

IN THE CIRCUIT COURT FOR  
BALTIMORE CITY, MARYLAND

**American Civil Liberties Union  
Foundation of Maryland,**  
3600 Clipper Mill Road  
Suite 350  
Baltimore, MD 21211

and

**The Real News Network**  
231 N. Holliday Street  
Baltimore, MD 21202

**Plaintiffs,**

v.

**City of Salisbury,**  
125 North Division Street  
Salisbury, MD 21801-4940

**Salisbury Police Department,**  
699 West Salisbury Parkway  
Salisbury, MD 21801

and

**Christopher M. Demone,** in his official  
capacity as Public Information Officer for  
the City of Salisbury and the Salisbury  
Police Department  
125 North Division Street  
Salisbury, MD 21801-4940

**Defendants.**

Case No.: \_\_\_\_\_

CIVIL DIVISION

2017 JUN 29 AM 10:00

**COMPLAINT**

Plaintiffs American Civil Liberties Union Foundation of Maryland (“ACLU of Maryland”) and The Real News Network (“TRNN”), by and through undersigned counsel, and for its complaint against Defendants City of Salisbury (the “City” or “Salisbury”), the Salisbury

Police Department (“SPD”), and Christopher M. Demone (“Demone”), state, claim and allege as follows:

### **NATURE OF THE CASE**

1. This is an action challenging as unlawful under the Maryland Public Information Act, Maryland Code, General Provisions § 4-101 *et seq.* (“MPIA”), the City of Salisbury and Salisbury Police Department’s failure to disclose information about the resolution of lawsuits alleging police misconduct toward Maryland citizens and/or other members of the public.

2. Plaintiffs ACLU of Maryland, a civil rights organization, and TRNN, a nonprofit media organization, sought information under the MPIA about the City’s settlement of a federal lawsuit against the SPD, entitled *Adams v. Aita*, No. RDB-14-2793, 2015 WL 5255358 (D. Md. Sept. 26, 2016). That suit alleged, among other things, that Salisbury University students endured police brutality, excessive force, and illegal seizure, detention, and arrest at the hands of an SPD officer. The complaint further alleged that SPD personnel confiscated surveillance footage of the incident and further attempted to cover up of this unlawful conduct by creating fictional narratives and reports. The complaint further alleged that SPD encouraged the unlawful conduct by implementing policies that allowed its officers to violate constitutional rights of students and others.

3. The City and the SPD denied Plaintiffs’ request outright, contending that neither entity has any documents relating to the *Adams* litigation or the settlement thereof.

4. Notably, Plaintiffs’ request and this Complaint arise in the context of allegations that City officials require those who challenge police misconduct sign confidentiality agreements as a condition of settlement.

5. Confidentiality provisions obstruct the public's access to public records regarding the decisions and operations of government institutions including municipalities and local law enforcement agencies. Access to the information at issue is necessary to ensure accountability of police and public officials, and to foster community trust in law enforcement. Given the importance of accountability of public officials and agencies to Maryland citizens, there is a significant public interest in disclosing a settlement agreement related to allegations of excessive use of force, baseless arrests, filing false police reports, and other abusive police practices. Likewise, there is a significant public interest in disclosure of documents that reflect whether Defendants Salisbury and SPD are complying with any obligations to reform or otherwise alter policy and practices as might be set forth in the settlement agreement, and whether any disciplinary action was imposed against the individuals at issue in the *Adams* litigation or other law enforcement personnel connected to the allegations in that case.

6. The Maryland legislature intended the MPIA to be “construed in favor of allowing inspection of a public record.” Md. Code G.P. § 4-103(b). There is a well-established presumption in Maryland of disclosure of government or public records or documents. *Maryland Dep't of State Police v. Maryland State Conference of NAACP Branches*, 430 Md. 179, 190 (2013). This presumption also applies to public access to court proceedings and records, including purportedly confidential settlement agreements and related documents in a lawsuit. *Baltimore Sun Co. v. Mayor & City Council of Baltimore*, 359 Md. 653, 660 (2000) (finding the “common law principle of openness regarding public access to court proceedings and court records” as favoring transparency to allow the Baltimore Sun and the public at large to review the settlement agreement between the plaintiff and the City of Baltimore).

