

RECEIVED
CIRCUIT COURT FOR
BALTIMORE CITY

STATE OF MARYLAND

2015 FEB - 1 P 3 42

v.

CR 115141033

EDWARD NERO

IN THE
CIRCUIT COURT FOR
BALTIMORE CITY
CASE No. 115141033
(Filed under seal)

* * * * *

STATE'S MOTION FOR APPROPRIATE RELIEF UNDER SEAL

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; Matthew Pillion, Assistant State's Attorney for Baltimore City; and John Butler, Assistant State's Attorney for Baltimore City; and respectfully moves this Court for appropriate relief under seal as set forth below.

I. Background

On October 14, 2015, this Court granted in part the Defendant's Motion to Compel Discovery and ordered the State to "provide counsel for the [Defendant], as officers of the court, for use in their preparation for trial, with copies of any and all documents pertaining to the investigation and prosecution of the [Defendant], with the exception of attorney work product items created after May 1, 2015." For a period commencing on October 27 and ending on November 4, the State made available to defense counsel all of the documents covered by the Court's Order. These documents included over 3,500 emails and attachments from the network computer accounts of 13 members of the Office of the State's Attorney, nearly 1,500 non-email documents, as well as 52 multi-media files (CCTV, interview recordings, etc.), many of which, of course, had already been provided in discovery.

II. The Relief Requested

Counsel have now finished their review of these documents and have specified thousands of pages of various materials they requested that the State provide (including an inexplicable

request for duplication of a substantial portion of the June 26 original discovery), all of which the State is mailing to counsel except a small fraction of items that comprise the subject of this Motion. Having facilitated counsel's examination of these documents as officers of the court, the State now respectfully requests that this Court review these remaining documents *in camera* and order that copies of these documents need not be provided to the Defendant's counsel. These items fall into the following categories: (A) documents that constitute attorney work product and/or executive deliberations; (B) documents related to the interaction between the Office of the State's Attorney and the Press; (C) State's Attorney Marilyn Mosby's May 1, 2015, public schedule and draft statements; (D) drafts of the Statement of Probable Cause used in the Application for the Statement of Charges originally filed in District Court; (E) a miscellany of emails and documents; (F) confidential personnel records of the Baltimore Police Department Internal Affairs Division for Defendants Rice, White, Miller, Goodson, and Porter, as well as Officers Novak and Wood; (G) documents created after May 1, 2015 and thus outside the date specified by the Court's Order; and (H) records related to the Grand Jury's investigation in this case. As outlined below, these items are not even arguably relevant or admissible in the Defendant's trial, are not helpful to his defense, and/or are especially sensitive because of their potential impact if they ever somehow became public.

A. Documents that constitute attorney work product and/or executive deliberations

The first category of documents (page numbered A001-A330) that the State requests not to copy for the Defendant's counsel consists of twenty items constituting classic attorney opinion work product and/or executive deliberations. Preliminarily, the State notes its full understanding and respect for the Court's ruling that a prosecutor's pre-charging investigative work product may be subjected to heightened disclosure requirements. The Supreme Court has long

distinguished between “those aspects of the prosecutor’s responsibility that cast [her] in the role of an administrator or investigative officer rather than that of advocate.” *Imbler v. Pachtman*, 424 U.S. 409, 430-31 (1976). Nevertheless, “the work of an advocate” extends to work “integral to the initiation of the prosecution” and “involv[ing] the exercise of professional judgment,” including the prosecutor’s “drafting of the [charging document], her determination that the evidence [is] sufficiently strong to justify a probable-cause finding, her decision to file charges, and her presentation of the information” to the judicial body to initiate charges. *Kalina v. Fletcher*, 522 U.S. 118, 130 (1997). Put succinctly, even during the pre-charging stage, *some* of a prosecutor’s actions are “the work of an advocate” and, therefore, may constitute classic attorney opinion work product that is privileged from adversarial discovery.

