

IN THE CIRCUIT COURT FOR  
BALTIMORE COUNTY

**Rhanda P. Gaines,**  
Personal Representative of the  
Estate of Korryn Shadawn Gaines  
816 Crimson Ave,  
Baltimore, MD 21229

Plaintiff,

**Rhanda P. Gaines,**  
on behalf of herself and as  
Guardian on behalf of her  
minor grandchild, K. Gaines  
816 Crimson Ave,  
Baltimore, MD 21229

Plaintiff,

**Kareem K. Courtney,**  
the father and legal custodian  
of said child, K. Gaines  
2800 Clifton Avenue  
Baltimore, Maryland 21216

Plaintiff,

**To the use of Corey Cunningham,**  
father of minor child Kodi Gaines,  
*unrepresented by instant counsel*  
711 St. Paul St.  
Baltimore, MD 21202

Use-Plaintiff,

**To the use of Ryan Gaines, Sr.,**  
father of decedent, Korryn Gaines  
*unrepresented by instant counsel*  
300 South Herring Court  
Baltimore, MD 21231

Use-Plaintiff

v.

Case No.

JURY DEMAND

RECEIVED AND FILED  
2015 SEP 13 11:54  
CLERK OF CIRCUIT COURT  
BALTIMORE COUNTY

**Baltimore County Maryland**  
400 Washington Avenue, Mailstop 2M01A  
Old Courthouse Mezzanine  
Towson, Maryland 21204

And

**Officer First Class Ruby**  
(Official and Individual Capacity)  
Baltimore County Police Department  
Support Operations Division  
700 E. Joppa Road  
Towson, Maryland 21286

Defendants.

COMPLAINT

1. The Plaintiff, Rhanda P. Gaines, Personal Representative of the Estate of Korryn Shadawn Gaines, deceased; Rhanda P. Gaines on behalf of herself and as Guardian on behalf of her minor grandchild, K. Gaines, and Plaintiff Kareem K. Courtney, the father and legal custodian of said child, K. Gaines; (to the use of Plaintiff Corey Cunningham, the father of minor child Kodi Gaines –unrepresented by instant counsel) by and through their attorneys, J. Wyndal Gordon, Esq. and The Law Office of J. Wyndal Gordon, P.A., and Jimmy A. Bell, Esq. and the Law Office of Jimmy Bell, L.L.C., present this Complaint for Wrongful Death and Survival Action; (for violation of Maryland Declaration of Rights Articles 10, 24, 26 (Suppression of Speech; Excessive Force; Gross Negligence (failure to train and failure to supervise) against Defendant Baltimore County, Maryland, Defendant Officer Rudy. The last known address of each use-plaintiff is listed above in the caption and the party bringing the action, Rhanda P. Gaines, Personal Representative of the Estate of Korryn Shadawn Gaines, conducted a good faith and reasonably diligent effort to identify, locate, and name, as use plaintiffs, all individuals who might qualify as such. The Plaintiff states as follows:

JURISDICTION AND VENUE

2. Plaintiffs brings before this Circuit Court a civil action with an amount in controversy that exceeds \$75,000 as reflected in Maryland Rule 2-305(b) and consistent with MD. COURTS AND JUDICIAL PROCEEDINGS CODE ANN. § 1- 501.
3. Defendant Baltimore County, Maryland is a chartered county established under MD. ANN. CODE ART. 25A and, as such, is a person or entity *sui juris* organized under the laws of the State of Maryland over whom this Court may exercise personal jurisdiction. See, MD. ANN. CODE ART. 25A; MD. COURTS AND JUDICIAL PROCEEDINGS CODE ANN. 6-102.
4. Venue is properly laid as the acts herein complained of occurred in Baltimore County, Maryland where the physical injuries and death occurred.



