

STATE OF MARYLAND

2016 JUN - 7 □ 3: UN THE

CIRCUIT COURT FOR BALTIMORE CITY

CASE No. 115141032

CAESAR GOODSON

v.

(Filed under seal)

STATE'S MOTION TO SEAL THE STATE'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS BASED ON THE STATE'S VIOLATION OF DEFENDANT'S CONSTITUTIONAL AND DISCOVERY RIGHTS

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 to Dismiss Based on the State's Violation of Defendant's Constitutional and Discovery Rights, 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 under seal.
- 2. On June 7, 2016, the State filed its response to the Defendant's Motion to Dismiss Based on the State's Violation of Defendant's Constitutional and Discovery Rights. That response 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 to Dismiss Based on the State's Violation of Defendant's Constitutional and Discovery Rights 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

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

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

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June, 2016, a copy of the State's Motion to Seal the State's Response to Defendant's Motion to Dismiss Based on the State's Violation of Defendant's Constitutional and Discovery Rights 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
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
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) ibledsoe@stattorney.org

STATE OF MARYLAND	*		IN THE		
v.	*		CIRCUIT COURT F BALTIMORE CITY		
CAESAR GOODSON	*		CASE No. 11514103 (Filed under seal)	2	
* * * * * *	*	*	* * *	*	*
<u>ORDER</u>					
Having considered the State's	Motion to	Seal	the State's Response	to De	fendant's
Motion to Dismiss Based on the State's Violation of Defendant's Constitutional and Discovery					
Rights and any response thereto, it is this day of, 2016, by the Circuit Court					
for Baltimore City					
ORDERED that the State's Motion to Seal the State's Response to Defendant's Motion					
to Dismiss Based on the State's Violation of Defendant's Constitutional and Discovery Rights 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 to Dismiss Based on the State's Violation of Defendant's Constitutional and					
Discovery Rights; 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 to Dismiss Based on the State's Violation of					
Defendant's Constitutional and Discovery Rights; and it is further					
ORDERED that the Clerk of the Court shall place this Order under seal.					
			Judge		
			Circuit Court for Bal	timore	City