

IN THE SUPREME COURT OF PENNSYLVANIA
EASTERN DISTRICT

COMMONWEALTH OF PENNSYLVANIA : NO. 41
 :
 v. :
 :
 MICHAEL FELDER, :
 :
 Petitioner : EAL 2018

**COMMONWEALTH'S RESPONSE
TO PETITION FOR ALLOWANCE OF APPEAL**

Petitioner Michael Felder has petitioned for Allowance of Appeal. The
Petition presents the following single question:

Does not a sentence of 50 years to life imposed upon a juvenile
constitute a *de facto* life sentence requiring the sentencing court,
as mandated by this Court in Commonwealth v. Batts, 163 A.3d
410 (Pa. 2017) ("Batts II"), first find permanent incorrigibility,
irreparable corruption or irretrievable depravity beyond a rea-
sonable doubt?

The Commonwealth agrees with Petitioner that this is an important question
that warrants this Court's review. Accordingly, the Commonwealth supports the
grant of the Petition for Allowance of Appeal.

Respectfully submitted,

/s/ Lawrence J. Goode
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