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STATE OF MARYLAND

MAY 06 2016

IN THE  
CIRCUIT COURT FOR  
BALTIMORE CITY

v.

Criminal Div.  
Circuit Court For  
Baltimore City

EDWARD NERO

CASE No. 115141033

\* \* \* \* \*

STATE'S MOTION REGARDING TRIAL SCHEDULING

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 this Court's inherent authority to control its docket requests that the above-captioned trial begin on Thursday, May 12, 2016, rather than on Wednesday, May 11, 2016. In support of this motion, the State avers that:

1. The trial in the above-captioned case is scheduled to begin before this Court on May 11, 2016, following motions hearings on May 10.
  
2. On May 3, 2016, the State's Attorney's Office was informed that its building at 120 E. Baltimore St. would be completely shut down without power from 6:00 a.m. on Saturday, May 7 until 6:00 p.m. on May 7 due to necessary BGE work. This power outage will cause the Office to be inaccessible, will require its computer servers to be turned off before BGE begins its work, and will also prevent the trial team from remotely accessing the Office's network of electronic files, effectively and unexpectedly halting final case preparations during the important last days before trial.

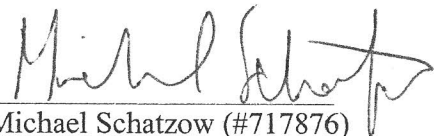
3. Because of this interruption, the State respectfully requests that this Court, in its inherent discretion and authority, allow the trial to begin on May 12, 2016. This short continuance would allow the State to recoup the lost final preparation time.

4. The State has spoken with Mr. Marc Zayon, counsel for Officer Nero, regarding this request. Mr. Zayon stated that he had no objection to the State's request and that he did not desire a hearing on the matter. The State also does not request a hearing on this matter.

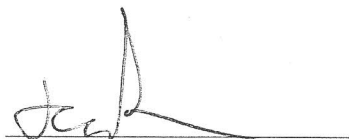
Wherefore, the State requests that this Court allow the trial of the above-captioned case to begin on Thursday, May 12, 2016, rather than on Wednesday, May 11, 2016.

Respectfully submitted,

Marilyn J. Mosby



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