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CIRCUIT COURT FOR
BALTIMORE CITY

STATE OF MARYLAND

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IN THE
CIRCUIT COURT FOR
BALTIMORE CITY
CASE No. 115141033

v.

CRIMINAL DIVISION

EDWARD NERO

* * * * *

STATE'S MOTION *IN LIMINE* TO PRECLUDE THE DEFENDANT FROM ATTEMPTING TO CALL PROSECUTORS IN THIS CASE AS TRIAL WITNESSES AND FROM ATTEMPTING TO CONTROVERT CERTAIN ASPECTS OF OR TO RAISE BASELESS ACCUSATIONS ABOUT THE STATE'S ATTORNEY'S PRE-INDICTMENT ACTIONS IN THIS CASE

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 pursuant to Rule 4-252(d) respectfully moves this Court *in limine* to issue a pretrial order precluding the Defendant from attempting to call prosecutors in this case as trial witnesses and from attempting to controvert certain aspects of or to raise baseless accusations about the State's Attorney's pre-indictment actions in this case which the State believes are irrelevant and/or inadmissible. In support of this Motion, the State submits the following:

1. Based on his counsel's prior pleadings and recent discovery disclosures, the State has reason to believe that the Defendant will seek to confuse, mislead, and prejudice the jury by attempting to call prosecutors in this case as trial witnesses or by attempting to offer evidence of, argument about, or reference to irrelevant aspects of or baseless accusations about the State's Attorney's pre-indictment actions in this case. This offered material may include any or all of the baseless accusations and irrelevant matters that the Defendant raised in his now-denied efforts to force the recusal of the Office of the State's Attorney for Baltimore City and/or certain of its prosecutors, including material about (1)

