

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

GITANJALI DEANE & LISA POLYAK; *
ALVIN WILLIAMS & NIGEL SIMON;
TAKIA FOSKEY & JOANNE RABB; *
JODI KELBER-KAYE & STACEY KARGMAN-KAYE;
DONNA MYERS & MARIA BARQUERO; *
JOHN LESTITIAN;
CHARLES BLACKBURN & GLEN DEHN; *
STEVEN PALMER & RYAN KILLOUGH;
PATRICK WOJAHN & DAVID KOLESAR; and *
MIKKOLE MOZELLE & PHELICIA KEBREAU, *

Plaintiffs,

v.

Case No. 24-C-04-005390

FRANK CONAWAY, in his official capacity as *
Baltimore City Circuit Court Clerk; *
ROSALYN PUGH, in her official capacity as *
Prince George’s County Circuit Court Clerk; *
EVELYN ARNOLD, in her official capacity as *
St. Mary’s County Circuit Court Clerk; *
DENNIS WEAVER, in his official capacity as *
Washington County Circuit Court Clerk; and *
MICHAEL BAKER, in his official capacity as *
Dorchester County Circuit Court Clerk, *

Defendants.

* * * * *

PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 2-501, Plaintiffs respectfully move the Court for entry of summary judgment in their favor and against Defendants on all counts. The grounds for this motion are set forth in the memorandum and exhibits that accompany and are filed in support of this motion. For the reasons stated in the memorandum, Plaintiffs’ motion for summary judgment should be granted. A proposed order is attached.

WHEREFORE, Plaintiffs respectfully request that the Court enter an order granting their motion for summary of judgment.

Respectfully submitted,



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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 14th day of June, 2005, copies of the foregoing motion and accompanying memorandum, exhibits, and proposed order were mailed via first class mail, postage prepaid, to:

J. Joseph Curran, Jr., Attorney General
Margaret Ann Nolan, Assistant Attorney General
Steven M. Sullivan, Assistant Attorney General
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Attorneys for Defendants



Andrew H. Baida

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MICHAEL BAKER, in his official capacity as *
Dorchester County Circuit Court Clerk, *

Defendants. *

* * * * *

ORDER

Upon consideration of Plaintiffs' Motion for Summary Judgment, Defendants' response thereto, and the entire record in this matter, it is this _____ day of _____, 2005, ORDERED that

1. Plaintiffs' Motion for Summary Judgment is GRANTED; and

2. Judgment is entered in favor of Plaintiffs and against Defendants on all counts, with costs to be paid by Defendants.

The Honorable M. Brooke Murdock
Judge, Circuit Court for Baltimore City, Maryland

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**PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**