

2016 JAN -5 A 10: 35

STATE OF MARYLAND

CRIMINAL DIVISION

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

v.

CAESAR GOODSON

* * * * *

STATE'S MOTION TO SEAL:
STATE'S MOTION IN LIMINE TO PROHIBIT THE TESTIMONY OF CHARLES G. RUSSELL, OR IN THE ALTERNATIVE, LIMIT HIS TESTIMONY TO ACCIDENT RECONSTRUCTION

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 John Butler, Assistant State's Attorney for Baltimore City; and requests that this Court order that the State's Motion *in Limine* to Prohibit the Testimony of Charles G. Russell, or in the Alternative, Limit His Testimony to Accident Reconstruction, be sealed for the following reasons:

1. This Court has previously directed that the State should file under seal any discovery disputes in this case and should keep under seal all matters related to the jury's vote in *State v. William Porter*.
2. On January 4, 2016, the State filed its Motion *in Limine* to Prohibit the Testimony of Charles G. Russell, or in the Alternative, Limit His Testimony to Accident Reconstruction. Those pleadings relate to discovery disputes. The present Motion to Seal is also a pleading subject to the Court's directions concerning matters to be filed under seal or to remain under seal.

Wherefore, the State requests that this Court order that the State's Motion *in Limine* to Prohibit the Testimony of Charles G. Russell, or in the Alternative, Limit His Testimony to Accident Reconstruction, be sealed and that this Motion to Seal likewise be sealed.

Respectfully submitted,

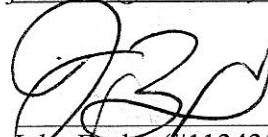
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CERTIFICATE OF SERVICE

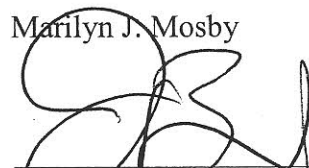
I hereby certify that on this 5th day of January, 2016, a copy of the State's Motion to Seal the State's Motion in Limine to Limit the Testimony of Charles G. Russell to Accident Reconstruction was mailed and e-mailed to:

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