

69-209-R 6254 H PETITION FOR ZONING RE-CLASSIFICATION AND/OR SPECIAL EXCEPTION

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

I, or we, Lantern Hill Corp., legal owner, of the property situated in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition (1) that the zoning status of the herein described property be re-classified, pursuant to the Zoning Law of Baltimore County, from an R.A. zone to an H-1 zone; for the following reasons:

Error in original zoning and genuine change in conditions.

See attached description

and (2) for a Special Exception, under the said Zoning Law and Zoning Regulations of Baltimore County, to use the herein described property, for:

Property is to be posted and advertised as prescribed by Zoning Regulations. I, or we, agree to pay expenses of above re-classification and/or Special Exception advertising, posting, etc., upon filing of this petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

PHILADELPHIA HOLDING CORPORATION
BY Richard D. Davis
Richard D. Davis, Pres. Contract purchaser

LANCORN HILL CORP.
BY Richard D. Davis
Richard D. Davis, Pres. Legal Owner

Address: 306 W. Joppa Road
Towson, Maryland 21204-823-1200

ORDERED By The Zoning Commissioner of Baltimore County, this 4th day of March, 1969, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be held before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore County, on the 7th day of April, 1969, at 1:00 o'clock P.M.

Commissioner of Baltimore County.

MAP #23
NW-2F
NW-8F
BL

DR. SARAH ELIZABETH FREEMAN
VS.
LANCORN HILL CORPORATION
AND
WILLIAM S. BALDWIN, Chairman
WILLIAM PARKER
JOHN A. SIGLER
JOHN A. MILLER and
WALTER A. REITER, Jr.
BOARD OF ZONING APPEALS

IN THE CIRCUIT COURT
FOR BALTIMORE COUNTY
IN EQUITY
JUL 8 1970
Docket 90
Folio 43
CASE NO. 66748
OFFICE OF LAW

MEMORANDUM OPINION AND ORDER OF COURT

This case comes into Court on Respondents' Motion Raising Preliminary Objections pursuant to Md. Rule 323. The Complainant essentially seeks an injunction against a zoning hearing and against violation of a restrictive covenant in a deed. Complainant and Respondent, Lantern Hill, have a common grantor in separate deeds to adjacent parcels of land upon which said grantor has imposed the restriction that the area not be used for store purposes or any business purpose whatsoever. Lantern Hill owns the land to the west of Complainant and has applied for rezoning from RA to BL. The Baltimore County Deputy Zoning Commissioner denied the Petition for Reclassification and Respondent, Lantern Hill, appealed to the County Board of Appeals, the present co-respondent, which appeal is still pending.

The issue at present may be generally stated as whether potential rezoning is relevant to the possible future enforcement of a deed restriction or vice versa. The fate of the injunction sought in the Bill of Complaint will follow upon the answer to this question.

An injunction will not issue to protect a right not in esse and which may never arise, nor will it issue to protect a doubtful or conjectural right. It is this 2nd day of July, 1970, ORDERED that the Motion Raising Preliminary Objection be and the same is hereby granted.

John N. Maguire
John N. Maguire
Judge

The Circuit Court for Baltimore County

THIRD JUDICIAL CIRCUIT OF MARYLAND

TOWSON, MARYLAND 21204

July 7, 1970

RECEIVED

OFFICE OF LAW

B. Marvin Potler
Assistant County Solicitor
315 County Office Building
Towson, Maryland - 21204

Dear Mr. Potler:

Re: Dr. Sarah Elizabeth Freeman
v. Lantern Hill Corporation
Equity - Case No. 66748
Docket 90, folio 43

Enclosed herewith is my opinion in the above entitled matter.

Very truly yours,
John N. Maguire
John N. Maguire

JNB/cb

cc: C. John Serio, Esq.
3 East Lexington Street
Baltimore, Maryland 21202

Marvin Land, Esq.
One North Charles Street
Baltimore, Maryland 21201

Enclosure

The Complainant is premature on two points. First, Complainant prays an injunction against a hearing. It is not within the Court's province to anticipate the action of an administrative body, whether it be acting in a legislative, judicial, or purely administrative fashion. Neither this Court nor Complainant can know what the outcome of the pending appeal will be. And as will be seen below the outcome may have little or no relevance. Second, Complainant prays an injunction against violation of the deed restriction. This is clearly anticipatory and lacks the ripeness which in our system sharpens controversies and focuses them for adversary proceeding and decision.

Respondents cite several cases on their behalf. They are all factually dissimilar from the case at bar, but there seem to be no close parallels of precedent in Maryland. This could very well be due to the lack of ripeness and the lack of relationship between restrictive covenants and zoning. The two citations most worthy of comment are both cases which address themselves in part to the problem of inappropriate anticipatory judicial action. Kohl v. Contoligato Co., Electric Light & Power Company, 191 Md. 249 @ 257-59 (1949). Brady v. B. B. B., 194 Md. 632 @ 639 (1950). But the case at bar is not to be confused with those involving a question of the bypassing of an administrative remedy. The administrative and the legal or equitable remedies are distinct under the facts of this case.

The closest thing to a direct answer to the issue involved here is found in an annotation at 48 A.L.R. 1437.

(2)

RE: PETITION FOR RECLASSIFICATION : BEFORE
from R.A. to B.L. zone : COUNTY BOARD OF APPEALS
SW/5 Liberty Road 175' SE of : OF
Sedgemoor Road :
2nd District :
Lantern Hill Corporation : BALTIMORE COUNTY
Petitioner :
Philadelphia Holding Corporation : No. 69-209-R
Contract Purchaser :

ORDER OF DISMISSAL

Petition of Lantern Hill Corporation (Philadelphia Holding Corporation, contract purchaser) for reclassification from R.A. to B.L., on property located on the southwest side of Liberty Road 175 feet southeast of Sedgemoor Road, in the Second Election District of Baltimore County.

WHEREAS, by letter dated April 1, 1974 the Board of Appeals notified the parties of record in the above entitled matter that the case is considered moot.

WHEREAS, this decision is based on an opinion dated November 10, 1971 which the Board received from the Baltimore County Solicitor, wherein he stated that no zoning case pending before the Board on the date the new zoning maps were adopted is moot.

WHEREAS, the Board has not received a letter or formal dismissal of the appeal, and the Board, on its own Motion, therefore will dismiss the within appeal

IT IS HEREBY ORDERED, this 15th day of May, 1974, that said petition be and the same is declared moot and the petition dismissed.

COUNTY BOARD OF APPEALS

OF BALTIMORE COUNTY

Walter A. Reiter, Jr.
Walter A. Reiter, Jr., Chairman
W. Giles Parker
W. Giles Parker
Robert L. Gilland
Robert L. Gilland

An extended search has disclosed no case other than the reported case (Vorenberg v. Bunnell, ante, 1433) discussing the effect of zoning laws or ordinances on restrictions on the use of real property, as regards either substantive rights or remedies. It will be noted that the Court in the reported case (Vorenberg v. Bunnell) held that a zoning law could not constitutionally relieve land from lawful restrictions, observing, however, that the enforcement of such restrictions was a matter of equitable discretion, depending on the circumstances in each case.

This annotation is supplemented at 54 A.L.R. 843 and provides in pertinent part that:

The rule announced in the earlier annotation, that a zoning law could not relieve land from lawful restrictions, is followed by the reported case (Vorenberg v. Bunnell, ante 1437), holding that a city zoning ordinance declaring a certain district a commercial zone did not suspend a covenant contained in a deed to use the property only for residential purposes for twenty-five years, where the lot was a part of a platted section and the scheme had been followed by the other lot owners.

A lack of Maryland cases in point presents an unclear picture, but the cases indicate that at most, discretion may be exercised dependent upon the circumstances. This discretion is not available to this Court at this time but would be exercisable in a timely action to enforce a violation of a restrictive covenant. Quotations from the two Maryland cases found to relate to the issue at bar are set out here. The first is unsupported by citation in the case in which it appears as a paragraph by itself.

The restrictions imposed on the property here involved are unenforceable because of the fact, very clearly shown by the photographs offered in evidence, and as also stipulated, the property now is in a commercial district. (Whitcomb v. Richmond, 179 Md. 523 @ 529 (1941)).

The second case makes a seemingly contrary generalization that "contractual restrictions are neither abrogated nor enlarged by zoning restrictions." (Martin v. Mainwaring, 205 Md. 513 @ 519 @ 527-28 (1954)). If there is discretion to be exercised by an equity Court in this matter, this motion is not the proper time.

(3)

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: William S. Baldwin, Chairman. Date: March 19, 1970
FROM: Office of Law
SUBJECT: Freeman v. Board of Appeals

Please be advised that a hearing has been scheduled for Baltimore County's Motion Raising Preliminary Objections. I will advise you of the outcome.

B. Marvin Potler
B. Marvin Potler
Assistant County Solicitor

bmp/get

John N. Maguire
John N. Maguire
Judge

JUL 08 1974

Pursuant to the advertisement, posting of property, and public hearing on the above petition and it appearing that by reason of.....

the above Reclamation should be had; and it further appearing that by reason of.....

a Special Exception for a..... should be granted.

IT IS ORDERED by the Zoning Commissioner of Baltimore County this..... day of....., 1969, that the herein described property or area should be and the same is hereby reclassified; from a..... zone to a..... zone, and/or a Special Exception for a..... should be and the same is granted, from and after the date of this order.

