

IN THE CIRCUIT COURT FOR BALTIMORE CITY

ACCOUNTABILITY & OVERSIGHT,  
P.C.,

*Plaintiff,*

v.

BRIAN E. FROSH,

*Defendant.*

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\* No. 24-C-19-001095 OC

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**MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**

Pursuant to Maryland Rule 16-912, Defendant, Brian E. Frosh, through counsel, moves the Court to enter an order to permit filing of the attached exhibit under seal because the exhibit contains confidential information covered by the attorney-client privilege.

1. This case is brought under the Public Information Act and challenges the decision of the Office of the Attorney General of Maryland to redact portions of a document on the grounds that the redacted passages are covered by the attorney-client privilege. *See* Md. Code Ann., Gen. Prov. § 4-301(a)(1) (exempting from disclosure under the Act documents that are privileged by law).

2. Plaintiff attached as Exhibit C to its Memorandum of Law in Support of Motion for Summary Judgment a redacted version of the exhibit to be sealed, which the Office had provided in response to the plaintiff's PIA request.

3. The attached exhibit is an unredacted version of that document, with the redacted passages highlighted for the Court's convenience should it wish to exercise its

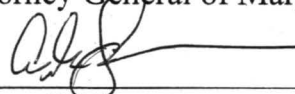
authority to examine the record *in camera*, as § 4-362(c)(2) of the General Provisions Article allows. The exhibit is in support of the simultaneously filed Defendant's Response to Motion for Summary Judgment and Memorandum in Support of Cross-Motion for Summary Judgment.

4. To facilitate the Court's *in camera* review without compromising the attorney-client privilege, the Defendant respectfully requests that the Court seal the exhibit and prohibit its disclosure to anyone other than the Court.

5. Should the Court deny this motion and elect not to conduct an *in camera* review, defendant requests that the undersigned counsel be notified so that the document may be retrieved.

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland



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**SEALED EXHIBIT**

The attached exhibit to Defendant's Response to Motion for Summary Judgment and Memorandum in Support of Cross-Motion for Summary Judgment is filed under seal for the Court's *in camera* review and is not available for inspection by the public.