for all victims of crime.
2. The mission of the National Center is to forge a national commitment to help victims of crime rebuild their lives.
3. Dedicated to serving individuals, families, and communities harmed by crime, the National Center, among other efforts, advocates laws and public policies that create resources and secure rights and protections for crime victims.
4. The National Center is particularly interested in this case because of its impact on the rights of victims of child sex abuse.

FILED FOR RECORD
2012 MAY -8 P 3:34
DEBRA C. IMEL
PROTHONOTARY
CENTRE COUNTY, PA

WHEREFORE, in light of the broad public policy implications of the issue at Bar, the National Center requests this honorable Court to accept and consider its brief, attached hereto, on behalf of future victims whose ability to have their cases heard in Pennsylvania courts may be hampered by an adverse decision in this circuit.

Respectfully Submitted,
NATIONAL CENTER FOR VICTIMS OF CRIME
By counsel

A handwritten signature in dark ink, appearing to read 'Stephanie Morris', is written over a horizontal line.

Stephanie Morris (Pa. Bar No. 87191)
2000 M Street, NW
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Certificate of Service

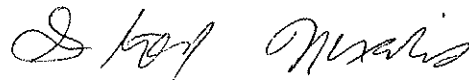
I hereby certify that a true and accurate copy of this Motion for Leave to File Amicus Curiae has been sent on this 8 day of May, 2012 by U.S. Mail, First Class and by facsimile to Counsel for the Commonwealth and Defendant at:

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