

COMMONWEALTH OF PENNSYLVANIA  
COURT OF JUDICIAL DISCIPLINE

**CERTIFIED FROM THE RECORD**

MAR 24 2021

*Cathy Kane*  
Clerk of Court

IN RE:

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

**RESPONDENT'S PRE-TRIAL MEMORANDUM**

AND NOW, this 24<sup>th</sup> day of March, 2021, comes Respondent, Judge Thomas A. Placey, by any thought 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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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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Court of Common Pleas                    :  
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2 JD 2020

**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,

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Attorney for Defendant  
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