

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND OFFICE OF THE PUBLIC *
DEFENDER, *et al.* *

Plaintiffs,

v.

TALBOT COUNTY, MARYLAND *

Defendant

Case No.: 1:21-cv-01088-ELH

**MOTION OF MOVE THE MONUMENT COALITION, TALBOT COUNTY FAITH
LEADERS, AND TALBOT COUNTY SMALL BUSINESS LEADERS FOR LEAVE TO
PARTICIPATE AS *AMICI CURIAE* IN SUPPORT OF PLAINTIFFS**

The Move the Monument Coalition, Talbot County Faith Leaders, and Talbot County Small Business Leaders, respectfully request leave to file an 11-page amicus brief in support of Plaintiffs. A copy of the proposed amicus brief is attached as Exhibit 1. Pursuant to D. Md. Local Civ. Rule 105(12)(e), the attached amicus brief is filed timely within seven days of Plaintiffs' Opposition to Defendant's Motion to Dismiss. The amicus brief brings to the attention of the Court relevant matter not already brought to its attention by the parties and will be of considerable help to the Court without adding burden.

Amici Curiae have received consent to this filing by the Plaintiffs. Defendant does not consent to the filing.

The proposed brief is unique in that it was written by actual community members, faith leaders, and business leaders of Talbot County.¹ These are the individuals who live, pray, and work in Talbot County. Like Plaintiffs, these members of the Talbot County community are living on a

¹ Undersigned counsel for *amici curiae* simply formatted the argument that was drafted by *amici curiae* members into an appropriate court filing.

daily basis with a monument that remembers a racist past that built a foundation to today's inequalities. However, each group represented in the brief has a unique perspective of how they are impacted.

The *amici curiae* have a strong interest in this case. Each three groups, who are represented in the brief, united around the cause of removing the "Talbot Boys" statue from the courthouse grounds. Each of the three groups suffer their own harm but are also empathetic to the harm caused to the Plaintiffs. They each feel an obligation to better their community by fighting for the removal of the Confederate monument – a monument that inaccurately represents their community and its past.

Move the Monument Coalition is a local, grass-roots group formed after the killing of George Floyd to address the most obvious symbol of systemic racism in Talbot County: the Confederate monument on the courthouse lawn. The coalition has 1,069 Facebook followers at Move the Confederate Talbot Boys Monument; 700 people on its email list at movethemonumenttc@gmail.com, and a web site, movethemonumenttc.org. Move the Monument's mission statement is: *We are a nonpartisan coalition of citizens dedicated to moving the Confederate soldier's monument, reflective of a divisive and racist past, off the lawn of the Talbot County Courthouse.*

Talbot County Faith Leaders support the Plaintiffs in this matter as the Confederate statue does not reflect the morals or tenets of the diverse religious and spiritual organizations present in Talbot County. These faith leaders who support the Plaintiffs in this matter include Molly Burgoyne Brian of Third Haven Friends Meeting; Rev. Paul Boothby, Minister (Retired) of Unitarian Universalist; Rev. Sue Browning of Unitarian Universalist Fellowship at Easton; Rev. Nancy M. Dennis of St. Stephen's A.M.E. Church-Unionville; Rev. Julie Hart of ELCA; Rabbi

Naomi Mara Hyman; Rabbi Peter Hyman of Temple B'Nai Israel; The Rt. Rev. Joel Marcus Johnson of Anglican Bishop of The Chesapeake; Mohammad Walid Kamsheh, MD of Islamic Society of Easton; Rev. Leonard E. Palmer, Sr.; The Rev. Gregory L. Powell - Dean, Trinity Cathedral; Rev. Nancy Sajda - Interfaith Minister, Easton, President, P.E.A.C.E.; Rev. Dr. Wm T Wallace Sr. of United Methodist Church (pastor); and Bishop Juanita E. Wharton-Church of Emmanuel Deliverance Center, Inc.

Talbot County Small Business Leaders are compelled to support the Plaintiffs in this matter as they know firsthand that a racially diverse, inclusive, and equitable local economy cannot be achieved as long as the monument stands. The monument is a symbol that certain consumers are not welcome in Talbot County. However, these small businesses have their doors open to all. The small business leaders of Talbot County who support the Plaintiffs in this matter include Madeline Hargrove of Agave Arts & Juicing Company; Brenda Fike of Bay Imprint; Gerson Martinez of Brand New Equity Group, LLC; Kulveen Virdee, ND of Easton Integrative Medicine; Kathleen Moss of Fox Briar Farm; Meghan Brown of Gray Wolf Craft Distilling; Alice L. & Jordan L. Lloyd of Hambleton House LLC; Jennifer McCrea of The Ivy Café; Oscar & Irma Martinez of Martinez Hauling Inc; Ryan Prell of Near and Far Media LLC; Noelle Filion-Powell; Richard Marks, CEO of Paris Foods Corp.; Andrea Davis-Cetina of Quarter Acre Farm; Tori Paxon, Jazmine Paxon & Heena Paracha of The Race Thing, Inc.; Lauren Giordano & George Burroughs of Schoolhouse Farmhouse Studio; Allison Prell & Alice Ryan of Trade Whims; and Jaime Windon of Windon Distilling.

For the reasons stated above and in the attached brief, *amici curiae* respectfully request that this Motion for Leave to Participate as *Amici Curiae* be granted.

Respectfully submitted,

_____/s/_____

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