Explaining this privilege, the Supreme Court has long held that “an attempt, without purported necessity or justification, to secure written statements, private memoranda and personal recollections prepared or formed by an adverse party’s counsel in the course of his legal duties . . . falls outside the arena of discovery and contravenes the public policy underlying the orderly prosecution and defense of legal claims.” *Hickman v. Taylor*, 329 U.S. 495, 510 (1946). Additionally, under Maryland’s constitutional separation of powers, “the judiciary . . . is not authorized to probe the mental processes of an executive or administrative officer,” and this “protection from disclosure clearly extends to confidential advisory and deliberative communications between officials and those who assist them in formulating and deciding upon future governmental action.” *Hamilton v. Verdow*, 287 Md. 544, 558-61 (1980).

It is through this lens that the State respectfully asks the Court to consider exempting the following items from being copied to the Defendant’s attorneys pursuant to the Court’s discovery order:

1. (A001-A024) This item contains legal research conducted by a Deputy State's Attorney during the Office's deliberations regarding the charges to bring in this case and is simply a LexisNexis copy of *Williams v. State*, 100 Md. App. 468 (1994).
2. (A025-A026) This item is a document prepared by a Deputy State's Attorney outlining the counts, alleged locations, and maximum penalties for each of the six Defendants charged.
3. (A027-A030) This item is a Memorandum labeled "Attorney Work Product, Privileged," dated April 22 from a Deputy State's Attorney to a Lieutenant in the Maryland State Police regarding possible assistance in the case investigation and outlining the Deputy's view of various tasks to be done.
4. (A031-A063) This item contains legal research conducted by a Deputy State's Attorney during the Office's deliberations regarding the charges to bring in this case and is simply a LexisNexis copy of *State v. Kanavy*, 416 Md. 1 (2010), and two copies of *Simpkins v. State*, 88 Md. App. 607 (1991).
5. (A064-A075) This item is a document outlining a Deputy State's Attorney's view of the supporting evidence and possible charges that could be brought against Defendants Porter, Goodson, Rice, Nero, Miller, and White, along with his research about the elements and jurisprudence of the crimes alleged.
6. (A076-A097) This item contains legal research conducted by a Deputy State's Attorney during the Office's deliberations regarding the charges to bring in this case and is simply a LexisNexis copy of *State v. Albrecht*, 336 Md. 475 (1994).
7. (A098-A127) This item is another document outlining a Deputy State's Attorney's view of the supporting evidence and possible charges that could be brought against Defendants Porter, Goodson, Rice, and White, along with his research about the elements and jurisprudence of the crimes alleged.
8. (A128) This item contains an email dated April 30 sent from a Deputy State's Attorney to the State's Attorney indicating potential charges that could be brought against Defendant White.
9. (A129-A130) This item contains an email dated April 30 sent from the State's Attorney's Chief of Staff to the State's Attorney presenting a meeting agenda, with one item on the agenda being the investigation into Mr. Gray's death.
10. (A131-A138) This item contains an email dated April 29 sent from the Chief Deputy State's Attorney to the State's Attorney's Chief of Staff requesting that she print the attachment in a forwarded email from a Deputy State's Attorney sent the same day, with the attachment outlining a list of the counts, alleged locations, and maximum penalties for each of the six Defendants charged.
11. (A139-142) This item contains an email dated April 29 from a Deputy State's Attorney to the State's Attorney with an attached document containing a Deputy State's Attorney's notes from her viewing of the CCTV footage recovered (and disclosed) in this case.

12. (A143-A155) This item is an email dated April 28 from a Deputy State's Attorney to the State's Attorney, Chief Deputy State's Attorney and other Deputy State's Attorneys, with an attached outline of the supporting evidence and possible charges that could be brought against Defendants Porter, Goodson, Rice, Nero, Miller, and White.

13. (A156-A160) This item contains an email dated April 28 sent from a Deputy State's Attorney to another Deputy State's Attorney requesting review and comment on an attached outline of the possible charges and corresponding supporting evidence against Defendant Goodson.

14. (A161-A163) This item contains an email dated April 27 sent from a Deputy State's Attorney to the State's Attorney and several of her Deputies forwarding legal research conducted during the Office's deliberations regarding the potential charges to bring in this case.

