



IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CRIMINAL ACTION - LAW

COMMONWEALTH OF PENNSYLVANIA :
 :
 v. : No.: CP-14-CR-1569-2008
 :
 HOBSON MCKOWN :

MOTION TO AMMEND ORDER

AND NOW, comes the Defendant, Hobson McKown, by and through his attorneys, Jason S. Dunkle, Esquire, and Masorti & Sullivan, P.C., and brings this Motion to Ammend Order, whereof the following is a statement:

1. On September 28, 2009, a hearing on the Defendant's Petition for a Writ of Habeas Corpus was held in the above captioned matter.
2. Briefs were submitted to the Court by both parties.
3. On October 21, 2009, the Court issued an Opinion and Order denying the Defendant's Habeas relief request.
4. In its Opinion and Order, the Court included the language that is required in order to allow the Defendant to seek review by the Superior Court.
5. It is the Defendant's understanding that the Court was certifying additional issues, including, but not limited to, issues of statutory interpretation of sections 6106 and 6109 of the Crimes Code.
6. The current wording in the Opinion and Order appears to only certify one issue.
7. The Defendant requests that this Honorable Court amend the current Order and clearly certify all issues raised in the Habeas.

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CLERK OF COURT
CENTRE COUNTY, PA

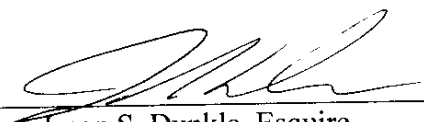
certify all issues raised in the Habeas.

WHEREFORE, the Defendant respectfully requests that this Honorable Court issue an Order amending its Order of October 21, 2009, or schedule a brief hearing on same to allow the parties to come to a consensus.

Respectfully submitted,

MASORTI & SULLIVAN, P.C.

By:



Jason S. Dunkle, Esquire
302 South Burrowes Street
State College, PA 16801
(814) 234-9500
Attorney I.D. # 93690

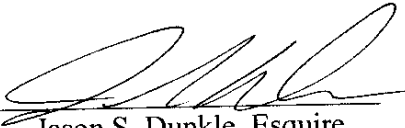
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VERIFICATION

I, Jason S. Dunkle, Esquire, do hereby verify that I am the Attorney for the Defendant, that I am fully authorized to make this verification on his behalf and that the Defendant is unavailable to this make this verification and that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that the source of my information is from discussions with my client and the documents provided.

I understand that the statements therein are made subject to the penalties of 18 Pa. C.S. A. §4904 relating to unsworn falsification to authorities.

By: 
Jason S. Dunkle, Esquire
Attorney for Defendant

Dated: 11/13/09

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CRIMINAL ACTION - LAW

COMMONWEALTH OF PENNSYLVANIA

v.

HOBSON MCKOWN

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:
:
:
:

No.: CP-14-CR-1569-2008

CERTIFICATE OF SERVICE

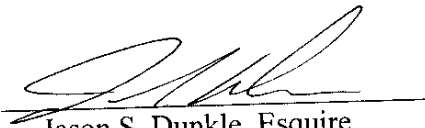
I hereby certify that on the 13th day of November, 2009,
a true and correct copy of Defendant's Motion for Return of Property was served via
hand delivery to the following:

Carolyn Larrabee, Esquire
Centre County Assistant District Attorney
Centre County Courthouse
Belleville, PA 16823

Respectfully submitted,

MASORTI & SULLIVAN, P.C.

By:



Jason S. Dunkle, Esquire
302 South Burrowes Street
State College, PA 16801
(814) 234-9500
Attorney I.D. # 93690

FILED FOR RECORD
2009 NOV 13 P 4:25
JASON S. DUNKLE
PROBATIONARY
CENTRE COUNTY, PA