

IN THE SUPREME COURT OF MARYLAND

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No. 11, September Term, 2025

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MAYOR AND CITY COUNCIL OF BALTIMORE,  
*Appellant,*

v.

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

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ANNE ARUNDEL COUNTY,  
*Appellant,*

v.

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

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CITY OF ANNAPOLIS,  
*Appellant,*

v.

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

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

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**MOTION FOR WAIVER OF SPECIAL ADMISSION FEE**

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The United States hereby requests that the fee required pursuant to Code, Courts and Judicial Proceedings Article, § 7-202(f), and submitted with the July 15, 2025 Motion for Special Admission of Out-of-State Attorney, Kyle Glynn, be waived.

Maryland Rule 19-305.5(d)(2) provides that “[a]n attorney admitted in another United States jurisdiction, and not disbarred or suspended from practice in any jurisdiction, may provide legal services in this jurisdiction . . . that the attorney is authorized to provide by federal law.” Under federal law, “any officer of the Department of Justice[] may be sent . . . to any State . . . to attend to the interests of the United States in a suit pending . . . in a court of a State.” 28 U.S.C. § 517. As a result, Department of Justice attorneys may conduct “any kind of legal proceeding” in which the United States is concerned, regardless of whether they reside in the state or district in which the proceeding is brought. *Id.* § 515(a).

Mr. Glynn is an attorney of the Department of Justice’s Environment and Natural Resources Division, Appellate Section, is a member in good standing of the Bar of the District of Columbia (D.C. Bar #90005572), and is not disbarred or suspended from practice in any jurisdiction. Pursuant to the statutes discussed above, courts routinely waive fee requirements for counsel appearing on behalf of the United States. *See, e.g.,* Local Rules for the United States District Courts for the

Southern and Eastern Districts of New York, Local Civil Rule 1.3(c) & accompanying committee note.

For the foregoing reasons, the United States requests that the fee required pursuant to Code, Courts and Judicial Proceedings Article, § 7-202(f), be waived.

Respectfully submitted,

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/s/ Frederick H. Turner  
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July 15, 2025  
DJ 90-12-0526

## **CERTIFICATE OF SERVICE**

I certify that, on this 15th day of July, 2025, a copy of the document titled Motion for Waiver of Special Admission Fee 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