
CITY OF BALTIMORE

BERNARD C. "JACK" YOUNG
Mayor



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CIRCUIT COURT FOR
BALTIMORE CITY
DEPARTMENT OF LAW
DANA P. MOORE, ACTING CITY SOLICITOR
100 N. HOLLIDAY STREET
SUITE 101, CITY HALL
BALTIMORE, MD 21202
JUL 13 2020 2:28 PM
CIVIL DIVISION

July 13, 2020

VIA EMAIL

The Honorable Videtta A. Brown
Courthouse East
111 N. Calvert Street, Room 205
Baltimore, MD 21202
Sameerah.mickey@mdcourts.gov

Re: *Mayor and City Council of Baltimore v. BP P.L.C. et al.*,
Case No.: 24-C-18-004219

Dear Judge Brown,

The Mayor and City Council of Baltimore ("City") write in response to Defendants' letter, dated July 8, 2020 ("Defs' Letter"), concerning the issues raised in Your Honor's Hearing Letter #3, dated July 1, 2020. Defendants' letter requests a total and indefinite stay of proceedings in this case pending resolution of two matters that neither control nor dispose of any issue before the Court, and which lack even a set schedule for disposition. Defendants have made their request without submitting a noticed motion, in violation of the rules of Maryland courts, and without engaging the elements courts must consider in ruling on a stay. The City reiterates its position that further postponing rulings on preliminary motions is unwarranted, and would be highly prejudicial to the just and timely adjudication of this important case.

First, Defendants are simply wrong that "[i]f the Supreme Court grants certiorari and rules in favor of Defendants, this case likely would return to federal court . . ." Defs' Letter at 1. The question presented in Defendants' certiorari petition does not challenge the merits of U.S. District Judge Hollander's order remanding the case to this Court, but rather asks whether that order is appealable in whole (as Defendants

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in ' H I H Q G D Q W V · O H W W H U U H T X H W W V D W R W D O certiorari petition does not challenge the merits of U.S. District - X G J H + R O O D Q G H U
Order
remanding the case to this Court, but rather asks whether that order is appealable in whole (as Defendants

