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Attorneys for Defendant The Harrisburg Authority

TD BANK, NATIONAL ASSOCIATION,  
 MANUFACTURERS AND TRADERS TRUST  
 COMPANY, and ASSURED GUARANTY  
 MUNICIPAL CORP.,

Plaintiffs

v.

THE HARRISBURG AUTHORITY, THE CITY OF  
 HARRISBURG, PENNSYLVANIA, and PAUL P.  
 WAMBACH, TREASURER OF THE CITY OF  
 HARRISBURG.,

Defendants

v.

THE COUNTY OF DAUPHIN,  
 Additional Defendant

THE BANK OF NEW YORK MELLON TRUST  
 COMPANY, NATIONAL ASSOCIATION,  
 Intervenor Plaintiff

IN THE COURT OF COMMON PLEAS  
 DAUPHIN COUNTY, PENNSYLVANIA

NO. 2010 CV 11737 CV

CIVIL ACTION

JURY TRIAL DEMANDED

DAUPHIN COUNTY  
 PENNSYLVANIA

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**DEFENDANT, THE HARRISBURG AUTHORITY'S,**  
**RESPONSE TO THE PRELIMINARY OBJECTIONS OF PLAINTIFFS TO THE**  
**JOINDER COMPLAINT OF THE COUNTY OF DAUPHIN**

Defendant, The Harrisburg Authority (the "Authority"), files this Response to Plaintiffs' Preliminary Objections to the Joinder Complaint of the County of Dauphin (the "County").

By Order dated October 4, 2011, this Court denied the Authority's Preliminary Objections to Plaintiffs' Preliminary Objections to the Authority's Joinder Complaint against the County.

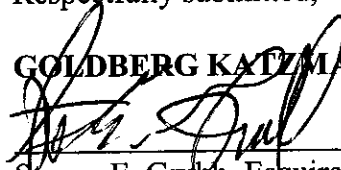
In response to Plaintiffs' Preliminary Objections to the Joinder Complaint, the Authority incorporates by reference, pursuant to Local Rule 205.2(l)(m), its Response to the Preliminary Objections filed by the County which the Authority filed on September 20, 2011 and which contains a paragraph by paragraph response to Plaintiffs' Preliminary Objections.

Respectfully submitted,

**GOLDBERG KATZMAN, P.C.**

Date: October 6, 2011

By:

  
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**CERTIFICATE OF SERVICE**

I hereby certify that I am this date serving a copy of the foregoing document upon the following via First Class Mail, which service satisfies the requirements of the Pennsylvania Rules of Civil Procedure:

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By:   
Steven E. Grubb, Esquire

Date: October 6, 2011