## **PARTIES**

7. Plaintiff ACLU of Maryland is the Maryland affiliate of a national civil rights organization, American Civil Liberties Union, which has local affiliates throughout the country. The ACLU of Maryland is dedicated to protecting the civil rights and liberties of all Marylanders and visitors to Maryland. The ACLU of Maryland is composed of a non-profit 501(c)(3) foundation and a non-profit 501(c)(4) organization, which receive most of their funding through charitable donations. The ACLU of Maryland has its main office at 3600 Clipper Mill Road, Suite 350, Baltimore, MD 21211.

8. Plaintiff ACLU of Maryland is a person and an applicant within the meaning of the MPIA. Md. Code G.P. § 4-101(b).

9. Plaintiff TRNN is a non-profit, internet-based, viewer-supported, daily video-news and documentary service. TRNN provides fact-guided reporting of daily news stories and bases its journalism on verifiable evidence. It has offices in the United States and Canada. Its principal place of business in the United States is located at 231 N. Holliday Street, Baltimore, MD 21202.

10. Plaintiff TRNN is a person and an applicant within the meaning of the MPIA. Md. Code G.P. § 4-101(b).

11. Defendant City of Salisbury is a municipal corporation and a political subdivision within the meaning of the MPIA. Md. Code G.P. § 4-101(i). All of its acts and omissions are taken under the color of law. It is required to maintain public records, as set forth in the MPIA. Md. Code Regs. 14.18.02.04-05.

12. Defendant Salisbury Police Department is a law enforcement agency that serves Salisbury and is a department within the government of Salisbury. Defendant SPD is funded through a budget set by the Mayor of Salisbury and approved by the City Council. Salisbury,

Md., Charter, art. III, §SC3-4(F). Defendant SPD is part of a municipal corporation and a political subdivision within the meaning of the MPIA. Md. Code G.P. § 4-101(i); *see also* Salisbury, Md., Charter, art. I, §SC1-19 (listing the police department as one of the departments of the City of Salisbury government). All of its acts and omissions are under the color of law. It is required to maintain public records, as set forth in the MPIA. Md. Code Regs. 14.18.02.04-05.

13. Defendant Christopher Demone is the officially designated Public Information Officer for both the City of Salisbury and the SPD. Brian E. Frosh, Maryland Office of the Attorney General, Maryland Public Information Act Manual J-40 (15th ed. 2016), [http://www.marylandattorneygeneral.gov/OpenGov%20Documents/Appendix\\_J.pdf](http://www.marylandattorneygeneral.gov/OpenGov%20Documents/Appendix_J.pdf). Defendant Demone is a public records custodian within the meaning of the MPIA. Md. Code G.P. § 4-101(d). Defendant Demone's acts and omissions are taken under color of law. Defendant Demone is responsible for ensuring that Defendants Salisbury and SPD comply with the MPIA, which includes providing for inspection of all public records within their possession, custody, and/or control. *See* Md. Code G.P. § 4-503(b).

#### **JURISDICTION AND VENUE**

14. This Court has jurisdiction over this action pursuant to Md. Code G.P. § 4-362(a)(1) and Cts. & Jud. Proc. § 1-501.

15. Because both Plaintiffs ACLU of Maryland and TRNN have principal places of business in Baltimore City, venue in this Court is proper under Md. Code G.P. § 4-362(a)(3).

#### **STATEMENT OF RELEVANT FACTS**

16. On September 3, 2014, four Salisbury University students filed suit in the U.S. District Court for the District of Maryland against the City and one police officer employed by

the SPD. *See* Compl., *Adams v. Aita*, No. RDB-14-2793, 2015 WL 5255358 (D. Md. Sept. 3, 2014).

