

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

MAYOR AND CITY COUNCIL OF  
BALTIMORE,

*Plaintiff,*

v.

ALEX M. AZAR II, in his official capacity as  
SECRETARY OF HEALTH AND HUMAN  
SERVICES; and U.S. DEPARTMENT OF  
HEALTH AND HUMAN SERVICES,

*Defendants.*

No. 1:19-cv-01672-GLR

**UNOPPOSED MOTION FOR ENTRY OF ORDER**

Defendants respectfully file this motion for an order authorizing the release of certain materials that are a part of the administrative record. Specifically, those materials include complaints that individuals have submitted to the United States Department of Health and Human Services Office for Civil Rights. Although Defendants have identified and redacted personally identifiable information in those complaints, they request out of an abundance of caution that the Court enter an order authorizing the release of these materials as part of the administrative record, including any information that may be covered by the Privacy Act, 5 U.S.C. § 552a. *See* 5 U.S.C. § 552a(b)(11) (permitting disclosure of information protected by the Privacy Act pursuant to a court order).

Defendants respectfully ask that the Court enter the requested order by July 22, 2019, the date by which Defendants are to produce the administrative record to Plaintiffs. Unless and until the Court enters the requested order, Defendants will be able to produce to Plaintiff only the portions of the record that do not contain potentially Privacy Act-covered information.

Dated: July 19, 2019

Respectfully submitted,

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MICHELLE R. BENNETT  
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/s/ Bradley P. Humphreys  
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**[PROPOSED] ORDER**

Defendants' motion for entry of order is **GRANTED**. Defendants are authorized to release the information described in Defendants' motion that may be covered by the Privacy Act, 5 U.S.C. § 552a, without obtaining the prior written consent of the individuals to whom such records or information pertain.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
George L. Russell III  
United States District Judge