

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

COMMONWEALTH OF PENNSYLVANIA)

vs.)

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

MOTION TO COMPEL

TO THE HONORABLE JOHN M. CLELAND, SENIOR JUDGE SPECIALLY ASSIGNED
TO THESE MATTERS IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY,
PENNSYLVANIA:

AND NOW, comes the Defendant, GERALD A. SANDUSKY, through his
attorney, Joseph L. Amendola, Esquire, who respectfully represents the following:

1. On May 7, 2012, the Commonwealth provided additional discovery
materials to Defendant's counsel consisting of at least one hundred (100) pages, one (1)
portable hard drive, four (4) DVD+R discs and six (6) CD-R discs of information.

2. Defendant's counsel does not have the sophisticated equipment or
software to access the information contained in the portable hard drive titled "Sandusky
Home Computers" provided by the Commonwealth to him on May 7, 2012 as well as one
(1) DVD-R disc titled Item 1, G7-11930V, "The Second Mile (TSM) Program Data Bases"
and one (1) CD-R disc titled Item 8, G7-119304, "Phone Records from Search at
Paterno's Office".


3. Defendant's counsel has been advised obtaining the sophisticated
equipment or software to access the information contained in the aforementioned
portable hard drive may well cost in excess of \$10,000.00.

DEBRA C. JAMES
PROTHONOTARY
CENTRE COUNTY, PA
2012 MAY 9 8:51
FILED
COPY

4. Defendant's counsel is asking this Honorable Court to direct the Commonwealth to provide him with the information contained in the portable hard drive and the two (2) aforementioned discs in traditional paper form so he, the Defendant, and other members of the defense team can review the aforementioned voluminous materials in a reasonable period of time.

WHEREFORE, the Defendant respectfully requests that this Honorable Court enter an Order directing the Commonwealth to provide paper copies of the information contained in the portable hard drive, the DVD-R disc titled Item 1, G7-11930V, "The Second Mile (TSM) Program Data Bases", and the CD-R disc titled Item 8, G7-119304, "Phone Records from Search at Paterno's Office" at the earliest point in time.

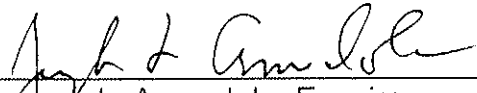
Respectfully submitted,

BY: 
Joseph L. Amendola, Esquire
Attorney for Defendant
110 Regent Court, Suite 202
State College, PA 16801
(814) 234-6821
I.D. No. 17667

Date: May 9, 2012

VERIFICATION

I verify that the statements made in the foregoing are true and correct. I understand that false statements are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.



Joseph L. Amendola, Esquire

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GERALD A. SANDUSKY)	

Commonwealth Attorneys:

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Jonelle H. Eshbach, Esquire

Defense Attorney:

Joseph L. Amendola, Esquire

CERTIFICATE OF SERVICE

AND NOW, this 9th day of May, 2012, I, Joseph L. Amendola, hereby certify that I have, this date, served a copy of the foregoing document, by:

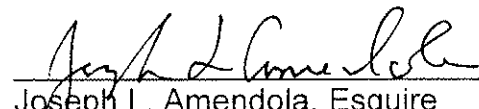
Hand Delivery

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

Joseph McGettigan, Esquire
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BY:



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