

IN THE SUPREME COURT OF PENNSYLVANIA  
EASTERN DISTRICT

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No. 14 EM 2015

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COMMONWEALTH OF PENNSYLVANIA,

Petitioner,

v.

TERRANCE WILLIAMS,

Respondent.

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**ANSWER OF RESPONDENT TERRANCE WILLIAMS TO APPLICATION OF  
PENNSYLVANIA DISTRICT ATTORNEYS' ASSOCIATION (PDAA) FOR  
LEAVE TO FILE A BRIEF OF AMICUS SUPPORTING THE KING'S BENCH  
PETITION FILED BY THE DISTRICT ATTORNEY OF PHILADELPHIA COUNTY**

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On Emergency Commonwealth Petition for Extraordinary Relief  
Under King's Bench Jurisdiction

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BILLY H. NOLAS  
Pa. Bar No. 83177  
SHAWN NOLAN  
Pa. Bar No. 56535  
Federal Community Defender  
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*Counsel for Respondent Terrance Williams*

Dated: March 2, 2015

The Court has directed that counsel for Respondent state a position on the PDAA's request for leave to file an amicus brief in support of the King's Bench petition filed by the Philadelphia District Attorney, and counsel for Respondent Terrance Williams answer as follows:

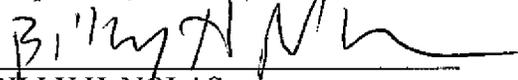
1. The Court has not directed Respondent Williams to file a brief in response to the PDAA amicus brief itself. Respondent's counsel are available to file a brief addressing the PDAA amicus brief upon the Court's request or direction.

2. The PDAA amicus brief endorses the assertions made by the Philadelphia District Attorney's Kings Bench petition. Respondent's counsel respectfully reiterate that the Kings Bench petition is devoid of merit under the relevant constitutional and statutory provisions, lacks merit under Pennsylvania judicial decisions, and should be denied.

3. Alternatively, the Court should permit full, proper briefing and oral argument, especially if the Court contemplates establishing new decisional law

4. As to the PDAA's request for leave to file an amicus brief, Respondent Williams takes no position.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

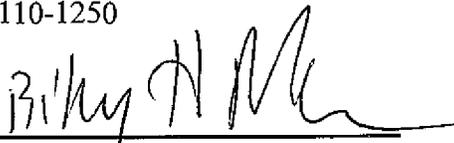
I, Billy H. Nolas, hereby certify that on this 2nd day of March, 2015, I served the above *Answer of Respondent Terrance Williams to Application of Pennsylvania District Attorneys' Association (PDAA) for Leave to File a Brief of Amicus Supporting the King's Bench Petition Filed by the District Attorney of Philadelphia County* upon the following persons by United States First Class Mail, postage prepaid, and/or electronically. Counsel for the PDAA have not provided an email address, so delivery on the PDAA is by mail.

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Billy H. Nolas

Dated: March 2, 2015