August 14, 2012

Mr. Todd Mosser, Chief, Civil Litigation Unit Philadelphia District Attorney's Office Three South Penn Square Philadelphia, PA 19107

Dear Mr. Mosser,

In accordance with Act 3 of 2008, 65 P.S. §§ 67.101 et seq. (the "Right to Know Law" or "Open Records Law"), I request the following records:

All documents, in electronic format or otherwise, which reflect, refer or in any way relate to the staff members of the Philadelphia District Attorney's Office assigned to the prosecutions of Msgr. William J. Lynn (CP-51-CR-0003530-2011) and Edward V. Avery (CP-51-CR-0003527-2011), including but not limited to attorneys, paralegals, investigators, and support staff. Also records related to the salaries and benefits of all such assigned staff.

We understand that government attorneys do not maintain detailed time records, but we presume that the office maintains some sort of records related to grand jury, case, and trial staffing.

When photocopying costs are known, I will immediately remit payment.

I look forward to your timely response to this matter.

Sincerely,

David F. Pierre, Jr. XX XXXXXX Rd. XXXXX, MA XXXXX xxx-xxx-xxxx (phone) xxx@xxxx.com (email)