17. The *Adams* complaint alleged facts detailing police brutality, excessive force, illegal seizure, detention, and arrest. The complaint claimed that the students had sustained both physical and emotional injuries due to the use of excessive force by an SPD officer. The complaint further alleged that SPD personnel confiscated surveillance footage of the relevant incident(s), created fictional police narratives and reports in an attempt to cover up the unlawful use of force, and implemented and encouraged policies that allowed its officers to violate constitutional rights, particularly those of Salisbury University students. *See* Am. Compl., *Adams v. Aita*, No. RDB-14-2793, 2015 WL 5255358 (D. Md. Sept. 30, 2014).

18. In September 2015, the *Adams* court denied the defendants' motion to dismiss the claims. The court concluded that the plaintiffs sufficiently alleged illegal patterns and practices of wrongfully targeting and arresting individuals, and also patterns and practices of creating fictional, post-dated, or grossly exaggerated narratives to justify such arrests. *Adams*, No. RDB-14-2793, 2015 WL 5255358 (D. Md. Sept. 9, 2015).

19. On September 26, 2016, the *Adams* court entered an order stating that it had been notified that the parties in the *Adams* litigation had settled all claims and, therefore, pursuant to U.S. District Court for the District of Maryland Local Rule 111, the case would be dismissed.

20. The September 26, 2016 order did not place the *Adams* case or any documents related to the settlement thereof under seal.

21. A news article about the *Adams* case reported that the settlement was confidential. Heather Coburn, Salisbury Students Settle Lawsuit Against Police Officer, City, *The Daily Record* (Baltimore, Md.), Sept. 26, 2016.

26. On December 1, 2016, Plaintiff ACLU of Maryland received a two-sentence electronic message from Defendant Demone responding to the November 1 MPIA request. *See* Ex. B, E-mail Correspondence Between Demone and ACLU of Maryland.

27. Defendant Demone's December 1 response stated, in relevant part, "the City of Salisbury does not have in its possession any documents" responsive to Plaintiffs' November 1 application. Ex. B, E-mail Correspondence Between Demone and ACLU of Maryland.

28. That same day, in follow-up to Defendant Demone's response, Plaintiffs asked for clarification as to whether Demone was responding in his capacity of record custodian for both for the City and for the SPD. Plaintiffs asked whether Demone was contending that neither the City nor SPD possessed any of the requested information. Plaintiffs' follow-up also advised Mr. Demone that Plaintiffs were previously informed by City officials that all information requests for either the City or the SPD must be made to him, as Public Information Officer for both. Ex. B, E-mail Correspondence Between Demone and ACLU of Maryland.

29. Defendant Demone responded to Plaintiffs' December 1 inquiry by reiterating that "SPD does not have the requested documents" or "any documents related to litigation." Defendant Demone then noted that "the City is represented by Local Government Insurance Trust," but never indicated the relevance of this representation to Plaintiffs' application and inquiries. Ex. B, E-mail Correspondence Between Demone and ACLU of Maryland.

30. Defendant Demone never stated or otherwise suggested that the requested documents either did not exist or fell within any disclosure exemption under the MPIA.

31. Defendant Demone's responses never cited legal authority for either the failure to produce the requested documents or Plaintiffs' appeal rights concerning the non-inspection. *See* Md. Code G.P § 4-203(c)(1).

32. On December 9, 2016, Plaintiffs sent another request for the same documents and records, this time to Salisbury Mayor Jacob Day and SPD Police Chief Barbara Duncan, and enclosed Plaintiffs' November 1, 2016 MPIA application. Plaintiffs also copied the Salisbury City Solicitor and Defendant Demone on this December 9 request. *See* Ex. C, Pls.' Second MPIA App.

33. The December 9, 2016 request not only reiterated the initial MPIA application, it emphasized the gravity of Defendants' failure to produce the documents, particularly in light of the significant public interest in police accountability and transparency in Maryland. Ex. C, Pls.' Second MPIA App.

34. To date, Plaintiffs have received no response to their December 9, 2016 correspondence.

### COUNT I

#### **Improper Denial of Access to Public Records; Failure to Disclose Public Records In Accordance with the Maryland Public Information Act, Md. Code G.P. §§ 4-101, *et seq.***

35. Plaintiffs ACLU of Maryland and TRNN incorporate by reference the allegations set forth in paragraphs 1-34 as if fully set forth herein.

