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RESPONDENT

IN THE COURT OF COMMON PLEAS OF CHESTER COUNTY, PENNSYLVANIA

CHESTER COUNTY OFFICE OF THE
CORONER

Petitioner

v.

No. 2022-08612-CS

TERENCE KEEL AND THE UNIVERSITY
OF CALIFORNIA-LOS ANGELES,
INSTITUTE FOR SOCIETY AND
GENETICS, BIOSYSTEMS LAB

Respondent

CORRECTION TO RESPONDENT'S PREVIOUS BRIEF

In the Respondent's previous *pro se* Brief, filed on December 23, the Respondent referenced OOR Dkt. 2022-1911, *Terence Keel v. County of Centre*. Respondent's Brief, pp. 8-9. In his discussion of this matter, the Respondent included one brief aside which he now understands, based upon newly discovered information, to be untrue. The entirety of this inaccurate statement is reproduced below:

[T]o the Respondent's knowledge, Centre County has filed no Petition for Review appealing the OOR's determination in that matter [OOR Dkt. 2022-1911]; noting that the deadline for Centre County to do so has long since passed, it is reasonable to presume that Centre County has determined its previous position to be untenable and shall comply with the underlying request.

At the time the Respondent filed his previous Brief with this Honorable Court, he was unaware that Centre County indeed had, on December 2, filed a Petition for Review with the Court of Common Pleas in that jurisdiction, and further that the Court had answered with a scheduling

Order on December 16. The Respondent only learned of this today (January 5) when an employee consulted the OOR's online docket, noted that the Centre County matter was listed as pending in the Court of Common Pleas, and contacted the Centre County Prothonotary by telephone to learn the docket number and status of the case.

The Centre County Prothonotary's online docket system indicates that the Order was sent by mail to the Respondent on December 16. Regrettably, the Respondent did not receive the mailed Order. The Petition itself includes no indication that it was ever mailed to any party. Despite having earlier exchanged numerous emails with the UCLA Biostudies Lab, to the Respondent's recollection no representative of Centre County ever indicated via email that the county had or intended to appeal the OOR's decision to the Court of Common Pleas.

The Respondent apologizes sincerely for his error, and seeks here to correct it by respectfully asking the Court to disregard the five line passage of his initial brief reproduced above. He maintains that this error has no substantive effect on the legal argument presented in any section of his December 23 Brief.

A handwritten signature in blue ink, appearing to read "Terence Keel".

/s/ Dr. Terence Keel
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