15. (A164-A231) This item contains an email dated April 27 sent from a Deputy State's Attorney to the State's Attorney and several of her Deputies and Assistants forwarding some legal research conducted during the Office's deliberations regarding the charges to bring in this case, with attachments from Lexis Nexis of *Williams v. State*, 100 Md. App. 468 (1994); *State v. Albrecht*, 336 Md. 475 (1994); *State v. Kanavy*, 416 Md. 1 (2010); and *Simpkins v. State*, 88 Md. App. 607 (1991).

16. (A232-A316) This item contains another email dated April 27 sent from a Deputy State's Attorney to herself forwarding legal research conducted during the Office's deliberations regarding the charges to bring in this case, with attachments from Lexis Nexis of *State v. Albrecht*, 336 Md. 475 (1994); *Simpkins v. State*, 88 Md. App. 607 (1991); *Simpkins v. State*, 88 Md. App. 607 (1991); *State v. Kanavy*, 416 Md. 1 (2010); *Williams v. State*, 100 Md. App. 468 (1994).

17. (A317-A319) This item contains an email labeled "Privileged and Confidential" and "Contains Attorney Work Product" dated April 25 sent from the Chief Deputy State's Attorney to a Deputy State's Attorney and cc'd to the State's Attorney, an email that he prefaced as "an effort to get down on paper some of my thoughts about where we are and what needs to be considered/done" and that then outlines the Chief Deputy's thoughts about the strengths/weaknesses of the case, potential trial strategies, possible charges that could be brought based on ways the evidence could meet the elements, and whether the Office *should* bring such charges. The email also includes the Chief Deputy's instructions about prioritizing/verifying the gathering and examination of evidence.

18. (A320-A325) This item contains an email dated April 22 from a Deputy State's Attorney to a Lieutenant in the Maryland State Police Department with an attached Memorandum labeled "Attorney Work Product, Privileged," dated April 22 from a Deputy State's Attorney to a Lieutenant in the Maryland State Police regarding possible assistance in the case investigation and outlining the Deputy's view of various tasks to be done.

19. (A326-A327) This item contains an email dated April 21 sent from a Deputy State's Attorney to another Deputy State's Attorney and the Chief Deputy State's Attorney

outlining the Deputy attorney's analysis of Mr. Gray's detention, arrest, and search under the attorney's judgment of the relevant Fourth Amendment case law.

20. (A328-330) This item contains an email dated April 19 sent from a the State's Attorney's Chief of Staff to the State's Attorney, updating her on a morning meeting and other issues relevant to daily Office operations.

The State sincerely believes that even though these items were created prior to the charges being filed in this case, each of the items constitutes attorney work product and/or the deliberative and advisory products of executive branch officials. For example, many of the items are clearly the work of a Deputy State's Attorney acting as an advocate and outlining his professional judgment about what charges the Office of the State's Attorney could bring based on particular evidence. Other items reflect another Deputy State's Attorney acting as an advocate and executive advisor collaborating with the City's elected chief prosecutor on the eve of the decision to charge about what particular evidence might mean or depict. Likewise, item 17 contains both explicit and obvious attorney work product as well as intimate executive deliberations, with the Chief Deputy State's Attorney candidly sharing with his closest colleagues his personal thoughts about the merits of the case, how best to prosecute it, and whether certain charges should be filed at all as a matter of official prosecutorial discretion. Ordering such materials to be copied to a criminal defendant's attorneys would not only contravene the very fiber of *Hickman* and *Hamilton* but would set a chilling precedent with no commensurate benefit to this Defendant's fair ability to prepare for trial.

B. Documents related to the interaction between the Office of the State's Attorney and the Press

The second category of documents (page numbered B001-B065) that the State requests not to copy for the Defendant's counsel consists of the following emails and documents about the Office of the State's Attorney's interaction with the Press:

