



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
McLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

[www.wileyrein.com](http://www.wileyrein.com)

August 3, 2011

**BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
AND ELECTRONIC MAIL**

George Nilson, Esq.  
Baltimore City Solicitor  
100 N. Holiday Street, Suite 101  
Baltimore, MD 21201

Mark H. Grimes, Esq.  
Chief Legal Counsel  
Baltimore Police Department  
601 East Fayette St., 5th Floor  
Baltimore, MD 21202

Re: Notice of Potential Litigation

Dear Counsel:

Along with the American Civil Liberties Union of Maryland, we represent Mr. Christopher Sharp. As set forth in more detail in the enclosed draft complaint, officers of the Baltimore Police Department violated Mr. Sharp's Constitutional rights on May 15, 2010 when they acted under departmental policy, practice, or custom that guides officers unlawfully to detain and improperly seize and search the property of individuals who record police officers performing their official duties in public.

Our client would prefer to resolve this matter amicably. Accordingly, we are willing to discuss a resolution that would address the department's unlawful practices concerning recording police officers who are performing their official duties in public and include a reasonable settlement amount for Mr. Sharp.

If we have not heard from you or your representatives by August 24, 2011, we will assume that you are not interested in an amicable resolution of this matter and will file the enclosed complaint.

We also note that you should retain all documents (including electronic copies) evidencing the department's policies, practices, customs, or actions with respect to recording police officers performing their official duties in public. Your efforts to preserve relevant documents should include without limitation preserving any

Richard A. Simpson  
202.719.7314  
[rsimpson@wileyrein.com](mailto:rsimpson@wileyrein.com)

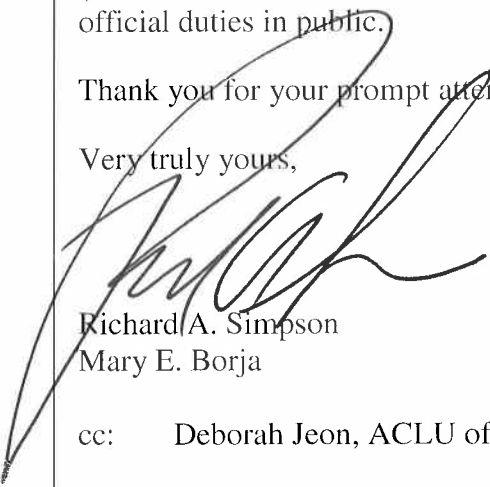
Mary E. Borja  
202.719.4252  
[mboria@wileyrein.com](mailto:mboria@wileyrein.com)

George Nilson  
Mark H. Grimes, Esq.  
August 3, 2011  
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presently-existing and future emails, server logs, and other communication (electronic or otherwise) referencing recording police officers performing their official duties in public.

Thank you for your prompt attention to this matter.

Very truly yours,



Richard A. Simpson  
Mary E. Borja

cc: Deborah Jeon, ACLU of Maryland