

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

**PROPERTY OWNERS ASSOCIATION
OF ARUNDEL ON THE BAY, INC., et al.**

Plaintiffs,

v.

MAURICE B. TOSE, et ux.

Defendants

Case No. C-02-CV-19-003640

CONSENT MOTION TO EXTEND TIME TO RESPOND TO MOTION

Plaintiffs, Property Owners Association of Arundel on the Bay, Inc. (the “Association”), David Delia (“Delia”) and Lori Strum (“Strum”) (collectively, “Plaintiffs”), by and through their attorneys, Wayne T. Kosmerl, N. Tucker Meneely and Council, Baradel, Kosmerl and Nolan, P.A., files this Consent Motion to Extend Time to Respond to Motion, and state as follows:

1. Defendants filed a Motion to Dismiss for Failure to Join Necessary Parties on or about March 7, 2021.
2. Due to undersigned counsel’s heavy workload, he has requested, and Defendants’ counsel has graciously consented, to a short extension until March 24, 2021 to file a response to Defendants’ Motion to Dismiss.
3. The requested extension is short and will not cause any prejudice to the parties, given Defendants’ consent thereto.

WHEREFORE, Plaintiffs request that this Court grant Plaintiffs’ Consent Motion to Extend Time to Respond to Motion and for any such other relief as this Court deems just and proper.

Respectfully submitted,

COUNCIL, BARADEL,
KOSMERL & NOLAN, P.A.

/s/ N. Tucker Meneely

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Attorneys for Plaintiffs/Counter-Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of March, 2021, a copy of the foregoing paper
was served electronically via MDEC upon:

Barbara J. Palmer
Hyatt & Weber, P.A.
200 Westgate Circle, Suite 500
Attorney for Defendant

/s/ N. Tucker Meneely

N. Tucker Meneely (CPF# 1012150249)

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ORDER

Upon consideration of Plaintiffs' Consent Motion to Extend Time to Respond to Motion and Defendants' consent thereto, it is this ____ day of _____, 2021, hereby

ORDERED, that the Consent Motion to Extend Time to Respond to Motion to Dismiss is **GRANTED**; and it is further

ORDERED, that deadline for Plaintiffs to respond to Defendants' Motion to Dismiss is extended to March 24, 2021.

Judge, Circuit Court for Anne Arundel County