



mla

# Arts Brief

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INSIDE

21st Century Holden Caulfield Put on Hold by New York Court (p.1)

Filmmaker Sings the Blues: A Cautionary Copyright Tale (p.1)

Jailhouse Rock: Keeping Your Film Out of Copyright Jail (p.4)

Photographer Intervenes in 'Hope' Poster Suit (p.6)

Case to Decide if Photo of Sculpture on Postal Service Stamp Was Fair Use (p.7)

## 21st Century Holden Caulfield Put on Hold by New York Court

by Marcia Semmes, MLA Executive Director

Any author thinking about plucking a character from a popular book and updating it for the 21st century needs to pay attention to J.D. Salinger's suit against a Swedish author who did just that with the iconic Holden Caulfield. Caulfield, the protagonist of Salinger's *The Catcher in the Rye*, was the standard bearer of a generation. His tale of teenage rebellion and alienation was added to the list of required reading in most secondary schools and colleges after its 1951 publication.

In *60 Years Later: Coming Through the Rye*, Fredrik Colting — writing under the pen name John David California — envisioned Holden Caulfield as an old man who escapes his retirement home to wander the streets of New York, just as Caulfield did in the original. The novel was published in Great Britain, but before it could be published in the United States, Salinger filed suit in federal court in New York to stop it.

Salinger's complaint called Colting's novel "a rip-off pure and simple" and sought to enjoin publication on the grounds that it is an unauthorized sequel that infringes Salinger's copyright in both his novel and his character.

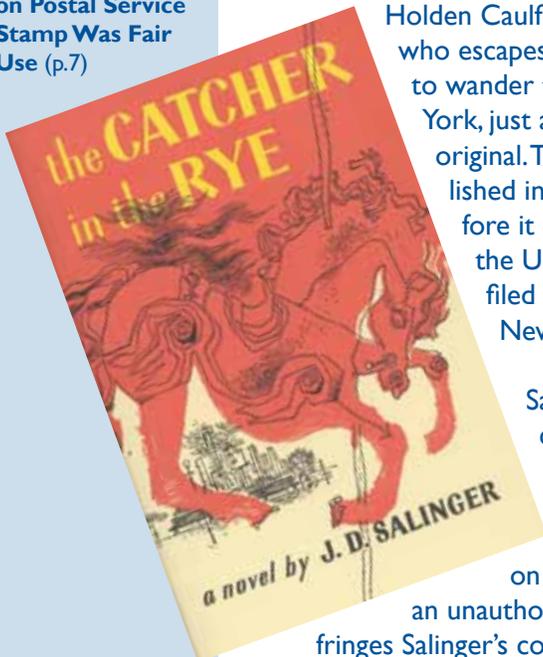


Image courtesy of Nina Paley

## Filmmaker Sings the Blues: A Cautionary Copyright Tale

by Marcia Semmes

Filmmaker Nina Paley was on a roll in 2008. Her exquisitely animated feature, "Sita Sings the Blues," was burning up the film festival circuit, with premieres at Berlin in February and Tribeca in April. Film critic Roger Ebert championed her film, inviting Paley to bring it to EbertFest. Distribution seemed within reach. Then Paley and her film ended up in what she calls "copyright jail."

"Sita Sings the Blues" illustrates the Indian epic poem "The Ramayan," the story of an Indian god reincarnated as a woman who goes through a bad breakup. Paley's own breakup is a subplot. The film was both inspired by and set to the music of 1920s jazz singer Annette Hanshaw, including the bluesy, breathy "Mean to Me." Paley researched the copyright to Hanshaw's songs and thought she was in the clear. What she didn't know, however, that while she was in the clear with regard to the recordings, she wasn't in the clear as to the underlying compositions, or as to the sync rights — the right to use the compositions in synchronization

(continued on page 2)

(continued on page 3)

Founded in 1985, Maryland 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.

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**MLA 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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*(21st Century Holden Caulfield from page 1)*

Colting's answer to the complaint argues that the work is more complex than just a sequel, and notes that Salinger himself is a character in *60 Years Later*.