1. (B001-B006) This item is a document listing possible media questions that might arise at the State's Attorney's planned May 1 news conference. The item also contains a handwritten note with bail recommendations for each defendant.
2. (B007-B018) This item is another document listing possible media questions in preparation for the May 1 news conference and suggesting the wording of possible answers to those questions should they arise.
3. (B019-B020) This item contains an email dated the morning of May 1 sent from the State's Attorney's Executive Assistant to the State's Attorney and her Executive Protection officers listing the day's schedule of events.
4. (B021-B022) This item contains an email dated April 30 sent from the State's Attorney to herself containing an attachment of various personal notes related to her planned events for the following day.
5. (B023) This item contains an email dated April 30 from a producer at CNN to the State's Attorney's Director of Communications regarding an interview with the State's Attorney.
6. (B024) This item contains an email dated April 30 from the State's Attorney to her Chief of External Affairs and copied to her Director of Communications with a draft of a possible statement to the press.
7. (B025-B030) This item contains an email dated April 29 sent from the State's Attorney's Director of Communications to the State's Attorney and her Chief of External Affairs containing an attached draft of potential questions from the press.
8. (B031) This item contains an email dated April 28 from the State's Attorney to certain members of her administrative staff with a draft of a possible statement to the press.
9. (B032) This item contains an email exchange dated April 28 between the State's Attorney and certain members of her administrative staff and includes a rough draft of a possible statement to the press.
10. (B033-B036) This item contains an email exchange dated April 6-22 between a producer and news director from WBAL and the State's Attorney's Chief of Staff detailing possible topics for an interview with the State's Attorney.
11. (B037-B038) This item contains an email dated April 21 from the Chief of External Affairs to the Director of Communications and includes an attachment with possible talking points for a press conference.
12. (B039) This item contains an email dated April 20 from a news anchor at WBAL to the Director of Communications inquiring whether a statement to the press can be attributed to the State's Attorney.
13. (B040-B042) This item contains an email exchange dated April 7-20 between the State's Attorney's Chief of Staff and various of her Assistants and a third party regarding the State's Attorney's possible appearance at a forum on April 20.

14. (B043) This item contains an email dated April 20 from the State's Attorney's Director of Communications to members of the press and includes a statement on the death of Mr. Gray.
15. (B044-B049) This item contains an email dated April 20 sent from the State's Attorney's Chief of Staff to the State's Attorney and her Director of Community Affairs, and includes a draft statement on the death of Mr. Gray, along with an attached Briefing Memorandum regarding a scheduled April 20 forum hosted by a congressman, as well as information about the congressman.
16. (B050) This item contains an email dated April 20 sent from the State's Attorney's Chief of External Affairs to certain members of the State's Attorney's staff and includes a draft statement regarding Mr. Gray.
17. (B051) This item contains an email dated April 20 sent from the State's Attorney's Chief of External Affairs to the State's Attorney and members of her Executive Team and includes an edited statement regarding Mr. Gray.
18. (B052) This item contains an email dated April 20 sent from a WBAL producer to the State's Attorney's Chief of Staff and her Director of Communications requesting an interview with the State's Attorney.
19. (B053) This item contains an email dated April 20 sent from a community liaison in the State's Attorney's office to members of the State's Attorney's office asking for guidance on dealing with an issue in the community.
20. (B054) This item contains an email dated April 19 sent from a Deputy State's Attorney to the State's Attorney's Director of Communications regarding a press conference held by municipal officials regarding the death of Mr. Gray.
21. (B055-B064) This item contains an email dated April 17 sent from the State's Attorney's Executive Assistant to her Director of Communications forwarding an attached Briefing Memorandum regarding a scheduled April 20 meeting between the State's Attorney and the Editorial Board of the Afro-American Newspaper.
22. (B065) This item contains an email dated April 30 sent from the State's Attorney's Director of Communications to a producer at CNN regarding a possible interview with the State's Attorney on May 1.

In short, not a single one of the above items constitutes a statement of any trial witness, and none of them are relevant, admissible, or helpful to the defense. Instead, these items reflect the public relations actions and deliberations of an elected public official and her advisers. The State willingly made them available for defense counsel's review pursuant to this Court's Order, but providing copies of these documents to persons outside the Office of the State's Attorney

would serve no purpose related to counsel's defense of their client and would merely heighten the potential that those copies would somehow become public. Accordingly, the State respectfully asks that these documents not be ordered copied to the Defendant's attorneys.

