

PAUL JOHN CISAR, et al.

*Plaintiffs,*

v.

F.O. MITCHELL & BRO, *et al.*

*Defendants.*

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* HARFORD COUNTY  
\* CASE NO.: C-12-CV-22-000888

\* \* \* \* \*

**DEFENDANT FREDERICK WARD ASSOCIATES, INC.’S  
MOTION TO JOIN DEFENDANT F.O. MITCHELL & BRO.’S OPPOSITION TO  
PLAINTIFFS’ RULE 2-505 MOTION FOR REMOVAL**

Defendant, Frederick Ward Associates, Inc. (“FWA”), by and through its undersigned counsel, hereby files this Motion to Join Defendant F.O. Mitchell & Bro.’s Opposition to Plaintiffs’ Rule 2-505 Motion for Removal, for reasons set herein:

1. This matter is pending before this Honorable Court pursuant to Plaintiffs’ Complaint that improperly seeks an advisory opinion regarding the Harford County Zoning Code, injunctive relief, and finding of an anticipatory nuisance and nuisance *per se* regarding the proposed development in Harford County, Maryland.

2. Defendant FWA hereby joins and adopts Defendant F.O. Mitchell & Bro.’s Opposition to Plaintiffs’ Rule 505 Motion for Removal and its arguments set forth in therein.

WHEREFORE, Defendant Frederick Ward Associates, Inc. respectfully requests this Honorable Court to DENY Plaintiffs’ Motion for Removal and grant such other and further relief as justice requires.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of March, 2023, a copy of Defendant, Frederick Ward Associates, Inc., Motion to Join Defendant's Opposition was e-filed and served on:

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/s/  
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