## STATEMENT OF FACTS

5. The Plaintiff, Rhanda P. Gaines, Personal Representative of the Estate of Korryn Shadawn Gaines, deceased.
6. Plaintiff, Rhanda P. Gaines brings this lawsuit on behalf of herself and as Guardian on behalf of her minor grandchild, K. Gaines.
7. Plaintiff Kareem K. Courtney, the father and legal custodian of said child, K. Gaines brings this lawsuit on behalf of K. Gaines.
8. This claim is being brought to the use of Plaintiff Corey Cunningham, the father of minor child Kodi Gaines, who is also decedent Korryn Gaines' biological son. They are not represented by undersigned counsel; they are represented by Kenneth Ravenell, Esq., Baltimore, Maryland; and to the use of Plaintiff Ryan Gaines, Sr., who is the biological father of Korryn Gaines. Ryan Gaines is not represented by undersigned counsel; he is represented by Landon White, Esq., Baltimore, Maryland.
9. Defendant Baltimore County, Maryland is a chartered county established under Maryland law. The Baltimore County Police Department is an agency of Defendant Baltimore County, Maryland.
10. Defendant Officer Ruby is a Baltimore County Police Officer who on August 1, 2016, illegally and unconstitutionally shot and killed Korryn Shadawn Gaines in her own apartment while he was on duty and/or acting within the scope of his employment. Defendant Officer Rudy shooting and killing of Korryn Shadawn Gaines was done with malice and constituted excessive force. Therefore, his conduct is not subject to public official immunity.
11. At all times mentioned herein, Defendant Officer Rudy was a sworn Baltimore County Police Officer for Defendant Baltimore County, Maryland. He was in full uniform, was an agent/employee for the Baltimore County Government, and his conduct was in furtherance of Baltimore County Government's interests of security and law enforcement. At all times mentioned herein, Defendant Rudy was acting, under color of law and with malice as his actions were motivated by ill will, and an improper motive exclusively driven by frustration rather than any perceived threat of injury, for the purpose of deliberately and willfully injuring Gaines.
12. Korryn Gaines, a 23 year old African-American woman and mother of two children, was illegally shot and killed by Officer Rudy, who is Caucasian, of the Baltimore County Police on August 1, 2016. Korryn was the daughter of Rhanda P. Gaines, who serves as the Personal Representative of Korryn's Estate, and Guardian of Korryn's one-year old child. Kareem Courtney is the father and legal custodian of said one-year old child. Courtney is employed as a HVAC Apprentice and is a graduate of TESST College HVAC. Korryn's mother is a retired psychiatric nurse formerly employed by Harbor Hospital and Bon Secours, and her biological father is a former dispatcher for the



Baltimore City Housing Police.

13. Korryn Gaines, graduated from Baltimore City College High School in 2010, which was founded in 1839 and is the third oldest public high school in the United States. It remains one of Baltimore's most highly regarded educational institutions. It was listed as one of Top High Schools in 2010, which was the same year Korryn Gaines graduated, as published in Baltimore Magazine; it was awarded a certificate of outstanding achievement on the 2010 Maryland High School Assessment from Baltimore City Public Schools; and listed in 2006, 2007, and 2008 as one of America's Top Public High Schools featured in Newsweek.com.
14. After graduating from high school Gaines enrolled at historic Morgan State University in the fall of semester of 2010 where she majored in political science. When Gaines learned she was pregnant with her first child, she began working as a hairstylist to support herself with hopes of one day returning to school and completing her degree.
15. On August 1, 2016, Korryn Gaines was illegally shot and killed in front of one of her two children by Officer Ruby not because he was fearful or perceived her as a threat but because he grew frustrated with the amount of time it was taking for Korryn to surrender to authorities and had had enough of County officers attempting to negotiate her surrender after a 7hr standoff as more fully described below.
16. Korryn Gaines was at her apartment located in Baltimore County Maryland, when she was gunned down by Officer Ruby, and incidentally, Gaines was not his first kill. Officer Ruby has shot and killed two people in less than 10 years while on duty as a Baltimore County officer acting under color of law. Unfortunately, in this instance, Officer Ruby acted with malice and had no legal justification for killing Korryn Gaines in light of the particular facts attendant to this case.
17. Fortunately, there were witnesses to the events that led to Gaines illegal and untimely death. In fact, an eye witness named Ramone Coleman, Korryn's next door neighbor, was home during the entire incident on August 1, 2016, and recalls the officers expression of frustration immediately prior to shots ringing out by police.
18. Coleman's apartment, directly adjacent to Gaines', was illegally commandeered and thereby seized by the Baltimore County Police SWAT Unit and used without Coleman's voluntary consent as a command post. Coleman was present during the entire incident as he was confined to his unit against his will while County officers configured his apartment to set up their systems and operation.
19. Around 8:30am – 8:45am Monday, August 1, 2016, Coleman heard several men yelling outside of the front door to his apartment unit. He went to the door to determine the source of the commotion, when he opened it, he observed several police officers in the hallway yelling at the top of their lungs.
20. Baltimore County police conceded that at least three officers went to Gaines' apartment unit to serve a bench warrant (not a search warrant) for failure to appear in court on July 13, 2016, for traffic violations and related misdemeanors. County police claimed they were present to serve Korryn Gaines, and Gaines' fiancé and father of her daughter, Kareem Courtney (who's address and drivers license show that he lives in Baltimore City



