

PAUL JOHN CISAR, et al.	*	IN THE
Plaintiffs,	*	CIRCUIT COURT
v.	*	FOR
F.O. MITCHELL & BRO, et al.	*	ANNE ARUNDEL COUNTY
Defendants.	*	
	*	CASE NO.: C-02-CV-22-000988

* * * * *

DEFENDANT F.O. MITCHELL & BRO’s
DISCLOSURE OF EXPERT TESTIMONY

Defendant F.O. Mitchell & Bro. (“Mitchell”), by and through its undersigned counsel, Robert S. Lynch, Esquire, David S. Lynch, Esquire, and Stark and Keenan, P.A., hereby makes the following disclosure of expert testimony that may be used at trial in this matter:

- Edward M. Steere, MSRE, AICP
Valbridge Property Advisors | Baltimore Washington Metro
11100 Dovedale Court
Marriottsville, Maryland 21104
443-333-5521

Mr. Steere is a certified planner with a strong background in regulation, site design and entitlement, as well as project management. He is Managing Director of Valbridge Property Advisors’ Baltimore-Washington DC regional office. Mr. Steere is an expert in planning and zoning, with specific knowledge of Harford County development regulations, including the site plan approval process for industrial, commercial, and residential development. Mr. Steere’s opinions will be based upon his personal factual knowledge,

review of correspondence, plans, documents, documents produced in discovery in this case, deposition transcripts and his knowledge of the development project which is the subject of this case. Mr. Steere's opinions will also be based upon his knowledge, experience and expertise in the fields of planning and Harford County zoning. Mr. Steere's *curriculum vitae*, which details his professional experience, is attached hereto and incorporated herein by reference. Mr. Steere has not yet authored a written report.

2. Mark Keeley, PTP – Traffic Concepts, Inc.
7525 Connelley Drive, Suite B
Hanover, Maryland 21076
410-760-2911

Mr. Keeley is a Project Manager/Transportation Planner for Traffic Concepts, Inc. and an expert in master planning, traffic impact and parking studies. Mr. Keeley's opinions will be based upon his personal factual knowledge, review of correspondence, plans, documents, documents produced in discovery in this case, deposition transcripts and his knowledge of the development project which is the subject of this case. Mr. Keeley's opinions will also be based upon his knowledge, experience and expertise in the fields of master planning, traffic impact and parking studies. Mr. Keeley has authored a Traffic Impact Study in relation to the development project which is the subject of this case.

Reservation of Rights to Supplement Designation

1. Defendant reserves the right to amend or revise its expert designation when all discovery has been provided by Plaintiffs, including all information regarding Plaintiffs' experts required by Maryland Rule 2-402.

2. Defendant reserves the right to call any expert designated by any other party as an expert witness in their case in chief.

/s/

Robert S. Lynch, Esquire
AIS# 8212010279

/s/

David S. Lynch, Esquire
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Attorneys for Defendant Mitchell

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 30th day of September, 2022, that a copy of the foregoing F.O. Mitchell and Bro's Disclosure of Expert Testimony was served via MDEC on:

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Qualifications of Edward M. Steere, MSRE, AICP
Senior Managing Director – Planning and Market Analysis
Valbridge Property Advisors | Baltimore Washington Metro



Independent Valuations for a Variable World

Education

MS —
Johns Hopkins University
Real Estate

BFA—
Syracuse University
Maxwell School of Citizenship
& Public Affairs, Geography

AICP—
American Planning Association
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Background

Valbridge Property Advisors (October 2017-Present)
Lipman Frizzell & Mitchell LLC (2016-2017)
EMSPanning LLC, Aberdeen, MD (2009-2015)
Frederick Ward Associates, Bel Air, MD (2003-2009)
Lipman Frizzell & Mitchell LLC, Columbia, MD (2001-2003)
Harford County Planning & Zoning, Bel Air, MD (1990-2001)
Chester County Planning Commission, West Chester, PA (1988-1990)
Fairfax County Public Works, Fairfax, VA (1987-1988)

Expert Witness

Before Maryland public administrative bodies, zoning hearing examiners and/or boards of appeals: Montgomery County, Prince Georges County, Baltimore County, Carroll County, Cecil County, Harford County, City of Laurel, City of Aberdeen, City of Havre de Grace, Town of Bel Air, Town of Elkton, Town of North East, Town of Perryville.

Membership/Affiliations

American Planning Association, American Institute of Certified Planners
Lambda Alpha International Land Economics Society (Baltimore), Member
Economic Development Advisory Board for Harford County, MD
Friends School of Harford Board of Trustees
Habitat for Humanity Susquehanna Resource Development Committee Member

Experience

Steere's experience has spanned nearly three decades as a professional in land planning, real estate research, marketing, development, appraisal and public policy across the Mid-Atlantic region. His experience includes both public- and private-sector land planning and zoning; feasibility and site design for development projects including institutional, residential, commercial and industrial; market and financial feasibility analyses for major real estate projects, including mixed use; due diligence research and project entitlement; and advising clients concerning development strategies.