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|-----------------------------------|---|----------------------------|
| PAUL CISAR, <i>ET AL</i>          | : | IN THE CIRCUIT COURT       |
|                                   | : |                            |
| Plaintiffs                        | : | OF MARYLAND                |
|                                   | : |                            |
| vs.                               | : | FOR HARFORD COUNTY         |
|                                   | : |                            |
| F.O. MITCHELL & BRO, <i>ET AL</i> | : | Case No. C-12-CV-22-000888 |
|                                   | : |                            |
| Defendants                        | : |                            |

**CHARLES A. MASLIN, III'S REPLY TO PLAINTIFFS' OPPOSITION TO MOTION TO DISMISS**

Charles A. Maslin, III (“Maslin”), by and through his attorney, Lori J. Hahn Maslin, Esquire, with The Hahn Law Offices, LLC, hereby files this Reply to Opposition of Plaintiffs to Defendant Charles A. Maslin, III’s Motion to Dismiss and Request for Hearing and in support thereof states as follows:

1. On February 15, 2023, Defendant F.O. Mitchell & Bro. (“Mitchell”) filed a Motion to Dismiss Amended Complaint and Request for Hearing, Memorandum of Law in Support of Motion to Dismiss Amended Complaint and supporting exhibits (collectively the “Mitchell Motion to Dismiss”).

2. On February 23, 2023, Maslin filed a Motion to Dismiss the Amended Complaint adopting the arguments set forth in the Mitchell Motion to Dismiss.

3. On March 2, 2023, Plaintiffs filed an Opposition to the Mitchell Motion to Dismiss (“Plaintiffs’ Opposition to Mitchell Motion”).

4. On March 6, 2023, Plaintiffs filed an Opposition to Maslin’s Motion to Dismiss.

5. On March 9, 2023, Defendant Mitchell filed a Reply to Plaintiffs Opposition to the Mitchell Motion to Dismiss (“Mitchell Opposition Reply”).

6. The Mitchell Opposition Reply sets forth multiple arguments in response to Plaintiffs Opposition to Mitchell Motion including: 1. adoption of Mitchell and Harford County's Reply in Support of Motions to Dismiss Plaintiffs' Original Complaint; 2. incorporation of Opposition to Motion to Strike; 3. that there is no justiciable controversy between the parties; and, 4. the Amended Complaint's counts for private and public nuisance should be dismissed because Plaintiffs have improperly pleaded an anticipatory nuisance.

7. Defendant, Charles A. Maslin, III, joins in the Mitchell Opposition Reply, and adopts and incorporates by reference all pleadings, arguments and exhibits submitted in support of the Mitchell Opposition Reply, reserving unto Charles A. Maslin, III all arguments and grounds in opposition to Maslin's Motion to Dismiss.

WHEREFORE, Defendant Charles A. Maslin, III respectfully requests this Honorable Court enter an Order:

- a. Granting Charles A. Maslin, III's Motion to Dismiss;
- b. Dismissing the Amended Complaint filed by the Plaintiffs; and,
- c. Granting such additional further relief as the nature and circumstances of Charles A. Maslin, III's cause may require or permit.

By: \_\_\_\_\_

  
**Lori J. Hahn Maslin, Esquire**  
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**CERTIFICATION OF SERVICE**

I, Lori J. Hahn Maslin, Esquire, do hereby certify that on March 14, 2023, a copy of the foregoing Reply to Plaintiffs' Opposition to Motion to Dismiss on behalf of Defendant Charles A. Maslin, III was filed electronically via MDEC, and shall be served electronically on all parties hereto upon acceptance by and via the MDEC system.



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Lori J. Hahn Maslin, Esquire  
CPF #0710160001  
Attorney for Charles A. Maslin, III

Dated: March 14, 2023