

Exhibit D — Commonwealth Court Docket 96 MD 2018

EXHIBIT D

COMMONWEALTH COURT DOCKET – 96 MD 2018

(Filed by attorney Lea Terlong Bickerton)

D-1. Docket Summary

Court: Commonwealth Court of Pennsylvania

Docket Number: 96 MD 2018

Filed: February 23, 2018

Petitioner: Listed as “J.B.” (initials)

Attorney: Lea Terlong Bickerton

Matter: Petition for Review pertaining to Pennsylvania State Police / Megan’s Law
classification

Status: Discontinued March 29, 2018

This docket reflects the only known Petition for Review filed by Bickerton during the period you retained her for Megan’s Law relief.

D-2. Timeline of Filings (From Docket Sheet)

February 23, 2018

- **Petition for Review Filed**
- Filed under the initials **J.B.**

- No indication Petitioner authorized filing under initials or seal.

February 23, 2018

- **Application to File Under Seal**
- Filed by attorney Bickerton.

February 26, 2018

- **Notice Issued** (Commonwealth Court Filing Office)
- Routine procedural step after opening a matter.

March 29, 2018

- **Praecipe for Discontinuance Filed** — *Filed by Bickerton.*
- Indicates voluntary withdrawal of the Petition.

March 29, 2018

- **Notice of Discontinuance Issued**
- Confirms the case was discontinued.

May 14–15, 2018

- **Final Court Order:**

“Petitioner's application to seal and conceal is dismissed as moot, as the petition has been discontinued.”

This sequence shows the case was closed without progress.

D-3. Relevance to Petition

This exhibit supports several critical claims:

1. **Petitioner was not notified** of the discontinuance.
2. **Petitioner did not authorize** the withdrawal of his case.
3. **Petitioner reasonably believed** his challenge was active for years.
4. The filing under **initials only** raises questions of transparency.
5. No relief was pursued despite:
 - o payment of **\$2,500** in attorney fees,
 - o repeated client inquiries,
 - o and years of representation.

This abandonment left Petitioner with **no active challenge** to PSP's misclassification, directly contributing to later arrests.

D-4. Documentation Included

- Commonwealth Court docket sheet (PA_Docket_Sheet-96_MD_2018.pdf)
- Filing fee entry
- Petition for Review entry
- Application to File Under Seal entry
- Praecipe for Discontinuance entry
- Notice of Discontinuance

- May 2018 court order

Each document independently verifies the case was filed and discontinued **within 34 days**.

D-5. Conclusion (Exhibit D)

Exhibit D demonstrates that Petitioner's retained counsel filed but then terminated a Commonwealth Court Petition without Petitioner's knowledge or consent, leaving the unlawful PSP classification unchallenged.

This supports Petitioner's claims of due process failure, attorney abandonment, and ongoing harm.

End of Exhibit D