and has never lived with Korryn in Baltimore County), with an arrest warrant (again, not a search warrant) for an unrelated misdemeanor offense from June 18, 2016, involving Gaines.

21. Police knocked on the door but no one answered, even though the police station was right across the street from the Carriage Hill Apartment complex in which they lived, police didn't leave and come back a different day, but stayed to ratchet up the encounter. They did this in spite of not knowing whether Korryn or Kareem were in the home despite hearing the sounds of voices coming from inside. It was not confirmed who's voices were heard or whether they were the voices of Gaines, Courtney, or artificially produced by a television set.
22. Despite not having any further information about whether the subjects of the arrest warrant were inside the apartment unit, County officers, without a search warrant, obtained a key from building management and illegally opened the front door to search for who was inside in violation of Gaines' and Courtney's constitutional rights at the time.
23. Police failed to articulate any exigent circumstance, consent, nor any reasonable belief that Gaines and Courtney were in the apartment unit, and they further failed to obtain a search warrant to lawfully gain entry into Gaines' home.
24. The Baltimore County Police Department stated that police officers tried to open the door fully but it was secured by a chain-link lock. However, through the partially opened door, the officers observed Gaines sitting on the floor holding her lawfully purchased and possessed shotgun, and her five-year-old milling about nearby. Police concede that Gaines was the lawful owner of the gun that she purchased in 2015.
25. Meanwhile, Ramone Coleman, who lived next door was able to hear everything taking place between Gaines and County police because police had his door open for operational purposes and logistics. Coleman heard Gaines request to inspect a copy of the warrant and he also heard the police refuse to comply with this reasonable request. Coleman also heard Gaines inquire about the physical location of the warrant; none of the officers responded to her inquisition.
26. At about 9:00 a.m. County police seized Ramone Coleman's apartment unit and set up surveillance equipment in his home; they brought in four (4) big black boxes. These officers were identified as Baltimore County special-forces. They didn't have regular Baltimore County Police uniforms. Their uniforms were dark green, and they carried AR-15 assault rifles and 9mm handguns strapped near their knees.
27. The Baltimore County Special Forces team the tactical unit drilled holes in Coleman's living room, bedroom and bathroom walls to monitor the movements of his next door neighbor, Korryn Gaines, with surveillance equipment connected to TV-like monitors. County special-forces used this equipment to watch what was going on in Gaines' apartment from different angles. Coleman observed one of the tactical unit officers wearing a body camera mounted on his helmet.
28. About 25 minutes after police set up their command post, Kareem Courtney, and Courtney and Gaines' child, K. Gaines, exited the apartment unit, Courtney surrendered



to police. He was arrested on the spot then later released within hours on his own recognizance.

