

WILLARD A. DANIELS, and
DOROTHY F. DANIELS, his wife,

Petitioners

IN THE CIRCUIT COURT

vs

FOR

BALTIMORE COUNTY

AT LAW

H. GUY CAMPBELL, DANIEL W.
HUBERS and CARL F. VONDEM,
being and constituting the
Board of Zoning Appeals of
Baltimore County,

Defendants

ANSWER TO WRIT OF CERTIORARI AND OTHER,
AND CERTIFIED COPIES OF PROCEEDINGS BEFORE THE
ZONING COMMISSIONER AND BOARD OF ZONING APPEALS
OF BALTIMORE COUNTY

Mr. Clerk:

Please file, do.

Counsel to Board of Zoning
Appeals of Baltimore County

WILLARD A. DANIELS, and
DOROTHY F. DANIELS, his wife

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Baltimore County,

Defendants

TO THE HONORABLE, THE JUDGE OF SAID COURT:

And now come H. Guy Campbell, Daniel W. Hubers and
Carl F. VonDEM, constituting the Board of Zoning Appeals of Baltimore
County, and in answer to the writ of certiorari directed against them
in this case, herewith return the record of proceedings had in the
above entitled matter, consisting of the following certified copies
or original papers on file in the office of the Zoning Department of
Baltimore County:

No. 2300

Oct. 10, 1952 Hearing held by Zoning Commissioner of Baltimore
County to determine Non-Conforming Use of property
of Willard A. Daniels, Catonsville Manor, First
District, for operation of an automobile junk yard.
Dec. 2, " Order of Zoning Commissioner.
" 10, " Appeal to Board of Zoning Appeals filed.
March 26, 1953 Hearing on appeal before Board of Zoning
Appeals.
May 28, " Order of Board of Zoning Appeals filed.
June 10, " Writ of certiorari and appeal to the Circuit
Court for Baltimore County served on Board
of Zoning Appeals.

July 3, 1953 Transcript of testimony taken at the appeal hearing
before the Board of Zoning Appeals, filed.

Petitioners' Exhibits "A", "B", "C", "D", "E", "F",
"G", "H", "I", "J", "K", and "L".
Prosecutors' Exhibits "A", "B", "C" and "D", applications
and permits.

Aug. 17, " Record of proceedings filed in the Circuit Court for
Baltimore County.

Record of proceedings pursuant to which said Order was
entered and said Board acted are permanent records of the Zoning
Department of Baltimore County as are also the use district maps and
your Respondents respectfully suggest that it would be inconvenient
and inappropriate to file the same in this proceeding, but your
Respondents will produce any and all such rules and regulations
together with the zoning use district maps at the hearing on this
matter or whenever directed to do so by this Court.

Respectfully submitted,

Counsel to the Board of
Zoning Appeals of Baltimore
County

WILLARD A. DANIELS, and
DOROTHY F. DANIELS, his wife

Petitioners

IN THE
CIRCUIT COURT

vs

FOR

BALTIMORE COUNTY

AT LAW

H. GUY CAMPBELL, DANIEL W. HUBERS
and CARL F. VONDEM, being and
constituting the Board of Zoning
Appeals of Baltimore County

Defendants

PETITION FOR WRIT OF CERTIORARI

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Petition of Willard A. Daniels and Dorothy F.
Daniels, his wife, by John B. Rowe and Harold M. Vick, their
attorneys, respectfully represents unto your Honors:-

1. That your Petitioners are property owners and tax-
payers of Baltimore County, and are engaged in the business of
buying and selling used cars, dismantling used cars, and selling
parts, accessories and tin and steel scrap recovered therefrom.

2. That in the prosecution of this business in which
they have been engaged since 1940 and prior thereto they have con-
tinuously used the property which is the subject of these proceedings,
all of which is located in Block 5, Catonsville Manor, plat of
which is on file in the Office of the Clerk of the Circuit Court
for Baltimore County.

3. That on or about October 27, 1952, Willard A. Daniels,
one of your Petitioners, pursuant to a request issued by the Zoning
Commissioner of Baltimore County, appeared before said officer and
was examined on the question of whether or not he was violating the
zoning laws of Baltimore County by using his property in a manner
not conforming to said zoning laws and in violation of said laws.

