



Arts Brief

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Left-Brain Support for Right-Brain People

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Actor's Performance Protected, Court Says

A federal appeals court Feb. 26 ordered Google Inc. to remove from YouTube an anti-Islamic film that it said more likely than not violated the plaintiff actor's copyright in her performance.

The U.S. Court of Appeals for the Ninth Circuit said that plaintiff Cindy Lee Garcia proved that she was likely to succeed on the merits of her infringement claim because she proved that she likely had an independent interest in her performance, that the filmmaker did not own an interest in her performance as a work-for-hire, and that even if he did, he exceeded any implied license to use it.

The plaintiff also established the likelihood that irreparable harm would result if Google were not ordered to take down the film because she was subject to death threats, the court said, as well as a sufficient causal connection between the infringement of her copyright and the alleged harm.

Observers warn that the "boneheaded" opinion could virtually halt the release of films as every disgruntled extra files suit to stop distribution.

Garcia was paid \$500 to work for three days on a film with the working title "Desert Warrior," which she thought was an Arabian adventure movie. Her performance was repurposed, however, and used in a film called "Innocence of Muslims," in which her lines were partially dubbed over so that she appeared to be asking "Is your Mohammed a child molester?"

(continued on page 2)



Magician's Illusion Infringed, Court Rules

In another rare ruling involving performance copyrights, a federal trial court in Nevada decided March 24 that a Dutch magician violated Raymond Teller's copyright in an illusion known as "Shadows."

While magic tricks are not per se copyrightable, the court said, federal law directly states that "dramatic works" and "pantomimes" are subject to copyright protection and grants owners exclusive public performance rights. The mere fact that a dramatic work or pantomime includes a magic trick, or even that a particular illusion is its central feature, does not render it devoid of copyright protection, the court ruled.

"[D]espite [defendant Gerard] Dogge's numerous attempts to utter an incantation to make the copyright disappear, the court finds that Teller maintains a valid interest as the creator and owner of 'Shadows.'"

(continued on page 3)

Founded in 1985, Maryland Volunteer Lawyers for the Arts provides pro bono legal assistance to income-eligible artists and arts organizations, and educational workshops and seminars on topics affecting artists. MdVLA is funded by the Harry L. Gladding Foundation; the Holofcener Foundation; PNC Bank; the William G. Baker, Jr. Memorial Fund, creator of the Baker Artist Awards (BakerArtistAwards.org), and by an operating grant from the Maryland State Arts Council, an agency dedicated to cultivating a vibrant cultural community where the arts thrive.

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MdVLA Arts Brief aims to educate and inform Maryland artists about legal issues affecting them. It is not intended as a substitute for legal advice. Artists with legal issues should seek legal counsel to address specific questions.

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(Innocence from page 1)

The video went viral after it was uploaded to YouTube and an Egyptian cleric issued a fatwa calling for the killing of everyone involved with the film, including Garcia, who soon began receiving death threats.

Garcia responded by filing eight takedown notices under Digital Millennium Copyright Act. When Google refused to act, she sought a temporary restraining order seeking removal of the film, claiming that it infringed her copyright in her performance (*Arts Brief* Vol. 5, Issue 3, Fall 2012, p. 5). The U.S. District Court for the Central District of California denied her motion, finding that she had delayed in bringing the action, had failed to demonstrate “that the requested preliminary relief would prevent any alleged harm” and was unlikely to succeed on the merits because she’d granted Youssef an implied license to use her performance in the film.

The Ninth Circuit disagreed with the district court on all counts. Garcia is likely to succeed on the merits of her copyright claim, the appeals court said, because she has a copyrightable interest in her performance. An actor’s performance, when fixed, is copyrightable if it evinces “some minimal degree of creativity... ‘no matter how crude, humble or obvious that might be.’” The court found it clear that Garcia’s performance met those minimum requirements.

The court noted that copyright interests in the vast majority of films are covered by contract, the work for hire doctrine, or implied licenses.

Under the work for hire doctrine, the rights to Garcia’s performance vested in Youssef if Garcia was his employee or was an independent contractor who transferred her interests to him in writing. Finding that Youssef didn’t obtain a written agreement, the appeals court concluded that Garcia didn’t qualify as a traditional employee on this record.

While a dissenting opinion argued that Garcia was an employee primarily because Youssef controlled the manner and means of making the movie and “was engaged in the business of film making at the time,” the majority opinion found nothing in the record to suggest that he was in the regular business of making films. He’d held many jobs, the majority said, but there’s no evidence he had any union contracts, relationships with prop houses or other film suppliers, leases of studio space or distribution agreements.