Judge Deborah Batts halted publication of the new novel July 1, finding that it did not fit under the "fair use" defense to copyright protection. The novel was not a critical parody that "transformed" the original, Batts said, adding "It is hardly parodic to repeat the same exercise... just because society and the characters have changed." Noting that the new novel's jacket cover explicitly stated that *60 Years Later* was published as a "sequel" to the "classic," the trial court concluded that Colting's novel borrowed "extensively" from *Catcher in the Rye* in substance and style, both principal and supporting characters, and that the proportion of what was borrowed to new material was quite high.

Colting appealed Batts' ruling to the Second Circuit July 23, arguing that his novel "is a highly transformative work of commentary and criticism," and not a continuation or retelling of *Catcher in the Rye*. According to Colting's brief, "60YL examines the widely-held impression of Holden as a free and independent hero, juxtaposed against the idea that Salinger is an author imprisoned by writer's block and fear of failure. 60YL creates an imaginary world where Salinger brings his character back to life so that he may kill him and finally be free of the burden his character's fame has caused. Salinger and his creation meet face-to-face, and Salinger ultimately realizes that he cannot destroy what has become his own flesh-and-blood and allows his character to go free." ■

*Catcher in the Rye book cover image on page 1 courtesy of Little, Brown and Co.*

## ORPHAN UPDATE

While health care legislation occupied all of Congress's attention before its August recess, sources tell MLA that the Orphan Works Act will be on its agenda when it returns in the fall. Last year's version of the bill would have created vast new numbers or "orphan works"—that is works whose creators cannot be located after a "reasonable diligent search"—and permit their good-faith use without the possibility of damages for copyright infringement. Artists mustered some 150,000 signatures against that bill, and at least one source credited/blamed their opposition on the bill's defeat.

(Filmmaker Sings the Blues from page 1)

with a moving picture. The owners of those copyrights — including Warner-Chappell and EMI — wanted \$220,000 to license the songs, or as Paley puts it to “decriminalize” the film.

She negotiated that figure down to \$50,000 (plus legal fees of \$20,000) and took out a loan to pay it. Then she took another radical step, making the film available on her web site for free under a Creative Commons Attribution Share Alike license.

It’s a happy ending for audiences, perhaps less so for Paley, who nonetheless resists being held up as an example. “What really bothers me is now the film is done and it’s getting awards, it’s getting all this praise, but people are saying ‘Oh, you’re having rights problems, oh you really should have cleared those before.’ And they’re using me as like this lesson, it’s like ‘Let that be a lesson to all of you, don’t touch anything that you haven’t cleared first!’ And I’m like, how is any independent artist going to clear this stuff first?”

For Paley — now a copyright reform activist — the lesson is a different one: “You know, if you’re not scared, you can do this stuff, and I am not wrong for making this film. There’s something very wrong with the laws right now, but I’m really really glad I made this film.”

Here, in her own words, is Paley’s takeaway from the experience:

**Q: If copyright is such a hassle, why don’t you just replace all those old Annette Hanshaw songs?**

A: The synchronicity of the Hanshaw songs and Sita’s story is uncanny. This impresses audiences and allows the film’s point to be made: the story of the Ramayana transcends time, place and culture. Because the songs feature an authentic voice from the 1920’s, they demonstrate that this story emerged organically in history. New songs composed by the director, while they could be entertaining, could not make that point. They would be a mere contrivance, whereas the authentic, historical songs give weight to the film’s thesis. They are in fact the basis of the film’s thesis, irrefutable evidence that certain stories — like the story of Sita and Rama — are inherent to human experience.

**Q: How much were the copyright holders initially asking to clear the compositions?**

A: What they initially quoted me was an average of \$20,000 per song. There are 11 songs in the movie, so it would re-

quire \$220,000, which was more than it cost to make the film. Since then, they have very generously, from their point of view, brought it down to a mere \$50,000, but there are all these strings attached, so I’m not able to fully clear the songs.

**Q: Can’t you negotiate a special deal, since this is so small-scale compared to a distributed release?**

A: There was no way to negotiate their contract, because it would have cost them more to negotiate than they would have gotten from me. The contract is \$3,500 per song, and it would have cost them more than \$3,500 for their lawyers to revisit the contract and modify it.