Zoning Commissioner of Baltimore County

Pursuant to the advertisement, posting of property and public hearing on the above petition and it appearing that by reason of failure to show error in the original zoning map or substantial changes in the character of the neighborhood.....

the above re-classification should NOT BE HAD, and the Special Exception should NOT BE GRANTED.

IT IS ORDERED by the Zoning Commission of Baltimore County, this..... day of....., 1969, that the above re-classification be and the same is hereby DENIED and that the above described property or area be and the same is hereby continued as and to remain a..... zone; and the Special Exception for..... should be and the same is denied.

DEPUTY Zoning Commissioner of Baltimore County

MCA
MATZ, CHILDS & ASSOCIATES, INC.
CONSULTING
ENGINEERS
1025 C. Street Bridge Rd. Baltimore, Md. 21204, Tel. 301/820-0800

Lester Matz, P. E.
John C. Childs, L. S.
Associates
Ronald W. Voyles, L. S.
George W. Bushby, L. S.
Robert W. Graham, P. E.
Leonard M. Glass, P. E.
Norman F. Herman, L. S.
Paul Lee, P. E.
Paul S. Strout

DESCRIPTION

16.9732 ACRE PARCEL, SOUTHWEST SIDE OF LIBERTY ROAD, NORTHWEST SIDE OF ST. LUKES LANE AND SOUTHEAST SIDE OF SEDGEMOOR ROAD, SECOND ELECTION DISTRICT, BALTIMORE COUNTY, MARYLAND.

THIS DESCRIPTION IS FOR "B-1" ZONING

Beginning for the same at a point on the southwest side of Liberty Road, 80 feet wide, at the distance of 175 feet, more or less, as measured southeasterly along the southwest side of said Liberty Road from its intersection with the southeast side of Sedgemoor Road, 50 feet wide, running thence binding on the southwest side of said Liberty Road (1) S 63° 48' 20" E - 873.59 feet, thence three courses: (2) S 23° 52' 35" W - 171.35 feet, (3) S 41° 51' 15" E - 43.74 feet and (4) S 54° 08' 05" E - 99.60 feet to the northwest side of St. Lukes Lane, 33 feet wide, thence binding thereon (5) S 42° 26' 55" W - 184.88 feet, thence three courses: (6) N 47° 33' 05" W - 159.00 feet, (7) S 42° 26' 55" W - 134.00 feet and (8) S 47° 33' 05" E - 159.00 feet, thence on the northwest side of said St. Lukes Lane (9) S 42° 26' 55" W - 371.56 feet, thence three courses: (10) N 47° 14' 40" W - 684.09 feet, (11) northwesterly, by a curve to the left with the radius of 1085.86 feet, the distance of 321.63 feet and (12) N 64° 12' 55" W - 23.86 feet to the southeast side of said Sedgemoor Road, thence binding thereon, five

Water Supply ■ Sewerage ■ Drainage ■ Highways ■ Structures ■ Developments ■ Planning ■ Reports

MCA
MATZ, CHILDS & ASSOCIATES, INC.

courses: (13) N 25° 47' 05" E - 277.39 feet, (14) northeasterly, by a curve to the right with the radius of 20.00 feet, the distance of 30.08 feet, (15) N 28° 43' 55" E - 50.34 feet, (16) northwesterly, by a curve to the right with the radius of 20.00 feet, the distance of 32.67 feet, and (17) N 25° 47' 05" E - 35.01 feet, thence two courses: (18) S 64° 04' 25" E - 175.00 feet and (19) N 25° 47' 05" E - 224.19 feet to the place of beginning.

Containing 16.9732 acres of land.

PPK:impl

J.O. #62182

November 22, 1968



BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

To: Marvin Potter, Esq.,
Assistant County Solicitor
Date: February 26, 1970
FROM: William S. Baldwin, Chairman
County Board of Appeals
SUBJECT: Zoning Case No. 69-209-B - Lantern Hill Corp.
Freeman v. Lantern Hill Corp., et al and County Board of Appeals

We have received the copies of the Bill of Complaint and Notice of Hearing on the above entitled case, for which we thank you.

We would appreciate it if you would keep this office informed as to the status of this case in Court so that we can schedule the zoning case accordingly.

William S. Baldwin, Chairman

DR. SARAH ELIZABETH FREEMAN • IN THE
vs. • CIRCUIT COURT
LANTERN HILL CORPORATION • FOR
and • BALTIMORE COUNTY
WILLIAM S. BALDWIN, Chairman • IN EQUITY
WILLIAM PARKER • Case No. 66743 90/43
JOHN A. SLOWIN •
JOHN A. MILLER and •
WALTER A. REITER, JR. •

LEGAL MEMORANDUM

QUESTION TO BE DETERMINED:

Is an Injunction proper to prevent an administrative body from performing its statutory duty?

ORDINANCE OF IMPORTANCE

"§50.10--Any person or persons, jointly or severally, or any taxpayer, or any official, office, department, board or bureau of Baltimore County, feeling aggrieved by any decision of the Zoning Commissioner shall have the right to appeal therefrom to the County Board of Appeals. Notice of such appeal shall be filed in writing, with the Zoning Commissioner within thirty days from the date of any final order appealed from, together with the required fee as provided in the zoning regulations. Such appeals shall be heard and disposed of by the County Board of Appeals as may be provided in the Charter and the Board's own rules of procedure. Any reclassification when granted by the County Board of Appeals shall, in the absence of an appeal therefrom, have the force and effect of law." (Baltimore County Zoning Regulations)

FACTS

On or about the 9th day of January, 1970 the Complainant herein filed a Petition for Injunction in the Circuit Court for Baltimore County to restrain the Board of Zoning Appeals of Baltimore County from conducting a hearing on the Appeal of Lantern Hill Corporation, a Defendant herein, on the decision of the Deputy Zoning Commissioner of Baltimore County rendered on August 11, 1969 denying said Defendant's Petition (Lantern Hill Corporation) for reclassification..

AUTHORITIES TO SUPPORT DISMISSAL OF INJUNCTION

CASE NO. 3 - Glenn et al vs. Fowler et al, 8 G & J Maryland Reports 213

FACTS

"The material grounds assumed in this bill and on which the injunction is asked are, that the appointment of the appellants to be permanent trustees has been irregularly made, on the recommendation of those who ought not to have been regarded by the commissioners of insolvent debtors as creditors; that the Court of law could not order a restitution of the property replevied all their next session; and that the trust created by the deed to Fowler, one of the appellees, would in the interim be obstructed to the prejudice of the cestui que trust."

POINT OF LAW

"Where a statute has made provision for all the circumstances of a particular case, no relief in equity can be afforded, although the provisions of the statute may conflict with the notions of natural equity and justice entertained by a Court of equity. (b)."

CASE NO. 2 - Suit v. Creswell, 45 Md. 529

FACTS

"The bill in this case was filed by the appellant on the 10th of August, 1875, praying an injunction to restrain the sale of certain real estate of the appellant, advertised to be made in virtue of a deed of trust or mortgage, executed by him and his wife to the appellees, Joseph J. Stewart, on the 29th of June, 1872, to secure to the Freedman's Savings and Trust Company, the payment of a promissory note of the same date for \$25,000, payable one year after date, with ten per cent interest, said sum of money having been borrowed by the appellant of said Savings and Trust Company."

"The complainant based his claim to an injunction upon several grounds. He charged that the Act of Congress, entitled 'An Act amending the charter of the Freedman's Savings and Trust Company, and for other purposes,' approved June 20th, 1874, under which the commissioners were acting, was unconstitutional and void; that the bond given by the trustee was insufficient both as to penalty and surety; and that he the complainant was entitled to a credit on his debt, by virtue of an assignment from one of the creditors of said company to him, which the commissioners refused to allow."

"On the 9th of August, 1875, Judge Brent passed an order directing an injunction to issue. The defendants answered the bill, and a motion was made to dissolve the injunction. Leave was given to either party to take testimony to be used at the hearing of the motion to dissolve. The cause was argued upon the bill, answers and proof, and on the 6th of March, 1876, Judge Magruder passed an order dissolving the injunction. From this order the complainant appealed."

POINT OF LAW

"A party applying for preventive relief by this extraordinary process, which is not a matter ex debito iustitie, must clearly show, that his application rests upon some solid and primary equity, in aid of which such remedy is to be employed."

-2-

"If he can have relief according to the nature of his case, without such interposition of a Court of Equity, he is without ground to invoke its assistance."