36. The MPIA states, "All persons are entitled to have access to information about the affairs of government and the official acts of public officials and employees." Md. Code G.P. § 4-103(a). Further, the MPIA "shall be construed in favor of allowing inspection of a public record." Md. Code G.P. § 4-103(b).

37. The MPIA requires that, "[e]xcept as otherwise provided by law, a custodian shall allow a person or governmental unit to inspect any public record at any reasonable time." Md. Code G.P. § 4-201(a)(1).



46. Accordingly, Defendants have violated the MPIA for failing to allow inspection of the public records requested by Plaintiffs ACLU of Maryland and TRNN.

47. Defendants also violated the MPIA for failure to issue a timely response to Plaintiffs' December 9, 2016 request, and for failure to provide all information required when denying inspection of public records. Md. Code G.P. § 4-203(b)(3); § 4-203(c).

#### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs American Civil Liberties Union Foundation of Maryland and The Real News Network respectfully request that this Court:

(1) Enter declaratory judgment in favor of Plaintiffs American Civil Liberties Union Foundation of Maryland and The Real News Network, and issue an order declaring that Defendants City of Salisbury, the Salisbury Police Department and Salisbury Public Information Officer Christopher M. Demone have violated the MPIA by failing to produce the public records requested by Plaintiffs in a timely manner;

(2) Enter an injunction preventing Defendants from withholding the public records sought by Plaintiffs and ordering Defendants to produce to Plaintiffs American Civil Liberties Union Foundation of Maryland and The Real News Network, or otherwise permit Plaintiffs to inspect and copy, any and all public records within Defendants' possession, custody, or control that fall within the scope of Plaintiffs' November 1, 2016 MPIA application;

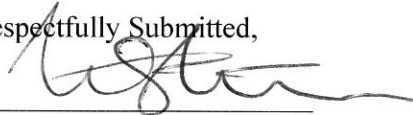
(3) Award Plaintiffs American Civil Liberties Union Foundation of Maryland and The Real News Network actual and statutory damages, as authorized by the MPIA, Md. Code G.P. § 4-362(d);

(4) Award Plaintiffs American Civil Liberties Union Foundation of Maryland and The Real News Network the costs they have incurred, including counsel fees and litigation costs, in maintaining this action, as authorized under the MPIA, Md. Code G.P. § 4-362(f); and

(5) Grant Plaintiffs American Civil Liberties Union Foundation of Maryland and The Real News Network such other relief as the Court deems just and proper.

Date: June 29, 2017

Respectfully Submitted,



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*Counsel for Plaintiffs*  
*ACLU of Maryland and TRNN*

IN THE CIRCUIT COURT FOR Baltimore City

(City or County)

CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: [X] PLAINTIFF [ ] DEFENDANT CASE NUMBER (Clerk to insert)

CASE NAME: ACLU of Md. and Real News Network vs. City of Salisbury, et al. Plaintiff Defendant

PARTY'S NAME: PHONE:

PARTY'S ADDRESS:

PARTY'S E-MAIL:

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Paul W. Kalish PHONE: (202) 624-2500

PARTY'S ATTORNEY'S ADDRESS: 1001 Pennsylvania Ave. NW, Washington, DC 20004

PARTY'S ATTORNEY'S E-MAIL: pkalish@crowell.com

JURY DEMAND? [ ] Yes [X] No

RELATED CASE PENDING? [ ] Yes [X] No If yes, Case #(s), if known:

ANTICIPATED LENGTH OF TRIAL?: hours 1 days

PLEADING TYPE

New Case: [X] Original [ ] Administrative Appeal [ ] Appeal

Existing Case: [ ] Post-Judgment [ ] Amendment

If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

TORTS

- [ ] Asbestos
[ ] Assault and Battery
[ ] Business and Commercial
[ ] Conspiracy
[ ] Conversion
[ ] Defamation
[ ] False Arrest/Imprisonment
[ ] Fraud
[ ] Lead Paint - DOB of Youngest Plt:
[ ] Loss of Consortium
[ ] Malicious Prosecution
[ ] Malpractice-Medical
[ ] Malpractice-Professional
[ ] Misrepresentation
[ ] Motor Tort
[ ] Negligence
[ ] Nuisance
[ ] Premises Liability
[ ] Product Liability
[ ] Specific Performance
[ ] Toxic Tort
[ ] Trespass
[ ] Wrongful Death

