

<b>IN THE SUPREME COURT OF PENNSYLVANIA</b>	
<p>Larry Krasner, in his official capacity as the District Attorney of Philadelphia</p> <p>v.</p> <p>Senator Kim Ward, in her official capacity as Interim President Pro Tempore of the Senate; Representative Timothy R. Bonner, in his official capacity as an impeachment manager; Representative Craig Williams, in his official capacity as an impeachment manager; Representative Jared Solomon, in his official capacity as an impeachment manager; and John Does, in their official capacities as members of the Senate Impeachment Committee</p> <p>Appeal of: Vamsidhar Vurimindi, Possible Intervenor</p>	<p>No.:35 ET 2023</p>

**JURISDICTION STATEMENT**

I, Vamsidhar Vurimindi am the proposed intervenor in the above captioned matter and appearing as pro se hereby file this Jurisdictional Statement in support of his appeal from January 05, 2023, Commonwealth Court of Pennsylvania per curiam order denying petition to intervene into Philadelphia District Attorney Lawrence Krasner (“District Attorney”) Petition for Review and Application for Summary Relief seeking declaratory relief to stop Republican Party lead Pennsylvania House of Representatives House Resolution 240 to impeach District Attorney.

**I. ORDER AND OPINIONS BELOW**

This is an appeal from Commonwealth Court of Pennsylvania Order of January 05, 2023. (See Exhibit-A)

## **II. BASIS FOR THE SUPREME COURT JURISDICTION**

This Court has jurisdiction in the case by virtue of the provisions of *42 Pa. C.S.A. § 723(a)* (Supreme Court has exclusive jurisdiction over appeals from final orders in matters originally commenced in Commonwealth Court) and *Pa.R.A.P.1101(a)(1)*(This rule applies to any appeal to the Supreme Court from an order of the Commonwealth Court entered in any matter which was originally commenced in the Commonwealth Court and which does not constitute an appeal to the Commonwealth Court from another court, a district justice or another government unit). District Attorney filed his Petition for Review and Application for Summary Relief in Commonwealth Court of Pennsylvania invoking its original jurisdiction under *42 Pa.C.S.A. § 761*. The January 05, 2023, Commonwealth Court of Pennsylvania order denying petition to intervene is an immediately appealable collateral order under *Pa.R.A.P. 313* and final order under *Pa.R.A.P. 341*, as it fully disposed of all claims and parties.

## **III. TEXT AND DATE OF ENTRY OF THE ORDER IN QUESTION**

This appeal seeks to review of January 5, 2023, Order: NOW, January 5, 2023, upon consideration of the “Nunc Pro Tunc Petition to Intervene” (Petition) filed by Vamsidhar Vurimindi, the Court notes the following: 1) Pursuant to this Court’s Order dated December 6, 2022, Applications for Leave to Intervene, complete with proposed filings and a memorandum of law in support thereof, were to be filed no later than December 12, 2022, at 3:00 p.m; 2) Vamsidhar Vurimindi filed his Petition on January 3, 2023, well beyond the Court-ordered deadline for Applications to Intervene; 3) Mr. Vurimindi’s Petition fails to set forth any grounds

that would warrant the grant of nunc pro tunc relief; and 4) This matter was decided by Order dated December 30, 2022, before Mr. Vurimindi filed his Petition. Accordingly, because Mr. Vurimindi's Petition is untimely and fails to set forth grounds for nunc pro tunc relief, the Petition is DISMISSED.<sup>1</sup> See Pa.R.Civ.P.2329(3).

#### **IV. CONCISE STATEMENT OF THE RELEVANT PROCEDURAL HISTORY**

On November 16, 2022, Republican Party lead Pennsylvania House of Representatives passed House Resolution 240 containing seven Articles of Impeachment against District Attorney. On November 30, 2022, Republican Party lead Pennsylvania State Senate adopted Senate Resolution 388, providing for District Attorney's impeachment trial to commence on January 18, 2023. On December 02, 2022, District Attorney filed Petition for Review and Application for Summary Relief in Commonwealth Court of Pennsylvania invoking its original jurisdiction under *42 Pa.C.S.A. § 761*, seeking declaratory relief to stop impeachment proceedings against him. On December 12, 2022, Impeachment Managers Representative Timothy R. Bonner and Craig Williams filed preliminary objections; and on December 30, 2022, Commonwealth Court denied all of their preliminary objections and granted District Attorney requested relief in his Petition for Review and Application for Summary Relief.