CASE NO. 3 - Kohl v. Consolidated Gas, Electric Light & Power Co. 191 Md. 249

FACTS

"In the case at bar for an injunction to prevent the construction of an overhead power transmission line by the defendant, appellee here, through a part of the Green Spring Valley section in Baltimore County, after the filing of the original bill of complaint, partly, at least, through the efforts of the landowner-complainant, the County Commissioners of Baltimore County-complainants adopted, pursuant to an enabling act, certain zoning regulations, including one which required power lines such as the one contemplated by the appellee to be located underground. Power was given to the Zoning Commissioner, however, to make special exceptions to this particular regulation and grant special permits 'when convinced by affirmative testimony * * * that such lines * * * may be carried overhead * * * without impairing the public health, safety or general welfare'. The regulations provided that the Commissioner, in determining any special exception, should be guided by certain factors enumerated, including the crossing of much-travelled highways, etc., and that comparative costs of overhead and underground construction could be considered by him but excess in cost, of itself, was not to be deemed sufficient cause for the issuance of a permit for overhead construction. An appeal to the Board of Zoning Appeals was provided. These provisions of the zoning regulations were confirmed and validated by the General Assembly in the Act of 1947, ch. 915, after the trials of the case began. The appellee had not applied to the Zoning Commissioner for a special permit and attacked, in these proceedings, the validity of the zoning regulations as applied to it. The Court held that the zoning regulations were a valid exercise of the police power and that the appellee must proceed under them and cannot invoke the aid of the courts, unless some improper, illegal or arbitrary action is taken by the zoning authorities; that the facts in this case, which the Court reviewed, do not show that the appellee had acquired such a vested right (as distinguished from an existing use) in the construction of its overhead line that it was not required to apply for a special permit and, therefore, it cannot invoke protection of the due process clause; and that the zoning regulations were not special laws on the subject covered by the general Public Service Commission Law and, therefore, they did not violate Md. Const., Art. 3, sec. 33."

POINT OF LAW

"Where an administrative agency is given power to determine questions, such questions, must, in the first instance, be submitted to it, and if a statutory method of appeal is provided, that must be, in general, followed. The courts do not favor the by-passing of administrative bodies, unless there is a clear necessity for a prior judicial decision."

-3-

"The Court of Appeals will not assume that zoning authorities will act arbitrarily in passing on an application for a special permit and refuse it for no reason at all or because the neighbors object; nor will it assume that they will disregard the standards set up in the regulations."

CASE NO. 4 - Boxley v. Babby, 194 Md. 632.

FACTS

"In the case at bar appellees brought suit to enjoin appellant from constructing a commercial building on certain property, which had been reclassified on appellant's application by the County Commissioners of Montgomery County from A Residential zone to D Commercial. Appellees also filed an application with the County Council, successor to the County Commissioners, for a review and reversal of the action reclassifying the property. Appellant filed a cross-bill to enjoin the County Council, from 'reviewing, reversing or rescinding' the reclassification order. The lower Court passed a decree dismissing the cross-bill, from which this appeal was taken, and the County Council passed orders declaring the reclassification 'without force and effect pending further action and hearing', and extending the period for action to thirty days after the decision of the Court of Appeals on this appeal. The Court of Appeals, in affirming the decree of the lower Court, held that there was no reason for the Court to halt the pending proceedings before the Council by injunction and take over the proceedings, and that the orders of the Council were not reviewable on this appeal."

POINT OF LAW

"The action to be enjoined, in the absence of other judicial review, ordinarily is enforcement of administrative action taken, not action feared but yet to be taken by order to be passed after hearing and compliance with at least the formalities of law."

CONCLUSION

Since the action which is the subject of the Complainant's Injunction is "action feared" and not action taken, the request for Injunction should be dismissed.

R. Bruce Alderman
County Solicitor

D. Marvin Potter
Assistant County Solicitor
315 County Office Building
Towson, Maryland 21204
494-3146

NSS
BMP

APPROVED BY
H. KEMP MACDONALD
JUDGE

The Circuit Court for Baltimore County

THIRD JUDICIAL CIRCUIT OF MARYLAND

TOWSON, MARYLAND 21204

February 23, 1970

RECEIVED

ER 1970

OFFICE OF LAW

C. John Serio, Esq.
3 East Lexington Street
Baltimore, Maryland 21202

Marvin Land, Esq.
One N. Charles Street
Baltimore, Maryland 21201

R. Bruce Alderman, County Solicitor
Harry S. Shapiro, Assistant County Solicitor
315 County Office Building
Baltimore, Maryland 21204

Gentlemen:

Re: Equity Case 90/13/66748
Freeman v. Lantern Hill Corp., et al,
and Board of Zoning Appeals

I have specially assigned the above entitled case for hearing on Motion Raising Preliminary Objection on MONDAY, MARCH 2, 1970, at 10:00 A.M. I trust this date will be agreeable and will expect you to be present.

Very truly yours,

H. Kemp Macdonald

ENCLOSURE

DR. SARAH ELIZABETH FREEMAN
6739 Liberty Road
Baltimore, Maryland 21207

VS.

LANTEH HILL CORPORATION
Serve on Resident Agent
Stanley H. Niles
326 St. Paul Place - 21202
PHILADELPHIA HOLDING CORPORATION
Serve on President
Leo Zwietsch, 9/9 Charles Brooks
306 W. Joppe Rd., Towson, Md. 21204
and

WILLIAM S. BALDWIN, Chairman
WILLIAM PARKER
JOHN A. SLOWIK
JOHN A. MILLER and
WALTER A. REITER, Jr., being and
constituting the Board of Zoning
Appeals of Baltimore County,
Maryland

IN THE
CIRCUIT COURT
FOR
BALTIMORE COUNTY
IN EQUITY

PEITION FOR INJUNCTION &
SHOW CAUSE ORDER

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Petition of Dr. Sarah Elizabeth Freeman, by C. John Serio, and Marvin Land, her attorneys, respectfully represents unto your Honor:

1. That on the 17th day of September, 1969, Walter H. Cook and Genevieve O. F. Cook, his wife, did grant and convey unto Sarah L. Freeman and Sarah Elizabeth Freeman, her daughter, as joint tenants, all that lot or parcel of ground, containing 0.95 acres of land, more or less, at the southwest corner of Liberty Road and St. Luke's Lane, being more particularly described in said deed; and, at the time of said conveyance the said Grantees did impose certain conditions and restrictions upon said property, which conditions and restrictions became applicable to and binding upon the lot of ground conveyed to the said Sarah L. Freeman and Sarah Elizabeth Freeman, her daughter, and all of the property of the said common grantees, Walter H. Cook and Genevieve O. F. Cook, his wife, within the feet of the property of the said Sarah L. Freeman and Sarah Elizabeth Freeman, her daughter, in a westerly and northerly direction; paragraph 3 of

said restrictions providing that said area is not to be used for store purposes or any business purposes whatsoever, said restrictions in said deed being more fully described, and being recorded among the Land Records of Baltimore County in Liber T.P.S. No. 1781, folio 152; a copy of said Deed being attached hereto and prayed to be taken as Petitioner's Exhibit No. 1. That your Petitioner became the sole surviving joint tenant and owner of said property mentioned in the deed from Walter H. Cook and Genevieve O. F. Cook, his wife, upon the death of her mother, Sarah L. Freeman, on March 2, 1969.

2. That your Petitioner, as surviving joint tenant, is entitled to enforce the said restrictions contained in the deed from Walter H. Cook and Genevieve O. F. Cook, his wife, to Sarah L. Freeman and Sarah Elizabeth Freeman, in order to prevent said restrictions from being violated.

3. That Lantern Hill Corporation, the owner of a parcel of land immediately to the west of your Petitioner's property and Philadelphia Holding Corporation, contractor purchaser, did apply to Baltimore County, Maryland, to change the zoning of said property from RA Zone to RL zone, and a hearing was held on said Petition; and, thereafter, on August 11, 1969, Edward D. Hardesty, Deputy Zoning Commissioner, denied the Petition for Reconsideration, and, thereafter, an appeal was filed by Lantern Hill Corporation and Philadelphia Holding Corporation, from the decision of the Deputy Zoning Commissioner, said appeal now pending before the County Board of Appeals.

4. That if the zoning of said property is changed from the present zoning to RL zoning, irreparable damage and injury will result to the Complainant, and to the adjoining property

5. WHEREFORE, your Petitioner prays to the Court:

(a) That the Defendants be perpetually enjoined from violating the restrictions set forth in said deed from Walter H.

Cook and Genevieve O. F. Cook, his wife, to Sarah L. Freeman and Sarah Elizabeth Freeman;

(b) That an Order be issued commanding the Defendants, William S. Baldwin, Chairman, William Parker, John A. Slowik, John A. Miller, and Walter A. Reiter, Jr., being and constituting the Board of Zoning Appeals of Baltimore County, Maryland, and Lantern Hill Corporation and Philadelphia Holding Corporation, to appear and show cause, if any they may have, why a restraining Order should not be entered, precluding the Defendants, Lantern Hill Corporation and Philadelphia Holding Corporation, from conducting a hearing before the County Board of Appeals; and further preventing the County Board of Appeals from holding a hearing in said matter;

(c) That your Petitioner recover from the Defendants her costs in this suit; and

(d) That your Petitioner have such other and further relief as the justice of the cause may require.

AND, as in duty bound, etc.

C. John Serio
Attorney for Petitioner
3 E. Lexington Street
Baltimore, Maryland 21202
PL 2-1970

Dr. Sarah Elizabeth Freeman
Petitioner

Marvin Land
Attorney for Petitioner
One N. Charles Street
Baltimore, Maryland 21201
75-5000

SHOW CAUSE ORDER

ORDERED by the Circuit Court for Baltimore County in Equity, that William S. Baldwin, Chairman, William Parker, John A. Slowik, John A. Miller, and Walter A. Reiter, Jr., being and constituting the Board of Zoning Appeals of Baltimore County, Maryland, and Lantern Hill Corporation and Philadelphia Holding Corporation, show cause on or before February 23, 1970, why the relief prayed in the foregoing Petition for Injunction should not be granted, provided a copy of this Petition for Injunction and this Order be served on the Defendants, William S. Baldwin, Chairman, William Parker, John A. Slowik, John A. Miller, and Walter A. Reiter, Jr., being and constituting the Board of Zoning Appeals of Baltimore County, Maryland, and Lantern Hill Corporation and Philadelphia Holding Corporation, on or before February 16, 1970.