I must emphasize this is a system problem. This is not an individual’s problem. Everyone involved in this is truly just doing their job. It’s the system itself that is broken. If you can’t

negotiate the contracts because it costs more money to negotiate a reasonable deal than they could earn, it is crazy.

**Q: Knowing there were problems, why did you go ahead with the movie anyway?**

A: I didn’t actually realize the compositions underlying the songs would be the problem. But even if I had, I would have done it anyway, because the alternative would have been to not make the movie — and that would have been wrong. The fact is that I’m not rich and there’s no way I could have gotten the amount of money these people want. I don’t think it’s right to kill a good idea over that. It

would have basically just functioned as censorship. The only thing that would have happened is that I would never have made the movie. That would have been horrible. There’s actually a lot of art that’s never been made because people are so scared about this stuff. As I was making this movie I thought, if I end up just giving this away for free, that’s o.k. because I need to make this movie.

**Q: Why did you decide to release “Sita” on-line?**

A: The whole struggle with our broken copyright system turned me into a Free Culture activist. I’m actually going to release all my old “Nina’s Adventures” and “Fluff” comics under a Share Alike (copyleft) license too. I saw what happened to Annette Hanshaw’s beautiful recordings: they got locked up so no one could hear them. I didn’t want that to happen to my film. My first concern is Art, and Art has no life if people can’t share it. ■

See Paley’s film online at [www.sitasingingtheblues.com](http://www.sitasingingtheblues.com).

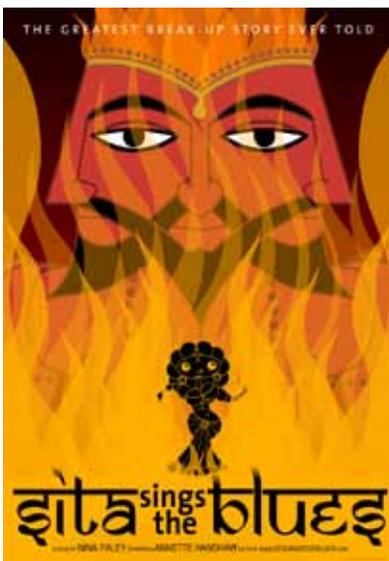


Image courtesy of Nina Paley



public domain, that element must still be licensed. Although the Annette Hanshaw recordings Nina Paley used were public domain, the compositions sung by Hanshaw were not.

Here are some ways to keep your film out of copyright jail.

### **It's Your Thing - Do What You Wanna Do!** **Use your own music in your film.**

If you compose your own musical score for the film, you will not need anyone's permission, or to clear any rights before using it in your film. Copyright is owned by the person who fixes the work in a tangible form. If you wrote the lyrics down, recorded the images, or saved original sound files to a hard drive, you own the copyright. Simple music synthesizer programs bundled with personal computers make it easy to compose simple musical compositions that can be looped with special effects to provide interesting sound tracks for films.

Maybe you already have music that you created. Make sure it's really yours. Be wary of using remixes of other people's music. If you do not own the underlying songs in your remix, they must be cleared. Remixes are more complicated to clear than ordinary music because they may contain samples from numerous songs. Bear in mind that even brief samples of a few notes of other people's sound recordings require rights clearance, even if the original song is unrecognizable in your music.

Some music synthesizer and video editing programs are equipped with royalty-free music libraries. Royalty-free music can be adapted to your score. It can be sampled, looped and synced to your imagery for free. Royalty-free music libraries are available for purchase as DVDs and digital downloads. Carefully read all license agreements or terms of use agreements enclosed with the disks or agreed to in downloading to ensure that the music remains free for all of your intended purposes. Some purposes may not be free. For example, royalty-free music may require payment of license fees for commercial uses of the music, such as in advertising. Read the fine print!

### **Don't Stop Thinking About Tomorrow!**

**Plan music rights clearance early!** Rights clearance is the process used to research ownership of rights in music (and other materials like video clips and graphics) and to request permission from owners to use their materials in your work. If you are determined to use another person's music in your film, you need plenty of time to determine whether the music is available and if it fits in your budget. Clear the rights to your chosen songs long before you start planning the film around the music. Some owners are difficult to identify and contact. Even if you identify and locate the owners, they may not respond in a timely manner or may refer you to another person authorized to administer the rights. Allow additional time to negotiate rights and license fees.

