

IN THE SUPREME COURT OF PENNSYLVANIA
EASTERN DISTRICT

No. 14 EM 2015

COMMONWEALTH OF PENNSYLVANIA,

Petitioner,

v.

TERRANCE WILLIAMS,

Respondent.

**ANSWER TO PHILADELPHIA DISTRICT ATTORNEY'S PETITION FOR
LEAVE TO REPLY TO ANSWERS TO EMERGENCY PETITION
FOR REVIEW UNDER KING'S BENCH JURISDICTION**

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

BILLY H. NOLAS
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SHAWN NOLAN
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Counsel for Respondent Terrance Williams

Dated: February 26, 2015

Comes Now Respondent Terrance Williams, through counsel, and opposes the Philadelphia District Attorney's petition, seeking leave to file a further submission.

1. We are in receipt of the Court's letter dated February 24, 2015, indicating that Respondent Williams should either file an answer to the Philadelphia District Attorney's Petition for Leave to Reply to Answers to Emergency Petition for Review Under King's Bench Jurisdiction, or a letter stating that Respondent intends not to file an answer. As counsel for Respondent Williams, we respectfully file this answer.

2. Respondent Williams opposes the District Attorney's petition for leave to file a reply. The proposed reply essentially repeats the arguments set forth in the District Attorney's original King's Bench Petition.

3. While the District Attorney's original petition lacks a meritorious basis in constitutional, statutory and decisional law and should be denied, should the Court allow this case to proceed beyond the original petition and the answers of Respondent Williams and Governor Wolf, then the Court should order full briefing and oral argument.

WHEREFORE, Respondent Terrance Williams opposes the Philadelphia District Attorney's Petition for Leave to Reply to Answers to Emergency Petition for Review Under King's Bench Jurisdiction and requests that the reply not be accepted by the Court.

Respectfully submitted,



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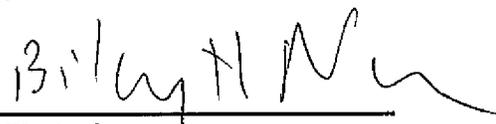
Counsel for Respondent Terrance Williams

CERTIFICATE OF SERVICE

I, Billy H. Nolas, hereby certify that on this 26th day of February, 2015, I served the above *Answer to Philadelphia District Attorney's Petition for Leave to Reply to Answers to Emergency Petition for Review Under King's Bench Jurisdiction* of Respondent Terrance Williams upon the following persons by United States First Class Mail, postage prepaid, and electronically:

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Billy Nolas

Dated: February 26, 2015