District Attorney and his representatives banished proposed intervenor from Pennsylvania and orchestrated to deport him from the United States; and now situated in Austin, Texas,

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1. Even if the Petition had set forth sufficient grounds for granting nunc pro tunc relief, it would fail on the merits because it does not satisfy any of the grounds for granting intervention set forth in *Pa.R.Civ.P. 2327*, nor does it satisfy the requirements of *Pa.R.Civ.P. 2328*.

proposed intervenor unaware of the Republican Party lead Pennsylvania House of Representatives House Resolution 240, seven Articles of Impeachment of District Attorney for misbehavior in office. On January 03, 2023, proposed intervenor found about Judge Ellen Ceisler ruling through casual news search about Philadelphia District Attorney, because on December 30, 2022, he filed injunctive relief action Vamsidhar Vs Philadelphia District Attorney et al, Case Number: 230100026, Court of Common Pleas, Philadelphia, and then read Republican Party Articles of Impeachment, District Attorney Petition for Review, Application for Summary Relief and Judge Ellen Ceisler ruling and found that this whole impeachment drama is akin to scripted fake WWE match of people belting each other over the head with folding chairs, and immediately filed Nunc Pro Tunc Petition To Intervene. On January 05, 2023, Commonwealth Court denied proposed intervenor's petition to intervene without hearing. On January 12, 2023, proposed intervenor filed application for reconsideration and on January 12, 2023, Commonwealth Court denied application for reconsideration. On January 31, 2023, proposed intervenor filed notice of appeal from January 05, 2023, order denying petition to intervene to Supreme Court of Pennsylvania.

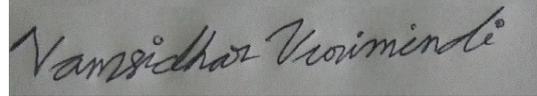
## **V. QUESTIONS PRESENTED FOR REVIEW**

1. Whether Commonwealth court erred in denying proposed intervenor's petition to intervene without hearing, where proposed intervenor has standing under Biester exceptions and as plaintiff in quo warranto complaint to oppose District Attorney Petition for Review and Application for Summary Relief seeking declaratory relief to stop Pennsylvania House of Representatives impeachment proceedings?
2. Whether Pennsylvania House of Representatives and State Senate lacked proposed

intervenor personal interest in convicting District Attorney Krasner for hiding white people misfeasance and malfeasance; and District Attorney Krasner silent on his serious misbehavior in office by hiding white people misfeasance and malfeasance to reduce backlash from white voters in Pennsylvania; and therefore proposed intervenor interest not protected by Republican Party led Pennsylvania House of Representatives Articles of Impeachment?

Date: February 13, 2023

Respectfully Submitted,



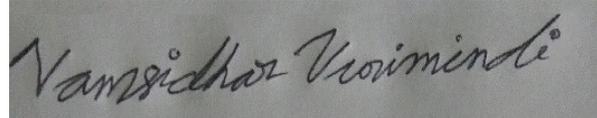
Vamsidhar Vurimindi,  
Plaintiff, Pro Se  
821 Gunter Street,  
Austin, TX 78702

### **VERIFICATION**

I, Vamsidhar Vurimindi verify the statements made in Jurisdictional Statement, are true and correct. I understand false statements are subject to penalty under 18 Pa.C.S.A. § 4904, relating to unsworn falsification to authorities.

Date: February 13, 2023

Respectfully Submitted,



Vamsidhar Vurimindi,  
Plaintiff, Pro Se  
821 Gunter Street

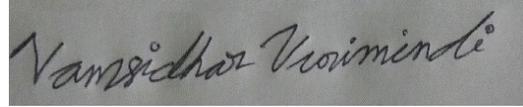
Austin, TX 78702

## **CERTIFICATE OF COMPLIANCE**

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

Date: February 13, 2023

Respectfully Submitted,



Vamsidhar Vurimindi  
821 Gunter Street  
Austin, TX 78702

## **CERTIFICATE OF SERVICE**

I, Vamsidhar Vurimindi certify that a true and correct copy of Jurisdictional Statement by USPS First Class Mail and via electronic mail to the following:

