

LAW OFFICE
SMITH AND HARRISON

February 26, 1959

Mr. Jack Rose, Deputy Zoning Commissioner
County Office Building
Chesapeake Avenue
Towson 4, Maryland

Re: Petition for Special Hearing of
Thomas R. Knight, et al-602-604
Plymouth Road, Catonsville

Dear Mr. Rose:

Please mark the above Petition "withdrawn
by the Petitioners without prejudice".

Very truly yours,

Richard C. Murray

RMG:sg

10/29/58
10 A.M.

MACDANIEL AND PAYNE
ATTORNEYS AT LAW
208-7 MUNSEY BUILDING
BALTIMORE 2, MARYLAND
PLANNING 8-1878
PLANNING 8-8181

February 19, 1959

Zoning Commissioner of Baltimore County
County Office Building
Towson 4, Maryland

Dear Mr. Commissioner:

This letter is to put you on notice and to be considered formal protest by my clients, Miss Helen G. Moyer, Miss Sarah M. Moyer, Mrs. Ann Cabell and other residents in and around the area of 604 Plymouth Road in Baltimore County of the use of the premises which is owned by Thomas R. Knight and Elsie F. Knight, his wife. It is being operated by them as a day-nursery from Monday through Friday of each and every week, twelve months per year; and on Saturdays, the said premises is being used for a dance school.

The property is residential and such use is in violation of its residential character.

- (1) it is detrimental to the health, safety, and general welfare of the locality,
- (2) it tends to create congestion in the streets,
- (3) it tends to overcrowd the land and cause undue concentration of population,
- (4) it interferes with adequate provisions for water, sewerage, transportation and other public requirements, conveniences and improvements,
- (5) and in other respects, it is detrimental to the property owners;

Wherefore, your Protestants respectfully request that a hearing be set at the first available date for Mr. & Mrs. Knight to show cause why their operation should not cease immediately.

Very truly yours,

MACDANIEL AND PAYNE
Richard D. Payne
Richard D. Payne

/s/ Richard Murray, 212 Washington Ave. (4)

RICHARD D. PAYNE
ADDRESS: 212 WASHINGTON AVE.
BALTIMORE 2, MARYLAND
PHONE: 2-1878

Richard D. Payne, Esquire
405 Munsey Building
Baltimore 2, Maryland

Dear Mr. Payne:

I am in receipt of your letter dated February 19th, regarding the operation of a Day Nursery on Plymouth Road by Thomas R. Knight and Elsie F. Knight.

A hearing was held on October 29, 1958 at 10:00 A. M.