4. That your Petitioner was called upon and required by
the Zoning Commissioner at the hearing on October 27, 1952 to
establish the fact that he had the right to use the subject property

in a manner not conforming to said zoning laws.

5. That following said hearing an opinion was rendered
by the Zoning Commissioner of Baltimore County, dated December 2,
1952, holding that, "if a lawful non-conforming use existed on
the effective date of the Zoning Regulations and Restrictions,
namely, January 2, 1945, for the use of cars in portions of Block 5,
of 'Catonsville Manor', that this non-conforming use was discontinued
for a period of one year and that no lawful non-conforming use exists
for the use of Block 5 of 'Catonsville Manor' for the operation
of a junk yard".

6. That the foregoing action by the Zoning Commissioner
was not accompanied by any order requiring anything to be done by
these Petitioners, however, your Petitioners believed that an appeal
to the Board of Zoning Appeals was necessary to protect their interests,
and entered an appeal to the Board of Zoning Appeals from said action
of the Zoning Commissioner.

7. That a hearing before the Board of Zoning Appeals was
held on April 23, 1953, and thereafter the Board of Zoning Appeals
rendered an "Opinion and Order," dated May 28, 1953, affirming the
"Opinion" of the Zoning Commissioner, dated December 2, 1952, and
further ordering your Petitioner "Willard A. Daniels, to discontinue
all business transactions in Block 5 'Catonsville Manor', and that
all junk cars, trucks, and other pieces and parcels of such vehicles
and other chattels in connection with said business be removed from
said property within sixty (60) days from the date hereof."

8. That your Petitioners are aggrieved by the decision
of the Board of Zoning Appeals of Baltimore County and aver that
such decision is illegal and should be reversed, set aside and
annulled by this Honorable Court for the following reasons:-

(a) That said Order of the Board of Zoning Appeals
of Baltimore County constitutes an arbitrary and capricious act and
a gross abuse of administrative discretion.

(b) That both the Zoning Commissioner and the Board

of Zoning Appeals required your Petitioner, Willard A. Daniels,
to establish by a preponderance of evidence - (1) that he was
the owner of all of the lots then being used by him for his
business, and (2) that he had been using all of these lots for
his business purposes prior to and on January 2, 1945, (the
effective date of the Zoning Laws of Baltimore County), which
was without legal authority and contrary to the constitutional
rights of your Petitioners.

(c) That your Petitioner, Willard A. Daniels, as
will appear from the records of the Zoning Board, hereinafter
prayed to be filed in this case, was not charged with a violation
of the Zoning Laws, but appeared in response to a request issued
by the Zoning Commissioner; that he did appear and although he
was not charged with a violation of the Zoning Laws was ordered
to establish the existence of a lawful non-conforming use of the
subject property, which action, both by the Zoning Commissioner
and the Board of Zoning Appeals, was arbitrary, illegal and uncon-
stitutional.

(d) That your Petitioner believes and therefor avers
that the burden of proof beyond a reasonable doubt of any violation
of the Zoning Laws was upon the Commissioner and/or the Board of
Zoning Appeals, and the testimony and records, hereinafter prayed
to be filed in this case, clearly establish that your Petitioner,
Willard A. Daniels, was required to prove by a preponderance of
positive testimony, through himself and disinterested witnesses, that
he was not violating the Zoning Laws, and as against this positive
evidence the only other testimony offered was the negative testimony
of certain residents that no use was made by your Petitioner of the
subject property, prior to January 2, 1945.

(e) That there was no substantial evidence before
the Zoning Commissioner or the Board of Zoning Appeals of Baltimore
County in these proceedings to justify and support the Opinion of

December 2, 1952 and Order of May 28, 1953 respectively.

(f) That the Opinion of the Zoning Commissioner of
Baltimore County dated December 2, 1952, and the Order of the Board
of Zoning Appeals of Baltimore County dated May 28, 1953, constitute
an attempted unlawful and unconstitutional exercise of authority.

(g) And for such other and further reasons that may
be shown at the hearing hereof.

