

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

C. Alan Walker, in his capacity as
Secretary for the Department of
Community and Economic Development,

Petitioner,

v.

City of Harrisburg,

Respondent

No. 569 M.D. 2011

RECEIVED & FILED
COMMONWEALTH COURT
OF PENNSYLVANIA
2013 AUG 26 P 3:54

REQUEST FOR A HEARING

AND NOW, comes William B. Lynch, the RECEIVER FOR THE CITY OF HARRISBURG ("**Receiver**"), through counsel, and respectfully requests that this Honorable Court set a hearing within thirty (30) days of the Receiver's filing of the modified recovery plan (the "**Harrisburg Strong Plan**"), which is being filed contemporaneously herewith, and no sooner than twenty-one (21) days from today, and shows this Honorable Court as follows:

1. The Municipalities Financial Recovery Act, Act of July 10, 1987, P.L. 246, (*as amended*), 53 P.S. § 11701.101, *et seq.* (the "**Act**"), provides that the Commonwealth Court may hold a hearing on any modification to a recovery plan within thirty (30) days of the receipt of the modified plan from the Receiver. 53 P.S. § 11701.703(e).

2. In order to afford this Honorable Court, Petitioner, and Respondent sufficient time to review the Harrisburg Strong Plan, the Receiver proposes that this Honorable Court set a hearing date no sooner than twenty-one (21) days from today.

3. For the foregoing reasons, the Receiver respectfully requests that this Honorable Court grant the Receiver's request to set a hearing within thirty (30) days of the filing of the


Harrisburg Strong Plan, but not sooner than twenty-one (21) days from the date hereof. A proposed Order is attached as Exhibit A for this Honorable Court's convenience.

Respectfully submitted,

McKenna Long & Aldridge, LLP

Date: August ____, 2013

By:


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[PROPOSED] ORDER GRANTING REQUEST FOR HEARING

This Honorable Court having considered the Request of William B. Lynch, the Receiver for the City of Harrisburg ("**Receiver**"), to set a hearing within thirty (30) days of submission of his modified recovery plan, as provided by Section 11701.703(e) of the Municipalities Financial Recovery Act, and good cause having been shown, it is hereby ORDERED:

A hearing on the Receiver's modified recovery plan, as provided by Section 11701.703(e) of the Municipalities Financial Recovery Act, is hereby set for _____, 2013.

BONNIE BRIGANCE LEADBETTER, Judge