While the dissent would hold that Youssef was in the regular business of filmmaking because he made “Innocence of Muslims,” the majority said that “if shooting a single amateur film amounts to the regular business of filmmaking, every schmuck with a videocamera becomes a movie mogul.”

Finally, the majority agreed with Google’s argument that Youssef had an implied license to use Garcia’s performance but said that even a broad implied license isn’t unlimited and in this case was not broad enough to cover the use of her performance in “Innocence of Muslims.”

The problem isn’t that the film didn’t turn out to be an adventure movie, the court said. It’s that the film wasn’t intended to entertain at all and indeed differs so radically from anything Garcia could have imagined when she was cast that it can’t possibly be authorized by any implied license that she granted Youssef.

The court also found that the harm Garcia complains of is real and immediate. She has been forced to take significant security precautions when traveling, has moved to a new home, and has relocated her business. Garcia also established sufficient causal connection between that harm and the conduct she seeks to enjoin, the court said.

The dissent would not have held Garcia’s performance copyrightable. Section 102(b) of the Copyright Act states that “In no case does copyright protection extend to any idea, procedure, process, system, method of operation, concept, principle, or discover, regardless of the form in which its described, explained, illustrated, or embodied in such work,” the dissent said, finding that an acting performance resembles the “procedure” or “process” by which “original work” is performed. ■

(Magician from page 1)

According to the opinion, “Shadows” has been an integral part of Teller’s act for more than 30 years. It consists of a spotlight trained on a vase containing a single rose. The shadow of the rose is projected on a white screen positioned some distance behind it. Teller — the silent half of the magic act Penn and Teller — then enters the otherwise still scene, picks up a large knife, and proceeds to use the knife to dramatically sever the leaves and petals of the rose’s shadow on the screen slowly, one-by-one, while the corresponding leaves of the real rose sitting in the vase fall to the ground, breaking from the stem at the point where Teller cut the shadow.

The scene closes with Teller pricking his thumb with the knife, and holding his hand in front of the canvas. A silhouette of a trail of blood appears, trickling down the canvas just below the shadow of Teller’s hand. Teller then wipes his hand across the “blood” shadow, leaving a crimson streak on the canvas.

Teller registered “Shadows” as a dramatic work with the United States Copyright Office on Jan. 6, 1983, some seven years after he first began performing it. Teller’s certificate of registration describes the action of “Shadows” in meticulous detail, appearing as a series of stage directions acted out by a single performer.

On March 15, 2012, defendant Gerard Dogge uploaded two videos to YouTube in which he performed a “strikingly similar” illusion titled “The Rose and Her Shadow.” In order to allow individuals to locate his videos using YouTube’s search functions, Dogge tagged them with keywords including “Penn” and “Teller.” Dogge’s caption for the videos stated “I’ve seen the great Penn & Teller performing a similar trick and now I’m very happy to share my version in a different and more impossible way with you.” Dogge later stated that he posted the YouTube videos in an attempt to sell the illusion’s secret “to customers in various countries, including the United States.”

The court found that even though Teller’s work was not registered within five years of its first performance, which would have been prima facie evidence of a valid copyright, he nonetheless provided substantial evidence that he is the creator and owner of “Shadows.”

The detail of the registration certificate in describing the work and its original performance date, in addition to the testimony of Jim Steinmeyer, a magic historian, stating that “Shadows” was original and unique when it was first performed served as substantial evidence that Teller owns a valid copyright in the work, the court said.

The court rejected Dogge’s arguments that Teller’s copyright is invalid because he abandoned his copyright, he “openly challenged others to copy” the work, and he failed to inform the public that “Shadows” is copyrighted.

It is well settled that rights gained under the Copyright Act may be abandoned, the court said, but abandonment must be manifested by some overt act indicating an intention to abandon it and there was no such act here. Teller’s failure to take action against other alleged infringers does not constitute abandonment, the court said.

The court also rejected Dogge’s argument that Teller challenged others to copy his work by having his partner, Penn Jillette state publicly: “No one knows how ‘Shadows’ is done and no one will ever figure it out.” The court said that even if it were possible to waive copyright protection by challenging others, the statement in question makes no indication that any other individual should publicly perform the work, and only demonstrates confidence that the illusion is so clever that its secret cannot be discovered.

(Magician from page 3)

Finally, the court rejected Dogge’s argument that Teller’s copyright is not valid because he did not affix “notice” to his performances indicating that “Shadows” is a copyrighted work. The Copyright Act does not require that holders provide notice that their works are copyrighted, the court said. Furthermore, Teller presented evidence that he directly told Dogge during an email exchange in March 2012 that “Shadows” was a copyrighted work.