TO THE HONORABLE:-

That a Writ of Certiorari be granted by this Honorable
Court directed against said defendants, constituting the Board of
Zoning Appeals of Baltimore County, to review the decision and order
of said Board of May 28, 1953, in this proceeding and prescribing
therein the time in which a return thereto shall be made and served
upon the Attorney for the defendants.

That said Board of Zoning Appeals of Baltimore County may
be required to return to this Honorable Court the original papers acted
upon by it, or certified copies thereof, together with a copy of all
records in said proceeding and a transcript of all testimony taken
before said Board in connection with said proceedings, as well as a
copy of the Order entered by said Board and a copy of any and all
rules and regulations pursuant to which said Order was entered and
said Board purported to act.

That this Honorable Court may permit your Petitioner to
take such other and further testimony as may be necessary for the
proper disposition of this matter.

That this Honorable Court may reverse, set aside, annul
and declare void and of no effect the decision and order of the
Board of Zoning Appeals for Baltimore County of May 28, 1953.

And for such other and further relief as the nature of
their case may require.

AND AS IN WRIT BOUND, etc.

John B. Rowe

Harold M. Vick, Attorneys for Petitioners

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY, That on this day of June, 1953,
before me, the subscriber, a Notary Public of the State of Maryland,
in and for Baltimore City, personally appeared WILLARD A. DANIELS,
one of the Petitioners in the above case, and made oath in due
form of law that the matters and facts contained in the foregoing
Petition are true to the best of his information, knowledge and
belief.

Notary Public

522 Upon the foregoing Petition and Affidavit, it is this day of June, 1953, by the Circuit Court for Baltimore County.

IT IS FURTHER ORDERED that the said Board of Zoning Appeals of Baltimore County shall return to this Court all the original papers, or certified or sworn copies thereof and the return shall concisely set forth such other facts as may be pertinent to show the grounds of the decision and order appealed from, together with a transcript of all testimony taken at the hearing and copies of exhibits filed therein.

George F. Oberly

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

Leroy Daniels vs. Bd. of Zoning Appeals
et al.

Case No. Misc. 1178
Remanded to Board for additional testimony, to
be returned within 30 days

Please be prepared for trial on that day.

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APR 13 1953

Mr. H. Gray Campbell,
Campbell Building
Towson 4, Maryland

Dear Mr. Campbell:

Additional testimony requested by the Court in the case of LARRY DANIELS will be taken on Thursday, April 23, 1953 at 10:30 a.m.

Immediately following the taking of the above testimony, the testimony to complete the case of Alfred Daniels will be taken.

Very truly yours,

Eating Condensinor

cc: Mr. Daniel W. Hubers,
Mr. Carl F. Vohden
Chas. W. Held, Jr., Eng.

April 24, 1961

Chas. B. Bosley, Esquire,
Munsey Building
Baltimore 2, Maryland

Dear Mr. Bosley:

Additional testimony requested by the Court in the case of LeRoy Daniels will be taken by the Board of Zoning Appeals of Baltimore County on Thursday, April 23, 1953 at 10:30 a.m.

Immediately following the taking of the above testimony, the testimony to complete the case of Alfred Daniels will be taken.

Very truly yours,

Zoning Commissioner

OPINION AND ORDER OF THE BOARD OF ZONING APPEALS
OF
BALTIMORE COUNTY

This is an appeal by Willard A. Daniels from an Opinion of the Zoning Commissioner of Baltimore County finding that the appellant does not have a lawful non-conforming use for the operation of an automobile junk yard in Block 5 of "Catonville Manor."

The case came on for hearing, testimony was taken, and counsel heard.

For a number of years there have been complaints and considerable correspondence in connection with the business operated on the tract of land in question by Willard A. Daniels. Much of the testimony in this case was conflicting, indefinite, vague, and uncertain due in part to two reasons, namely:

1. The long lapse of time from January 1, 1945, to the time of the hearing on appeal, making it difficult for the witnesses to recall clearly and distinctly the exact and definite details necessary to determine the date of the beginning of the operation of the business on the property in question.

2. That other members of the Daniels' family have been junking cars on adjoining and nearby lots over a period of years, and that sometimes, so it appeared, the junked cars or trucks were moved from one lot to another.

