

PAUL JOHN CISAR, <i>et al.</i> ,	*	IN THE
Plaintiffs,	*	CIRCUIT COURT
v.	*	FOR
F.O. MITCHELL & BRO, <i>et al.</i> ,	*	HARFORD COUNTY
Defendants.	*	Case No.: C-12-CV-22-000888
* * * * *	*	* * * * *

PLAINTIFFS' RULE 2-431 CERTIFICATE

Prior to filing this Motion to Compel and for Sanctions, the parties engaged in good faith efforts to resolve the discovery disputes. These efforts include undersigned counsel's emails of November 18, 2022, at 2:21 p.m. to Robert S. Lynch, Esquire, and email sent to David S. Lynch, Esquire, on November 28, 2022 at 2:34 p.m., collectively attached as Exhibit 1. A subsequent telephone conference was had between counsel, with no resolution of the dispute.

/s/ Rignal W. Baldwin
Rignal W. Baldwin V, CPF No. 1212110046
Baldwin | Seraina, LLC
111 South Calvert Street, Suite 1805
Baltimore, Maryland 21202
Telephone (410) 385-5695
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of February 2023, a copy of the forgoing Rule 2-431 Certificate, was efiled with MDEC, which will provide electronic notice to all counsel of record.

/s/ Rignal W. Baldwin

EXHIBIT 1

Rig Baldwin V

From: Antoinette Levon
Sent: Monday, November 28, 2022 2:34 PM
To: David Lynch
Cc: Rig Baldwin V; Bob Lynch
Subject: RE: Discovery - (Cisar, et al. v. F.O. Mitchell., et al.)

Mr. Lynch:

Mr. Baldwin has availability tomorrow around 3:00 p.m. Is that amenable to you both? Also how would you like to have this discussion, telephone or Zoom?

Antoinette Levon
Legal Assistant – Office Administrator

Office (Main): 410-385-5695
Email: alevon@baldwin-seraina.com
111 South Calvert Street | Suite 1805 | Baltimore, Maryland 21202

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-----Original Message-----

From: David Lynch <DLynch@StarkandKeenan.com>
Sent: Monday, November 28, 2022 2:31 PM
To: Antoinette Levon <alevon@baldwin-seraina.com>
Cc: Rig Baldwin V <RBaldwinV@baldwin-seraina.com>; Bob Lynch <rlynch@starkandkeenan.com>
Subject: FW: Discovery - (Cisar, et al. v. F.O. Mitchell., et al.)

Ms. Levon:

Following up on the below email I sent last Monday. We have not heard from you. Please let us know Mr. Baldwin's availability. Thank you.

-David

David S. Lynch, Esquire
Voice: 410.879.2222
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-----Original Message-----

From: David Lynch

Sent: Monday, November 21, 2022 4:11 PM

To: alevon@baldwin-seraina.com

Cc: Bob Lynch <rlynch@starkandkeenan.com>

Subject: Discovery - (Cisar, et al. v. F.O. Mitchell., et al.)

Ms. Levon:

Bob Lynch asked to reach out to you in response to an email he received from Mr. Baldwin last Friday regarding discovery in the above-referenced case. Mr. Baldwin asked us to coordinate a time to confer to try to resolve our discovery dispute in the above-referenced matter. We are available next Monday anytime after 11am. Please advise as to Mr. Baldwin's availability. Thank you and have a Happy Thanksgiving.

-David

Sent from my iPhone

Rig Baldwin V

From: Rig Baldwin V
Sent: Friday, November 18, 2022 2:21 PM
To: rlynch@starkandkeenan.com
Cc: Antoinette Levon
Subject: Discovery (Cisar v F.O Mitchell)

Mr. Lynch,

This is a good faith effort to resolve a discovery dispute. I wanted to discuss your client's non-responses to my clients' discovery requests. Specifically, I wanted to get a better sense of why your client refused to respond substantively, rather than seeking a protective order from the court. Could you please coordinate with Ms. Levon (copied) to set up a time to confer, so that we can try to resolve this disagreement?

Best,

Rig

Rignal W. Baldwin V

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