

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

COMMONWEALTH OF PENNSYLVANIA :
v. :
KATHLEEN G. KANE :

No. 6239-15
No. 8423-15

2016 APR - 8 3:18 PM
CLERK OF COURTS
OFFICE
MONTGOMERY COUNTY
PENNA

**COMMONWEALTH'S RESPONSE TO THE MOTION OF PHILADELPHIA
MEDIA NETWORK, THE MORNING CALL, ALM MEDIA, BLOCK
COMMUNICATIONS, AND PA MEDIA GROUP TO INTERVENE FOR THE
LIMITED PURPOSE OF SEEKING ACCESS TO JUDICIAL RECORDS AND
PROCEEDINGS**

The District Attorney of Montgomery County, Kevin R. Steele, by and through his assistant M. Stewart Ryan, hereby respectfully submits the *Commonwealth's Response to the Motion of Philadelphia Media Network, The Morning Call, ALM Media, Block Communications, and PA Media Group to Intervene for the Limited Purpose of Seeking Access to Judicial Records and Proceedings.*

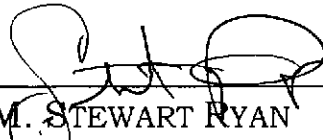
TABLE OF CONTENTS

I. THE COMMONWEALTH TAKES NO POSITION ON THE MOTION BY PHILADELPHIA MEDIA NETWORK, ET AL. 1

I. THE COMMONWEALTH TAKES NO POSITION ON THE MOTION BY PHILADELPHIA MEDIA NETWORK ET AL.

The Commonwealth is unaware of any authority that would permit the sealing of a pretrial motion as requested by defendant. *See* Pa. R. Crim. P. 576(a)(1) (“All written motions and any written answers ... shall be filed with the clerk of courts.”). Regardless, the Commonwealth takes no position on the motion filed by Philadelphia Media Network, et al., and leaves it to this Court’s discretion.

RESPECTFULLY SUBMITTED:



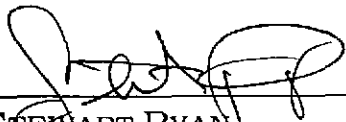
M. STEWART RYAN
ASSISTANT DISTRICT ATTORNEY

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VERIFICATION

I verify that the statements made in the foregoing response are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsification to authorities.



M. STEWART RYAN
ASSISTANT DISTRICT ATTORNEY

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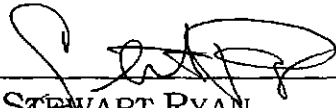
CERTIFICATE OF SERVICE

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsification to authorities. I, M. Stewart Ryan, Assistant District Attorney, being duly sworn according to law, depose and say that a true and correct copy of the Commonwealth's Response to the Motion of Philadelphia Media Network, The Morning Call, ALM Media, Block Communications, and PA Media Group to Intervene for the Limited Purpose of Seeking Access to Judicial Records and Proceedings will be delivered to the following:

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