Judge

This Copy Test
ORVILLE T. CROVELL, CLERK
Per [Signature]

DR. SARAH ELIZABETH FREEMAN
Plaintiff

VS.

LANTEH HILL CORPORATION, et al
Defendant

and

WILLIAM S. BALDWIN, Chairman
WILLIAM PARKER
JOHN A. SLOWIK
JOHN A. MILLER and
WALTER A. REITER, JR., being and
constituting the Board of Zoning Appeals
of Baltimore County, Maryland
Defendant

IN THE
CIRCUIT COURT
FOR
BALTIMORE COUNTY
IN EQUITY

MOTION RAISING PRELIMINARY OBJECTION

NOW COMES the Board of Appeals of Baltimore County, by its attorneys, R. Bruce Alderman, Harry S. Shapiro, and B. Marvin Potter, and in answer to the Complainant's Petition for Injunction and Show Cause Order moves, pursuant to Maryland Rule 323, a(1) and a(7) for judgment in its favor on the following grounds:

1. That this Court lacks jurisdiction over the subject matter

2. That there is presently pending in the Board of Appeals of Baltimore County another action between the same parties for the same cause

R. Bruce Alderman
County Solicitor

Harry S. Shapiro
Assistant County Solicitor

B. Marvin Potter
Assistant County Solicitor
315 County Office Building
Towson, Maryland 21204 494-3149

I hereby certify that on this _____ day of February, 1970, a copy of the within Motion was mailed to C. John Serio, Esquire, 3 E. Lexington Street, Baltimore, Maryland 21202, and Marvin Land, One N. Charles Street, Baltimore, Maryland 21201, Attorneys for the Plaintiff.

DR. SARAH ELIZABETH FREEMAN
Plaintiff

VS.

LANTEH HILL CORPORATION, et al
Defendant

and

WILLIAM S. BALDWIN, Chairman
WILLIAM PARKER
JOHN A. SLOWIK
JOHN A. MILLER and
WALTER A. REITER, JR., being and
constituting the Board of Zoning Appeals
of Baltimore County, Maryland
Defendant

IN THE
CIRCUIT COURT
FOR
BALTIMORE COUNTY
IN EQUITY

POINTS AND AUTHORITIES IN SUPPORT OF
MOTION RAISING PRELIMINARY OBJECTION

1. Rule 323. Motion Raising Preliminary Objection. Gen'l.

a. Motion Optional.

The following defenses may at the option of the pleader be made by motion:

1. lack of jurisdiction over the subject matter

7. pendency of another action between the same parties for the same cause (Maryland Rules of Procedure, Rule 323).

R. Bruce Alderman
County Solicitor

Harry S. Shapiro
Assistant County Solicitor

B. Marvin Potter
Assistant County Solicitor
315 County Office Building
Towson, Maryland 21204
494-3149

I hereby certify that on this _____ day of February, 1970, a copy of the within Points and Authorities was mailed to C. John Serio, Esquire, 3 E. Lexington Street, Baltimore, Maryland 21202, and Marvin Land, One N. Charles Street, Baltimore, Maryland 21201, Attorneys for the Plaintiff.

B. Marvin Potter
Assistant County Solicitor

DR. SARAH ELIZABETH FREEMAN
Plaintiff

VS.

LANTEH HILL CORPORATION, et al
Defendant

and

WILLIAM S. BALDWIN, Chairman
WILLIAM PARKER
JOHN A. SLOWIK
JOHN A. MILLER and
WALTER A. REITER, JR., being and
constituting the Board of Zoning Appeals
of Baltimore County, Maryland
Defendant

IN THE
CIRCUIT COURT
FOR
BALTIMORE COUNTY
IN EQUITY

REQUEST FOR HEARING

Mr. Clerk:

Pursuant to Local Rule 1.6, Defendant, Baltimore County, Maryland, requests a hearing on its Motion Raising Preliminary Objection of the Plaintiff.

R. Bruce Alderman
County Solicitor

Harry S. Shapiro
Assistant County Solicitor

B. Marvin Potter
Assistant County Solicitor
315 County Office Building
Towson, Maryland 21204

I hereby certify that on this _____ day of February, 1970, a copy of the within Request for Hearing was mailed to C. John Serio, Esquire, 3 E. Lexington Street, Baltimore, Maryland 21202, Attorney for the Plaintiff, and Marvin Land, One N. Charles Street, Baltimore, Maryland 21201, Attorney for the Plaintiff.

B. Marvin Potter
Assistant County Solicitor

JUL 08 1974

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: William S. Baldwin, Chairman
Board of Appeals
Date: February 25, 1970

FROM: Office of Law

SUBJECT: Freeman v. Lantern Hill Corp., et al,
and Board of Zoning Appeals

In response to your recent letter concerning the above matter,
enclosed please find the following:

1. Bill of Complaint
2. Notice of Hearing.

B. Marvin Potter
B. Marvin Potter
Assistant County Solicitor

BMP/bbr

Encl.

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: B. Marvin Potter, Esq.
Assistant County Solicitor
Date: February 19, 1970

FROM: William S. Baldwin, Chairman
County Board of Appeals

SUBJECT: Freeman, Plaintiff, v. Lantern Hill Corp., et al and William S. Baldwin, et al,
Circuit Court for Baltimore County - In Equity - Case #66748 Defendants

Dear Bud:

I am in receipt of your Motion Raising Preliminary Objection and Request for Hearing in the above captioned case.

This is a complete mystery to me. In order that the Board will be aware of what is going on, please drop me a Memo as to what the situation is in this case. I am completely unaware of the Board being a Defendant in the above case. Thanks.

Best personal regards,

William S. Baldwin, Chairman

WSB:ute

May 15, 1974

Bernard S. Denick, Esq.
326 St. Paul Place
Baltimore, Md. 21202

Re: File No. 39-209-R
Lantern Hill Corp. (Phila. Holding Corp., c.p.)

Dear Mr. Denick:

Enclosed herewith is copy of Order of Dismissal passed today by the County Board of Appeals in the above entitled case.

Very truly yours,

Muriel T. Baldemaster

Encl.

cc: Robert L. Sullivan, Jr., Esq.
John Serio, Esq.
Arthur W. Kupfer, Esq.
The Rev. E. M. Amos
Mr. Robert S. Ward
Mr. Saul Goldberg
Mrs. Per Rosenbaum
Mr. S. R. Simons
Mr. Nelson A. Luthy
Richard D. Byrd, Esq.
Harry C. Davison, Esq.
Mr. S. E. DiNenna
Mr. W. D. Franen
Mrs. R. Warrath
Board of Education

County Board of Appeals
COUNTY OFFICE BUILDING
111 W. CHESAPEAKE AVENUE
TOWSON, MARYLAND 21204
April 1, 1974

Bernard S. Denick, Esquire
326 St. Paul Place
Baltimore, Md. 21202

Re: Zoning File No. 69-209-R
Lantern Hill Corporation, Petitioner
Philadelphia Holding Corp., Contract Purchaser

Dear Mr. Denick:

As Attorney of Record for the Appellant in the above referenced case, you are hereby advised that said case on the Board of Appeals' Docket is considered moot. This decision is based on an opinion, dated November 10, 1971, which the Board has received from the Baltimore County Solicitor, R. Bruce Alderman, wherein he stated that any zoning cases pending before the Board on the date the new (zoning) maps were adopted are moot.

Therefore, unless you present written objection to an amended appeal, where applicable, to the Board no later than thirty days of the date hereof, an official dismissal order on the Board's own motion will follow.

Very truly yours,

Walter A. Baker, Jr.
Walter A. Baker, Jr., Chairman

cc: Robert L. Sullivan, Jr., Esquire
John Serio, Esquire
Arthur W. Kupfer, Esquire
The Rev. Edison M. Amos
Mr. Robert S. Ward
Mr. Saul Goldberg
Mrs. Per Rosenbaum
S. R. Simons
Mr. Nelson A. Luthy
B. Marvin Potter, Esquire

LAW OFFICES
W. LEE HARRISON
300 WEST JOPPA ROAD
TOWSON, MARYLAND 21204

November 5, 1970

Mrs. Edith Eisenhardt
Baltimore County Board of Appeals
Court House
Towson, Maryland 21204

Re: Lantern Hill - St. Lukes Lane and Liberty Road

Dear Mrs. Eisenhardt:

Please enter the appearance of Bernard S. Denick as counsel for the Petitioner, and strike the appearance of W. Lee Harrison.

A copy of this letter is being forwarded to the law offices of Bernard S. Denick, as well as copies forwarded to all counsel of record.

With kind personal regards, I remain

Sincerely yours,

Charles E. Brooks
Charles E. Brooks

CEB:s

LAW OFFICES
W. LEE HARRISON
300 WEST JOPPA ROAD
TOWSON, MARYLAND 21204

April 15, 1969

Mr. John G. Rose
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: No. 69 209 R Lantern Hill Corp.

Dear Mr. Rose:

Please note an appeal from the Decision and Order of the Deputy Zoning Commissioner of Baltimore County dated April 11, 1969. Please note that you have received my check covering this appeal under date of April 9, 1969.

Very truly yours,

W. Lee Harrison
W. Lee Harrison
Counsel for Lantern Hill Corp.

cc: Arthur W. Kupfer, Esquire
John Serio, Esquire
Robert L. Sullivan, Esquire

LAW OFFICES
W. LEE HARRISON
300 WEST JOPPA ROAD
TOWSON, MARYLAND 21204

April 9, 1969

Mr. John G. Rose
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: No. 69 209 R Lantern Hill Corp.

Dear Mr. Rose:

Please note an appeal to the County Board of Appeals of Baltimore County from the Decision and Order of the Deputy Zoning Commissioner dated April 7, 1969 denying the Petition for Reclassification.

I enclose my check in the amount of \$70.00 to cover the cost and expense of noting this appeal.

Very truly yours,

W. Lee Harrison
W. Lee Harrison
Counsel for Lantern Hill Corp.

CEB:cc

cc: Arthur Kupfer, Esquire
John Serio, Esquire
Robert L. Sullivan, Esquire

W. Lee Harrison, Esquire
306 West Joppa Road
Towson, Maryland 21204

RE: Petition for Reclassification
SW 1/4 of Liberty Road, 175' SE of
Sedgemoor Road - 2nd District
Lantern Hill Corporation -
Petitioner
NO. 69-209-R (Item No. 167)

Dear Mr. Harrison:

I have this date passed my Order in the above captioned matter. Copy of said Order is attached.

Very truly yours,

Edward D. Hardesty
EDWARD D. HARDESTY
Deputy Zoning Commissioner

EDH:ari

Enclosures

cc: Arthur W. Kupfer, Esquire
540 Equitable Building
Calvert Street and Fayette Street
Baltimore, Maryland 21202

C. John Serio, Esquire
25 Central Savings Bank
Baltimore, Maryland 21203

Robert L. Sullivan, Jr., Esquire
1010 One Charles Center
Baltimore, Maryland 21201

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Mr. John Rose Date: January 23, 1969
 FROM: William M. Greenwalt
 SUBJECT: Item 167 - Zoning Advisory Committee Meeting, January 21, 1969

Health Department Comments:

167. Property Owner: Lantern Hill Corp.
 Location: SW/S Liberty Rd., NW/S St. Lukes Lane
 District: 2nd
 Present Zoning: RA
 Proposed Zoning: BL
 No. Acres: 16.9 ±

Public water and sewers are available to the site.

Air Pollution Comment: The building or buildings on this site may be subject to registration and compliance with the Maryland State Health Air Pollution Control Regulations. Additional information may be obtained from the Division of Air Pollution, Baltimore County Department of Health.

William M. Greenwalt
 Chief
 Water and Sewer Section
 BUREAU OF ENVIRONMENTAL HEALTH

WNG/ca

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Mr. John G. Rose, Zoning Commissioner Date: January 23, 1969
 FROM: Captain Charles F. Morris, Jr., Fire Department
 SUBJECT: Property Owners: Lantern Hill Corp.
 Item 167 - Zoning Agenda - Tuesday, January 21, 1969
 Location: SW/S Liberty Road, NW/S St. Lukes Lane
 District: 2nd

1. Owner shall be required to comply with all Fire Department requirements when construction plans are submitted for approval.

Charles F. Morris, Jr.
 Captain
 Fire Department

cc: Mr. Jay Hanna,
 Fire Protection Engineer

STATE ROADS COMMISSION
 300 WEST PRESTON STREET
 BALTIMORE, MD. 21201

January 23, 1969

Mrs. Jenn G. Rose
 Zoning Commissioner
 County Office Building
 Towson, Md. 21204

Re: Zoning Advisory Committee Meeting
 Item 167, Property owners:
 Lantern Hill Corp.
 Location: SW/S Liberty Rd.
 Rte 26 NW/S St. Lukes Lane
 District: 2nd
 Present Zoning: RA
 Proposed Zoning: BL

Dear Mr. Rose:

Due to the vertical alignment of Liberty Rd. the volume of traffic on Liberty Rd. and the anticipated traffic that would be generated by the proposed development, The State Roads Comm. feels that there should be no direct access to the site from Liberty Rd. Other officers of the Commission are reviewing the plans. Upon our receipt of their comments, this office will make additional comments which will be transmitted to you. It is requested that the subject petition be held in abeyance until such time as the additional comments are made.

Thank you for your cooperation

Charles Lee, Chief
 Development Engineering Section
 by: John E. Hayoffs
 Asst. Development Engineer

CL:G:tdg



BUREAU OF ENGINEERING

Comment - Zoning Plat

167. Property Owner: Lantern Hill Corp.
 Location: SW/S Liberty Rd., NW/S St. Lukes Lane
 District: 2nd
 Present Zoning: RA
 Proposed Zoning: BL
 No. Acres: 16.9 ±

Highways:

This property has access from three public roads. Improvements are required on St. Lukes Lane - curb and gutter and 10' of macadam paving and sidewalks along the frontage of the site. A road construction drawing has been prepared for the highway improvements on St. Lukes Lane in connection with the development of the site as apartments. The intersection of St. Lukes Lane and Liberty Road is realigned to form a 90° intersection. Two offsite right-of-ways are needed to make the proposed improvements. The developer shall be fully responsible for the cost of the acquisition.

Sedgemoor Road is fully improved and only entrances are required.

Liberty Road is a State Road and subject to State Roads Commission review and approval. Any improvements to Liberty Road will be the full responsibility of the Developer.

Storm Drain Comments:

With the property graded as shown on the plan, a major storm drain system will be required to extend to Wynns Falls. All costs will be the full responsibility of the Developer.

A sediment control plan will be required for review and approval of the Bureau of Engineering and the Soils Conservation Service.

Water Comments:

There is existing public water available to serve the site upon application for a meter.

Sanitary Sewer Comments:

Public sanitary sewer can be made available to serve the site by making a short extension from the existing 8" sanitary sewer in St. Lukes Lane. The extension must be made to serve the outstanding parcel on St. Lukes Lane. A construction drawing has been previously prepared for this improvement and may be used for this project.

CL:G:tdg

CERTIFICATE OF PUBLICATION

TOWSON, MD. MAR 20 1969

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper printed and published in Towson, Baltimore County, Md., once in each of one (1) consecutive weeks before the 7th day of April, 1969, the 6th publication appearing on the 20th day of March, 1969.

