

PETITION FOR SPECIAL HEARING

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:
Liberty Plaza Enterprises, Inc. and Court Plaza Realty
XXXXX we, XXXXX, legal owners of the property
situate in Baltimore County and which is described in the description and
plat attached hereto and made a part hereof, hereby petition for a Special
Hearing Under Section 500.7 of the Zoning Regulations of Baltimore County,
to determine whether or not the Zoning Commissioner and/or Deputy Zoning
Commissioner should approve uses of the subject property for uses as permitted
in a D.R. 16 zone pursuant to Sec. 230.1

See attached description.

Property is to be posted and advertised as prescribed by Zoning
Regulations.
I, or we, agree to pay expenses of above Special Hearing 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.

By: XXXXX XXXXX Inc.
County Clerk
Contract Purchaser
Address: XXXXX
DATE: XXXXX
BY: XXXXX
Address: XXXXX
Richard C. Murray
Petitioner's Attorney
Address: XXXXX

ORDERED By the Zoning Commissioner of Baltimore County, this 30th
day of August, 1972, 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 had before the Zoning
Commissioner of Baltimore County in Room 165, County Office Building in
Towson, Baltimore County, on the 25th day of October, 1972,
at 10:30 o'clock A.M.



XXXXX
Zoning Commissioner of Baltimore County

(over)

JOSEPH D. THOMPSON, P.E., S.L.S.
CIVIL ENGINEERS & LAND SURVEYORS
1180
101 SHELL BUILDING - 200 EAST JOPPA ROAD
TOWSON, MARYLAND 21204 • Valley 3-8820

DESCRIPTION FOR A SPECIAL HEARING FOR ZONING, CHURCH ROAD,
SECOND DISTRICT, BALTIMORE COUNTY, MARYLAND

BEING a parcel of land, of approximately 3.6 acres on the south
side of Church Road beginning 150 feet, more or less, east of Brenbrook Road and
fronting on Church Road 776 feet, more or less.

7-3-72



RE: PETITION FOR SPECIAL HEARING : BEFORE THE
S/S of Church Road, 150' E of : DEPUTY ZONING
Brenbrook Road - 2nd District : COMMISSIONER
Liberty Plaza Enterprises, Inc. :
Petitioner : OF
NO. 73-98-SPH (Item No. 37) :
: BALTIMORE COUNTY

Pursuant to Section 500.7 of the Baltimore County Zoning Regulations,
the Petitioners have requested a Special Hearing for a determination as to
whether or not an undeveloped portion of their commercially zoned shopping
center can be developed for uses as permitted in a D.R. 16 Zone pursuant to
Section 230.1 of the Baltimore County Zoning Regulations.

The Petitioners' overall tract contains 17.6 acres, more or less, and
has frontage on the north side of Liberty Road, the south side of Church Lane,
and is bisected in a north-south direction by Brenbrook Road. The improved
portion of the Petitioners' overall tract lies east of Brenbrook Road and con-
tains approximately 15 acres. Improvements consists of a major food store,
several retail stores, a restaurant, a theatre, bowling lanes, a car wash and
a service station.

The property is zoned B.M. (Business, Major) and has a C.C.C. (Com-
mercial Community Core) District superimposed thereon. Districts are des-
cribed under Section 100.1B1 as being intended to further the purposes of
zones, and to provide a greater refinement in land use regulations for critical
areas of development within the County.

The principal issue of this hearing is Section 233.1 of the B.M. Use
Regulations which states "Uses permitted in B.L. Zones" and Section 230.1
of the B.L. Use Regulations which states "Uses permitted and as limited in
the residential use immediately adjoining ----".

The overall 17.6 acre tract is adjacent to and binds on D.R. 5.5 zoning
along Church Lane to the north, D.R. 16 zoning on the easternmost property
line, B.L. zoning along the Liberty Road frontage, D.R. 16 and D.R. 5.5

The residue commercial area proposed to be developed for D.R. 16
purposes (60 apartment units), binds on undeveloped D.R. 16 zoned land for a
distance of 225'. However, this same area binds on developed D.R. 5.5 zoned
land for a distance of 790'. Under these circumstances, D.R. 16 use of this
property should not be considered to be in the best interest of the health,
safety and general welfare of the neighbors or neighborhood.

