

**IN THE SUPREME COURT OF MARYLAND**

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Misc. No. 2, September Term, 2024  
SCM-MISC-0002-2024

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THE KEY SCHOOL, INCORPORATED, et al.  
Appellants  
v.  
VALERIE BUNKER,  
Appellee

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*CERTIFIED QUESTION OF LAW from the  
United States District Court for the District of Maryland,  
Civil Case Number 1:23-cv-02662-MJM  
(The Honorable Matthew J. Maddox)*

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Misc. No. 10, September Term, 2024  
SCM-REG-0002-2024

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BOARD OF EDUCATION OF HARFORD COUNTY  
Appellant  
v.  
JOHN DOE,  
Appellee

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*ON PETITION FOR WRIT OF CERTIORARI from the  
Circuit Court for Harford County,  
Civil Case Number C-12-CV-23-767  
(The Honorable Alex M. Allman)*

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**MOTION FOR SPECIAL ADMISSION OF OUT-OF-STATE ATTORNEY  
UNDER RULE 19-217**

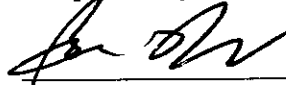
I, Bruce Plaxen, attorney of record for proposed *Amici Curiae* Association for Justice, Child USA, Change the Conversation, Maryland Association for Justice, and

Public Justice, move that this Honorable Court admit out-of-state attorney, Sean Ouellette, for the limited purpose of appearing and participating in this case as co-counsel with me. Mr. Ouellette is a member in good standing of the Bars of Massachusetts (Bar No. 697559) and the District of Columbia (Bar No. 1741535). His Out-of-State Attorney Information is as follows:

Sean Ouellette  
PUBLIC JUSTICE  
1620 L St. NW Suite 630  
Washington, D.C. 20036  
Phone: (202) 797-8600, ext. 264  
Email: souellette@publicjustice.net

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,



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Bruce M. Plaxen  
(AIS 8212010364)  
PLAXEN ADLER MUNCY, PA  
10211 Wincopin Cir., Ste. 620  
Columbia, MD 21044  
(410) 730-7737  
bplaxen@plaxenadler.com

*Counsel for Amici Curiae*

**CERTIFICATE AS TO SPECIAL ADMISSIONS**

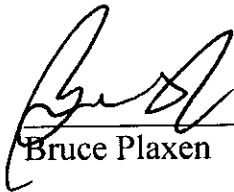
I, Sean Ouellette, certify on this 6th day of August, 2024 that during the preceding five years, I have been specially admitted in the State of Maryland ZERO times.

Dated: August 6, 2024.

*/s/ Sean Ouellette*  
Sean Ouellette  
PUBLIC JUSTICE  
1620 L St. NW Suite 630  
Washington, D.C. 20036  
Phone: (202) 797-8600, ext. 264  
Email: souellette@publicjustice.net

**RULE 1-322.1 CERTIFICATION**

I HERBY CERTIFY pursuant to Rule 1.322.1 that none of the foregoing filings contain personal identified information.

  
Bruce Plaxen

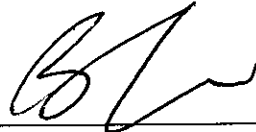
**RULE 20-201 CERTIFICATION**

I HERBY CERTIFY pursuant to Rule 20-201(h)(2) that none of the foregoing filings contain restricted information.

  
Bruce Plaxen

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6<sup>th</sup> day of August, 2024, copies of (1) Motion for Special Admission of Out-of-State Attorney Under Rule 19-217; (2) Certificate as to Special Admission and (3) Proposed Order were served via MDEC on all parties entitled to service.

  
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Bruce Plaxen