

<b>PAUL JOHN CISAR, et al.</b>	*	IN THE
Plaintiffs,	*	CIRCUIT COURT
v.	*	FOR
<b>F.O. MITCHELL &amp; BRO, et al.</b>	*	HARFORD COUNTY
Defendants.	*	
	*	CASE NO.: C-12-CV-22-000888
* * * * *		

**DEFENDANT F.O. MITCHELL & BRO.'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 ITS ENTIREY**

F.O. Mitchell & Bro. ("Mitchell"), by and through its undersigned counsel, Robert S. Lynch, Esquire, David S. Lynch, Esquire, and Stark and Keenan, P.A., 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 in Case in its Entirety, for the reasons set forth 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 F.O. Mitchell & Bro. 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 therein.

WHEREFORE, Defendant F.O. Mitchell & Bro. 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,



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY on this 31st day of March, 2023, that a copy of the foregoing Defendant F.O. Mitchell & Bro.'s Motion to Join Defendant Chesapeake Real Estate Group, LLC's Motion to Stay Discovery/Motion For Protective Order Pending Resolution of Defendant's Motions to Dismiss the Case in its Entirety was served on all parties registered for services via MDEC e-filing.

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