

IN THE SUPREME COURT OF MARYLAND

No. 11, September Term, 2025

MAYOR AND CITY COUNCIL OF BALTIMORE,
Appellant,

v.

B.P. P.L.C., et al.,
Appellees.

ANNE ARUNDEL COUNTY,
Appellant,

v.

B.P. P.L.C., et al.,
Appellees.

CITY OF ANNAPOLIS,
Appellant,

v.

B.P. P.L.C., et al.,
Appellees.

On Appeal from the Circuit Courts for Baltimore City (Hon. Videtta Brown)
and Anne Arundel County (Hon. Steven Platt)

CONSENT MOTION FOR LEAVE TO FILE AMICUS BRIEF

The United States hereby moves for leave to file the proposed amicus curiae brief accompanying this motion under Maryland Rule 8-511. The parties have consented to the relief requested in this motion and have agreed to waive service of hard copies. A copy of the proposed amicus brief is attached with this motion as required by Maryland Rule 8-511(b)(2).

Respectfully submitted,

ADAM R.F. GUSTAFSON
Acting Assistant Attorney General

/s/ Frederick H. Turner
FREDERICK H. TURNER (AIS #1112150228)
Senior Trial Attorney
Wildlife and Marine Resources Section
Environment and Natural Resources Division
U.S. Department of Justice
Post Office Box 7611
Washington, D.C. 20044
Phone: (202) 305-0641
Fax: (202) 305-0275
Email: frederick.turner@usdoj.gov

KYLE GLYNN (*pro hac vice* pending)
Attorney
Appellate Section
Environment and Natural Resources Division
U.S. Department of Justice
Post Office Box 7415
Washington, D.C. 20044
Phone: (202) 514-4786
Fax: (202) 353-1873
Email: kyle.glynn@usdoj.gov

July 15, 2025
DJ 90-12-05266

CERTIFICATE OF SERVICE

I certify that, on this 15th day of July, 2025, a copy of the document titled Consent Motion for Leave to File Amicus Brief was filed electronically and served electronically by the MDEC system on all persons entitled to service.

/s/ *Frederick H. Turner*

FREDERICK H. TURNER

Counsel for the United States