## **Keeping Your Film Out of Copyright Jail**

by Cynthia Blake Sanders, Esq.\*

It's a miracle that "Sita Sings the Blues" escaped a life sentence. Sadly many films never do. Great music enhances film and video. Digital video editing tools make it easy to add popular music and remixes to a film. Unfortunately, permission to use music in an independent film is not easy to acquire. Filmmakers, who sync popular music to their films planning to seek permission later when the film attracts investors, are often devastated to learn, as Nina Paley did, that the music is unavailable or prohibitively expensive. Many films made with unlicensed music, like Paley's "Sita Sings the Blues," are shelved or must be laboriously re-edited with properly licensed or royalty-free music.

Some unauthorized uses of music in a film may constitute fair use, but investors and distributors are unwilling to rely on fair use, no matter how compelling. Most require filmmakers to obtain professional liability insurance to protect against lawsuits for copyright infringement. Insurers will not accept fair use in lieu of properly licensed music. Fair use is a complex legal defense employed in court, not a business plan.

Public domain music can be freely used in a film because its copyrights are expired, but because copyright protection lasts nearly 100 years from creation, there is precious little public domain music available. The public domain status of music is very difficult and expensive to comprehensively confirm because of the numerous elements — lyrics, melody, harmony, and instrumental and vocal performances — that must be cleared. If just one element of a song is not in the

Make a wish list of the songs you want to use in the film. Identify the exact sound recordings you want. Some recordings are performed by songwriters, but numerous songs are covered by several different artists who perform the song with different styles.

Then identify all music owners associated with the sound recordings you want to use. Review credits on album covers and track listings. Search for connections on the Internet. Note all names and companies associated with each recording. Start contacting music owners for estimated costs. The cost of using music varies depending on the source. Songs controlled by big industry record labels and publishing houses are very expensive. However, if the desired music is available and essential to the production, a budget can be structured and funds raised to accommodate that need.

### **Double Vision!**

**You need two (2) permissions for each song you wish to use.** Each sound recording has two copyrights that must be cleared. In some cases one person, such as a singer-songwriter, may own both copyrights in a recording. More often, two or more organizations must be contacted for permission to use each recording.

A songwriter initially owns the copyright in the musical composition she writes. Often songwriters transfer part or all of their rights in the composition to a publishing company. The publishing company administers licenses for use of the composition. The owner of the musical composition copyright controls several rights, including the rights to sync the musical composition to moving images and to publicly perform the composition in a film. A recording artist initially owns the copyright in the sound recording she performs of the musical composition. The recording artist may transfer part or all of her copyright to a record label which distributes the sound recording. The owner of the sound recording copyright controls the use of the master recording.

Usually music owners demand rights equal to their counterparts, both between music composition and sound recording owners as well as between owners of rights in all songs used in the film. If one demands agreement on a “most favored nations” basis, it means that they want to be paid the same as the highest rate demanded by other rights owners. Sometimes rights can be negotiated as one rate for all owners of a song on an “all in” basis.

### **Send Lawyers, Guns and Money!**

**Get help to request the correct rights.** Music owners have many different rights that may be licensed by a filmmaker. You need to know which rights to ask for. Reproducing the music in the film, screening a film in a theater, distributing the film as home videos or digital downloads, and broadcasting the film on television each require different rights

from music owners. Each of these rights may cost thousands of dollars per song. All rights to use of one song in your film may cost upwards of \$20,000 per song depending on the rights and number of songs you request.

To lower your licensing costs, contact an entertainment lawyer for assistance. To reduce your attorney’s fees, do some homework. First identify every use you intend to make of your film. Will the film be used in viral advertising? Or, is it a documentary on an important political topic or social issue that will be screened at fundraisers and rallies? Will it be an independent film and screened in film festivals around the country? Is it to be a horror movie intended for home video distribution? Will your film be broadcast on television? Each of these uses involves different rights and may be licensed separately.

Next determine how each song will be used in the film. Will it be used in the trailer, as the theme song, or performed live in the film? Do you plan to feature the song performance as part of the story told by the film or will you simply use the song in the background? What is happening on screen when the track is heard? Music owners will request this information to determine what rights you need. Depending on how a sound recording is used, the license fee may cost more or less.