1. Counselor Emily Maegan Bell, 280 Granite Run Dr Ste 300, Lancaster, PA 17601. (emilymaebell@gmail.com)
2. William Costopoulos, 4250 Crums Mill Rd # 201, Harrisburg, PA 17112 (wcostopoulos@costopoulos.com)
3. Robert A. Graci, 4250 Crums Mill Rd, Ste 201, Harrisburg, PA 17112 (rag@saxtonstump.com)
4. Stephen Allen Loney, P.o. Box 60173, Philadelphia, PA 19102 (sloney@aclupa.org)
5. Carson Blythe Morris, 280 Granite Run Dr Ste 300, Lancaster, PA 17601 (cbm@saxtonstump.com)
6. Dawn E. Murphy-Johnson, Kleinbard LLC, 1717 Arch St, Philadelphia, PA 19103 (fnotarianni@kleinbard.com)
7. Timothy P. O'Toole, 900 16th Street, NW, Washington, DC 20006 (totoole@milchev.com)
8. Michael J. Satin, 900 16th Street, NW, Washington, DC 20006 (msatin@milchev.com)
9. Lawrence F. Stengel, 280 Granite Run Dr, Lancaster, PA 17601 (lfs@saxtonstump.com)
10. John S. Summers, Hanglely Aronchick et al, 1 Logan Sq Fl 27 Philadelphia, PA 19103-6995 (jsummers@hanglely.com)
11. Shohin Hadizadeh Vance, Kleinbard LLC, 1717 Arch St 5th Fl Philadelphia, PA 19103 (svance@kleinbard.com)
12. Joshua John Voss, Kleinbard LLC, 1717 Arch St Fl 5<sup>th</sup>, Philadelphia, PA 19103

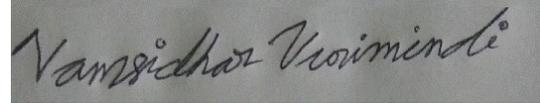
(jvoss@kleinbard.com)

13. Corrie Allen Woods, 200 Commerce Dr Ste 210, Moon Township, PA 15108  
(cwoods@woodslawoffices.com)

14. Samantha G.Zimmer, Kleinbard LLC, 1717 Arch St 5th Fl, Philadelphia, PA 19103  
(szimmer@kleinbard.com)

Date: February 13, 2023

Respectfully Submitted,

A rectangular box containing a handwritten signature in cursive script that reads "Vamsidhar Vurimindi".

Vamsidhar Vurimindi,  
Plaintiff, Pro Se  
821 Gunter Street,  
Austin, TX 87802

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

Larry Krasner, in his official capacity :  
as the District Attorney of :  
Philadelphia, :  
Petitioner :

v. :

Senator Kim Ward, in her official :  
capacity as Interim President Pro :  
Tempore of the Senate; :  
Representative Timothy R. Bonner, :  
in his official capacity as an :  
impeachment manager; :  
Representative Craig Williams, in his :  
official capacity as an impeachment :  
manager; Representative Jared Solomon, :  
in his official capacity as an :  
impeachment manager; and John Does, :  
in their official capacities as members :  
of the Senate Impeachment Committee, :  
Respondents :

No. 563 M.D. 2022

**PER CURIAM**

**ORDER**

NOW, January 5, 2023, upon consideration of the “Nunc Pro Tunc Petition to Intervene” (Petition) filed by Vamsidhar Vurimindi, the Court notes the following:

- 1) Pursuant to this Court’s Order dated December 6, 2022, Applications for Leave to Intervene, complete with proposed filings and a memorandum of law in support thereof, were to be filed no later than December 12, 2022, at 3:00 p.m.
- 2) Vamsidhar Vurimindi filed his Petition on January 3, 2023, well beyond the Court-ordered deadline for Applications to Intervene.

3) Mr. Vurimindi's Petition fails to set forth any grounds that would warrant the grant of nunc pro tunc relief.

4) This matter was decided by Order dated December 30, 2022, before Mr. Vurimindi filed his Petition.

Accordingly, because Mr. Vurimindi's Petition is untimely and fails to set forth grounds for nunc pro tunc relief, the Petition is **DISMISSED**.<sup>1</sup> See Pa.R.Civ.P. 2329(3).

Order Exit  
01/05/2023

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<sup>1</sup> Even if the Petition had set forth sufficient grounds for granting nunc pro tunc relief, it would fail on the merits because it does not satisfy any of the grounds for granting intervention set forth in Pa.R.Civ.P. 2327, nor does it satisfy the requirements of Pa.R.Civ.P. 2328.