The Board is also of the opinion that some of the persons testifying for Willard A. Daniels were not sure of the location of the junked vehicles and parts so as to determine whether they were situated on the lots in question in Block 5 of "Catonsville Manor" or on property belonging to others.

It also appears that some of the purchasers of parts bought from Willard A. Daniels and some bought from other members of the Daniels' family. At times said lots were entirely cleared

-2-

of cars and parts, and at other times, according to the testimony, there was visible evidence of such chancells on the land. Reports by the inspectors of the Building and Zoning Department of Baltimore County, and especially that of July 16, 1947, made by William Schott and Harry C. Gartside, would indicate that there had been an abandonment of the automobile Junk yard operations on the tract of land complained about, as it was reported: "Inspection was made today on Carroll Street, Queen Anne Street and several other streets in Katonawille Manor." "As we were unable to locate any Auto Junk Yard which we were told was located on Carroll Street near Daniels Street (operated by Mr. Daniels and two sons), we asked the lady who lives on the corner of Queen Anne and Carroll Streets and she told us one of the men who operated this Auto Junk Yard was in the Federal Penitentiary for stealing cars and changing motor serial numbers, that the F. B. I. made the arrest and he was given two years."

"She also stated that shortly after he was taken to the penitentiary all the cars and trucks were removed. She told Mr. Gartside and me that she thought they were down in the woods in the rear. We went down to the woods, but could not locate anything. We also looked around the neighborhood but could not locate anything of this nature."

Sometime later the business began again. Mr. Knopp testified that he bought parts from both of the Daniels' boys starting with the transmission in 1939, but he was unable to determine exactly in what location these parts had been stored or as to whether or not they were on the property of Willard A. Daniels or on some of the property of the other members of the Daniels' family.

■ 3 ■

From the conflicting testimony and especially from the uncertainty of the persons testifying that occasionally they dealt with Willard A. Daniels and that they now and then visited the Daniels' property but were not familiar with the location of the various lots in Block 5 of "Catonville Manor," and further that those living in the neighborhood were in a better position to observe the operations of the business and were in a better position to determine the exact location of the junked cars and more nearly determine the time in which the business began to be operated by Willard A. Daniels; and for reasons above stated the Board of Zoning Appeals finds that Willard A. Daniels does not have a lawful non-conforming use in Block 5 of "Catonville Manor" as defined by the Zoning Regulations and restrictions of Baltimore County.

Therefore, it is ordered this 28th day of May, 1953, that Willard A. Daniels discontinue all business transactions in Block 5, "Gatonsville Manor," and that all junk cars, trucks and other pieces and parcels of such vehicles and other chattel in connection with said business be removed from said property within sixty (60) days from the date hereof.

U.S. Apple
Chairman
James M. Apple
Carl F. Apple
Board of Zoning Appeals of
Baltimore County

FILED DEC 10 1952

AUGUSTINE J. MILLER, ZONING COMMISSIONER

VS.

WILLARD A. DANIELS
Catonville Manor, 1st District of Baltimore
County, Maryland

December 5, 1952

Mr. Augustine J. Miller
303 Washington Avenue
Towson 4, Maryland
Dear Sir:

Willard A. Daniels feeling aggrieved by the decision of the
Zoning Commissioner dated December 2nd, 1952, in the above entitled case,
hereby enters an appeal to the Board of Zoning Appeals from said decision.

Please send all papers to the Board of Zoning Appeals.

John B. Hove
Frank M. Vile
Attorneys for Willard A. Daniels

RE: HEARING TO DETERMINE NON-CONFORMING USE OF
PROPERTY OF WILLARD A. DANIELS, Catonville
Manor, First District of Baltimore County

The purpose of the special hearing, in the above entitled
matter, was to determine whether or not Willard A. Daniels has a
lawful non-conforming use for the operation of an automobile junk
yard in Block 5, of "Catonville Manor". Testimony introduced at the
hearing by Officer Walter D. Knapp, 18 Bloomington Avenue, a member
of the Baltimore County Police Department, was to the effect that he
had known Willard A. Daniels since 1937 and that he had purchased
parts from him and had seen junked cars on lots Nos. 31 to 36,
inclusive, lots Nos. 37 to 48, inclusive, and lots Nos. 59 to 64,
inclusive, of Block 5, "Catonville Manor", prior to January 2, 1945.

Mr. Stanley F. Glanville, 611 Myrtle Lane, Catonville,
a member of the Baltimore County Fire Department, testified that he had
visited this property in 1941 and there were at that time 20 cars in
Block 5 and in September 1941, when he came from the Army, he had
seen junked cars in Block 5.

Officer John G. Williams, Ridgeleigh Oak Road, Towson, a
member of the Baltimore Park Police Force, testified that he had known
Willard A. Daniels since 1940, that he bought parts in 1939 and again
in 1945. Officer Williams was not positive as to where the junked
cars were located from which the parts were taken.

Mr. Henri J. Raphael, Jr., Old Court Road, Pikesville, a former
member of the Zoning Department stated that an inspection made by him
in 1943 showed that lots Nos. 37, 38 and 39 and lots Nos. 21 to 36,
inclusive, and the rear of lots Nos. 59 to 64 were being used sparsely
for the storage of junked cars. Mr. Raphael further stated that he
sold a car to Willard A. Daniels, prior to January 2, 1945, and that
upon a visit to "Catonville Manor" saw this car parked in block 5.

Willard A. Daniels testified that he bought lots Nos. 33 to
36, inclusive, by deed dated July 10, 1941. He also bought lots Nos.
21, 22, 27, 28 and 29 to 36, inclusive, by deed dated May 21, 1945.
He further stated that in 1942 he used lots Nos. 59 to 64, inclusive,
and lots Nos. 21 and 22 and he also used lots Nos. 25 and 26 without
permission of the owner.

Testimony of the residents of the area was as follows:

Mrs. Louis Byrd, 5906 Carroll Avenue, Catonville, owns lots
Nos. 49, 50, 51 and 52, Block 5. Mrs. Byrd stated that she bought
these lots in 1941 and built her residence in 1941. Mrs. Byrd stated
that Mr. Byrd was injured on December 3 or 4, 1947. At that time
Willard A. Daniels had two trucks, in block 5, one of the trucks was
used to take parts from to repair the other. After December 3, 1947
a number of milk trucks were parked on the lot and it was after
December 3, 1947 that the junking operations began in block 5.

Mr. Eagan M. Doby, Johnnycroft Road, Catonville, testified
that he bought the farm adjoining "Catonville Manor" on the west in
September, 1943. In the spring of 1944 he heard that the Daniels
family had a tractor for sale and that he visited "Catonville Manor"

and at that time in block 5 he saw one tractor and two trucks on
the Daniels' property in Block 5. Mr. Doby also testified that
to his knowledge the junking business was started in block 5 in
1948 or 1949.

Mrs. Alice Pruitt, 5930 Carroll Avenue, had lived at
this location since 1925; Mrs. Pruitt owns lots Nos. 53 to 58,
inclusive. Mrs. Pruitt stated that Willard A. Daniels started
to junk cars in block 5 in 1947 or 1948. She stated that her
brother came home in December 1946 and there were no junked cars
in block 5 then.

Mr. Harry F. Roman, 5950 Queen Anne Street, "Catonville
Manor", stated that he owns lots Nos. 58 to 72, inclusive, in
Block 6. He stated that there was a garage fire on the Daniels'
property in November 1945 and that there were no junked cars in
block 5 at that time. Mr. Roman stated that the junking started
in block 5 in 1946.

Mrs. John C. Kinschberger, 1220 Dorchester Avenue, whose
house is located on lots Nos. 42 and 43, block 6, "Catonville
Manor" stated that she can see block 5 from her house and that
there were no cars in block 5 in 1946 when she bought her
property and that the junking started in 1950.

Mr. William Bernhardt, 5947 Prince George Street, bought
the lots upon which his home is located in 1947. He stated he
built his home in 1948 and moved in, in 1948. He stated that
his car got stuck in the mud in December 1948 on St. Marys Street
and that Willard A. Daniels pulled him out. He stated that in
May 1949, Willard A. Daniels was in the gravel hauling business.
He stated further that he saw no cars in block 5 in December 1948.

