

IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PENNSYLVANIA

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

FILED FOR
2012 MAY - 8
DEBRA C. IM
PROTHONOTA
CENTRE COUNT

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

AND NOW, comes the Honorable John Wetzel, Secretary of Corrections, 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 Corrections (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.

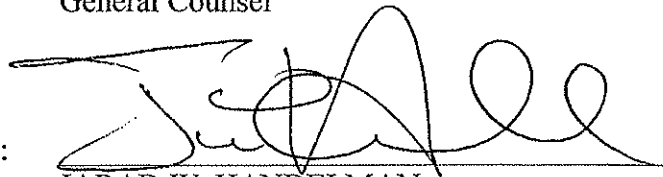
WHEREFORE, the Pennsylvania Department of Corrections respectfully requests that this Honorable Court direct that the Centre County Clerk of Courts seal the Department's Motion to Quash Subpoena until such time as the Court determines whether public disclosure of the Department's Motion to Quash is violative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

Respectfully submitted,

STEPHEN S. AICHELE
General Counsel

Date: May 7, 2012

By:

A handwritten signature in black ink, appearing to read 'Jarad W. Handelman', written over a horizontal line.

JARAD W. HANDELMAN
Deputy General Counsel
Attorney I.D. No. 82629

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*Counsel for Third-Party Respondent, Pennsylvania
Department of Corrections*

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

Mailed U.S. Mail First Class and Electronic Delivery

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PROTHONOTARY
CENTRE COUNTY, PA