Talk to the lawyer about your goals for the film and any marketing plans. Make realistic plans to use music that you can afford. Have the lawyer make initial inquiries to determine the music’s availability and cost. Alternatively, the lawyer may be able to refer you to a music clearance agency or music supervisor to assist you in locating appropriate music.

### **With a Little Help from my Friends!**

#### **Use music created by friends or local musicians.**

Copyright owners are entitled to deny your request to use their music in a film or other work. If you cannot obtain permission or if license fees for your desired music exceed your budget, you need a back-up plan. Commissioning music from a composer on a work-made-for-hire basis can provide music that evokes the sound you desire for a flat fee. Once you have a written agreement with the composer, no further clearance is needed. Alternatively, local independent artists can license their music to your film for a fraction of the cost of big music industry songs. You should still work with an entertainment attorney to make sure that you get all of the rights you need – up front and in writing. If you wait until the film is about to be released to paper the deal, you could end up paying more than you originally agreed. ■

\* Sanders is an attorney with the Baltimore firm Ober|Kaler, and a member of MLA’s board of directors.

# Photographer Intervenes in Suit Over Shepard Fairey 'Hope' Poster

by Marcia Semmes

The litigation over Shepard Fairey's Obama "Hope" poster turned into a steel cage match July 22, as a judge allowed photographer Mannie Garcia — who took the photo on which the poster is based — to intervene in the lawsuit. Garcia argues that because he was a freelancer when he



took the photograph at issue — and not an AP employee — that he holds the copyright on the photograph under the “work-for-hire doctrine.”

The litigation is continuing proof, as the U.S. Supreme Court said in 1989, that “The contours of the work for hire doctrine... carry profound significance for freelance creators — including artists, writers, photographers, designers, composers, and computer

programmers — and for the publishing, advertising, music, and other industries which commission their works.’

Fairey sued AP in February, seeking a declaration that his use of Garcia's photograph did not infringe any copyrights held by AP and is protected by the fair use doctrine, a defense to copyright infringement that allows works to be reproduced without payment or penalty in certain situations — criticism, comment, news reporting, teaching, scholarship, and research.

AP shot back with a countersuit in March, calling Fairey “hypocritical” for repeatedly copying the works of other artists and photographers without paying or crediting them.

Under the Copyright Act of 1976, the creator of a work generally holds the copyright, except in work for hire situations, where “the employer or other person for whom the work was prepared is considered the author” and owns the copyright, unless there is a written agreement to the contrary. Section 101 of the 1976 Act provides that a work is “for hire” when: “(1) the work is prepared by an employee within the scope of his or her employment; or (2) the work is specially ordered or commissioned for use as a contribution to a collective work, as a part of a motion picture or other audiovisual work, as a translation, as a supplementary work, as a compilation, as an instructional text, as a test, as

answer material for a test, or as an atlas, if the parties expressly agree in a written instrument signed by them that the work shall be considered a work made for hire.”

The U.S. Supreme Court laid out the parameters of the work-for-hire doctrine in *Community for Creative Nonviolence v. Reid*, holding that a homeless nativity sculpture that Baltimore artist James Reid created on commission for CCNV was not a work made for hire because Reid:

- engaged in a skilled occupation
- supplied his own tools
- worked in Baltimore without daily supervision from Washington
- was retained for a relatively short period of time
- was paid as independent contractors typically are, without deductions for payroll or Social Security taxes, and with no deductions for employee benefits, unemployment insurance or workers' compensation funds.

In his motion to intervene, Garcia states that he is an independent, freelance professional photographer and that he worked for AP for approximately five weeks in 2006. He worked from his apartment and his car and used his own equipment, Garcia says, and he selected what photographs to take. He received no health, vacation, unemployment or other benefits from AP and never agreed to assign his copyrights to AP, Garcia says. ■

## NEW AT NEA

**The Senate confirmed Rocco Landesman as chairman of the National Endowment of the Arts Aug. 7. Landesman, a Broadway theater producer, said afterward:**

**“Art is essential to the civic, economic, and cultural vitality of our nation. It reflects who we are and what we stand for — freedom of expression, imagination, and vision. I am eager to work with our many partners to bring quality arts programs to neighborhoods and communities across the country.”**

# Case to Decide if Photo of Sculpture on Postal Service Stamp Was Fair Use

by Marcia Semmes

Stanford University's Fair Use Project (FUP) weighed in July 15 on yet another case over an artist's right to use existing imagery to create new artistic expression. This one has as many layers as an onion — a photograph of a sculpture that was made into a stamp.

