

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

C. ALAN WALKER, in his capacity as)
Secretary for the Department of Community)
and Economic Development,)

Petitioner)

v.)

CITY OF HARRISBURG,)

Respondent)

Docket No. 569 MD 2011

RECEIVED & FILED
COMMONWEALTH COURT
OF PENNSYLVANIA
2013 OCT -4 P 12:41

**COUNTY OF DAUPHIN'S APPLICATION FOR RELIEF IN THE FORM OF JOINDER
IN THE REQUEST FOR RELIEF FILED ON BEHALF OF THE RECEIVER**

AND NOW comes the County of Dauphin (the "County"), by its attorneys, Mette, Evans & Woodside and Saidis, Sullivan & Rogers, and hereby files the following Application:

1. This is an action in this Court's original jurisdiction pursuant to a declaration of fiscal emergency made by Governor Tom Corbett on October 24, 2011 relating to the City of Harrisburg (the "City"), and the ensuing action initiated in this court by C. Alan Walker, Secretary of the Pennsylvania Department of Community and Economic Development, under the Financially Distressed Communities Act ("Act 47"), 53 P.S. §§ 11701-101 – 11701-710, to proceed with development, submission and necessary approvals for a "fiscal recovery plan" for the City.

2. On August 26, 2013, the Receiver of the City, the Honorable William B. Lynch, (the "Receiver") filed his plan to implement the fiscal recovery plan, labeling it the "Harrisburg Strong Plan" (the "Plan").

3. On September 11, 2013, the County filed an Application for Leave to Intervene and on September 19, 2013, this Honorable Court entered an Order granting, *inter alia*, the County's Application to Intervene.

4. A hearing on the Plan was held on September 19, 2013, and on September 23, 2013 this Honorable Court issued an Order approving the Plan.

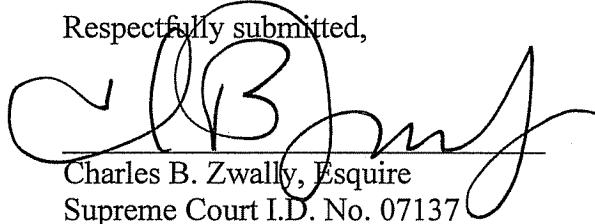
5. On October 3, 2013, a Response of the Receiver to Objections to Plan of Recovery (the "Response") was filed on behalf of the Receiver in response to a document listing certain "objections" filed *pro se* by Daniel C. Miller, Controller for the City of Harrisburg (the "Objections").

6. The County hereby incorporates by reference the Response filed on behalf of the Receiver pursuant to Pa. R.C.P. 1019(g).

7. The County hereby joins in the Request for Relief made on behalf of the Receiver within the Response.

WHEREFORE, the County of Dauphin respectfully requests that this Honorable Court deny the Objections filed on behalf of Daniel C. Miller for the reasons cited in the Receiver's Response.

Respectfully submitted,



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Date: October 4, 2013

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