PAUL CISAR, ET AL : IN THE CIRCUIT COURT

Plaintiffs : OF MARYLAND

: FOR HARFORD COUNTY

VS.

F.O. MITCHELL & BRO, *ET AL* : Case No. C-12-CV-22-000888

**Defendants** 

## CHARLES A. MASLIN, III'S MOTION TO JOIN THE MOTION TO STAY DISCOVERY/MOTION FOR PROTECTIVE ORDER AS FILED BY DEFENDANT CHESAPEAKE REAL ESTATE GROUP, LLC PENDING RESOLUTION OF DEFENDANTS' MOTIONS TO DISMISS

Charles A. Maslin, III ("Maslin"), by and through his attorney, Lori J. Hahn Maslin, Esquire, with The Hahn Law Offices, LLC, files this Motion to Join Defendant Chesapeake Real Estate Group, LLC's ("Cheasapeake RE") Motion to Stay Discovery/Motion for Protective Order Pending Resolution of Defendants' Motion to Dismiss and in support thereof states as follows:

- 1. This matter is pending before this Honorable Court pursuant to Plaintiffs' Amended Complaint that improperly seeks and advisory opinion regarding current zoning in Harford County, injunctive relief, anticipatory nuisance and nuisance per se regarding proposed development currently authorized under the Harford County Zoning Code ("Amended Complaint").
- 2. On March 2, 2023, Plaintiffs effected service of Interrogatories and Request for Production of Documents upon Maslin. ("Discovery Requests")
- 3. Maslin hereby motions to join and adopt Chesapeake RE's Motion to Stay Discovery/Motin for Protective Order Pending Resolution of Defendants' Motions to Dismiss the Amended Complaint.

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

- a. Granting the Motions to Stay/Motions for Protective Order;
- 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

CPF #0710160001

ljhmlawoffice@gmail.com

100 S. Washington Street

P.O. Box 694

Havre de Grace, MD 21078

610-668-0818

Attorney for Charles A. Maslin, III

## **CERTIFICATION OF SERVICE**

I, Lori J. Hahn Maslin, Esquire, do hereby certify that on March 31, 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.

ori J. Hahn Maslin, Esquire

CPF #0710160001

Attorney for Charles A. Maslin, III

Dated: