

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)

**MOTION FOR SPECIAL ADMISSION
OF OUT-OF-STATE ATTORNEY**

I, Frederick H. Turner, a member in good standing of the Bar of the State of Maryland and an attorney for Amicus Curiae the United States, hereby move that this Court admit Kyle Glynn for the limited purpose of appearing and participating in this case as co-counsel. Kyle Glynn is a member in good standing of the Bar of the District of Columbia (D.C. Bar #90005572), and his out-of-state attorney information is as follows:

Kyle Glynn
Attorney
Appellate Section
Environment and Natural Resources Division
U.S. Department of Justice
Post Office Box 7415
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Unless the court has granted a motion for reduction or waiver, the \$100.00 fee required by Code, Courts and Judicial Proceedings Article, § 7-202(f) is included with this motion.

I do not request that my presence be waived under Rule 19-217(d).

Respectfully submitted,

ADAM R.F. GUSTAFSON

Acting Assistant Attorney General

/s/ Frederick H. Turner

FREDERICK H. TURNER (AIS #1112150228)

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July 15, 2025

DJ 90-12-05266

CERTIFICATE AS TO SPECIAL ADMISSION

I, Kyle Glynn, certify on this 15th day of July, 2025, that during the preceding five years, I have been specially admitted in the State of Maryland zero times. I have never been issued any of the following unique identifying numbers by the Maryland Judiciary: Attorney Information System, Client Protection Fund, Maryland Electronic Courts (MDEC).

/s/ Kyle Glynn

KYLE GLYNN (D.C. Bar #90005572)

Attorney

Appellate Section

Environment and Natural Resources Division

U.S. Department of Justice

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CERTIFICATE OF SERVICE

I certify that, on this 15th day of July, 2025, a copy of the document titled Motion for Special Admission of Out-of-State Attorney 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