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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	:	

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**CHARLES A. MASLIN, III'S OPPOSITION TO  
PLAINTIFFS' RULE 2-505 MOTION FOR REMOVAL**

Charles A. Maslin, III ("Maslin"), by and through his attorney, Lori J. Hahn Maslin, Esquire, with The Hahn Law Offices, LLC, opposes Plaintiffs' Maryland Rule 2-505 Motion for Removal and in support thereof states as follows:

1. On March 6, 2023, Plaintiffs filed a Rule 2-505 Motion for Removal ("Removal").


2. On March 9, 2023, Defendant F.O. Mitchell & Bro. filed an Opposition to Plaintiffs Motion for Removal ("Mitchell Removal Opposition").

3. The Mitchell Removal Opposition sets forth various arguments in opposition to Removal including 1. plaintiffs failed to Appeal the Transfer Order from Anne Arundel County despite that such Order is immediately appealable and thus Plaintiffs have waived their right to appeal; 2. failure to file a supporting affidavit as required by Rule 2-505; 3. Supreme Court of Maryland case law states that no right of removal exists in equity cases like the instant matter; 4. failure to identify reasonable grounds for the belief 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 venue shopping.

4. Defendant Charles A. Maslin, III joins in the Mitchell Removal Opposition and adopts and incorporates by reference all pleadings, arguments and exhibits submitted in support of the Mitchell Removal Opposition, reserving all arguments and grounds available in opposition to the Motion for Removal unto Charles A. Maslin, III.


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

- a. Deny Plaintiffs' Motion for Removal;
- b. Grant 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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Attorney for Charles A. Maslin, III

**REQUEST FOR HEARING**

Defendant Charles A. Maslin, III hereby respectfully requests a Hearing on the foregoing Motion for Removal.

By:   
Lori J. Hahn Maslin, Esquire  
CPF #0710160001

**CERTIFICATION OF SERVICE**

I, Lori J. Hahn Maslin, Esquire, do hereby certify that on March 17, 2023, a copy of the foregoing Opposition to Plaintiffs' Motion for Removal 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 17, 2023