THE JEFFERSONIAN

L. L. Louch
 Manager

Cost of Advertisement, \$

PAGE 25

LEGALS

PETITION FOR RECLASSIFICATION
 ZONING, FROM R.A. TO A-1, Zone.
 LOCATION: Section on side of Liberty Road 1/2 mi. N of town of Towson, Baltimore County, Maryland.
 DATE: 1969, APRIL 7, 1969 at 1:00 P.M.
 PUBLIC HEARING: Room 118, County Office Building, 111 N. Chesapeake Avenue, Towson, Maryland.
 The Board of Commissioners of Baltimore County, by resolution, do hereby certify that the above petition was filed in the office of the Zoning Commissioner of Baltimore County, and that the same was referred to the Zoning Board of Baltimore County, which will hold a public hearing on the petition on the 20th day of March, 1969.
 All that parcel of land in the Second District of Baltimore County containing for the whole or a part thereof the following described lots, to-wit: (1) 1/2 of Lot 1, 1/2 of Lot 2, 1/2 of Lot 3, 1/2 of Lot 4, 1/2 of Lot 5, 1/2 of Lot 6, 1/2 of Lot 7, 1/2 of Lot 8, 1/2 of Lot 9, 1/2 of Lot 10, 1/2 of Lot 11, 1/2 of Lot 12, 1/2 of Lot 13, 1/2 of Lot 14, 1/2 of Lot 15, 1/2 of Lot 16, 1/2 of Lot 17, 1/2 of Lot 18, 1/2 of Lot 19, 1/2 of Lot 20, 1/2 of Lot 21, 1/2 of Lot 22, 1/2 of Lot 23, 1/2 of Lot 24, 1/2 of Lot 25, 1/2 of Lot 26, 1/2 of Lot 27, 1/2 of Lot 28, 1/2 of Lot 29, 1/2 of Lot 30, 1/2 of Lot 31, 1/2 of Lot 32, 1/2 of Lot 33, 1/2 of Lot 34, 1/2 of Lot 35, 1/2 of Lot 36, 1/2 of Lot 37, 1/2 of Lot 38, 1/2 of Lot 39, 1/2 of Lot 40, 1/2 of Lot 41, 1/2 of Lot 42, 1/2 of Lot 43, 1/2 of Lot 44, 1/2 of Lot 45, 1/2 of Lot 46, 1/2 of Lot 47, 1/2 of Lot 48, 1/2 of Lot 49, 1/2 of Lot 50, 1/2 of Lot 51, 1/2 of Lot 52, 1/2 of Lot 53, 1/2 of Lot 54, 1/2 of Lot 55, 1/2 of Lot 56, 1/2 of Lot 57, 1/2 of Lot 58, 1/2 of Lot 59, 1/2 of Lot 60, 1/2 of Lot 61, 1/2 of Lot 62, 1/2 of Lot 63, 1/2 of Lot 64, 1/2 of Lot 65, 1/2 of Lot 66, 1/2 of Lot 67, 1/2 of Lot 68, 1/2 of Lot 69, 1/2 of Lot 70, 1/2 of Lot 71, 1/2 of Lot 72, 1/2 of Lot 73, 1/2 of Lot 74, 1/2 of Lot 75, 1/2 of Lot 76, 1/2 of Lot 77, 1/2 of Lot 78, 1/2 of Lot 79, 1/2 of Lot 80, 1/2 of Lot 81, 1/2 of Lot 82, 1/2 of Lot 83, 1/2 of Lot 84, 1/2 of Lot 85, 1/2 of Lot 86, 1/2 of Lot 87, 1/2 of Lot 88, 1/2 of Lot 89, 1/2 of Lot 90, 1/2 of Lot 91, 1/2 of Lot 92, 1/2 of Lot 93, 1/2 of Lot 94, 1/2 of Lot 95, 1/2 of Lot 96, 1/2 of Lot 97, 1/2 of Lot 98, 1/2 of Lot 99, 1/2 of Lot 100, 1/2 of Lot 101, 1/2 of Lot 102, 1/2 of Lot 103, 1/2 of Lot 104, 1/2 of Lot 105, 1/2 of Lot 106, 1/2 of Lot 107, 1/2 of Lot 108, 1/2 of Lot 109, 1/2 of Lot 110, 1/2 of Lot 111, 1/2 of Lot 112, 1/2 of Lot 113, 1/2 of Lot 114, 1/2 of Lot 115, 1/2 of Lot 116, 1/2 of Lot 117, 1/2 of Lot 118, 1/2 of Lot 119, 1/2 of Lot 120, 1/2 of Lot 121, 1/2 of Lot 122, 1/2 of Lot 123, 1/2 of Lot 124, 1/2 of Lot 125, 1/2 of Lot 126, 1/2 of Lot 127, 1/2 of Lot 128, 1/2 of Lot 129, 1/2 of Lot 130, 1/2 of Lot 131, 1/2 of Lot 132, 1/2 of Lot 133, 1/2 of Lot 134, 1/2 of Lot 135, 1/2 of Lot 136, 1/2 of Lot 137, 1/2 of Lot 138, 1/2 of Lot 139, 1/2 of Lot 140, 1/2 of Lot 141, 1/2 of Lot 142, 1/2 of Lot 143, 1/2 of Lot 144, 1/2 of Lot 145, 1/2 of Lot 146, 1/2 of Lot 147, 1/2 of Lot 148, 1/2 of Lot 149, 1/2 of Lot 150, 1/2 of Lot 151, 1/2 of Lot 152, 1/2 of Lot 153, 1/2 of Lot 154, 1/2 of Lot 155, 1/2 of Lot 156, 1/2 of Lot 157, 1/2 of Lot 158, 1/2 of Lot 159, 1/2 of Lot 160, 1/2 of Lot 161, 1/2 of Lot 162, 1/2 of Lot 163, 1/2 of Lot 164, 1/2 of Lot 165, 1/2 of Lot 166, 1/2 of Lot 167, 1/2 of Lot 168, 1/2 of Lot 169, 1/2 of Lot 170, 1/2 of Lot 171, 1/2 of Lot 172, 1/2 of Lot 173, 1/2 of Lot 174, 1/2 of Lot 175, 1/2 of Lot 176, 1/2 of Lot 177, 1/2 of Lot 178, 1/2 of Lot 179, 1/2 of Lot 180, 1/2 of Lot 181, 1/2 of Lot 182, 1/2 of Lot 183, 1/2 of Lot 184, 1/2 of Lot 185, 1/2 of Lot 186, 1/2 of Lot 187, 1/2 of Lot 188, 1/2 of Lot 189, 1/2 of Lot 190, 1/2 of Lot 191, 1/2 of Lot 192, 1/2 of Lot 193, 1/2 of Lot 194, 1/2 of Lot 195, 1/2 of Lot 196, 1/2 of Lot 197, 1/2 of Lot 198, 1/2 of Lot 199, 1/2 of Lot 200, 1/2 of Lot 201, 1/2 of Lot 202, 1/2 of Lot 203, 1/2 of Lot 204, 1/2 of Lot 205, 1/2 of Lot 206, 1/2 of Lot 207, 1/2 of Lot 208, 1/2 of Lot 209, 1/2 of Lot 210, 1/2 of Lot 211, 1/2 of Lot 212, 1/2 of Lot 213, 1/2 of Lot 214, 1/2 of Lot 215, 1/2 of Lot 216, 1/2 of Lot 217, 1/2 of Lot 218, 1/2 of Lot 219, 1/2 of Lot 220, 1/2 of Lot 221, 1/2 of Lot 222, 1/2 of Lot 223, 1/2 of Lot 224, 1/2 of Lot 225, 1/2 of Lot 226, 1/2 of Lot 227, 1/2 of Lot 228, 1/2 of Lot 229, 1/2 of Lot 230, 1/2 of Lot 231, 1/2 of Lot 232, 1/2 of Lot 233, 1/2 of Lot 234, 1/2 of Lot 235, 1/2 of Lot 236, 1/2 of Lot 237, 1/2 of Lot 238, 1/2 of Lot 239, 1/2 of Lot 240, 1/2 of Lot 241, 1/2 of Lot 242, 1/2 of Lot 243, 1/2 of Lot 244, 1/2 of Lot 245, 1/2 of Lot 246, 1/2 of Lot 247, 1/2 of Lot 248, 1/2 of Lot 249, 1/2 of Lot 250, 1/2 of Lot 251, 1/2 of Lot 252, 1/2 of Lot 253, 1/2 of Lot 254, 1/2 of Lot 255, 1/2 of Lot 256, 1/2 of Lot 257, 1/2 of Lot 258, 1/2 of Lot 259, 1/2 of Lot 260, 1/2 of Lot 261, 1/2 of Lot 262, 1/2 of Lot 263, 1/2 of Lot 264, 1/2 of Lot 265, 1/2 of Lot 266, 1/2 of Lot 267, 1/2 of Lot 268, 1/2 of Lot 269, 1/2 of Lot 270, 1/2 of Lot 271, 1/2 of Lot 272, 1/2 of Lot 273, 1/2 of Lot 274, 1/2 of Lot 275, 1/2 of Lot 276, 1/2 of Lot 277, 1/2 of Lot 278, 1/2 of Lot 279, 1/2 of Lot 280, 1/2 of Lot 281, 1/2 of Lot 282, 1/2 of Lot 283, 1/2 of Lot 284, 1/2 of Lot 285, 1/2 of Lot 286, 1/2 of Lot 287, 1/2 of Lot 288, 1/2 of Lot 289, 1/2 of Lot 290, 1/2 of Lot 291, 1/2 of Lot 292, 1/2 of Lot 293, 1/2 of Lot 294, 1/2 of Lot 295, 1/2 of Lot 296, 1/2 of Lot 297, 1/2 of Lot 298, 1/2 of Lot 299, 1/2 of Lot 300, 1/2 of Lot 301, 1/2 of Lot 302, 1/2 of Lot 303, 1/2 of Lot 304, 1/2 of Lot 305, 1/2 of Lot 306, 1/2 of Lot 307, 1/2 of Lot 308, 1/2 of Lot 309, 1/2 of Lot 310, 1/2 of Lot 311, 1/2 of Lot 312, 1/2 of Lot 313, 1/2 of Lot 314, 1/2 of Lot 315, 1/2 of Lot 316, 1/2 of Lot 317, 1/2 of Lot 318, 1/2 of Lot 319, 1/2 of Lot 320, 1/2 of Lot 321, 1/2 of Lot 322, 1/2 of Lot 323, 1/2 of Lot 324, 1/2 of Lot 325, 1/2 of Lot 326, 1/2 of Lot 327, 1/2 of Lot 328, 1/2 of Lot 329, 1/2 of Lot 330, 1/2 of Lot 331, 1/2 of Lot 332, 1/2 of Lot 333, 1/2 of Lot 334, 1/2 of Lot 335, 1/2 of Lot 336, 1/2 of Lot 337, 1/2 of Lot 338, 1/2 of Lot 339, 1/2 of Lot 340, 1/2 of Lot 341, 1/2 of Lot 342, 1/2 of Lot 343, 1/2 of Lot 344, 1/2 of Lot 345, 1/2 of Lot 346, 1/2 of Lot 347, 1/2 of Lot 348, 1/2 of Lot 349, 1/2 of Lot 350, 1/2 of Lot 351, 1/2 of Lot 352, 1/2 of Lot 353, 1/2 of Lot 354, 1/2 of Lot 355, 1/2 of Lot 356, 1/2 of Lot 357, 1/2 of Lot 358, 1/2 of Lot 359, 1/2 of Lot 360, 1/2 of Lot 361, 1/2 of Lot 362, 1/2 of Lot 363, 1/2 of Lot 364, 1/2 of Lot 365, 1/2 of Lot 366, 1/2 of Lot 367, 1/2 of Lot 368, 1/2 of Lot 369, 1/2 of Lot 370, 1/2 of Lot 371, 1/2 of Lot 372, 1/2 of Lot 373, 1/2 of Lot 374, 1/2 of Lot 375, 1/2 of Lot 376, 1/2 of Lot 377, 1/2 of Lot 378, 1/2 of Lot 379, 1/2 of Lot 380, 1/2 of Lot 381, 1/2 of Lot 382, 1/2 of Lot 383, 1/2 of Lot 384, 1/2 of Lot 385, 1/2 of Lot 386, 1/2 of Lot 387, 1/2 of Lot 388, 1/2 of Lot 389, 1/2 of Lot 390, 1/2 of Lot 391, 1/2 of Lot 392, 1/2 of Lot 393, 1/2 of Lot 394, 1/2 of Lot 395, 1/2 of Lot 396, 1/2 of Lot 397, 1/2 of Lot 398, 1/2 of Lot 399, 1/2 of