

NON-PRECEDENTIAL DECISION - SEE SUPERIOR COURT O.P. 65.37

COMMONWEALTH OF PENNSYLVANIA : IN THE SUPERIOR COURT OF
: PENNSYLVANIA

V.

JOSHUA JOHN MARANEY

Petitioner

: No. 70 WDM 2026

Appeal from the Order entered June 8, 2026 ,
In the Court of Common Pleas of Greene County Criminal Division at
No(s): CP-30-CR-0000085-2026

COMMONWEALTH OF PENNSYLVANIA : IN THE SUPERIOR COURT OF
: PENNSYLVANIA

V.

JOSHUA JOHN MARANEY

Petitioner

: No. 71 WDM 2026

Appeal from the Order entered June 8, 2026,
In the Court of Common Pleas of Greene County Criminal Division at
No(s): CP-30-CR-0000086-2026

BEFORE: OLSON, J., NICHOLS, J., and LANE, J.

JUDGMENT ORDER BY OLSON, J.:

FILED: October 15, 2026

Petitioner, Joshua John Maraney, filed these Petitions for Specialized Review (“Petitions”) of the June 8, 2026 orders denying his applications to modify bail, entered in the Greene County Court of Common Pleas. Pursuant to Pa.R.A.P. 1610, ***Interest of N.E.M.***, 311 A.3d 1088 (Pa. 2024), and ***Commonwealth v. Miller***, 319 A.3d 575 (Pa. Super. 2024), we treat the

Petitions as notices of expedited appeals. Petitioner has also filed applications to supplement the Petitions. We consolidate these appeals, grant the applications to supplement, and quash.

The relevant facts and procedural history of these cases are as follows. The Commonwealth charged Petitioner with numerous crimes at each docket, and held him in pre-trial incarceration beginning December 29, 2025. At docket CP-30-CR-0000085-2026 ("Docket 85"), the trial court on March 12, 2026, granted the motion to set bail filed by Petitioner's Counsel, setting bail at \$500,000 at 10%. At docket CP-30-CR-0000086-2026 ("Docket 86"), the magisterial district court set bail at \$10,000 on January 2, 2026.

Petitioner filed a *pro se* motion for nominal bail on May 11, 2026, at only Docket 85, arguing that he would be entitled to nominal bail pursuant to Pa.R.Crim.P. 600(B)(1). Petitioner was represented at the time by Timothy Michael Ross, Esquire, who Petitioner sought to remove at Docket 86 on February 26, 2026, and who filed a motion to withdraw representation at Docket 85 on April 7, 2026. The trial court did not grant Attorney Ross permission to withdraw until June 11, 2026, at both dockets. That same day, the trial court appointed John Headley, Esquire, at both dockets. The trial court treated the *pro se* motion as a motion to modify bail; the court captioned its order with both docket numbers, even though the motion's caption contained only Docket 85, and scheduled a hearing at both dockets for June 8, 2026, at which Attorney Ross represented Petitioner, but at which the trial

court questioned Petitioner directly about his arguments for nominal bail. On June 11, 2026, the trial court entered the orders denying modification of bail.

Attorney Headley, who was appointed to replace Attorney Ross on the day that the trial court denied modification of bail, filed the instant Petitions on June 23, 2026. Attorney Headley filed applications to supplement the Petitions, seeking to include the notes of testimony from the June 8, 2026 hearing and related filings. The trial court dockets indicate that on July 2, 2026, Attorney Headley filed applications to withdraw as counsel. On August 26, 2026, the trial court held a hearing on Attorney Headley's applications to withdraw. The trial court dockets thereafter contain September 11, 2026 entries stating that Attorney Headley was permitted to withdraw, and Mark Kovach, Esquire, was appointed as Petitioner's counsel.

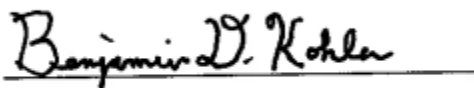
Upon review of all the materials provided to this Court, and of the updated trial court dockets, we conclude that Petitioner is not entitled to relief. Petitioner filed his *pro se* motion for bail while he was represented by Attorney Ross. Without an amended or substitute filing from Attorney Ross, the trial court should have considered the *pro se* filing a legal nullity. **See *Commonwealth v. Piscanio*, 608 A.2d 1027, 1029 n.3 (Pa. 1992)** (finding that defendant's *pro se* filings related to denial of bail were legal nullities because counsel still represented him). Moreover, Petitioner did not file a motion for nominal bail at Docket 86, rendering the orders addressing nominal bail at Docket 86 as nullities. Accordingly, the appeals must be quashed. **See *Commonwealth v. Green*, 265 A.3d 798, 801 (Pa. Super. 2021)** (holding

that when order appealed from is legal nullity, appeal is also legal nullity and appellate court must quash).

Even assuming, *arguendo*, that the bail proceeding was valid due to Attorney Ross's presence at the hearing, Petitioner filed his May 11, 2026 motion, and the trial court held the June 8, 2026 hearing, well before Rule 600(B)(1)'s initial 180-day period expired on June 28, 2026. **See *Commonwealth v. Rice*, 331 A.3d 5, 10 (Pa. Super. 2025)** ("[T]o obtain relief under Rule 600, the defendant must have a valid Rule 600 claim **at the time** he files the motion to dismiss the charges." (quoting ***Commonwealth v. Dunmore*, 324 A.3d 1, 7 (Pa. Super. 2024)** (emphasis added))). Accordingly, Petitioner is entitled to no relief.

Applications to supplement GRANTED. Appeals QUASHED. This Court's Prothonotary is DIRECTED to provide a copy of this Judgment Order to the Greene County Court of Common Pleas, the Commonwealth, Attorney Headley, and Attorney Kovach.

Judgment Entered.

A handwritten signature in black ink, reading "Benjamin D. Kohler", is written over a horizontal line.

Benjamin D. Kohler, Esq.
Prothonotary

DATE: 10/15/2026