IN THE COURT OF COMMON PLEAS MONTGOMERY COUNTY, PENNSYLVANIA – CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA

No. 6239-15

No. 8423-15

KATHLEEN G. KANE

 V_*

SUPPLEMENTAL PRETRIAL MOTIONS OF ATTORNEY GENERAL KATHLEEN G. KANE

Attorney General Kathleen G. Kane, by and through her counsel, Gerald L. Shargel, Esq., hereby moves the Court before the Honorable Wendy Demchick-Alloy, Justice of the Court of Common Pleas, Montgomery County, 2 East Airy Street, Norristown, Pennsylvania for an Order:

- 1. For an evidentiary hearing to establish facts related to the leak of prejudicial recordings to the press, and potential prosecutorial misconduct;
- 2. For permission to file Attorney General Kathleen G. Kane's motion alleging selective and vindictive prosecution under seal;
- 3. And for any other relief the Court deems just and proper.

Dated: New York, New York March 18, 2016

Winston & Strawn LLP

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Ross M. Kramer, Esq.

Attorneys Pro Hac Vice for Attorney General

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