Mrs. Beulah Taylor, 1112 Gregory Avenue, testified that
she inspected a house in the 1200 block of Dorchester Avenue in
June 1948 for the purpose of buying said house. Mrs. Taylor stated
that there were no cars in block 5 in June 1948.

Mrs. Thurman W. Darr, 1538 Lakeside Avenue, testified
that she moved to the above address in September 1947 and that
she visited Mrs. Pruitt in December 1947 and that
there were no junked cars to the north of Carroll Street in
block 5 at that time. Mrs. Darr further testified that Willard
A. Daniels started the junking operations in 1949.

An inspection report dated July 16, 1947 on file in
the Zoning Department and signed by William I. Schott and Harry
C. Gardside, members of the Zoning Department, is as follows:

"Inspection was made today on Carroll Street, Queen Anne
Street and several other streets in 'Catonville Manor'."

As we were unable to locate any junk yard which we were told
was located on Carroll Street, near Daniels Street (operated by
Mr. Daniels and two sons), we asked the lady who lives on the
corner of Queen Anne and Carroll Streets and she told us one

of the men who operated this Auto Junk yard was in the Federal
Penitentiary for stealing cars and changing motor serial numbers,
that Mr. B. L. made the arrest and he was given two years.

She also stated that shortly after he was taken to the
penitentiary all the cars and trucks were removed. She told Mr.
rarr. We went down to the woods, but could not locate anything.
We also looked around the neighborhood but could not locate
anything of this nature."

It appears from the testimony of Willard A. Daniels,
Walter D. Knapp, Stanley F. Glanville, John C. Williams and Henri
J. Raphael, Jr., that there was activity in the junking of automobiles
in block 5 prior to January 2, 1945. However, residents of the
area testified that there was no junking of cars prior to 1946
and there was considerable testimony to the effect that there was
no junking of cars in 1947 and 1948.

Due to the fact that Willard A. Daniels, the father of
Willard A. Daniels and Lelley Daniels, the brother of Willard A.
Daniels, were junking cars in block 6, it is difficult for the
persons testifying in this case to be sure as to the exact
location of the junked cars. Especially in this time of persons
who do not live in the area and were only infrequent visitors.

It is, therefore, the opinion of the Zoning Commissioner
of Baltimore County, that the testimony of the persons living in
the area should be given more weight in determining the location
and dates of the operations involved. In addition to this testimony,
a report of William I. Schott and Harry C. Gardside, dated July
16, 1947, stated clearly that at that time there were no junked
cars in this section of "Catonville Manor".

It is the opinion of the Zoning Commissioner of Baltimore
County that if a lawful non-conforming use existed on the effective
date of the Zoning Regulations and Ordinances, namely, January 2,
1945, for the use of certain portions of block 5 of "Catonville
Manor", that this non-conforming use was discontinued for a period
of one year and that no lawful non-conforming use exists for the
use of block 5 of "Catonville Manor" for the operation of a
junk yard.

Augustine J. Miller
Zoning Commissioner
of Baltimore County

Date: Dec 5, 1952

September 11, 1952

Mr. Alfred B. Daniels,
88 Marge Ave., at Eagleview Ave.,
Catonville Manor,
Baltimore 74, Maryland

Dear Mr. Daniels:

This Department has from time to time received
complaints concerning the operation of your junk yard in Catonville
Manor. Upon investigation of this complaint it could not
be ascertained whether you have a lawful nonconforming use for
the operation of this junk yard, and if such right exists, the
extent to which it exists.

It has been requested by counsel, representing
the protestants, that a public hearing be held to determine the
facts in the case. This hearing will be held on Monday, October 6,
1952 at 1:00 p. m. in the Hearing Room, in the basement of the
Council Building, Towson, Maryland.

It is recommended that you produce at this
hearing any records or data which might be of help in determining
your rights in the operation of this junk yard.

