

IN THE ORPHANS' COURT DIVISION OF THE COURT OF COMMON PLEAS
OF CENTRE COUNTY, PENNSYLVANIA

IN RE: THE SECOND MILE

ORPHANS' COURT NO. 14-12-0255

FILED FOR RECORDED
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KIMBERLY A. BARTO
REGISTER OF WILL
CLERK OF ORPHANS' CO
CENTRE COUNTY, PA

Subst

**JOHN DOE B's RESPONSE TO PETITION FOR EXPEDITED APPROVAL OF SALE
OF ATHERTON STREET PROPERTY**

AND NOW, comes John Doe B ("Respondent"), by and through his attorneys, Clifford A. Rieders, Esquire, and Corey J. Mowrey, Esquire, of RIEDERS, TRAVIS, HUMPHREY, HARRIS, WATERS & WAFFENSCHMIDT, and responds to the Motion and Amended Petition as follows:

1-8. The averments are with respect to the history of Second Mile and as such cannot be admitted or denied by Respondent. The allegations with respect to what was reported in the news media are incomplete in that Gerald Sandusky was found guilty. It is the position of Respondent that The Second Mile is liable as well for the sexual abuse which has occurred.

9. The allegations contained are a conclusion of law and no response is required.

10-24. Respondent does not oppose the sale of the property so long as the Court remains in supervision thereof and determines that the price is fair and reasonable.

New Matter

25. Respondent has a crucial interest in the outcome of this Petition since he was victimized by Jerry Sandusky.

26. There is clearly liability on the part of The Second Mile in connection with the sexual abuse which occurred based upon the actions of Gerald Sandusky.

27. Petitioners seem generally to agree that the assets of The Second Mile should be utilized for the Jerry Sandusky victims.

28. Respondent's concern is that the price of the property be fair and reasonable, be supervised by the Court and that the monies are placed in a proper interest-bearing escrow account for the use of the victims.

29. It is the position of Respondent that the court should maintain jurisdiction over the funds to assure that they remain on deposit and available for the victims of the Jerry Sandusky abuse.

Respectfully submitted,

RIEDERS, TRAVIS, HUMPHREY, HARRIS,
WATERS & WAFFENSCHMIDT

Clifford A. Rieders, Esquire (PA ID#: 20962)
Corey J. Mowrey, Esquire (PA ID#: 307507)
Attorneys for Respondent John Doe B
161 West Third Street
PO Box 215
Williamsport, PA 17703-0215
(570) 323-8711 (telephone)
(570) 567-1025 (facsimile)
crieders@riederstravis.com
cmowrey@riederstravis.com

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IN RE: THE SECOND MILE

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CERTIFICATE OF SERVICE

AND NOW comes Clifford A. Rieders, Esquire/ Corey J. Mowrey, Esquire,
attorneys for Plaintiff, and certifies that a copy of the foregoing John Doe B's Response
to Petition for Expedited Approval of Sale of Atherton Street Property was served upon
the following parties via First Class Mail on this 20th day of March 2013:

H. Amos Goodall, Jr., LL.M., Esquire
Goodall & Yurchak, P.C.
328 South Atherton Street
State College, PA 16801

Daniel F. Monahan, Esquire
Monahan Law Practice, P.C.
7 Great Valley Parkway, Ste. 290
Malvern, PA 19355

Benjamin D. Andreozzi, Esquire
Andreozzi & Associates, P.C.
215 Pine Street, Suite 200
Harrisburg, PA 17101

Marci A. Hamilton, Esquire
36 Timber Knoll Drive
Washington Crossing, PA 18977

Jeffrey P. Fritz, Esquire
Soloff & Zervanos, P.C.
1525 Locust Street
8th Floor
Philadelphia, PA 19102

Thomas R. Kline, Esquire
Kline & Specter
1525 Locust Street
19th Floor
Philadelphia, PA 19102

Terry S. Hyman, Esquire
Schmidt Kramer, PC
209 State Street
Harrisburg, PA 17101

Charles L. Becker, Esquire
Kline & Specter
1525 Locust Street, 19th Floor
Philadelphia, PA 19102

Shawn P. McLaughlin, Esquire
Menges & McLaughlin, P.C.
145 East Market Street
York, PA 17401

Joel J. Feller, Esquire
Ross Feller Casey LLP
1650 Market Street
Suite 3450, One Liberty Place
Philadelphia, PA 19103

Slade H. McLaughlin, Esquire
McLaughlin & Lauricella, LC
One Commerce Square
2005 Market Street, Suite 2300
Philadelphia, PA 19103-7042

Justine Andronici, Esquire
333 South Allen Street
State College, PA 16801

Michael J. Boni, Esquire
Boni & Zack LLC
15 St. Asaphs Road
Bala Cynwyd, PA 19004

Andrew Shubin, Esquire
333 South Allen Street
State College, PA 16801

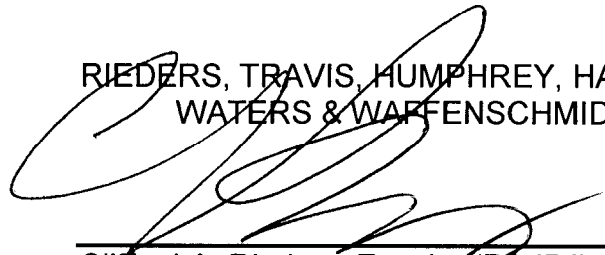
Don Bailey, Esquire
4311 North Sixth Street
Harrisburg, PA 17110

Howard A. Rosenthal, Esquire
One Liberty Place – 32nd Floor
1650 Market Street
Philadelphia, PA 19103

Jeffrey A. Anderson, Esquire
Anderson & Associates
366 Jackson Street
Suite 100
Saint Paul, MN 55101

Howard Alan Janet, Esquire
Janet Jenner & Suggs LLC
1829 Reistertown Road
Suite 320
Baltimore, MD 21208

RIEDERS, TRAVIS, HUMPHREY, HARRIS,
WATERS & WAFFENSCHMIDT



Clifford A. Rieders, Esquire (PA ID#: 20962)
Corey J. Mowrey, Esquire (PA ID#: 307507)
Attorneys for Respondent John Doe B
161 West Third Street
PO Box 215
Williamsport, PA 17703-0215
(570) 323-8711 (telephone)
(570) 567-1025 (facsimile)
rieders@riederstravis.com
cmowrey@riederstravis.com