Therefore, IT IS ORDERED by the Deputy Zoning Commissioner of
Baltimore County this 12th day of April, 1973, that Sections 233.1 and
230.1 of the Baltimore County Zoning Regulations, does not permit D.R. 16
uses or garden apartments on the herein Petitioned for parcel, containing
3.6 acres net and 4.1 acres gross, therefore, such uses are hereby DENIED.

James E. Pyper
Deputy Zoning Commissioner of
Baltimore County

zoning along the westernmost boundary line.

Based on Section 230.1 and the fact that his property does adjoin D.R.
16 zoned land, the Petitioners amended his shopping center plan to include 60
garden apartment units on residue land fronting the south side of Church Lane.
A new boundary line encompassing 4.1 acres, more or less, was established
for the 60 units to meet the requirements for density parking setbacks, etc.
That portion of this parcel that fronts Church Lane has a frontage of 790 feet
and adjoins D.P. 5.5 zoned and improved land on the north side of said lane.
The easternmost end of said parcel binds on the easternmost boundary of the
overall tract and adjoins unimproved D.R. 16 zoned land for a distance of
225 feet, more or less.

The Office of Planning and Zoning refused to issue building permits for
the 60 apartment units apparently on the basis that the intent of the Zoning
Regulations was not being complied with.

The Petitioners contend that there is a D.R. 16 Zone or Zones immedi-
ately adjoining the tract, and hence, residential uses are allowed as a matter
of right. He further contended that the regulation in question does not author-
ize any administrative official to grant or withhold approval based upon vague
ideas of which of two residential zones might have the greatest adjoining
boundaries and which of two or more residential uses might be more suitable,
etc.

Several area residents, many of whom live opposite the proposed apart-
ments, were in attendance at the hearing in protest to the Petitioners' request.

The Protestants contended that any such use, as proposed by the appli-
cant, would be detrimental to the health, safety and general welfare of the
people residing in the area and would cause congestion and serious hazards
to Church Lane. Church Lane was described as being a two lane hardtop
County road 20 feet wide which twists and turns every 100 feet or so as it
meanders through the countryside. They contend that the area on the op-
posite side of Church Lane, which adjoins the proposed apartments, is

ORDER RECEIVED FOR FILING

DATE April 12, 1973

BY Julia W. Lichter

Assistant County Solicitor

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Mr. S. Eric DiNenna, Zoning Commissioner Date: February 7, 1973
FROM: Office of Law
SUBJECT: Liberty Plaza Enterprises, Inc.

The attached correspondence and Memorandum were referred to me by
Ned Griffin for examination. I would like to discuss same with you and
Norman Gerber. Frankly, I cannot determine what involvement, if any,
this office should have in the matter.

Julia W. Lichter
Assistant County Solicitor

JWL/bbr

cc: Mr. Norman Gerber



zoned D.R. 5.5, and does not permit apartment uses.

They also feel that the Petitioners have received approval, and have in
fact, utilized his property for a shopping center, and does not have an ab-
solute right to change plans and uses contrary to what has been approved.

Since this Special Hearing is for the purpose of interpreting a use re-
gulation, the Zoning Advisory Committee did not offer comment with regard
to the Petitioners' plans.

Recommendations from the Office of Planning and Zoning were as
follows:

"While some apartment development on the site may
have merit, especially behind the existing shopping
center building, we question whether the County has
authority to grant Variances or other modifications
to the use regulations of Section 235.A.1. A Petition
for Reclassification appears to be a more appropriate
vehicle on which to discuss the merits of this proposal."

Section 235.A.1 which relates to special regulations for C.C.C. Districts
states: Apartments shall be permitted, but only above the first story of a
building.