Very truly yours,

Zoning Commissioner

cc: Chas. H. Harley, 5841

Harold H. Vile, Esquire,
2 E. Lexington Street
Baltimore 2, Maryland
to
County Commissioners of
Baltimore County
4 Zoning Department
303 Washington Avenue,
Towson 4, Maryland

July 3, 1953

Certified copies of petition and other papers filed in the
matter of property of Willard A. Daniels, Catonville Manor
1st District

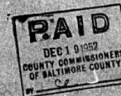
046.00

December 19, 1952

\$22.00

RECEIVED of Harold H. Vile, Attorney for Willard A.
Daniels, the sum of Twenty Two (\$22.00) Dollars, being cost of
appeal to the Board of Zoning Appeals of Baltimore County
from the decision of the Zoning Commissioner rendered in the
operation of a junk yard in Catonville Manor, 1st District.

Zoning Commissioner



AUTO'S IN Area outlined in RED 1/10/55
 Auto's " " " " GREEN 2/15/55 Shows much improvement in

PRINCE GEORGE ST.

ST. MARY'S

STREET

CARROLL

STREET

QUEEN

ANNE

STREET

TALBOTT

STREET

AVENUE

KENT

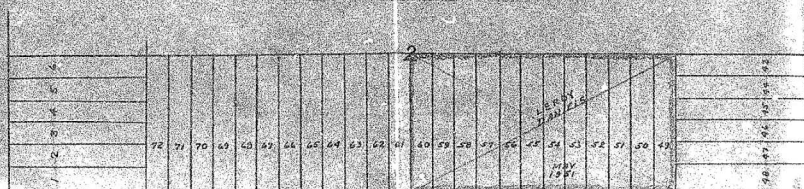
AVENUE

DORCHESTER

13
20
26

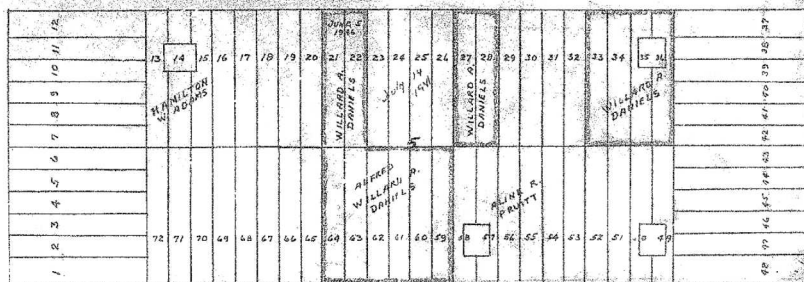
SCALE
1" = 50'

PRINCE GEORGE ST.



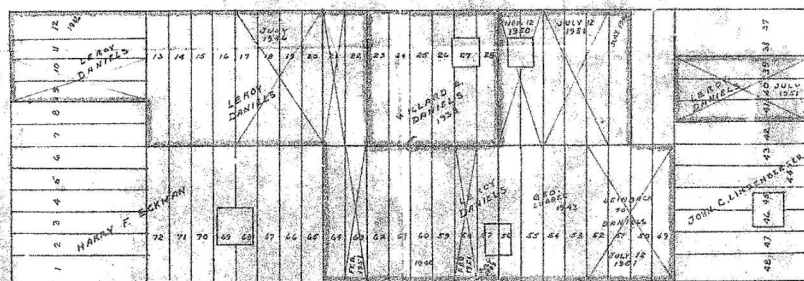
ST. MARY'S

STREET



CARROLL

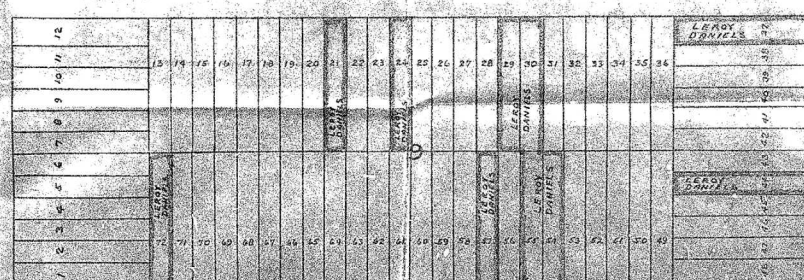
STREET



QUEEN

ANNE

STREET



TALBOT

STREET

AVENUE

AVENUE

KENT

DORCHESTER

SCALE
1"=32'