After the judge decided that Teller had a copyrighted work, he went on to decide that Dogge had in fact infringed the copyright. As the judge explained, proof of infringement

requires proof that the defendant had access to the work and that the works at issue are substantially similar in their protected elements.

In this case, Dogge’s caption to the YouTube videos clearly stated, “I’ve seen the great Penn & Teller performing a similar trick and now I’m very happy to share my version in a different and more impossible way with you.” Furthermore, during his deposition, Dogge recounted “I saw Shadows from Mr. Teller; the illusion, magic trick, on the internet on YouTube.” Given Dogge’s clear statements admitting he had access to Teller’s work, the court ruled that his later contradictory statements did not put the issue in dispute.

In order to determine whether two works are substantially similar, courts in the Ninth Circuit use a two-part analysis: an “extrinsic test” to observe objective criteria and analytically dissect the two works and an “intrinsic test” to determine “whether the ordinary, reasonable audience would find the works substantially similar in the total concept and feel of the works.”

The court concluded that even overlooking the non-protectable elements, Teller’s “Shadows” and Dogge’s “The Rose and Her Shadow” are nearly identical twins. The events and dramatic progression of the two works are nearly identical. Both works rely on a mysterious mood and proceed at a similar pace. Each involves a sole, silent performer.

In fact, the only perceivable differences between these two works, the court said, are the slight differences in props (Teller’s vase versus Dogge’s bottle) and the variance in the performer’s actions in the final seconds (smearing blood versus pouring water). These minor differences are inconsequential compared to the overwhelming number of significant and subtle similarities between these two works, the court said in concluding that they are substantially similar under the extrinsic test.

The court also found that a reasonable audience would find that the works have the same total concept and feel. Both performances are based on the incredibly unique concept of a performer methodically cutting parts of a rose’s shadow, thereby severing the corresponding parts of a real rose, and would be indistinguishable from each other in the mind of an ordinary observer.

The court said it lacked enough evidence to decide if Dogge’s infringement was willful, in which case Teller would be entitled to statutory damages of \$150,000 per act of infringement, or non-willful, in which case he would only be entitled to \$30,000 per act of infringement. ■

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Beastie Boys Settle Suit; Toymakers Apologize, Pay

The Beastie Boys dropped their copyright infringement claims against toymaker GoldieBlox March 17 in exchange for a public apology and the chance to direct a payment based on a percentage of the manufacturer's revenues to one or more charities of their choosing.

The GoldieBlox apology states: "We sincerely apologize for any negative impact our actions may have had on the Beastie Boys. We never intended to cast the band in a negative light and we regret putting them in a position to defend themselves when they had done nothing wrong. As engineers and builders of intellectual property, we understand an artist's desire to have his or her work treated with respect. We should have reached out to the band before using their music in the video. We know this is only one of the many mistakes we're bound to make as we grow our business. The great thing about mistakes is how much you can learn from them. As trying as this experience was, we have learned a valuable lesson. From now on, we will secure the proper rights and permissions in advance of any promotions, and we advise any other young company to do the same.

GoldieBlox filed a preemptive suit against the Beastie Boys in federal court in California in November 2013, seeking a declaration that its use of the song "Girls" in an advertisement for toys aimed at empowering young females was fair use (*Arts Brief*, Vol. 6, Issue 3, Fall/Winter 2013, p. 4).

The advertisement at issue depicts three young girls rejecting stereotypical princess play and instead creating a complex Rube Goldberg mechanism throughout multiple rooms and the yard of one of their homes.

GoldieBlox said it created its parody video specifically to comment on the Beastie Boys song and to further its goals of encouraging young girls to engage in activities that challenge their intellect, particularly in the fields of science, technology, engineering, and math.

In an open letter responding to the suit, Beastie Boys Mike D and Ad-Rock said that while they were impressed by the creativity and the message behind the video, it was nonetheless an advertisement, something that they long ago made a conscious decision not to permit.

The Beastie Boys filed counterclaims against GoldieBox in December 2013, alleging that the toy makers "acted intentionally and despicably with oppression, fraud, and malice toward the Beastie Boys Parties." ■



Cariou Settles Copyright Suit Against Artist Richard Prince

Photographer Patrick Cariou and appropriation artist Richard Prince settled their copyright infringement dispute March 18, with Cariou agreeing to drop his case against Prince, who along with his gallery was declared the legal owner of the works at issue, free and clear of any copyright or moral right claims by Cariou. Both sides agreed to pay their own attorneys' fees.

