

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

ST. MICHAEL’S MEDIA, INC.	)	
	)	
	)	
	)	
Plaintiff,	)	
v.	)	Civil No. 1:21-CV-02337 (ELH)
	)	
THE CITY OF BALTIMORE, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

---

**SMG’S MOTION IN OPPOSITION TO PLAINTIFF’S AMENDED MOTION FOR  
PRELIMINARY INJUNCTION**

Defendant SMG, by undersigned counsel, submits this Opposition to Plaintiff’s Amended Motion for Preliminary Injunction and states as follows:

SMG joins in the opposition filed by Defendants Mayor and City Council of Baltimore, James L. Shea, and Brandon M. Scott (collectively and individually the “City”) and hereby incorporates by reference the Memorandum of Law in Support of the City’s Opposition to Plaintiff’s Amended Motion for Preliminary Injunction.

WHEREFORE, for the reasons set forth above, SMG respectfully requests that this Honorable Court grant its Motion in Opposition to Plaintiff’s Amended Motion for Preliminary Injunction and grant such further relief as the nature of this case shall require.

Dated: September 23, 2021

Respectfully Submitted,

/s/ Renita L. Collins  
RENITA L. COLLINS (#28637)  
Chief Solicitor  
HANNA MARIE C. SHEEHAN (#19531)  
Chief Solicitor  
Baltimore City Law Department  
100 N. Holliday Street  
City Hall Baltimore, MD 21202  
Phone: 410-396-3930  
Fax: 410-547-1025  
Renita.Collins@baltimorecity.gov  
Hanna.Sheehan@baltimorecity.gov  
*Counsel for Defendants Mayor and City  
Council of Baltimore, James L. Shea,  
Brandon M. Scott, and SMG*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of September 2021, SMG's *Opposition to Plaintiff's Amended Motion for Preliminary Injunction* was served via the Court's CM/ECF electronic filing system on Counsel of Record.

/s/ Renita L. Collins  
RENITA L. COLLINS (#28637)