

**IN THE COURT OF COMMON PLEAS
OF LUZERNE COUNTY**

STEFANIE J. SALAVANTIS, :

individually and in her official :

capacity as LUZERNE COUNTY :

DISTRICT ATTORNEY, :

SAMUEL M. SANGUEDOLCE, :

individually and in his official capacity :

as FIRST ASSISTANT DISTRICT :

ATTORNEY OF LUZERNE COUNTY :

and/or ACTING DISTRICT : **NO. 2021 - 02937**

ATTORNEY OF LUZERNE COUNTY :

and THE OFFICE OF DISTRICT :

ATTORNEY, :

Plaintiffs

v. :

COUNTY OF LUZERNE :

Defendant :

MEMORANDUM OF UNDERSTANDING

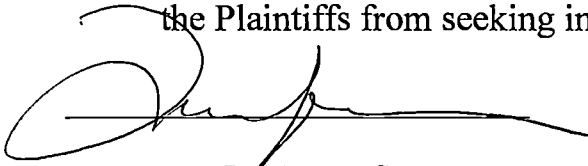
Whereas Luzerne County Council acted to declare a vacancy in the Office of District Attorney on March 9, 2021; and

Whereas District Attorney Stefanie J. Salavantis has repeatedly stated her intention to resign the Office of District Attorney; and

Therefore, the following Understanding has been reached by the undersigned on behalf of the parties identified in the above caption:

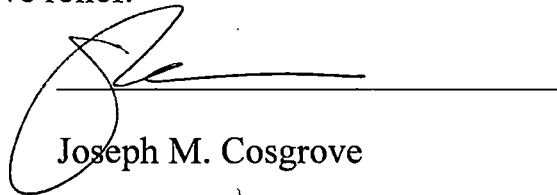
1. Plaintiffs have today filed and caused to be served a complaint seeking declaratory judgment and quo warranto relief.

2. Plaintiffs will not file or seek preliminary injunction today nor at any time if the provisions of the present Memorandum of Understanding are fulfilled.
3. District Attorney Salavantis will today submit a letter of resignation from the Office of District Attorney with an effective date of March 25, 2021 and will also state that pursuant to the vacancy created by her resignation, First Assistant Sanguedolce will become Acting District Attorney effective at that time on March 25.
4. At its next meeting, Luzerne County Council will vote on whether to accept District Attorney Salavantis' letter of resignation and its terms, and will thus rescind as moot the March 9, 2021 declaration of vacancy in the Office of District Attorney, and declare the Office of District Attorney vacant as of March 25, 2021.
5. The parties agree that District Attorney Salavantis will continue to serve as District Attorney until the effective date of her letter of resignation (March 25, 2021) and that First Assistant Sanguedolce will continue to serve as Acting District Attorney from that point until the vacancy in the Office of District Attorney is permanently filled in due course.
6. If County Council fails to accept the letter of resignation at its March 23, 2021 meeting and fails to rescind as moot the March 9, 2021 declaration, then the letter of resignation will become a nullity and nothing will prevent the Plaintiffs from seeking injunctive relief.



Lawrence J. Moran, Sr.

Counsel for Plaintiffs



Joseph M. Cosgrove

Counsel for Defendant

Date: March 19, 2021