

PAUL CISAR, ET AL	*	IN THE
Plaintiff	*	CIRCUIT COURT
v.	*	OF MARYLAND
FO MITCHELL AND BRO, ET AL	*	FOR
Defendants	*	HARFORD COUNTY
	*	Case No. C-12-CV-22-000888
* * * * *		

MOTION TO EXTEND TIME TO FILE RESPONSIVE PLEADING TO VERIFIED AMENDED COMPLAINT FOR INJUNCTIVE RELIEF AND DECLARATORY JUDGMENT AND PRIVATE ACTION FOR NUISANCE AND PUBLIC NUISANCE, WITH COMPENSATORY DAMAGES

Now comes Harford County, Maryland (the “County”), its attorneys, Jefferson L. Blomquist, County Attorney, and Sean P. Carven, Senior Assistant County Attorney, respectfully requests the Court to grant its Motion for Extension of Time to Respond to Verified Amended Complaint, and for cause states:

1. The Verified Amended Complaint was filed February 1, 2023 at 6:45 pm.
2. A response, to the extent the County does not rely on the response filed to the Verified Complaint, is due February 17, 2023.
3. The County requested an extension of time to file a response to the Verified Amended Complaint.
4. The County left a message requesting the foregoing extension with counsel for Plaintiffs, Rignal W. Baldwin V, Esquire, and received no response.

5. The Harford County Law Department has three unfilled attorney vacancies, and the undersigned are scheduled for an injunction hearing in *Harford County v. Bennett* on February 14-15, 2023.
6. The County would like to file a meaningful response to the Verified Amended Complaint instead of relying on the grounds stated for dismissal in the County's Motion to Dismiss and Reply in Support of Motion to Dismiss filed in response to the Verified Complaint.

WHEREFORE, for the foregoing reasons, Harford County, Maryland requests an extension to file a responsive pleading to the close of business on February 24, 2023.

/s/ Jefferson L. Blomquist
Jefferson L. Blomquist (CPF #8312010046)
County Attorney
Jlblomquist@harfordcountymd.gov

/s/ Sean P. Carven
Sean P. Carven (CPF# 9406230043)
Senior Assistant County Attorney
spcarven@harfordcountymd.gov
Harford County Department of Law
220 S. Main Street
Bel Air, MD 21014
(410) 638-3205

Attorneys for Harford County, Maryland

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10TH day of February, 2023, a copy of the foregoing Motion for Extension of Time for Harford County, Maryland to respond to the Verified Amended Complaint was filed electronically and served on all parties registered for services via MDEC e-filing.

/s/ Sean P. Carven

Sean P. Carven (CPF# 9406230043)

Senior Assistant County Attorney

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* * * * *

ORDER

Upon consideration of Harford County’s Motion to Extend Time to File Responsive Pleading to Verified Amended Complaint, and all papers filed and any proceedings conducted pursuant thereto, it is the _____ day of _____, 2023, by the Circuit Court for Harford County, hereby

ORDERED, that the Motion to Extend Time is GRANTED; and it is further

ORDERED, that the deadline for Harford County to respond to the Verified Amended Complaint is extended until February 24, 2023.

Judge, Circuit Court for Harford County