

PETITION OF WOMEN AGAINST
PRIVATE POLICE FOR JUDICIAL
REVIEW OF THE DECISION OF THE
MARYLAND STATE BOARD OF
ELECTIONS

* IN THE CIRCUIT COURT FOR
* ANNE ARUNDEL COUNTY

*
*
*
*
*
*

* CIVIL ACTION NO: C-02-CV-19-001327

WOMEN AGAINST PRIVATE POLICE, *et*
al.,

*
*
*

Plaintiffs,

*
*

v.

*
*

MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,

*
*
*

Defendants.

*

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

1. Plaintiffs, through their undersigned counsel, hereby move, pursuant to Rule 2-501(a), for summary judgment on the grounds that there is no genuine dispute regarding any material fact and that they are entitled to judgment as a matter of law.

2. For support of this motion, Plaintiffs rely on their Memorandum in Support of Petition for Judicial Review and in Support of Plaintiffs' Motion for Summary Judgment filed contemporaneously herewith.

WHEREFORE, Plaintiffs request that the Court:

- a) Grant this motion and enter judgment in their favor;
- b) Vacate the Defendants' Advance Determinations of non-referability of the Plaintiffs' petition of 2019 Md. Laws, ch. 25 to a vote of the electorate;
- c) Declare that Sections 2 and 3 of 2019 Md. Laws, ch. 25 are eligible for referral to the ballot pursuant to Md. Const. Art. XVI, § 1;

- d) Order, as the only adequate remedy, that the deadlines for Plaintiffs to submit petition signatures shall each be extended for nine days, to June 9, 2019, and July 9, 2019, respectively;
- e) Order that the Defendants shall complete all steps related to the certification process for Plaintiffs' petition with all necessary speed and without reference to the Advance Determinations vacated hereby; and
- f) Grant such other and further relief as the Court deems appropriate to assure the integrity of the electoral process.

Dated May 14, 2019

Respectfully submitted,

/s/

David R. Rocah
Senior Staff Attorney
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MARYLAND
3600 Clipper Mill Rd., Suite 350
Baltimore, MD 21211
Tel: (410) 889-8555
Fax: (410) 366-7838
rocah@aclu-md.org
Client Protection Fund ID # 0312050001

/s/

Debra Gardner
Legal Director
PUBLIC JUSTICE CENTER
1 North Charles Street, Suite 200
Baltimore, MD 21201
Tel: (410) 625-9409
Fax: (410) 625-9423
gardnerd@publicjustice.org
Client Protection Fund ID # 8509010013

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 14th day of May, 2019, a copy of the foregoing Motion was filed and served on counsel of record by MDEC, and sent via e-mail to the following:

Andrea W. Trento
Assistant Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
atrento@oag.state.md.us

_____/s/_____
David Rocah