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CIRCUIT COURT FOR
BALTIMORE CITY

2016 FEB 16 P 3:41

STATE OF MARYLAND

CRIMINAL DIVISION

IN THE
CIRCUIT COURT FOR
BALTIMORE CITY

v.

EDWARD NERO

CASE No. 115141033

* * * * *

STATE'S RESPONSE TO DEFENDANT'S MOTION *IN LIMINE* TO PRECLUDE INTRODUCTION OF EVIDENCE, OR ARGUMENT, OF MR. GRAY'S INJURIES

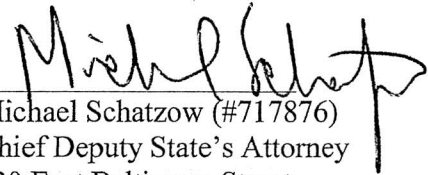
Now comes the State of Maryland, by and through Marilyn J. Mosby, the State's Attorney for Baltimore City; Michael Schatzow, Chief Deputy State's Attorney for Baltimore City; Janice L. Bledsoe, Deputy State's Attorney for Baltimore City; and Matthew Pillion, Assistant State's Attorney for Baltimore City; and responds as follows to the Defendant's Motion *in Limine* to Preclude the introduction of evidence, or argument, of Mr. Gray's injuries:

1. The Defendant's Motion *in Limine* seeks to exclude evidence of or argument about Mr. Gray's injuries on grounds that such evidence would be irrelevant because the Defendant is not charged with any crime that requires proof of actual injury.
2. On February 1, 2016, the State filed in the above-captioned case its Motion in Limine to Allow the State to Present Medical Expert Testimony to Prove that the Defendant's Conduct Created a Substantial Risk of Death or Serious Physical Injury. Because that Motion fully addresses each of the objections the Defendant's competing Motion raises, the State responds by incorporating its Motion in Limine as if fully stated herein.

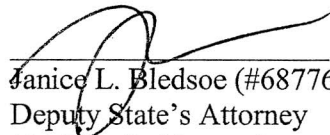
Wherefore, the State requests that this Court deny the Defendant's Motion in Limine to Preclude the introduction of evidence, or argument, of Mr. Gray's injuries.

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

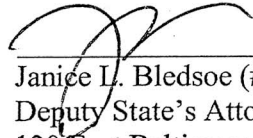
CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2016, a copy of the foregoing State's Response to the Defendant's Motion *In Limine* to Preclude the introduction of evidence, or argument, of Mr. Gray's injuries was mailed and e-mailed to:

Marc L. Zayon
Roland Walker & Marc L. Zayon, P.A.
201 N. Charles Street, Suite 1700
Baltimore, Maryland 21201
(410) 727-3710
mzayon@walkerzayon.com
Attorney 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@statorney.org