Very truly yours,

Walter H. Adams
Zoning Commissioner
of Baltimore County

VHA/Am

PETITION FOR A SPECIAL HEARING

#4471

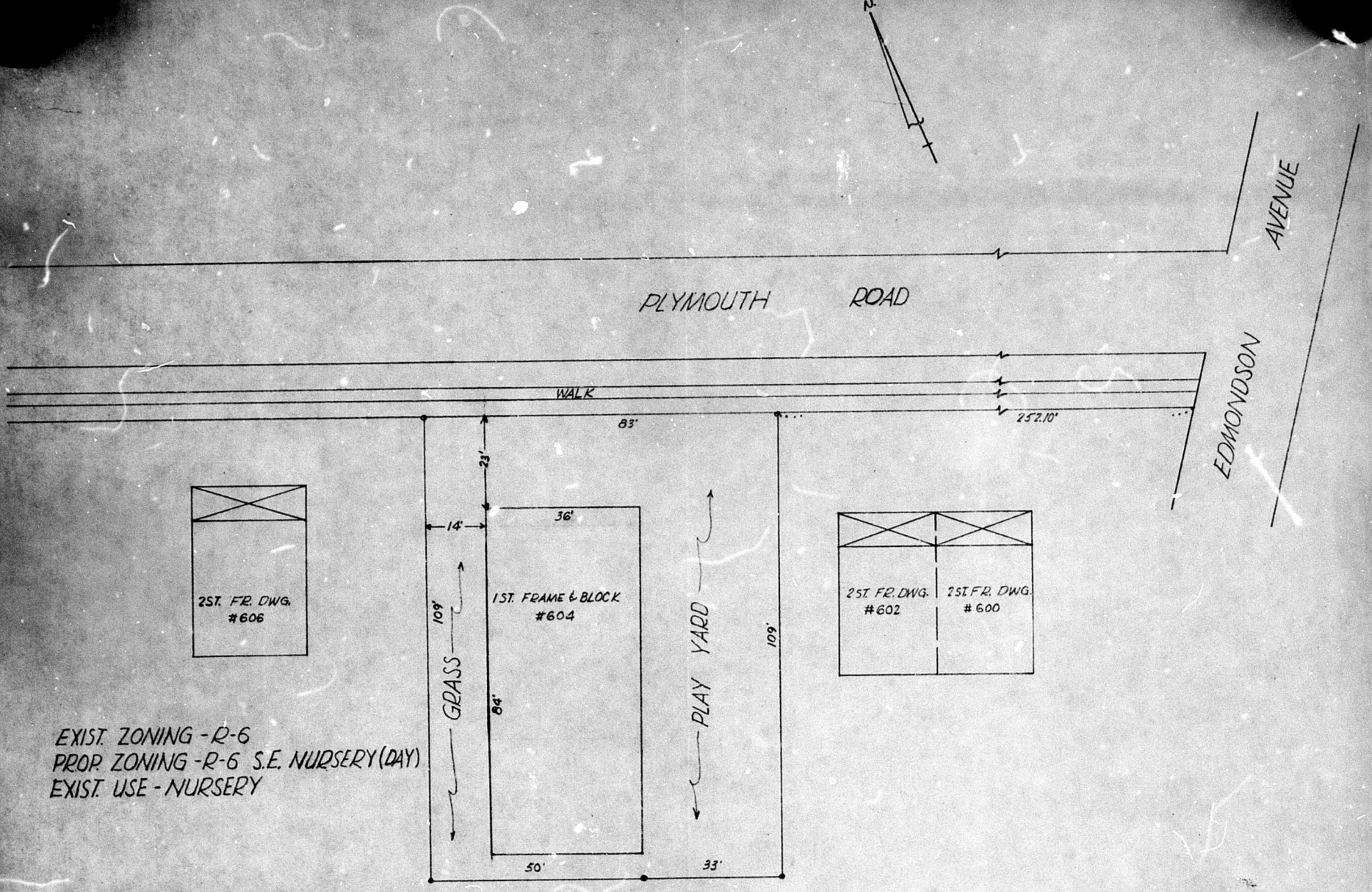
In the Matter of : ELISE F. F.
Petition of : ZONING COMMISSIONER
Thomas R. Knight :
Elsie F. Knight, wife : OF BALTIMORE COUNTY

For a Special Hearing

To the Zoning Commissioner of Baltimore County

Thomas R. Knight and wife and Robert Vogel and wife
Petitioners

hereby petition for a Special Hearing, under the Zoning law and Regulations of Baltimore County, to determine whether or not the Zoning Commissioner of Baltimore County ~~SHOULD~~ SHOULD ~~DECLINE~~ DECLINE ~~TO~~ TO ~~CONSIDER~~ CONSIDER ~~THE~~ THE ~~USE~~ USE ~~OF~~ OF ~~THE~~ THE ~~PROPERTY~~ PROPERTY ~~AS~~ AS ~~BEING~~ BEING ~~IN~~ IN ~~VIOLATION~~ VIOLATION ~~OF~~ OF ~~THE~~ THE ~~ZONING~~ ZONING ~~LAW~~ LAW ~~AND~~ AND ~~REGULATIONS~~ REGULATIONS ~~OF~~ OF ~~THE~~ THE ~~CITY~~ CITY ~~OF~~ OF ~~BALTIMORE~~ BALTIMORE ~~COUNTY~~ COUNTY ~~AND~~ AND ~~THE~~ THE ~~USE~~ USE ~~OF~~ OF ~~THE~~ THE ~~PROPERTY~~ PROPERTY ~~AS~~ AS ~~BEING~~ BEING ~~IN~~ IN ~~VIOLATION~~ VIOLATION ~~OF~~ OF ~~THE~~ THE ~~ZONING~~ ZONING ~~LAW~~ LAW ~~AND~~ AND ~~REGULATIONS~~ REGULATIONS ~~OF~~ OF ~~THE~~ THE ~~CITY~~ CITY ~~OF~~ OF ~~BALTIMORE~~ BALTIMORE ~~COUNTY~~ COUNTY ~~AND~~ AND ~~THE~~ THE ~~USE~~ USE ~~OF~~ OF ~~THE~~ THE ~~PROPERTY~~ PROPERTY ~~AS~~ AS ~~BEING~~ BEING ~~IN~~ IN ~~VIOLATION~~ 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EXIST. ZONING - R-6
PROP. ZONING - R-6 S.E. NURSERY (DAY)
EXIST. USE - NURSERY

MULLER, RAPHEL & ASSOCIATES
PROFESSIONAL ENGINEERS & LAND SURVEYORS
201 COURTLAND AVE.
TOWSON 4, MARYLAND

PLAN TO ACCOMPANY ZONING PETITION
PLYMOUTH ROAD
1ST ELECTION DISTRICT BALTO. CO., MD.
SCALE: 1" = 20'
AUG 7, 1950