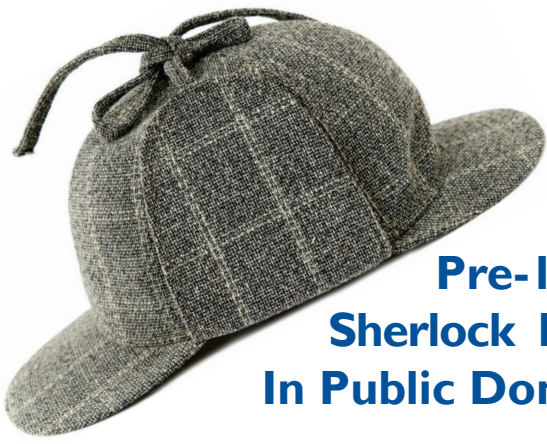
The settlement follows the U.S. Supreme Court's Nov. 11, 2013 refusal to grant review of the landmark appropriation case, in which the Second Circuit Court of Appeals upheld artist Richard Prince's right to appropriate Patrick Cariou's photos of Rastafarians for his own use.

The Second Circuit's ruling shocked many in both the arts and legal communities with its holding that Prince did not infringe Cariou's copyright because he transformed 25 of the 30 photographs at issue so much that his use was considered fair (*Arts Brief* Vol. 6, Issue 2, p. 1, Summer 2013).

Assuming the role of art critics, the Second Circuit said that Prince's use of Cariou's work was fair because the 25 artworks "manifest an entirely different aesthetic than Cariou's photographs." While Cariou's "serene and deliberately composed portraits and landscape photographs depict the natural beauty of Rastafarians and their surrounding environs, Prince's crude and jarring works...are hectic and provocative."

The appeals court sent five other Prince works that it said presented closer questions back to the district court, finding that they did not sufficiently differ from Cariou's incorporated photographs to make a determination about their transformative nature as a matter of law.

The upshot is that instead of the hoped-for clarity on fair use, the appeals court has muddied the waters even further. They won't truly clear until the Supreme Court or Congress acts. ■



Pre-1923 Sherlock Holmes In Public Domain

Admirers of Benedict Cumberbatch and would-be authors of Sherlock Holmes fan fiction scored a victory recently as a federal trial court in Illinois ruled that the public is free to use characters, character traits, and other story elements from Sir Arthur Conan Doyle's Sherlock Holmes stories published in the United States before Jan. 1, 1923.

In contrast, the court said, 10 Sherlock Holmes stories released in the United States after that date remain under copyright and will not enter the public domain until 70 years after the author's death.

The ruling means that authors and playwrights can use Holmes, Watson, and other Conan Doyle characters in works as long as they do not mention details or characters — like Watson's second wife or Holmes' retirement from his detective agency — introduced in those last 10 stories.

Sir Conan Doyle wrote four novels and 56 short stories featuring Holmes and Watson, referred to in the opinion as the canon.

This case arose when plaintiff Leslie Klinger sought a declaratory judgment that the Holmes and Watson characters and characteristics were in the public domain. He needed the judgment in order to proceed with *In the Company of Sherlock Holmes*, a collection of new and original short stories featuring various characters and story elements from the canon.

Klinger apparently came to believe the declaratory judgment was necessary after one of the authors contributing to the anthology informed the estate that he intended to use a post-1923 character in his story. The estate contacted the publisher to say that not only was a license necessary, but that the estate works with retailers such as Amazon and Barnes & Nobel “to weed out unlicensed uses of Sherlock Holmes and “[w]ould not hesitate to do so with your book as well.”

In court, the estate took the position that Conan Doyle was not finished creating the characters of Holmes, Watson, and others until those last stories were published. In what the court called a “novel legal argument,” the estate argued that because the characters of Sherlock

Holmes and Dr. Watson continued to be developed throughout the copyrighted 10 stories, they remain under copyright protection until the final copyrighted story enters the public domain in 2022.

The court rejected the estate's argument out of hand, writing “Where an author has used the same character in a series of works, some of which are in the public domain, the public is free to copy story elements from the public domain works.” The effect of adopting the estate's position would be to “extend impermissibly the copyright of certain character elements of Holmes and Watson beyond their statutory period, contrary to the goals of the Copyright Act,” the court said. ■

Visual Arts Hindered By Fair Use Confusion

Members of the visual arts community commonly overestimate the risk of employing the fair use defense to copyright infringement, avoiding it even where the law permits it, according to a recently published report commissioned by the College Art Association (CAA).

