

**RECEIVED**

STATE OF MARYLAND

\* IN THE

Plaintiff

\* CIRCUIT COURT

DEC 15 2015

v.

\* FOR

**Criminal Div.  
Circuit Court For  
Baltimore City**

CAESAR GOODSON

\* BALTIMORE CITY

Defendant

\* Case No. 115141032

\* \* \* \* \*

**DEFENDANT'S SECOND MOTION FOR RECONSIDERATION OF THE DENIAL OF MOTION FOR REMOVAL AND REQUEST FOR HEARING**

Defendant Caesar Goodson, through his counsel, files this Second Motion for Reconsideration of the Denial of Motion for Removal and in support thereof states:

This Court has previously considered Defendant's Motion for Removal, and Defendant's Motion for Reconsideration of the Denial of the Motion for Removal.<sup>1</sup> Based on the publicity generated by the trial of *State v. Porter*, Officer Goodson renews his Motion for Removal, and Motion for Reconsideration of the previous denial. All of the reasons for the original motion and request for reconsideration remain, and are now compounded by the added publicity attendant to *State v. Porter*, and the news coverage of testimony during that trial relating to the role and alleged responsibilities of Officer Goodson.

"The Sixth Amendment secures to criminal defendants the right to trial by an impartial jury." *Skilling v. United States*, 561 U.S. 358, 377 (2010). This is an "extreme

<sup>1</sup> Officer Goodson incorporates his previous motion for removal, and his motion for reconsideration of the denial of the first motion.

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