CONTRACT

- [ ] Asbestos
[ ] Breach
[ ] Business and Commercial
[ ] Confessed Judgment
[ ] (Cont'd)
[ ] Construction
[ ] Debt
[ ] Fraud

- [ ] Government
[ ] Insurance
[ ] Product Liability
PROPERTY
[ ] Adverse Possession
[ ] Breach of Lease
[ ] Detinue
[ ] Distress/Distrain
[ ] Ejectment
[ ] Forcible Entry/Detainer
[ ] Foreclosure
[ ] Commercial
[ ] Residential
[ ] Currency or Vehicle
[ ] Deed of Trust
[ ] Land Installments
[ ] Lien
[ ] Mortgage
[ ] Right of Redemption
[ ] Statement Condo
[ ] Forfeiture of Property / Personal Item
[ ] Fraudulent Conveyance
[ ] Landlord-Tenant
[ ] Lis Pendens
[ ] Mechanic's Lien
[ ] Ownership
[ ] Partition/Sale in Lieu
[ ] Quiet Title
[ ] Rent Escrow
[ ] Return of Seized Property
[ ] Right of Redemption
[ ] Tenant Holding Over

PUBLIC LAW

- [ ] Attorney Grievance
[ ] Bond Forfeiture Remission
[ ] Civil Rights
[ ] County/Mncpl Code/Ord
[ ] Election Law
[ ] Eminent Domain/Condemn.
[ ] Environment
[ ] Error Coram Nobis
[ ] Habeas Corpus
[ ] Mandamus
[ ] Prisoner Rights
[X] Public Info. Act Records
[ ] Quarantine/Isolation
[ ] Writ of Certiorari

EMPLOYMENT

- [ ] ADA
[ ] Conspiracy
[ ] EEO/HR
[ ] FLSA
[ ] FMLA
[ ] Workers' Compensation
[ ] Wrongful Termination

INDEPENDENT PROCEEDINGS

- [ ] Assumption of Jurisdiction
[ ] Authorized Sale
[ ] Attorney Appointment
[ ] Body Attachment Issuance
[ ] Commission Issuance

- [ ] Constructive Trust
[ ] Contempt
[ ] Deposition Notice
[ ] Dist Ct Mtn Appeal
[ ] Financial
[ ] Grand Jury/Petit Jury
[ ] Miscellaneous
[ ] Perpetuate Testimony/Evidence
[ ] Prod. of Documents Req.
[ ] Receivership
[ ] Sentence Transfer
[ ] Set Aside Deed
[ ] Special Adm. - Atty
[ ] Subpoena Issue/Quash
[ ] Trust Established
[ ] Trustee Substitution/Removal
[ ] Witness Appearance-Compel

PEACE ORDER

- [ ] Peace Order

EQUITY

- [ ] Declaratory Judgment
[ ] Equitable Relief
[ ] Injunctive Relief
[ ] Mandamus

OTHER

- [ ] Accounting
[ ] Friendly Suit
[ ] Grantor in Possession
[ ] Maryland Insurance Administration
[ ] Miscellaneous
[ ] Specific Transaction
[ ] Structured Settlements

**IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)**

- |  |   |  |   |
|--|---|--|---|
| <input type="checkbox"/> Abatement               | <input type="checkbox"/> Earnings Withholding   | <input type="checkbox"/> Judgment-Interest           | <input type="checkbox"/> Return of Property     |
| <input type="checkbox"/> Administrative Action   | <input type="checkbox"/> Enrollment             | <input type="checkbox"/> Judgment-Summary            | <input type="checkbox"/> Sale of Property       |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement            | <input type="checkbox"/> Liability                   | <input type="checkbox"/> Specific Performance   |
| <input type="checkbox"/> Arbitration             | <input type="checkbox"/> Findings of Fact       | <input type="checkbox"/> Oral Examination            | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination     | <input type="checkbox"/> Foreclosure            | <input type="checkbox"/> Order                       | <input type="checkbox"/> Writ-Execution         |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction             | <input type="checkbox"/> Ownership of Property       | <input type="checkbox"/> Writ-Garnish Property  |
| <input type="checkbox"/> Cease & Desist Order    | <input type="checkbox"/> Judgment-Affidavit     | <input type="checkbox"/> Partition of Property       | <input type="checkbox"/> Writ-Garnish Wages     |
| <input type="checkbox"/> Condemn Bldg            | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order                 | <input type="checkbox"/> Writ-Habeas Corpus     |
| <input type="checkbox"/> Contempt                | <input type="checkbox"/> Judgment-Confessed     | <input type="checkbox"/> Possession                  | <input type="checkbox"/> Writ-Mandamus          |
| <input type="checkbox"/> Court Costs/Fees        | <input type="checkbox"/> Judgment-Consent       | <input type="checkbox"/> Production of Records       | <input type="checkbox"/> Writ-Possession        |
| <input type="checkbox"/> Damages-Compensatory    | <input type="checkbox"/> Judgment-Declaratory   | <input type="checkbox"/> Quarantine/Isolation Order  |   |
| <input type="checkbox"/> Damages-Punitive        | <input type="checkbox"/> Judgment-Default       | <input type="checkbox"/> Reinstatement of Employment |   |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded.  Liability is not conceded, but is not seriously in dispute.  Liability is seriously in dispute.

**MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)**

- Under \$10,000       \$10,000 - \$30,000       \$30,000 - \$100,000       Over \$100,000
- Medical Bills \$ \_\_\_\_\_       Wage Loss \$ \_\_\_\_\_       Property Damages \$ \_\_\_\_\_

**ALTERNATIVE DISPUTE RESOLUTION INFORMATION**

- Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)
- A. Mediation       Yes       No      C. Settlement Conference       Yes       No
- B. Arbitration       Yes       No      D. Neutral Evaluation       Yes       No

**SPECIAL REQUIREMENTS**

- If a Spoken Language Interpreter is needed, **check here and attach form CC-DC-041**
- If you require an accommodation for a disability under the Americans with Disabilities Act, **check here and attach form CC-DC-049**

**ESTIMATED LENGTH OF TRIAL**

*With the exception of Baltimore County and Baltimore City, please fill in the estimated **LENGTH OF TRIAL**.*

*(Case will be tracked accordingly)*

- |   |   |
|---|---|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time           |
| <input type="checkbox"/> 1 day of trial time      | <input type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time     |   |

**BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM**

*For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.*

- Expedited**- Trial within 7 months of Defendant's response       **Standard** - Trial within 18 months of Defendant's response

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE  
MANAGEMENT PROGRAM (ASTAR)**

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.*

- Expedited** - Trial within 7 months of Defendant's response       **Standard** - Trial within 18 months of Defendant's response

**IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.**

**CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)**

- Expedited      Trial 60 to 120 days from notice. Non-jury matters.
- Civil-Short      Trial 210 days from first answer.
- Civil-Standard      Trial 360 days from first answer.
- Custom      Scheduling order entered by individual judge.
- Asbestos      Special scheduling order.
- Lead Paint      Fill in: Birth Date of youngest plaintiff.....
- Tax Sale Foreclosures      Special scheduling order.
- Mortgage Foreclosures      No scheduling order.

**CIRCUIT COURT FOR BALTIMORE COUNTY**

- Expedited (Trial Date-90 days)      Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
- Standard (Trial Date-240 days)      Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases.
- Extended Standard (Trial Date-345 days)      Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
- Complex (Trial Date-450 days)      Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

June 29, 2017  
Date

1001 Pennsylvania Ave. NW  
Address

Washington      DC      20910  
City      State      Zip Code

*/s/ Paul Kalish*

Signature of Counsel / Party

Paul W. Kalish

Printed Name