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

* * * * *
CHESAPEAKE REAL ESTATE GROUP, LLC'S OPPOSITION TO PLAINTIFFS'
RULE 2-505 MOTION FOR REMOVAL

Chesapeake Real Estate Group, LLC, Defendant, by and through its attorneys, Joseph F. Snee, Jr., with Snee, Lutche & Helmlinger, P.A., oppose Plaintiffs' Rule 2-505 Motion for Removal and in support thereof states the following:

1. On March 6, 2023, Plaintiffs filed a Rule 2-505 Motion for Removal ("Motion for Removal").
2. On March 9, 2023, Defendant F.O. Mitchell & Bro. filed an Opposition to Plaintiffs' Motion for Removal. (the "Mitchell Opposition").
3. The Mitchell Opposition sets forth multiple arguments in opposition to Plaintiffs' Motion for Removal including, but not limited to: 1) Plaintiffs did not appeal the Transfer Order from Anne Arundel County despite the fact that the Transfer Order is immediately appealable and thus Plaintiffs waived their right to appeal; 2) failure to file a supporting affidavit as required by Maryland Rule 2-505; 3) Supreme Court of Maryland case law stating that no right of removal exists in equity cases like the one before this Court; 4) failure to identify reasonable grounds that Plaintiffs cannot receive a fair and impartial trial in Harford County; and 5) Plaintiffs' Motion for Removal is nothing more than a veiled attempt to continue Plaintiffs' venue shopping.

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4. Defendant Chesapeake Real Estate Group, LLC joins in the Mitchell Opposition and adopts and incorporates by reference all pleadings, arguments and exhibits submitted in support of the Mitchell Opposition, reserving unto Chesapeake Real Estate Group, LLC all arguments and grounds in opposition to the Motion for Removal.

WHEREFORE, Defendant Chesapeake Real Estate Group, LLC respectfully requests that this Honorable Court enter an Order:

- A. Denying Plaintiffs' Motion for Removal; and
- B. Granting such other and further relief as the nature of Defendant's cause may require or allow.

Joseph F. Snee, Jr.

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REQUEST FOR HEARING

Defendant Chesapeake Real Estate Group, LLC hereby requests a hearing on the foregoing Opposition to Plaintiffs' Rule 2-505 Motion for Removal.

Joseph F. Snee, Jr.

Joseph F. Snee, Jr. (8501180012)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of March, 2023, a copy of the foregoing was electronically served via MDEC on all parties hereto.

Joseph F. Snee, Jr.

Joseph F. Snee, Jr. (8501180012)

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IN THE

CIRCUIT COURT

FOR

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Case No. C-12-CV-22-000888

* * * * *

ORDER

This Court, having read and considered Plaintiffs' Rule 2-505 Motion for Removal and the responses thereto, hereby

ORDERS that Plaintiffs' Rule 2-505 Motion for Removal is **DENIED**.

DATE

Judge, Circuit Court for Harford County