

2015 DEC 30 P 3:24

STATE OF MARYLAND

v.

CAESAR GOODSON

\* \* \* \* \*

IN THE  
CIRCUIT COURT FOR  
BALTIMORE CITY  
CASE No. 115141032  
(Filed under seal)

**STATE'S MOTION TO SEAL THE STATE'S RESPONSE TO DEFENDANT'S  
MOTION IN LIMINE TO PRECLUDE TESTIMONY OF CAROL ALLAN, M.D., AND  
TO SEAL STATE'S RESPONSE TO DEFENDANT'S MOTION FOR JURY  
QUESTIONNAIRE**

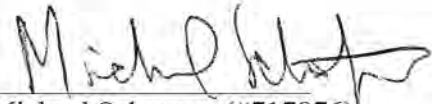
Now comes the State of Maryland, by and through Marilyn J. Mosby, the State's Attorney for Baltimore City; Michael Schatzow, Chief Deputy State's Attorney for Baltimore City; Janice L. Bledsoe, Deputy State's Attorney for Baltimore City; and Matthew Pillion, Assistant State's Attorney for Baltimore City; and requests that this Court order that the State's Response to Defendant's Motion in Limine to Preclude Testimony of Carol Allan, M.D., and the State's Response to Defendant's Motion for Jury Questionnaire, as well as the present Motion, be sealed for the following reasons:

1. This Court has previously directed that the Parties should file any discovery disputes and pleadings concerning the voir dire process under seal.
2. On December 30, 2015, the State filed its Response to Defendant's Motion in Limine to Preclude Testimony of Carol Allan, M.D., and its Response to Defendant's Motion for Jury Questionnaire. Those Responses and the present Motion to Seal are pleadings subject to the Court's direction that such pleadings be sealed.

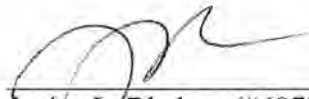
Wherefore, the State requests that this Court order that the State's Response to Defendant's Motion in Limine to Preclude Testimony of Carol Allan, M.D., and the State's Response to Defendant's Motion for Jury Questionnaire be sealed and that this Motion to Seal likewise be sealed.

Respectfully submitted,

Marilyn J. Mosby



Michael Schatzow (#717876)  
Chief Deputy State's Attorney  
120 East Baltimore Street  
The SunTrust Bank Building  
Baltimore, Maryland 21202  
(443) 984-6011 (telephone)  
(443) 984-6256 (facsimile)  
[mschatzow@stattorney.org](mailto:mschatzow@stattorney.org)



Janice L. Bledsoe (#68776)  
Deputy State's Attorney  
120 East Baltimore Street  
The SunTrust Bank Building  
Baltimore, Maryland 21202  
(443) 984-6012 (telephone)  
(443) 984-6256 (facsimile)  
[jbledsoe@stattorney.org](mailto:jbledsoe@stattorney.org)



Matthew Pillion (#653491)  
Assistant State's Attorney  
120 East Baltimore Street  
The SunTrust Bank Building  
Baltimore, Maryland 21202  
(443) 984-6045 (telephone)  
(443) 984-6252 (facsimile)  
[mpillion@stattorney.org](mailto:mpillion@stattorney.org)

**CERTIFICATE OF SERVICE**

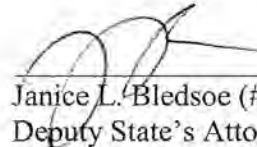
I hereby certify that on this 30th day of December, 2015, a copy of the State's Motion to Seal the State's Response to Defendant's Motion in Limine to Preclude Testimony of Carol Allan, M.D., and to Seal the State's Response to Defendant's Motion for Jury Questionnaire was mailed and e-mailed to:

Matthew B. Fraling, III  
Sean Malone  
Harris Jones & Malone, LLC  
2423 Maryland Avenue, Suite 100  
Baltimore, MD 21218  
(410) 366-1500  
[matthew.fraling@mdlobbyist.com](mailto:matthew.fraling@mdlobbyist.com)  
Attorneys for Officer Caesar Goodson

Andrew Jay Graham  
Amy E. Askew  
Kramon & Graham, P.A.  
1 South Street, Suite 2600  
Baltimore, MD 21202  
410-752-6030  
[AGraham@kg-law.com](mailto:AGraham@kg-law.com)  
Attorney for Officer Caesar Goodson

Respectfully submitted,

Marilyn J. Mosby



Janice L. Bledsoe (#68776)  
Deputy State's Attorney  
120 East Baltimore Street  
The SunTrust Bank Building  
Baltimore, Maryland 21202  
(443) 984-6012 (telephone)  
(443) 984-6256 (facsimile)  
[jbledsoe@statorney.org](mailto:jbledsoe@statorney.org)

STATE OF MARYLAND

v.

CAESAR GOODSON

\* \* \* \* \*

\*  
\*  
\*  
\*  
\*  
\*

IN THE  
CIRCUIT COURT FOR  
BALTIMORE CITY  
CASE No. 115141032  
(Filed under seal)

**ORDER**

Having considered the State’s Motion to Seal the State’s Response to Defendant’s Motion in Limine to Preclude Testimony of Carol Allan, M.D., and to Seal the State’s Response to Defendant’s Motion for Jury Questionnaire and any response thereto, it is this \_\_\_\_ day of \_\_\_\_\_, 201\_\_, by the Circuit Court for Baltimore City

**ORDERED** that the State’s Motion to Seal the State’s Response to Defendant’s Motion in Limine to Preclude Testimony of Carol Allan, M.D., and to Seal the State’s Response to Defendant’s Motion for Jury Questionnaire be and hereby is **GRANTED**; it is further

**ORDERED** that the Clerk of the Court shall place under seal the State’s Response to Defendant’s Motion in Limine to Preclude Testimony of Carol Allan, M.D.; it is further

**ORDERED** that the Clerk of the Court shall place under seal the State’s Response to Defendant’s Motion for Jury Questionnaire; it is further

**ORDERED** that the Clerk of the Court shall place under seal the State’s Motion to Seal the State’s Response to Defendant’s Motion in Limine to Preclude Testimony of Carol Allan, M.D., and to Seal the State’s Response to Defendant’s Motion for Jury Questionnaire; and it is further

**ORDERED** that the Clerk of the Court shall place this Order under seal.

\_\_\_\_\_  
Judge  
Circuit Court for Baltimore City