Lot 400, 1/2 of Lot 401, 1/2 of Lot 402, 1/2 of Lot 403, 1/2 of Lot 404, 1/2 of Lot 405, 1/2 of Lot 406, 1/2 of Lot 407, 1/2 of Lot 408, 1/2 of Lot 409, 1/2 of Lot 410, 1/2 of Lot 411, 1/2 of Lot 412, 1/2 of Lot 413, 1/2 of Lot 414, 1/2 of Lot 415, 1/2 of Lot 416, 1/2 of Lot 417, 1/2 of Lot 418, 1/2 of Lot 419, 1/2 of Lot 420, 1/2 of Lot 421, 1/2 of Lot 422, 1/2 of Lot 423, 1/2 of Lot 424, 1/2 of Lot 425, 1/2 of Lot 426, 1/2 of Lot 427, 1/2 of Lot 428, 1/2 of Lot 429, 1/2 of Lot 430, 1/2 of Lot 431, 1/2 of Lot 432, 1/2 of Lot 433, 1/2 of Lot 434, 1/2 of Lot 435, 1/2 of Lot 436, 1/2 of Lot 437, 1/2 of Lot 438, 1/2 of Lot 439, 1/2 of Lot 440, 1/2 of Lot 441, 1/2 of Lot 442, 1/2 of Lot 443, 1/2 of Lot 444, 1/2 of Lot 445, 1/2 of Lot 446, 1/2 of Lot 447, 1/2 of Lot 448, 1/2 of Lot 449, 1/2 of Lot 450, 1/2 of Lot 451, 1/2 of Lot 452, 1/2 of Lot 453, 1/2 of Lot 454, 1/2 of Lot 455, 1/2 of Lot 456, 1/2 of Lot 457, 1/2 of Lot 458, 1/2 of Lot 459, 1/2 of Lot 460, 1/2 of Lot 461, 1/2 of Lot 462, 1/2 of Lot 463, 1/2 of Lot 464, 1/2 of Lot 465, 1/2 of Lot 466, 1/2 of Lot 467, 1/2 of Lot 468, 1/2 of Lot 469, 1/2 of Lot 470, 1/2 of Lot 471, 1/2 of Lot 472, 1/2 of Lot 473, 1/2 of Lot 474, 1/2 of Lot 475, 1/2 of Lot 476, 1/2 of Lot 477, 1/2 of Lot 478, 1/2 of Lot 479, 1/2 of Lot 480, 1/2 of Lot 481, 1/2 of Lot 482, 1/2 of Lot 483, 1/2 of Lot 484, 1/2 of Lot 485, 1/2 of Lot 486, 1/2 of Lot 487, 1/2 of Lot 488, 1/2 of Lot 489, 1/2 of Lot 490, 1/2 of Lot 491, 1/2 of Lot 492, 1/2 of Lot 493, 1/2 of Lot 494, 1/2 of Lot 495, 1/2 of Lot 496, 1/2 of Lot 497, 1/2 of Lot 498, 1/2 of Lot 499, 1/2 of Lot 500, 1/2 of Lot 501, 1/2 of Lot 502, 1/2 of Lot 503, 1/2 of Lot 504, 1/2 of Lot 505, 1/2 of Lot 506, 1/2 of Lot 507, 1/2 of Lot 508, 1/2 of Lot 509, 1/2 of Lot 510, 1/2 of Lot 511, 1/2 of Lot 512, 1/2 of Lot 513, 1/2 of Lot 514, 1/2 of Lot 515, 1/2 of Lot 516, 1/2 of Lot 517, 1/2 of Lot 518, 1/2 of Lot 519, 1/2 of Lot 520, 1/2 of Lot 521, 1/2 of Lot 522, 1/2 of Lot 523, 1/2 of Lot 524, 1/2 of Lot 525, 1/2 of Lot 526, 1/2 of Lot 527, 1/2 of Lot 528, 1/2 of Lot 529, 1/2 of Lot 530, 1/2 of Lot 531, 1/2 of Lot 532, 1/2 of Lot 533, 1/2 of Lot 534, 1/2 of Lot 535, 1/2 of Lot 536, 1/2 of Lot 537, 1/2 of Lot 538, 1/2 of Lot 539, 1/2 of Lot 540, 1/2 of Lot 541, 1/2 of Lot 542, 1/2 of Lot 543, 1/2 of Lot 544, 1/2 of Lot 545, 1/2 of Lot 546, 1/2 of Lot 547, 1/2 of Lot 548, 1/2 of Lot 549, 1/2 of Lot 550, 1/2 of Lot 551, 1/2 of Lot 552, 1/2 of Lot 553, 1/2 of Lot 554, 1/2 of Lot 555, 1/2 of Lot 556, 1/2 of Lot 557, 1/2 of Lot 558, 1/2 of Lot 559, 1/2 of Lot 560, 1/2 of Lot 561, 1/2 of Lot 562, 1/2 of Lot 563, 1/2 of Lot 564, 1/2 of Lot 565, 1/2 of Lot 566, 1/2 of Lot 567, 1/2 of Lot 568, 1/2 of Lot 569, 1/2 of Lot 570, 1/2 of Lot 571, 1/2 of Lot 572, 1/2 of Lot 573, 1/2 of Lot 574, 1/2 of Lot 575, 1/2 of Lot 576, 1/2 of Lot 577, 1/2 of Lot 578, 1/2 of Lot 579, 1/2 of Lot 580, 1/2 of Lot 581, 1/2 of Lot 582, 1/2 of Lot 583, 1/2 of Lot 584, 1/2 of Lot 585, 1/2 of Lot 586, 1/2 of Lot 587, 1/2 of Lot 588, 1/2 of Lot 589, 1/2 of Lot 590, 1/2 of Lot 591, 1/2 of Lot 592, 1/2 of Lot 593, 1/2 of Lot 594, 1/2 of Lot 595, 1/2 of Lot 596, 1/2 of Lot 597, 1/2 of Lot 598, 1/2 of Lot 599, 1/2 of Lot 600, 1/2 of Lot 601, 1/2 of Lot 602, 1/2 of Lot 603, 1/2 of Lot 604, 1/2 of Lot 605, 1/2 of Lot 606, 1/2 of Lot 607, 1/2 of Lot 608, 1/2 of Lot 609, 1/2 of Lot 610, 1/2 of Lot 611, 1/2 of Lot 612, 1/2 of Lot 613, 1/2 of Lot 614, 1/2 of Lot 615, 1/2 of Lot 616, 1/2 of Lot 617, 1/2 of Lot 618, 1/2 of Lot 619, 1/2 of Lot 620, 1/2 of Lot 621, 1/2 of Lot 622, 1/2 of Lot 623, 1/2 of Lot 624, 1/2 of Lot 625, 1/2 of Lot 626, 1/2 of Lot 627, 1/2 of Lot 628, 1/2 of Lot 629, 1/2 of Lot 630, 1/2 of Lot 631, 1/2 of Lot 632, 1/2 of Lot 633, 1/2 of Lot 634, 1/2 of Lot 635, 1/2 of Lot 636, 1/2 of Lot 637, 1/2 of Lot 638, 1/2 of Lot 639, 1/2 of Lot 640, 1/2 of Lot 641, 1/2 of Lot 642, 1/2 of Lot 643, 1/2 of Lot 644, 1/2 of Lot 645, 1/2 of Lot 646, 1/2 of Lot 647, 1/2 of Lot 648, 1/2 of Lot 649, 1/2 of Lot 650, 1/2 of Lot 651, 1/2 of Lot 652, 1/2 of Lot 653, 1/2 of Lot 654, 1/2 of Lot 655, 1/2 of Lot 656, 1/2 of Lot 657, 1/2 of Lot 658, 1/2 of Lot 659, 1/2 of Lot 660, 1/2 of Lot 661, 1/2 of Lot 662, 1/2 of Lot 663, 1/2 of Lot 664, 1/2 of Lot 665, 1/2 of Lot 666, 1/2 of Lot 667, 1/2 of Lot 668, 1/2 of Lot 669, 1/2 of Lot 670, 1/2 of Lot 671, 1/2 of Lot 672, 1/2 of Lot 673, 1/2 of Lot 674, 1/2 of Lot 675, 1/2 of Lot 676, 1/2 of Lot 677, 1/2 of Lot 678, 1/2 of Lot 679, 1/2 of Lot 680, 1/2 of Lot 681, 1/2 of Lot 682, 1/2 of Lot 683, 1/2 of Lot 684, 1/2 of Lot 685, 1/2 of Lot 686, 1/2 of Lot 687, 1/2 of Lot 688, 1/2 of Lot 689, 1/2 of Lot 690, 1/2 of Lot 691, 1/2 of Lot 692, 1/2 of Lot 693, 1/2 of Lot 694, 1/2 of Lot 695, 1/2 of Lot 696, 1/2 of Lot 697, 1/2 of Lot 698, 1/2 of Lot 699, 1/2 of Lot 700, 1/2 of Lot 701, 1/2 of Lot 702, 1/2 of Lot 703, 1/2 of Lot 704, 1/2 of Lot 705, 1/2 of Lot 706, 1/2 of Lot 707, 1/2 of Lot 708, 1/2 of Lot 709, 1/2 of Lot 710, 1/2 of Lot 711, 1/2 of Lot 712, 1/2 of Lot 713, 1/2 of Lot 714, 1/2 of Lot 715, 1/2 of Lot 716, 1/2 of Lot 717, 1/2 of Lot 718, 1/2 of Lot 719, 1/2 of Lot 720, 1/2 of Lot 721, 1/2 of Lot 722, 1/2 of Lot 723, 1/2 of Lot 724, 1/2 of Lot 725, 1/2 of Lot 726, 1/2 of Lot 727, 1/2 of Lot 728, 1/2 of Lot 729, 1/2 of Lot 730, 1/2 of Lot 731, 1/2 of Lot 732, 1/2 of Lot 733, 1/2 of Lot 734, 1/2 of Lot 735, 1/2 of Lot 736, 1/2 of Lot 737, 1/2 of Lot 738, 1/2 of Lot 739, 1/2 of Lot 740, 1/2 of Lot 741, 1/2 of Lot 742, 1/2 of Lot 743, 1/2 of Lot 744, 1/2 of Lot 745, 1/2 of Lot 746, 1/2 of Lot 747, 1/2 of Lot 748, 1/2 of Lot 749, 1/2 of Lot 750, 1/2 of Lot 751, 1/2 of Lot 752, 1/2 of Lot 753, 1/2 of Lot 754, 1/2 of Lot 755, 1/2 of Lot 756, 1/2 of Lot 757, 1/2 of Lot 758, 1/2 of Lot 759, 1/2 of Lot 760, 1/2 of Lot 761, 1/2 of Lot 762, 1/2 of Lot 763, 1/2 of Lot 764, 1/2 of Lot 765, 1/2 of Lot 766, 1/2 of Lot 767, 1/2 of Lot 768, 1/2 of Lot 769, 1/2 of Lot 770, 1/2 of Lot 771, 1/2 of Lot 772, 1/2 of Lot 773, 1/2 of Lot 774, 1/2 of Lot 775, 1/2 of Lot 776, 1/2 of Lot 777, 1/2 of Lot 778, 1/2 of Lot 779, 1/2 of Lot 780, 1/2 of Lot 781, 1/2 of Lot 782, 1/2 of Lot 783, 1/2 of Lot 784, 1/2 of Lot 785, 1/2 of Lot 786, 1/2 of Lot 787, 1/2 of Lot 788, 1/2 of Lot 789, 1/2 of Lot 790, 1/2 of Lot 791, 1/2 of Lot 792, 1/2 of Lot 793, 1/2 of Lot 794, 1/2 of Lot 795, 1/2 of Lot 796, 1/2 of Lot 797, 1/2 of Lot 798, 1/2 of Lot 799, 1/2 of Lot 800, 1/2 of Lot 801, 1/2 of Lot 802, 1/2 of Lot 803, 1/2 of Lot 804, 1/2 of Lot 805, 1/2 of Lot 806, 1/2 of Lot 807, 1/2 of Lot 808, 1/2 of Lot 809, 1/2 of Lot 810, 1/2 of Lot 811, 1/2 of Lot 812, 1/2 of Lot 813, 1/2 of Lot 814, 1/2 of Lot 815, 1/2 of Lot 816, 1/2 of Lot 817, 1/2 of Lot 818, 1/2 of Lot 819, 1/2 of Lot 820, 1/2 of Lot 821, 1/2 of Lot 822, 1/2 of Lot 823, 1/2 of Lot 824, 1/2 of Lot 825, 1/2 of Lot 826, 1/2 of Lot 827, 1/2 of Lot 828, 1/2 of Lot 829, 1/2 of Lot 830, 1/2 of Lot 831, 1/2 of Lot 832, 1/2 of Lot 833, 1/2 of Lot 834, 1/2 of Lot 835, 1/2 of Lot 836, 1/2 of Lot 837, 1/2 of Lot 838, 1/2 of Lot 839, 1/2 of Lot 840, 1/2 of Lot 841, 1/2 of Lot 842, 1/2 of Lot 843, 1/2 of Lot 844, 1/2 of Lot 845, 1/2 of Lot 846, 1

