

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 :  
:

**MOTION OF THE PENNSYLVANIA DEPARTMENT OF LABOR  
AND INDUSTRY 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 Julia K. Hearthway, Secretary of Labor and Industry, 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 Labor and Industry (hereinafter the "Department" or "L&I"), 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.

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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 Labor and Industry 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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*Counsel for Third-Party Respondent, Pennsylvania  
Department of Labor and Industry*

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 7<sup>th</sup> 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**

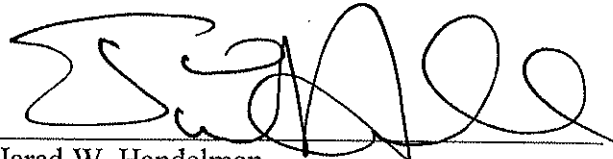
Hon. John M. Cleland, Senior Judge  
c/o Ms. Maxine Ishler, Court Administrator  
Centre County Courthouse  
102 South Allegheny Street  
Bellefonte, PA 16823

**Mailed U.S. Mail First Class and Electronic Delivery**

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