The sculpture is “The Column,” created by plaintiff Frank Gaylord for the Korean War Memorial on the national mall. Nineteen soldiers are each rendered larger than life, and placed so that the platoon appears to emerge out of the woods at the edge of the Memorial. The photograph was taken by John Alli, who shot hundreds of photos at all times of day and in all seasons to capture the snowy, spectral image he achieved in what he called “Real Life.”

In 2002, the U.S. Postal Service created a stamp using the photo to commemorate the 50th anniversary of the Korean War armistice. The USPS paid Alli \$1,500 for the right to use the photo, which was altered for a more monochromatic color scheme and reduced in size so that all but three of the 19 soldiers appear as tiny silhouettes. According to the brief, the Postal Service produced approximately 86.6 million stamps and a variety of retail goods featuring the image of the stamp before retiring it on March 31, 2005.



The lawsuit arose because while the Postal Service got permission to use Alli's photograph, it did not seek Gaylord's permission. Gaylord sued the USPS for copyright infringement, seeking a royalty of 10 percent of net sales of the stamp. He also sued Alli, but that case was settled.

The trial court held that while Gaylord is the sole copyright owner of *The Column*, the Postal Service made fair use of the sculpture in the commemorative stamp. Gaylord appealed.

FUP filed a “friend of the court” brief on behalf of the Andy Warhol Foundation, the Warhol Museum, and contemporary artists Barbara Kruger, Thomas Lawson, Jonathan Monk, and Allen Ruppersberg, among others.



Image courtesy of Terry J. Adams, National Park Service

Fair use recognizes that new expression and creativity are often built on what has come before, FUP's brief argued. Each of the factors courts use to determine fair use favors the Postal Service, FUP said — the purpose and character of the use and whether it was “transformative”; the nature of the copyrighted work; the amount and substantiality of the portion used; and the effect of the use upon the potential market for or value of the work.

Focusing on the question of transformation, FUP argued that “When the nature of Alli's image and the Postal Service's further manipulation of it is compared to the original sculpture, there can be little doubt that the image” added new expression, meaning, and message to Gaylord's statue. While the statue is a three-dimensional depiction of a unit on patrol in Korea set in a meadow on the edge of the woods, Alli's image and the stamp that incorporates it represent a highly-stylized and abstracted attempt to convey a much more particularized facet of the Korean War experience — the frigid cold that describes the experience literally and depicts it symbolically.

“By depicting the sculpture in this frigid, surreal and highly stylized way, the image provides new insight into both the Korean War experience and Gaylord's sculptural expression of it.”

In sum, FUP argued, the stamp uses *The Column* for a highly expressive and transformative purpose, imposing no plausible harm to the value of *The Column*. The artistic expression embodied by the image at the center of this case is precisely the sort of creative activity copyright law should encourage, not suppress. ■

## SPEAK OUT: HEALTHCARE & ARTISTS

By one estimate, 40 percent of artists lack health insurance, more than double the national average. Americans for the Arts and a coalition of 20 national arts organizations are urging Congress to make sure that artists' interest are considered in the ongoing healthcare debate, calling for a bill that includes:

- A public health insurance option for individual artists, especially the uninsured.
- A way for financially-strapped nonprofit arts organizations to reduce skyrocketing health insurance costs to cover their employees without cuts to existing benefits and staff while the economy recovers.
- A way for smaller nonprofit and unincorporated arts groups to afford to cover part and full-time employees for the first time.
- Support for the arts in healthcare programs, which have shown to be effective methods of prevention and patient care.

You can voice your support for an artist-friendly bill by going to <http://capwiz.com/artsusa/issues/alert/?alertid=1387033>

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