29. Between 10am and 10:30am, Korryn Gaines said to the police, "*if you put your guns down and back up from my apartment, I will come out.*" However, none of the police backed up from the apartment door.
30. At that time, at least eight (8) Baltimore County Police Officers were in the hallway right outside of Gaines' door; six - eight Baltimore County Tactical Unit Police were in Coleman's unit. The Tactical Unit police made sure Coleman's front door remained wide open at all times during the stand-off.
31. When the officers failed or refused to produce the arrest warrants and leave from in front of Gaines' unit after Gaines' demand, Gaines said "*leave me alone and get the hell away from my house.*" In response, Baltimore County Police escalated the confrontation into a full-blown standoff refusing all options to deescalate the situation beyond any point where police were committed to resolving it peacefully.
32. County police were observed turning away Gaines' family members who desperately seeking to offer help to the situation fearing that police would kill her because everyone was extremely hyped. Family members pleaded with officers to allow them to help deescalate the situation as they remained present in an additional command post during the standoff. However, they were never asked to assist police in bringing the standoff to a peaceful resolution. In fact, family members were told by County police Officers, early as 10 a.m., less than an hour into the standoff, that the situation was past the point where they could be useful. However, this was untrue because Gaines had a great relationship with her family present on the scene, and knowing Korryn Gaines, they could have spoken to her to get her to surrender. This was not a suicide, or hostage situation nor was it a barricade as County top brass publicly conceded because none of the negotiations between Gaines and police were recorded according to departmental policy, --it was indeed a standoff.
33. The Baltimore County Police admitted that they did not use their Crisis Team during the standoff but was unclear as to why. Incidentally, this "Mobile Crisis Team," according to the county website, can be dispatched for "suicidal subjects, mentally ill subjects, situational crisis, emergency petitions and other acute situations." Gaines' matter constituted a situational crisis or other acute situation for which the Crisis Team was established.
34. After the standoff extended into close to three hours, at 12:30 p.m., Baltimore County police applied for arrest warrant from a Baltimore County District Court Commissioner alleging that Gaines pointed a gun at them. No reason was given for the officers' request for the court to issue another arrest warrant if they truly already had valid arrest warrants for both Gaines and Courtney in their possession before their unlawful forced entry into Gaines' apartment unit with a key they obtained from Carriage Hill Apartments' rental office.
35. Incidentally, while the standoff was in full swing, Korryn Gaines was live-streaming it through social media to capture what the officers were doing to her in real time. When County police learned of her live-stream it had the social media outlets block her



streaming coverage. By blocking her live streaming, the Baltimore County Police Department not only suppressed her speech under the Maryland Constitution but also stopped the only independent audio-visual record of what was taking place before Officer Ruby killed her.

