

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JAMIEN PALMER, *et al.*

\*

*Plaintiffs,*

\*

v.

\*

Civil Action No. 1:22-cv-00899-LKG

STATE OF MARYLAND, *et al.*,

\*

*Defendants.*

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\* \* \* \* \*

**DEFENDANTS' MOTION TO DISMISS**

Defendants, the State of Maryland (the “State”), the Maryland Department of Public Safety and Correctional Services (“DPSCS”), the Maryland Division of Pretrial Detention and Services (“DPDS”), and Frederick T. Abello, former Warden of the Baltimore City Booking and Intake Center (“Warden Abello”) (collectively “Defendants”), by and through their attorneys, Anthony G. Brown, Attorney General of Maryland, and Michael O. Doyle, Merrillyn E. Ratliff and Veronica N. Love, Assistant Attorneys General, hereby move under Fed. R. Civ. P. 12(b)(6) for dismissal of Counts III and IV of the First Amended Complaint in their favor, as set forth more fully in the attached memorandum of law, which is incorporated herein by reference.

Respectfully submitted,

ANTHONY G. BROWN  
Attorney General of Maryland

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/s/  
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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2023, the foregoing Motion to Dismiss was served on counsel of record by electronic means.

/s/

MERRILYN E. RATLIFF