

COMMONWEALTH OF PENNSYLVANIA
COURT OF JUDICIAL DISCIPLINE

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OF PENNSYLVANIA

MAR 24 2021

RECEIVED AND FILED

IN RE:

Judge Thomas A. Placey :
Court of Common Pleas : 2 JD 2020
9th Judicial District :
Cumberland County :

RESPONDENT'S PRE-TRIAL MEMORANDUM

AND NOW, this 24th day of March, 2021, comes Respondent, Judge Thomas A. Placey, by any through counsel, Heidi F. Eakin, and files this Pre-trial Memorandum.

A. TRIAL WITNESS LIST

Respondent may call some of the following witnesses at trial:

1. Judge Thomas A. Placey

Judge Placey may testify regarding the issues raised in the Board Complaint.

2. Bryan Bartosik-Velez, Esquire

Attorney Barosik-Velez may testify regarding the issues raised in the Board Complaint.

3. Respondent may call all witnesses identified in the Judicial Conduct Boards Pre-trial memorandum.

4. Respondent specifically reserves the right to supplement the witness list with reasonable notice to the Court and the Board.

B. BOARD EXHIBITS

Respondent has no objection to the Board Exhibits as outlined in its Pre-trial memorandum.

C. STIPULATIONS

The Board and counsel for Respondent are actively preparing Joint Stipulations.

D. DISCOVERY

Respondent acknowledges receipt of full discovery to date.

Respectfully submitted,

Heidi F. Eakin, Esq.

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Camp Hill, PA 17011
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Sup. Ct ID 43893

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CERTIFICATE OF SERVICE

I, Heidi F. Eakin, Esquire, attorney for Defendant, do hereby certify that a true and correct copy of this Respondent's Pretrial Memorandum served upon the following individuals be delivering same to the following person at the address below on the below date:

Melissa L. Norton
Deputy Counsel
Pa. Supreme Court ID 46684
Judicial Conduct Board
Pennsylvania Judicial Center
Harrisburg, PA 17106

Court of Judicial Discipline
601 Commonwealth Avenue
Harrisburg, PA 17120

BY:
Heidi F. Eakin, Esquire

Date: 3-24-2021

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CERTIFICATE OF COMPLIANCE

I hereby certify that this filing complies with the provisions of Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that requires filing confidential information and documents differently than non-confidential information and documents.

Respectfully submitted,

Heidi F. Eakin
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