36. Police did not fear Gaines as they had indulged her for several hours even up to the point where they alleged that she handled her weapon. Police grew frustrated with Gaines because she would not submit to their authority, after 6-7 hours the wait had taken a toll on the officers, namely Ruby, because Gaines would not come out of the apartment. Upon information and belief, the officer closest to Gaines did not fire his weapon; it was officer Ruby, who was furthest away from Gaines who shot multiple times and killed her, and injured her son. As it were, shortly after Korryn Gaines' door was kicked in Officer Ruby entered her unit with his partner and killed her.
37. Indeed, the next thing heard was a male police officers voice utter, "*I'm sick of this shit.*" From that point forward multiple shots were fired, a multiple expletives were hurled in a male's voice, then there was a brief period of silence, and ultimately chaos.
38. County officers shot first, killing Gaines with multiple shots to her torso area in an utter disregard of Gaines' life, and the life of her five-year old son who was shot in the face and elbow requiring several surgeries to repair. Officer Ruby did not act reasonably in his decision to shoot and kill Korryn Gaines out of his own personal frustration rather than any true fear of a threat to him or others. In fact, his actions of shooting Plaintiff were malicious, sadistic, and done under color of law and within the scope of his employment.
39. Defendant Baltimore County, Maryland failed to properly train, supervise and and/or adequately monitor Defendant Officer Ruby actions toward decedent Korryn Gaines while acting in the course of his duties, and specifically failed to supervise the Defendant Officer Ruby as he illegally shot and killed decedent Korryn Gaines.
40. Defendant Officer Ruby's gross negligence and illegal actions are responsible for the natural injuries suffered by Korryn Gaines. Defendant Officer Ruby's intentional illegal actions were committed while he was acting under color of state law. Defendant Ruby intentional illegal actions constituted a state-created danger which deprived decedent Korryn Gaines of life and liberty in violation of the Maryland Constitution.
41. Defendant Baltimore County, Maryland with deliberate indifference to the Maryland Constitutional rights of decedent Korryn Gaines created a dangerous situation, thereby directly causing the death of decedent Korryn Gaines.
42. Defendant Baltimore County, Maryland with deliberate indifference to the Maryland Constitutional rights of decedent Korryn Gaines failed to properly train, supervise and and/or adequately monitor Baltimore County police officer Ruby and others on the clearly established constitutional rights of citizens that prohibit unlawful searches and seizures in the home of Korryn Gaines.
43. Baltimore County, Maryland further failed to instruct its officers not to interfere with Gaines' rights as a private citizen to video record police in the performance of their public duties via live-stream or in any other way, and to train its officers not to illegally suppress Gaines' clearly established fundamental right to freedom of speech under the



Maryland Constitution.

44. Defendant Baltimore County, Maryland with deliberate indifference to the Maryland Constitutional rights of decedent Korryn Gaines created a dangerous situation by engaging in all of the conduct contained in paragraphs 16 - 46, thereby directly causing the death of decedent Korryn Gaines and there is no sufficient intervening cause of injuries and death suffered by Korryn Gaines.
45. As a result of all of the Defendants' conduct and actions/inactions, Korryn Gaines suffered sudden impact fright, severe physical and conscious pain and suffering after she was shot multiple times by officer Ruby.
46. On September 12, 2016, Plaintiffs satisfied the notice provision for suing a local government under the Maryland Local Government Tort Claims Act.

COUNT I — Wrongful Death Act  
(Against All Defendants)

47. The Plaintiff repeats and realleges Paragraphs 1 – 46 of this Complaint with full force and effect as if pleaded here in full.
48. It was the duty of the Defendants to exercise reasonable care under the circumstances to protect and preserve the life of the decedent, Korryn Shadawn Gaines, and respect her rights to be free from unlawful searches and seizures, excessive force resulting from an arrest for traffic violations and misdemeanor criminal offenses, manslaughter due to negligence or murder; yet, notwithstanding these duties, the Defendants, through its agents, servants, or employees acting within the course and scope of their employment failed to exercise reasonable care under the circumstances that would have placed their conduct in consonant with the law.
49. Defendant Officer Ruby shooting and killing of Korryn Shadawn Gaines constituted an unlawful seizure and unconstitutional use of excessive force.
50. Defendant Officer Ruby committed these acts with ill will, gross negligence, recklessness, wantonness, oppressiveness, a willful disregard of the Plaintiff's Rights, and actual malice.
51. Defendant Officer Rudys' intentional illegal actions were committed while he was acting under color of state law. Defendant Rubys' intentional illegal actions constituted a state-created danger which ultimately resulted in the shooting death of Korryn Gaines.
52. Defendant Officer Ruby's intentional illegal actions were foreseeable, and his actions causing potential kill Korryn Gaines were foreseeable. Defendant Ruby intentionally used his authority to create a danger for Korryn Gaines and rendered her more vulnerable to the death than if Defendant Ruby had not acted at all.
53. Defendant Baltimore County, Maryland with deliberate indifference to the Maryland Constitutional rights of decedent Korryn Gaines created a dangerous situation, thereby directly and/or proximately causing the death of decedent Korryn Gaines.