C. State's Attorney Marilyn Mosby's May 1, 2015, public schedule and draft statements

The third category of documents (page numbered C001-C086) that the State requests not to copy for the Defendant's counsel consists of the following eleven items comprising State's Attorney Marilyn Mosby's May 1, 2015, draft statements:

1. (C001-C003) This item contains a draft of notes and possible remarks the State's Attorney planned to deliver at the May 1 press conference.
2. (C004-C013) This item contains a draft of possible remarks the State's Attorney planned to deliver at the May 1 press conference, including a Statement of Probable Cause, charges against each of the defendants, and the bases for those charges.
3. (C014-C020) This item contains yet another draft of possible remarks the State's Attorney planned to deliver at the May 1 press conference.
4. (C021-C030) This item contains still another copy of a draft of possible remarks the State's Attorney planned to deliver at the May 1 press conference.
5. (C031-C037) This item contains still another copy of a draft of possible remarks the State's Attorney planned to deliver at the May 1 press conference.
6. (C038 -C045) This item contains an email dated April 30 sent from the Chief Deputy State's Attorney to the State's Attorney and her Chief of External Affairs and includes an attachment with edits to a draft of possible remarks the State's Attorney planned to deliver at the upcoming press conference, including a Statement of Probable Cause and charges against each of the defendants.
7. (C046 -C053) This item contains an email dated April 30 sent from the Chief of External Affairs to the State's Attorney, and copied to the Chief Deputy State's Attorney and includes the original attachment contained in C039-C045.
8. (C054 -C059) This item contains an email dated April 30 sent from the State's Attorney's Public Relations Officer to the State's Attorney, her Chief of External Affairs, and her Director of Communications, and includes an attachment with a draft of possible remarks the State's Attorney planned to deliver at the upcoming press conference, including charges against each of the defendants.

9. (C060-C064) This item contains an email dated April 30 sent from the State's Attorney's Public Relations Officer to the State's Attorney forwarding attached alternate versions of possible remarks the State's Attorney could make at the upcoming press conference.

10. (C065-C075) This item contains a document titled "Baltimore City State's Attorney – Press Conference," dated May 1, and includes a bullet point outline of possible remarks the State's Attorney could make at an upcoming news conference, including charges against each of the defendants, and the bases of those charges.

11. (C76-C086) This item contains another copy of the document contained in C065-C075.

None of these drafts or documents are remotely relevant, admissible, or helpful to the defense. The Defendant's attorneys have viewed and even transcribed the State's Attorney's actual May 1 comments. These items merely show an elected public official's internal drafts and notes considering variations on a speech to constituents, items which further no legitimate defense purpose and which should not be copied to the Defendant's counsel.

D. Drafts of the Statement of Probable Cause used in the Application for the Statement of Charges originally filed in District Court

The fourth category of specific documents (page numbered D001-D095) that the State requests not to copy for the Defendant's counsel consist of multiple separate drafts of and corresponding emails about the Statement of Probable Cause used in the Application for the Statement of Charges originally filed in District Court written and edited largely by attorneys within the Office of the State's Attorney. These various drafts are attorney work product or executive deliberative materials and/or are not even arguably relevant or admissible in the Defendant's trial, are not helpful to his defense, and are not investigative material. Moreover, these documents do not constitute statements of any trial witness or party opponent and have since been superseded by the Grand Jury's Indictment. Instead, these documents (a) show the

writing, grammatical, and typographical skills and mistakes of their attorney authors; (b) reflect the deliberations and thought processes of members of the State's Attorney's Office; and (c) contain attorney opinions about the significance of certain facts in the case. Accordingly, the State respectfully asks that these documents not be ordered copied to the Defendant's attorneys.

E. A miscellany of emails and documents

The fifth category of materials (page numbered E001-E014) that the State requests not to disclose to the Defendant consists of the following miscellany of emails and documents:

