

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RAYMOND WOOLLARD, *et al.*, *
Plaintiffs, *
v. * Civil Case No. 1:10-cv-2068-BEL
MARCUS BROWN, *et al.*, *
Defendants. *

* * * * *

RENEWED MOTION FOR STAY PENDING APPEAL

The defendants, through counsel, hereby renew their motion under Rule 62(c) for an order granting a stay of this Court’s March 2, 2012 Order (entered March 5, 2012) (ECF No. 53), as amended by this Court’s March 30, 2012 Order (entered April 2, 2012) (ECF No. 63).¹ This motion is based on the reasons stated in the defendants’ Motion for Clarification or Amendment of Order and for Immediate Stay Pending Appeal (ECF No.

¹ At the time the defendants filed the original motion for stay, they had not yet filed a notice of appeal. The notice of appeal (ECF No. 64) was filed on April 2, 2012. Because Rule 62(c) is applicable “[w]hile an appeal is pending,” the defendants now renew that motion.

54), at 1-3 and 7-19, which is hereby incorporated by reference, as well as the reasons to be stated in supplemental briefing pursuant to the March 30, 2012 Order (ECF No. 63).

Respectfully submitted,

DOUGLAS F. GANSLER
Attorney General of Maryland

DAN FRIEDMAN (Fed. Bar # 24535)
Assistant Attorney General
Office of the Attorney General
Legislative Services Building
90 State Circle, Room 104
Annapolis, Maryland 21401
Tel. 410-946-5600
dfriedman@oag.state.md.us

/s/

MATTHEW J. FADER (Fed. Bar # 29294)
STEPHEN M. RUCKMAN (Fed. Bar # 28981)
Assistant Attorneys General
200 St. Paul Place, 20th Floor
Baltimore, Maryland 21202
Tel. 410-576-7906
Fax. 410-576-6955
mfader@oag.state.md.us
sruckman@oag.state.md.us

April 19, 2012

Attorneys for Defendants