



IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA : No(s). CP-14-CR-2421-2001
: CP-14-CR-2422-2011
VS. :
: :
GERALD A. SANDUSKY : :

**MOTION OF THE PENNSYLVANIA DEPARTMENT OF PUBLIC
WELFARE TO SEAL THE DEPARTMENT'S MOTION TO
QUASH DEFENDANT'S SUBPOENA, OR IN THE ALTERNATIVE,
FOR IN CAMERA INSPECTION AND PROTECTIVE ORDER**

FILED FOR RECORD
2012 MAY - 7 3:48
DEPT. OF PUBLIC WELFARE
CENTRE COUNTY, PA

AND NOW comes the Honorable Gary Alexander, Secretary of the Department of Public Welfare, by and through the Governor's Office of General Counsel, and hereby moves to seal the motion to quash the subpoena issued by Defendant to the Pennsylvania Department of Public Welfare (hereinafter the "Department"), or in the alternative, for an *in camera* inspection and protective order. In support thereof, the Department avers as follows:

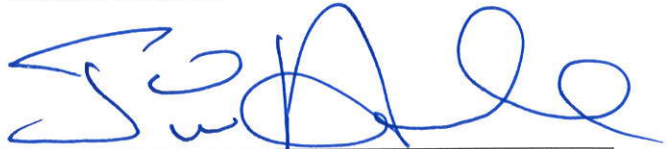
1. On May 7, 2012, the Department filed a Motion to Quash Defendant's Subpoena, or In The Alternative, Motion for *In Camera* Inspection and Protective Order.
2. In its motion, the Department identifies specific categories of records that may be responsive to the subpoena.
3. In compliance with this Court's Order of March 13, 2012, the Department's motion and attachments do not contain the names or identifying information of Victims 1-10.
4. Nevertheless, the Department is concerned that the records identified in its motion, when combined with other information already in the public domain, may lead to the identity of one or more of the victims, thereby defeating the purpose of the Court's Order.

5. Therefore, in an abundance of caution, the Department respectfully files this Motion to Seal its Motion to Quash Subpoena in order to afford the Court with an opportunity to consider the effects of a public filing of the Department's motion on its March 13, 2012 Order.

WHEREFORE, the Pennsylvania Department of Public Welfare respectfully requests that this Honorable Court direct that the Centre County Clerk of Courts seal the Department's Motion to Quash Subpoena until such time as the Court determines whether public disclosure of the Department's Motion to Quash is violative of its March 13, 2012 Order.

Respectfully submitted,

STEPHEN S. AICHELE
General Counsel



Date: May 7, 2012

By:

JARAD W. HANDELMAN
Deputy General Counsel
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**IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CRIMINAL DIVISION**

COMMONWEALTH OF PENNSYLVANIA :

v. :

GERALD A. SANDUSKY :

**NOS: CP-14-CR-2421-2011 &
CP-14-CR-2422-2011**

Commonwealth Attorneys:

Joseph McGettigan, Esquire

Jonelle H. Eshbach, Esquire

Defense Attorney:

Joseph L. Amendola, Esquire

CERTIFICATE OF SERVICE

AND NOW, this 7th day of May, 2012, I, Jarad W. Handelman, 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
Bellefonte, PA 16823

FILED FOR RECORD
2012 MAY -7 P 3:48
DEBRA C. IMEL
PROTHONOTARY
CENTRE COUNTY, PA

Mailed U.S. Mail First Class and Electronic Delivery

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