

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

LEADERS OF A BEAUTIFUL STRUGGLE
et al.,

Plaintiffs,

v.

BALTIMORE POLICE DEPARTMENT
et al.,

Defendants.

No. 20-cv-929-RDB

JOINT MOTION FOR ENTRY OF AGREED ORDERS
OF EXPUNGEMENT AND DISMISSAL

Plaintiffs Leaders of a Beautiful Struggle, Erricka Bridgeford, and Kevin James (“Plaintiffs”), and Defendants Baltimore Police Department and Baltimore Police Commissioner Michael S. Harrison in his official capacity (“Defendants”), hereby jointly move this Court to enter the attached Order for Expungement of Records, and Agreed Order of Dismissal (the “Orders”). In support of this Motion, the parties state the following:

1. On January 5, 2022, Plaintiffs entered into a Settlement Agreement with Defendants (the “Settlement Agreement”). The Settlement Agreement with signature pages and exhibits is attached hereto.

2. The Settlement Agreement has been approved by all of the necessary parties.

3. The Settlement Agreement explicitly contemplates the entry of the requested Orders in ¶¶ 5 and 10, and the conditions precedent to this request have been satisfied.

Accordingly, for all the foregoing reasons, the parties hereby respectfully request that this Court grant this Motion and enter the Order of Expungement and Agreed Order of Dismissal.

February 11, 2022

Ashley Gorski*
Brett Max Kaufman*
Nathan Freed Wessler*
Ben Wizner*
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
T: 212.549.2500
F: 212.549.2654
agorski@aclu.org
bkaufman@aclu.org
nwessler@aclu.org
bwizner@aclu.org

* *pro hac vice*

Respectfully submitted,

/s/ David R. Rocah
David R. Rocah (Bar No. 27315)
American Civil Liberties Union Foundation of
Maryland
3600 Clipper Mill Road, Suite 350
Baltimore, MD 21211
T: 410.889.8555
F: 410.366.7838
rocah@aclu-md.org

Counsel for Plaintiffs

James L. Shea
Baltimore City Solicitor

/s/
(Signed by David Rocah with permission of Elisabeth S. Walden)
Elisabeth S. Walden (Bar No. 28684)
Chief, Police Legal Affairs

Kara K. Lynch (Bar. No. 29351)
Chief Solicitor

Baltimore City Law Department
100 N. Holliday Street, Room 101
Baltimore, Maryland 21202
T: 410-396-2496
F: 410-396-2126
lisa.walden@baltimorepolice.org
kara.lynch@baltimorepolice.org

Counsel for Defendants