

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 CHESAPEAKE REAL ESTATE GROUP, LLC’S
MOTION TO STAY DISCOVERY/MOTION FOR PROTECTIVE ORDER PENDING
RESOLUTION OF DEFENDANTS’ MOTIONS TO DISMISS THE CASE IN IT
ENTIREY**

Defendant, Frederick Ward Associates, Inc. (“FWA”), by and through its undersigned counsel, hereby files this Motion to Join Defendant Chesapeake Real Estate Group, LLC’s Motion to Stay Discovery/Motion for Protective Order Pending Resolution of Defendants’ Motion to Dismiss the Case in its Entirety, 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 Chesapeake Real Estate Group, LLC’s Motion to Stay Discovery/Motion for Protective Order Pending Resolution of Defendants’ Motion to Dismiss the Case in its Entirety and its arguments set forth in therein.

WHEREFORE, Defendant Frederick Ward Associates, Inc. respectfully requests this Honorable Court to grant the Motion to Stay/Motion for Protective Order 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 27th day of March, 2023, a copy of Defendant, Frederick Ward Associates, Inc., Motion to Join Defendant's Motion to Stay/Motion for Protective Order was e-filed and served on:

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* * * * *

ORDER

Upon consideration of Defendant Frederick Ward Associates, Inc.’s Motion to join Defendant Chesapeake Real Estate Group, LLC’s Motion to Stay Discovery/Motion for Protective Order Pending Resolution of Defendants’ Motion to Dismiss the Case in its Entirety to Dismiss and opposition thereto, it is this _____ day of _____, 2023, hereby

ORDERED that Defendant Frederick Ward Associates, Inc.’s Motion is GRANTED; and it is further

ORDERED that all discovery is STAYED until further order by the Court.

Judge
Circuit Court of Harford County