

**IN THE SUPREME COURT OF PENNSYLVANIA
WESTERN DISTRICT**

IN RE: FORTIETH STATEWIDE : No. 106 WM 2018
INVESTIGATING GRAND JURY :
: Supreme Court of Pennsylvania
: 2 W.D. MISC. DKT. 2016
APPLICATION OF: :
PHILADELPHIA MEDIA NETWORK, : Allegheny County Court of Common
PBC, ET AL. : Pleas
: CP-02-MD-571-2016
: :
: Notice Number 1

**REPLY TO APPLICATION TO INTERVENE TO SEEK PUBLIC ACCESS
TO GRAND JURY REPORT AND ASSOCIATED DOCKET SHEETS AND
FILINGS**

Dated: July 5, 2018

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Counsel for Respondent [REDACTED]

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**REPLY TO APPLICATION TO INTERVENE TO SEEK PUBLIC ACCESS
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██████████, a retired priest, through his undersigned attorney, Laurel Brandstetter and Schnader Harrison Segal & Lewis LLP, replies to the Application to Intervene to Seek Public Access to Grand Jury Report and Associated Docket Sheets and Filings (“Application”) as follows:

1. ██████████ acknowledges that the Intervenors listed in paragraphs 1 through 7 of the Application are members of the media who have standing to assert their right to intervene in these proceedings, and to assert their rights to seek access to “Report No. 1 of the Fortieth Statewide Investigating Grand Jury, and the dockets and filings associated with challenges to Report No. 1’s release.”

2. To the extent that the Intervenor seeks to lift the stay of the release of the report on the ground that “Report No. 1 was supported by the preponderance of the evidence,” [REDACTED] objects. [REDACTED] rejects the conclusion that a preponderance of the evidence exists to support the references made to him in Report No. 1.

3. [REDACTED] does not object to the Intervenor's request for release of “a redacted version of Report No. 1 in the interim that redacts only those portions implicated by the unknown petitioners' challenges.”

4. Similarly, [REDACTED] does not object to the public release of the filings associated with his challenge to Report No. 1's release, with thorough redactions. [REDACTED] has significant concerns about the scope of the redactions and believes that significant portions of his Petition would require redaction as they set forth the specific factual basis for his claims.

5. In the event that this Honorable Court authorizes the redacted release of the Report No. 1 and associated filings, [REDACTED] requests the opportunity to review the proposed redactions to the Report and his filings.

Dated: July 5, 2018

Respectfully submitted,

SCHNADER HARRISON SEGAL & LEWIS, LLP

By: /s/ Laurel Brandstetter

Laurel Brandstetter

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Counsel for Respondent [REDACTED]

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 127 of the Pennsylvania Rules of Appellate Procedure, I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Dated: July 5, 2018

SCHNADER HARRISON SEGAL & LEWIS, LLP

By: /s/ Laurel Brandstetter

Laurel Brandstetter

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Counsel for Respondent ██████████

PROOF OF SERVICE

I, Laurel Brandstetter, being duly sworn according to law does hereby state and aver that I caused a true and correct copy of the foregoing document titled, *Reply To Application To Intervene To Seek Public Access To Grand Jury Report And Associated Docket Sheets And Filings* to the following:

Via Electronic Mail and U.S. First-Class Mail, Postage Pre-Paid

The Honorable Norman A.
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Dated: July 5, 2018

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/s/ Laurel Brandstetter
Laurel Brandstetter
Attorney I.D. No. 87115

Counsel for Respondent [REDACTED]