1. (E001-E004) This item contains four email confirmations dated April 26 sent from LexisNexis to a Deputy State's Attorney and does not include any substantive information.
2. (E005) This item contains a letter dated April 24 sent from the Chief Medical Examiner to the Gray family attorney allowing an independent forensic pathologist to be present at an examination.
3. (E006-E007) This item contains an email from one member of the Baltimore City Police Department to multiple individuals and email groups within the Department dated April 16, memorializing a perceived threat to officer safety.
4. (E008) This item contains an email dated May 1 sent from the Chief Deputy State's Attorney to a Baltimore City deputy sheriff requesting information about corrections in a public data system.
6. (E009-E010) This item contains an email exchange dated April 22-23 between the State's Attorney and members of the External Affairs Division discussing a possible letter to the Governor.
7. (E011-E012) This item contains an email dated April 21 from an investigator in the Office of the State's Attorney to an Assistant State's Attorney with information on an unrelated case.
8. (E013) This item contains an email dated April 20 from the State's Attorney's Director of Community Affairs to community liaisons regarding various ongoing activities in the State's Attorney's office.
9. (E014) This item contains an email dated April 16 sent from a Deputy State's Attorney to an Office investigator and members of the External Affairs Division regarding possible bereavement services for the Gray family.

Reviewing these emails and materials, it should be abundantly clear that none of the items are remotely relevant, admissible, or helpful to the defense. The State cannot even fathom why defense counsel would request these items as additional discovery given that they further no legitimate defense purpose and are only tangentially related to the case, if at all. They should not be copied to the Defendant's counsel.

F. Confidential personnel records of the Baltimore Police Department Internal Affairs Division for Defendants White, Rice, Goodson, Miller, and Porter, as well as Officers Novak and Wood

The sixth category of materials (page numbered F001-F122) that the State requests not be disclosed to the Defendant consists of confidential personnel records of the Baltimore Police Department Internal Affairs Division for Defendants White, Rice, Goodson, Miller, and Porter, as well as Officers Novak and Wood. The State may not legally disclose the internal affairs records of police officers without a court order. *Fields v. State*, 432 Md. 650 (2013) (holding that internal affairs records of police officers are confidential under the Maryland Public Information Act and so may not be disclosed by the State unless a Court so orders after having conducted a *Zaal* balancing test). Consequently, these records should not be disclosed to the Defendant.

G. Documents created after May 1, 2015, and thus outside the date specified by the Court's order

The seventh category of materials contains one item (page numbered G001) entitled "9-16-15 meeting with detectives," created on that same day and memorializing a Deputy State's Attorney's notes about a meeting. The document falls outside the date range specified by the Court's order issued on October 14, 2015, and thus should not be copied to the Defendant's counsel.

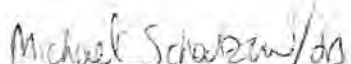
H. Records related to the Grand Jury's investigation in this case

The final category of materials (page numbered H001-H010) contains drafts of subpoenas to compel various witnesses to appear before a Baltimore City Grand Jury, as well as one email dated April 22 sent from a staff member of the Office of the State's Attorney to an investigator in the Office containing a sample Grand Jury subpoena duces tecum. These subpoenas are mere drafts but reflect the actual activities of the Grand Jury's investigation into this matter. Such matters are secret and not open to public inspection absent a court order. *See e.g. In re Criminal Investigation No. 437*, 316 Md. 66 (1989) ("Secrecy is the lifeblood of the grand jury."); *see also* Rule 4-642(a) ("Files and records of the court pertaining to criminal investigations shall be sealed and shall be open to inspection only by order of the court."). As such, these materials should not be copied to the Defendant's counsel.

Wherefore, the State respectfully requests that this Motion for Appropriate Relief Under Seal be granted in its entirety.

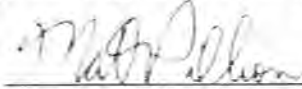
Respectfully submitted,

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@statorney.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@statorney.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@statorney.org



John Butler (#113431)
Assistant State's Attorney
120 East Baltimore Street
The SunTrust Bank Building
Baltimore, Maryland 21202
(443) 984-6145 (telephone)
(443) 984-6252 (facsimile)
jbutler@statorney.org

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February, 2016, a copy of the State's Motion for Appropriate Relief Under Seal was mailed and e-mailed to:

Marc L. Zayon, Esq.
Law Office of Roland Walker & Marc L. Zayon
201 N. Charles Street, Suite 1700
Baltimore, Maryland 21201
(410) 727-3710
mzayon@walkerzayon.com
Attorneys for Officer Edward Nero

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@stattorney.org