

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

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KIMBERLY A. EASTON
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CENTRE COUNTY PA

**JOHN DOE B's RESPONSE TO THE SECOND MILE'S MOTION TO LIFT STAY AND
AMENDED PETITION FOR LIMITED DISTRIBUTION OF ASSETS AND
INCREMENTAL PROGRAM TRANSFER OF THE SECOND MILE PENDING
DISSOLUTION**

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:

1-9. Cannot admit or deny as stated, and therefore proof thereof is demanded. The statements describing the program represent assertions by Petitioner which are of dubious application to the Order being sought.

10. Cannot admit or deny as stated, and proof thereof is demanded. The allegation is incomplete in that Mr. Gerald Sandusky was convicted of unlawful acts in connection with child sexual abuse.

11. The statement is a conclusion concerning jeopardy to the existence of The Second Mile which cannot be admitted or denied and proof thereof is demanded.

12-18. The averments cannot be admitted or denied as stated and therefore proof thereof is demanded.

19-32. The procedural averments, generally speaking, set forth a course of events. With respect to filings and dates thereof, the allegations are admitted. With respect to the conclusions and summary of the documentation, the documents speak for themselves and proof thereof is demanded.

33-37. The averments are legal conclusions to which no response is required.

38-53. The allegations are statements with respect to Arrow which may or may not be correct. Respondents are not in a position to know the truth of the averments and therefore the statements are denied and strict proof thereof is demanded.

54-72. The statements concerning what Arrow will do are specifically denied and proof thereof is demanded. Arrow is not among the Petitioners and currently is not subject to the jurisdiction of this Court. Arrow should be joined as a party so that it may be under the jurisdiction and supervision of the Court. Therefore, the averments are denied and strict proof thereof is demanded.

New Matter

73. Respondent represents John B. Doe.

74. An action has been filed by Plaintiff in the Court of Common Pleas of Philadelphia County.

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

76. Clearly, The Second Mile is involved in the allegations with respect to the sexual abuse and in part because of its relationship with Gerald Sandusky.

77. Petitioner has made allegations with respect to Arrow-PA, but Arrow is not a petitioner and is currently not under the jurisdiction of the Court.

78. Respondent's sole concern is that any monies that go to Arrow are used properly and under court supervision, and represent a *de minimis* amount so that the assets of Second Mile can be available for the use of Sandusky/Second Mile victims.

79. Respondent does not have an Order indicating what the "plan" is specifically that the Court is being asked to sign off on.

80. Certain pro formas have been provided with respect to 2013 projected cash analysis.

81. Any pro forma should be included in the Court Order so that an approximation of the assets remaining after the transfer would be available.

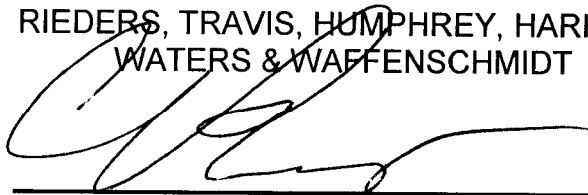
82. Arrow-PA should be a party to this proceeding and should make appropriate representation to the Court.

83. Any Court Order should provide for the auditing of Arrow by Arrow and representations by Arrow to the Court in order to ensure the money is utilized as represented.

84. There will need to be continuing monitoring and required reports to the Court with respect to the assets remaining to assure that they are utilized as suggested by Petitioner.

Respectfully submitted,

RIEDERS, TRAVIS, HUMPHREY, HARRIS,
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OF CENTRE COUNTY, PENNSYLVANIA

IN RE: THE SECOND MILE

ORPHANS' COURT NO. 14-12-0255

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 the Second Mile's Motion to Lift Stay and Amended Petition for Limited Distribution of
Assets and Incremental Program Transfer of the Second Mile Pending Dissolution was
served upon the following parties via First Class Mail on this 20th day of
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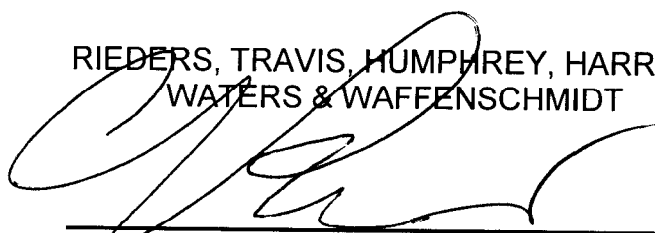
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