54. Defendant Baltimore County, Maryland with deliberate indifference to the Maryland Constitutional rights of decedent Korryn Gaines by failing to properly train, supervise and and/or adequately monitor the Baltimore County police not to illegally enter Korryn Gaines' apartment and not to illegally suppress her freedom of speech under the Maryland Constitution.
55. Defendant Baltimore County, Maryland with deliberate indifference to the Maryland Constitutional rights of decedent Korryn Gaines created a dangerous situation, thereby directly causing the death of decedent Korryn Gaines and there is no sufficient intervening cause that resulted in the injuries and death to Korryn Gaines.
56. As a direct and proximate result of one or more of the aforementioned acts or omissions of the Defendants, the Plaintiffs' decedent suffered serious injuries that resulted in death. Defendants' aforementioned acts or omissions constituted gross negligence and a violation of decedent, Korryn Shadawn Gaines constitutional rights under the Maryland Constitution.
57. Pursuant to the Annotated Code of Maryland, Courts & Judicial Proceedings § 3-904(a), Plaintiffs bring an action based upon the death of Korryn Ganies at the hands of Defendants. Plaintiffs demand all damages recoverable under the Act including substantial damages for funeral and medical expenses, conscious pain and suffering, as well as any other damages recoverable under the Act.
58. Wherefore, Plaintiffs demand judgment against Defendants, jointly and severally, in an amount that exceeds \$75,000 pursuant to Maryland Rule 2-305 plus interest and costs.

COUNT II — Survival Action  
(Against All Defendants)

59. The Plaintiffs repeats and realleges Paragraphs 1 – 58 of this Complaint with full force and effect as if pleaded here in full.
60. As a direct and proximate result of one or more of the aforementioned acts or omissions of the Defendants, the Plaintiff, Rhanda P. Gaines' decedent, Korryn Shadawn Gaines, suffered serious injuries of a personal injury of a pecuniary nature, including, but not limited to, great pain and suffering before his death and medical expenses, subjecting the Defendant to liability pursuant under the Survival Act Statute. Defendants aforementioned acts or omissions constituted negligence, gross negligence and/or a violation of decedent, Korryn Shadawn Gaines constitutional rights under the Maryland Constitution.
61. Plaintiff, Rhanda P. Gaines, Personal Representative of the Estate of Korryn Shadawn Gaines demands judgment against Defendants, jointly and severally, in an amount that exceeds \$75,000 pursuant to Md. Rule 2-305 in the form of compensatory and punitive damages (punitive damages are only claimed Officer Ruby and only in his individual capacity), plus interest and costs.
62. WHEREFORE, it is respectfully requested that judgment be entered in favor of the Plaintiff, Rhanda P. Gaines, Personal Representative of the Estate of Korryn Shadawn Gaines, deceased, against the Defendants, in an amount that exceeds \$75,000 pursuant to Maryland Rule 2-305(b) in order to fully and fairly compensate the estate for all losses



compensable under the terms of the Survival Statute.

COUNT III — Maryland Constitution  
(Against All Defendants)

