

Exhibit 52

to

Plaintiffs' Reply to Defendants'  
Opposition to Plaintiffs' Cross-Motion  
for Summary Judgment

**In The Matter Of:**

*Shawn J. Tardy, et al. vs.  
Martin J. O'Malley, et al.*

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*Anthony W. Batts*

*Vol. 1*

*December 19, 2013*

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1 of your deposition today.

2 A Okay. I'm looking at page five of the  
3 document that is -- looks like Sub Category E.  
4 Commissioner Anthony W. Batts, Baltimore City Police  
5 Department. Relates to training, firearms secured  
6 by officers at the police department. The lack of  
7 the use of assault weapons. The dangerousness of  
8 assault weapons and high capacity magazines.  
9 Opinion on assault weapons high capacity. Lessons  
10 learned from mass shooting incidents. Gives the  
11 address of the police organization.

12 Is that it on page six?

13 Q Yes.

14 A Okay.

15 Q And are you generally familiar with the  
16 subject matters that are listed there?

17 A Generally. I am not an expert, but  
18 generally, yes.

19 MR. SWEENEY: All right. Please mark  
20 that as Exhibit 1, Batts 1.

21 (Batts Exhibit 1 was marked for purposes