According to the report, “Copyright, Permissions, and Fair Use among Visual Artists and the Academic and Museum Visual Arts Communities,” those individuals pay a high price for misunderstanding copyright. “Their work is constrained and censored, most powerfully by themselves, because of that confusion and the resulting fear and anxiety.”

The visual arts field is pervaded with a “permissions culture,” the report said — the widespread acceptance that all new uses of copyrighted material must be expressly authorized. “This assumption has taken its toll on practice in every area of the visual arts field, adversely affecting the work of art historians, museums, publishers, and artists. As digital opportunities emerge, old frustrations with this permissions culture have taken on a new urgency.”

The report — written by co-principal investigators Pat Aufderheide, director of the Center for Media & Social Impact at American University, and Peter Jaszi, professor, Washington College of Law, American University — said the “highest cost is scholarship left undone, knowledge not preserved for the next generation, creative use of digital opportunities truncated — the “missing future.”

The report defined the visual arts community very broadly, including not just visual artists and other visual arts professionals, but also art historians, educators, professors, editors or publishers, museum professionals, and gallerists.

All of them share a common problem in creating and circulating their work, the report said, citing confusion and misunderstanding of the nature of copyright law and the availability of fair use — the limited right to reuse copyrighted material without permission or payment.

Although all members of the visual arts communities of practice share these problems, the report said, artists are more likely to use copyrighted material without licensing it, and less likely to abandon or avoid projects because of copyright frustrations.

The report cited some startling statistics to back up its assertion of “widespread and often urgent interest within the visual arts communities of practice in finding ways to address a prevalent “permissions culture.” According to the report:

- One-third of visual artists and visual arts professionals have avoided or abandoned work in their field because of copyright concerns, including one-fifth of artists, more than one half of editors and publishers, and more than one-third of art historians.
- Examples of thwarted missions in the visual arts include: art historians and editors who avoid modern-era art history, overviews of an artistic movement, and digital scholarship; museums that are stalled in developing digital access to their works; curators who avoid group exhibitions, controversial exhibitions, exhibitions where copyright permissions make cost prohibitive; artists who avoid collage, pop-culture critiques, digital experiments, and multimedia; and art historians who are thwarted by copyright holders who make use of copyright to stop the publication of unwelcome critiques.
- Costs are high, both in dollar figures and staff time. For example, permissions costs for scholarly publishing can run to \$20,000 per book, with costs carried by the author; costs for image access fees, sometimes understood as copyright based, can rival permissions costs; and staff resources at publishers, museums, archives, and educational institutions are dedicated solely to managing permissions processes.

The report said that uncertainty about copyright and fair use within the visual arts communities is a problem that the communities themselves can address. “The biggest single issue for professionals is understanding their rights as new users of existing copyrighted material,” the report said, adding: “This can be remedied not only by educational projects but by the formation of a consensus within the communities of practice about the shape of a code of best

practices in fair use for the visual arts. Such codes have vastly improved access to fair use for other communities of practice,” such as documentary filmmakers and poets.

The report is the first step in developing a Code of Best Practices for Fair Use in the Creation and Curation of Artworks and Scholarly Publishing in the Visual Arts. Over the coming year, CAA will host small group discussions in five cities (Chicago, Dallas, Los Angeles, New York and Washington, D.C.) among visual arts professionals, guided by Professors Aufderheide and Jaszi, to identify areas of consensus in how fair use can be employed.

These deliberations will undergird the development of a code of best practices, which will be reviewed by the project’s Principal Investigators, Project Advisors, members of the CAA Task Force on Fair Use, its Committee on Intellectual Property, and a Legal Advisory Committee. Once finalized, it will be presented to the CAA Board of Directors for approval and widely disseminated. ■

Federal Resale Royalty Legislation Introduced

Two U.S. senators and a congressman introduced legislation Feb. 26 that would provide a resale royalty right of 5 percent of the sales price when works of visual art are resold for \$5,000 or more.

The American Royalties, Too (ART) Act of 2014 would cap the 5 percent royalty at \$35,000. The royalty applies to any auction where the entity conducting the auction has sold at least \$1 million of visual art during the previous year.

Royalties are collected by visual artists’ copyright collecting societies that are required to distribute the royalties to the artists or their heirs at least four times per year.

The ART Act also allows U.S. artists to collect resale royalties when their works are sold at auction in the European Union and more than 70 other countries.

Under current copyright law, visual artists — unlike recording artists, composers, lyricists, actors, playwrights, and screenwriters, or publishers — sell their work only once. If they are successful, the price of their work increases but they recoup nothing when their original work is resold at a much higher price. The benefits derived from the appreciation in the price of a visual artist’s work typically go to collectors, auction houses, and galleries, not to the artist. ■

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