



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

COMMONWEALTH OF

v.

GERALD A. SANDUSKY,

PETITIONER.

CP-14-CR-2421-2011

CP-14-CR-2422-2011

HONORABLE SENIOR JUDGE
JOHN M. CLELAND

FILED
PROTON
COURT

2016 MAY 16 PM 12:38

TYPE OF PLEADING:

MOTION TO CLARIFY THE
WITNESSES WHO WILL BE
PERMITTED TO BE CALLED

FILED ON BEHALF OF:

PETITIONER, GERALD A. SANDUSKY

COUNSEL FOR PETITIONER:

ALEXANDER H. LINDSAY, ESQUIRE
Pa. Supreme Court Id. No. 15088

J. ANDREW SALEMME, ESQUIRE
Pa. Supreme Court Id. No. 208257

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COMMONWEALTH OF PENNSYLVANIA	:	CP-14-CR-2421-2011
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GERALD A. SANDUSKY,	:	
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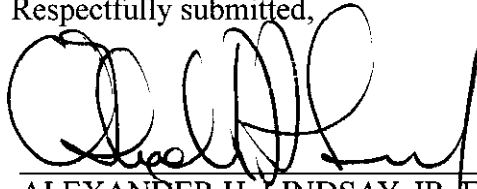
**MOTION TO CLARIFY THE WITNESSES WHO WILL BE PERMITTED TO BE
CALLED**

AND NOW COMES, Petitioner, Gerald A. Sandusky, by and through his counsel, Alexander H. Lindsay, Jr., Esq., and J. Andrew Salemme, Esq., and the Lindsay Law Firm, P.C., and files this Motion to Clarify the Witnesses Who Will be Permitted to be Called and aver the following:

The parties on May 10, 2016 participated in a telephone status conference. Based on that conference, the PCRA Court made clear that Petitioner would be permitted to present the testimony of Attorney Frank Fina, Attorney Joseph McGettigan, and Judge Barry Feudale. However, at both the May 2, 2016 argument and the aforementioned teleconference, the PCRA Court made reference that based on Petitioner's witness certifications, Petitioner might be precluded from presenting certain witnesses relative to the claims currently in question. So as to not burden various law enforcement officials and other potential witnesses, the undersigned seek clarification as to whether counsel is precluded from calling other witnesses.¹

¹ Petitioner acknowledges that the following witnesses included in the Amended Witness Certifications filed on April 27, 2016, do not have a bearing on the May 20, 2016 issues: Norris Gelman, Dr. Simpson, Dr. Esplin, Thomas Farrell, Dick Anderson, Chad Rexrode, Lindsay Kowalski, Ben Andreozzi, D.S.

Respectfully submitted,



ALEXANDER H. LINDSAY, JR. ESQ.

Pa. Supreme Court Id. No. 15088



J. ANDREW SALEMME, ESQ.

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Attorneys For Gerald A. Sandusky

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CERTIFICATE OF SERVICE


The undersigned hereby certifies that on the 16th day of May, 2016 he caused an exact copy of the foregoing document to be served in the manner specified, upon the following:

Via First Class Mail

Honorable John M. Cleland, Sr. Judge c/o Office of the Court Administrator and
Office of the Clerk of Courts of Centre County
Centre County Courthouse
102 South Allegheny Street
Bellefonte, PA 16823

Assistant Attorney General Jennifer Peterson
Office of the Attorney General – Criminal Prosecutions Section
16th Floor Strawberry Square
Harrisburg, PA 17120

Respectfully submitted,


ALEXANDER H. LINDSAY, JR., ESQ.
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