63. The Plaintiffs repeats and realleges Paragraphs 1 – 62 of this Complaint with full force and effect as if pleaded here in full.
64. The acts of the Defendant police officers unlawfully searching Korryn Gaines' apartment by illegally entering without a search warrant or reasonable belief that Korryn Gaines or Kareem Courtney were inside; suppressing her freedom of speech; and then seizing her by killing her; and the conduct of Defendant Baltimore County in failing to properly train and supervise the Defendant police officers as to the constitutional duties owed to Gaines, violated Articles 10, 24 and 26 of the Maryland Declaration of Rights which guaranteed Gaines a right to be free from unreasonable searches and seizures, without due process of law before being deprived of her life and liberty, and a right not to be subjected to death by excessive force.
65. Baltimore County is liable on the basis of respondent superior for any violations of the Maryland Constitution by the Defendant police officers that deprived Korryn Gaines of her rights under Articles 10, 24 and 26 of the Maryland Declaration of rights. Baltimore County is also liable for its own violations of the Maryland Constitution because it failed to supervise the Defendant police officers, and it failed to train, monitor and supervise its police force in their actions and use of lethal force, as well as duties owed to citizens for the prevention of State constitutional violations.
66. The Defendant Baltimore County's failure to provide proper training and supervision demonstrated deliberate indifference to the safety of Gaines and other civilians with whom its police officers come into contact with, specifically those persons suffering from mental anxiety disorders. The County's wrongful conduct in failing to properly train and supervise its officers directly and proximately caused the death of Korryn Gaines and to the injuries and damages suffered by her survivors.
67. Wherefore, Plaintiffs demand judgment against Defendants, jointly and severally, in an amount that exceeds \$75,000 pursuant to Maryland Rule 2-305(b) in compensatory and punitive damages (punitive damages are only claimed against Officer Ruby and only in his individual capacity), plus interest and costs.

**RELIEF SOUGHT**

68. Plaintiff re-pleads and re-alleges paragraphs 1 - 69 with the same force and effect as if set forth separately and at length herein.
69. Plaintiff requests the following relief:
70. Compensatory and punitive<sup>1</sup> damages in an amount that exceeds \$75,000 pursuant to

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<sup>1</sup> Punitive damages are only being brought against Defendant Officer Ruby in his individual capacity and not against Defendant Baltimore County Maryland.



Maryland Rule 2-305(b).

71. Pre and post-judgment interest.
72. The costs of litigation, including reasonable attorney's fees, and expert witness fees, lost wages and benefits the deceased would likely have earned if he had lived until retirement, other contributions the deceased would likely have made to support, care, and provide companionship and other services for his surviving family members.
73. Such other relief as may be just.

**JURY DEMAND**

76. Plaintiff demands a trial by jury.

Respectfully submitted,



J. Wyndal Gordon

**THE LAW OFFICE OF  
J. WYNDAL GORDON, P.A.**

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*Lead Counsel for Plaintiffs*



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*Co-Counsel for Plaintiffs*



CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS:

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a). A copy must be included for each defendant to be served.

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS AN ANSWER OR RESPONSE.

FORM FILED BY: [X] PLAINTIFF [ ] DEFENDANT CASE NUMBER

CASE NAME: The Estate of Korryn Gaines, et al. vs. Baltimore County MD & Officer 1st Class Ruby

JURY DEMAND: [X] Yes [ ] No Anticipated length of trial: 10 days

RELATED CASE PENDING? [ ] Yes [ ] No If yes, Case #(s), if known:
Special Requirements? [ ] Interpreter (Please attach Form CC-DC-041) [ ] ADA accommodation (Please attach Form CC-DC-049)

NATURE OF ACTION (CHECK ONE BOX)

DAMAGES/RELIEF

Grid containing categories: TORTS, LABOR, REAL PROPERTY, OTHER, A. TORTS, B. CONTRACTS, D. EQUITY, C. NONMONETARY. Includes checkboxes for Motor Tort, Workers' Comp., Judicial Sale, etc.

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)
A. Mediation [X] Yes [ ] No
B. Arbitration [ ] Yes [ ] No
C. Settlement Conference [ ] Yes [ ] No
D. Neutral Evaluation [ ] Yes [ ] No

TRACK REQUEST

With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL.
THIS CASE WILL THEN BE TRACKED ACCORDINGLY.
[ ] 1/2 day of trial or less [ ] 3 days of trial time
[ ] 1 day of trial time [X] More than 3 days of trial time
[ ] 2 days of trial time

PLEASE SEE PAGE TWO AND THREE OF THIS FORM FOR INSTRUCTIONS PERTAINING TO THE BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM AND COMPLEX SCIENCE AND/OR MEDICAL CASE MANAGEMENT PROGRAM (ASTAR), AS WELL AS ADDITIONAL INSTRUCTIONS IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, BALTIMORE COUNTY, OR PRINCE GEORGE'S COUNTY.