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

3 Signs 69-209-R

District: 2nd Date of Posting: 3-22-69
 Posted for: Reclassification
 Petitioner: Lantern Hill Corp.
 Location of property: Sw. of Liberty Rd. - W. of Sedgewick Rd.
 Location of Signs: D. 240' W. of Liberty Rd. on S. of Sedgewick Rd. - E. 240' W. of Sedgewick Rd. on S. of Liberty Rd. - E. 240' W. of Liberty Rd. on S. of Sedgewick Rd.
 Remarks: _____
 Posted by: _____ Date of return: 3-22-69
 Signature _____

TELEPHONE
833-3000
EXT. 387

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 62143

DATE: March 9, 1969

BILLED BY:

TO: **W. Lee Harrison, Esq.,**
306 W. Joppa Road
Towson, Md. 21204

Zoning Dept. of Baltimore County

REPORT TO ACCOUNT NO. 01-622		RETURN THIS PORTION WITH YOUR REMITTANCE	TOTAL AMOUNT
QUANTITY	DETAILS ALONG PERFORATION AND KEEP THIS PORTION FOR YOUR RECORDS	COST	
4	Advertising and posting of property for Lantern Hill Corp. 69-209-R	\$53.70	

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON, MARYLAND 21204

TELEPHONE
833-3000
EXT. 387

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 62156

DATE: 4/15/69

BILLED BY:

TO: **W. Lee Harrison, Esq.,**
306 W. Joppa Road,
Towson, Md. 21204

Office of Planning & Zoning
119 County Office Bldg.,
Towson, Md. 21204

REPORT TO ACCOUNT NO. 01-622		RETURN THIS PORTION WITH YOUR REMITTANCE	TOTAL AMOUNT
QUANTITY	DETAILS ALONG PERFORATION AND KEEP THIS PORTION FOR YOUR RECORDS	COST	
4	Cost of appeal - property of Lantern Hill Corp. No. 59-209-R	\$75.00	

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON, MARYLAND 21204

TELEPHONE
833-3000
EXT. 387

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 60895

DATE: March 17, 1969

BILLED BY:

TO: **W. Lee Harrison, Esq.,**
306 W. Joppa Road
Towson, Md. 21204

Zoning Dept. of Baltimore County

REPORT TO ACCOUNT NO. 01-622		RETURN THIS PORTION WITH YOUR REMITTANCE	TOTAL AMOUNT
QUANTITY	DETAILS ALONG PERFORATION AND KEEP THIS PORTION FOR YOUR RECORDS	COST	
1	Petition for Reclassification for Lantern Hill Corp. 69-209-R	\$0.00	

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON, MARYLAND 21204

ENTRANCE

LIBERTY ROAD

TO
DARTMOUTH
Main Drive System Is
In Center of Ground
and Street

Case Entrance Plan
Entrance Plan
Entrance Plan

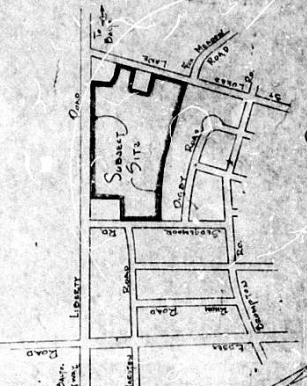
ENTRANCE DRIVE DRIVE
DRAINAGE

ENTRANCE

BUILDING

445.00

18 SQ. FT.



LOCATION PLAN
Scale 1:500

- General Notes
- 1 Area of Property Equals 10,978 Acres
 - 2 Existing Zoning of Property "R-1"
 - 3 Existing Use of Property "No Use"
 - 4 Proposed Zoning of Property "B-1"
 - 5 Proposed Use of Property "Retail Store"
 - 6 Proposed Front Area Equals 146,010 Sq. Ft.
 - 7 Required Offstreet Parking Equals 788 Cuts
 - 8 Proposed Offstreet Parking Equals 955 Cuts

#69-2092

MAP
2-B
WESTERN
AREA
NW-4-F
NW-5-F
BL

FOX MEADOW ROAD

To Downtown
-a- Bayway

See 10 Water St. Drawg
7/20/21 8/2/2021 A.D.

Existing Entrance

Existing Rwyng

19' T.P.P.P.

17'5' DECELERATION LANE

EXIST' CONC. CURB 2' 8" 82' 82'

Designing Road
15' to 25' 1/2" 82' 82'

2 Existing Zoned "B-1"
"B-1" Use

PROPOSED BUILDING
FIN. FLOOR ELEV. = 445.00
FLOOR SPACE = 146,318 SQ. FT.

14' SIDEWALK 802.75

MARSTON ROAD

SEDGEMOOR ROAD



#167
Lynette Hill Cop

PLAT TO ACCOMPANY PETITION
FOR RECLASSIFICATION OF PROPERTY
LIBERTY RD. & ST. LOUIS LANE
DATE: 6-10-22