Date September 13, 2014 Signature [Handwritten Signature]

**BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM**

*For all jurisdictions, if Business and Technology track designation under Md. Rule 16-205 is requested, attach a duplicate copy of complaint and check one of the tracks below.*

**Expedited**  
Trial within 7 months  
of Filing

**Standard**  
Trial within 18 months  
of Filing

EMERGENCY RELIEF REQUESTED \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

**COMPLEX SCIENCE AND/OR MEDICAL CASE  
MANAGEMENT PROGRAM (ASTAR)**

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO AN ASTAR RESOURCE JUDGE under Md. Rule 16-202.  
Please check the applicable box below and attach a duplicate copy of your complaint.*

Expedited - Trial within 7 months of Filing

Standard - Trial within 18 months of Filing

**IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, BALTIMORE COUNTY, OR PRINCE GEORGE'S COUNTY PLEASE FILL OUT THE APPROPRIATE BOX BELOW.**

**CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)**

- Expedited                      Trial 60 to 120 days from notice. Non-jury matters.
- Standard-Short                Trial 210 days.
- Standard                        Trial 360 days.
- Lead Paint                      Fill in: Birth Date of youngest plaintiff \_\_\_\_\_
- Asbestos                        Events and deadlines set by individual judge.
- Protracted Cases              Complex cases designated by the Administrative Judge.

**CIRCUIT COURT FOR BALTIMORE COUNTY**

- Expedited  
(Trial Date-90 days)              Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
- Standard  
(Trial Date-240 days)              Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases.
- Extended Standard  
(Trial Date-345 days)              Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
- Complex  
(Trial Date-450 days)              Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.



**CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY**

To assist the Court in determining the appropriate Track for this case, check one of the boxes below. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded.
- Liability is not conceded, but is not seriously in dispute.
- Liability is seriously in dispute.

**CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY ONLY**

*Section D. Equity Cases — Addendum*

<input type="checkbox"/> Accounting	<input type="checkbox"/> Adverse Possession	<input type="checkbox"/> Appointment of a Trustee
<input type="checkbox"/> Assumption of Jurisdiction	<input type="checkbox"/> Authorized Sale	<input type="checkbox"/> Breach of Covenant
<input type="checkbox"/> Constructive Trust	<input type="checkbox"/> Declaratory Judgment (Equity)	<input type="checkbox"/> Declaratory Relief (Equity)
<input type="checkbox"/> Detinue	<input type="checkbox"/> Disciplinary Action	<input type="checkbox"/> Ejectment
<input type="checkbox"/> Equitable Relief	<input type="checkbox"/> Establishment of Trust	<input type="checkbox"/> Foreclosure Land Installment
<input type="checkbox"/> Foreclosure Lien	<input type="checkbox"/> Foreclosure Right of Redemption	<input type="checkbox"/> Foreclosure Statement Condo
<input type="checkbox"/> Foreclosure of Deed Trust	<input type="checkbox"/> Foreclosure Mortgage	<input type="checkbox"/> Forfeiture of Prop. / Personal Item
<input type="checkbox"/> Foreclosure of Currency or Vehicle	<input type="checkbox"/> Fraudulent Conveyance	<input type="checkbox"/> Injunctive Relief (Equity)
<input type="checkbox"/> Mandamus (Equity)	<input type="checkbox"/> Mechanic's Lien	<input type="checkbox"/> Notice of Lis Pendens
<input type="checkbox"/> Part / Sale in Lieu of Part	<input type="checkbox"/> Quiet Title	<input type="checkbox"/> Receiverships
<input type="checkbox"/> Removal of Trustee	<input type="checkbox"/> Set Aside Deed	<input type="checkbox"/> Specific Performance
<input type="checkbox"/> Specific Transaction	<input type="checkbox"/> Structured Settlement	<input type="checkbox"/> Trust