One of the basic laws of property is that a person shall be allowed the
widest use of his property, consistent with the protection of his neighbors.

In this instance, a strict interpretation without regard to its effect
would permit the widest use of the Petitioners' property, i.e., residential
use corresponding to any adjoining residential zone without regard to other
adjoining residential zones and uses.

However, it is also obvious that such an interpretation would not result
in a use that would be consistent with the protection of the Petitioners'
neighbors.

Section 600 of the Baltimore County Zoning Regulations states in part:

"In their interpretation and application, these Regulations
shall be held to be the minimum requirements for the pro-
motion of the public health, safety, convenience, and gen-
eral welfare."

- 3 -

Re: 1/26/73

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Mr. S. Eric DiNenna, Zoning Commissioner Date: October 25, 1972
FROM: Norman E. Gerber, Office of Planning
SUBJECT: Petition 73-98-SPH. South side of Church Road 150 feet, more or less
East of Brenbrook Road.
Petition for Special Hearing for Permitted Use.
Liberty Plaza Enterprises, Inc. - Petitioner
2nd District
HEARING: Wednesday, October 25, 1972 (10:30 A.M.)

The Office of Planning and Zoning has reviewed the subject petition, and has the following
comments to offer:

While some apartment development on this site may have merit,
especially behind the existing shopping center building, we question
whether the County has the authority to grant variances or other
modifications to the "use" regulations of Sec. 235.A.1. A petition
for reclassification appears to be a more appropriate vehicle on
which to discuss the merits of the proposal.

Memo - 2 weeks
97-411
Mr. Richard Murray
James E. Pyper 494 3351
Rep. Zoning Committee

MEMORANDUM ON BEHALF OF APPLICANT

The Applicant desires to use a portion of a B, M, M, zoned tract for uses permitted in a D, R, 16 zone. A question having arisen with the County, this action was brought for a determination as to whether the proposed use is permitted under the Baltimore County Zoning Regulations.

The Applicant is the developer of a relatively large tract of land all of which is in a B, M, M, Zone. The tract may be described as approximating a trapezoid although the northern and westerly sides are irregular in shape. The area proposed for D, R, 16 uses consists of 3.6 acres at the northeasterly end of the property and is proposed for garden apartments.

Along the easterly boundary of the entire tract there is a D, R, 16 zone for a distance of about 1,400 feet. One end of the proposed site "abuts" the adjacent D, R, 16 zone. The north boundary of the tract follows along Church Lane and to the north of Church Lane the zoning is D, R, 5, 5. Along part of the western boundary of the tract is another D, R, 16 zone having a common boundary of approximately 350 feet.

QUESTION PRESENTED

DOES SEC. 230.1 OF THE ZONING REGULATIONS PERMIT
D, R, 16 USES IN A B, M, M, ZONE UNDER THE FACTS OUT-
LINED ABOVE?

ARGUMENT

Sec. 233 of the Regulations deals generally with B, M, Zones and permits, inter alia, those uses allowed in a B, L, Zone. Sec. 230 in turn, covers B, L, Zones, generally outlining 59 permitted uses including Sec. 230.1 which authorizes "Uses permitted and as limited in the residential zone immediately adjoining. . ."

The Applicant contends that there is a D, R, 16 zone or zones immediately adjoining the tract and hence residential uses are allowed as a matter of right. Factually there can be no dispute as to the existence of the adjacent D, R, 16 zones and the issue is simply whether they "immediately adjoin" the proposed site.

The word adjoin has been defined in various ways. In 2 C.J.S., page 1, it is defined as follows:

"The word, in its strictest sense, is said to carry the idea of actual contact and touch; and hence it has been defined as meaning to abut, to abut upon, to append, to attach, to be contiguous to, to be in contact with, to connect with, to join or unite, to lie contiguous to or next to, to touch.

in its etymological sense, and according to the more approved definitions, the word means abutting, contiguous, having a common boundary, in contact with, lying next to or in contact with, meeting at some line or point of juncture, next to, touching, touching or contiguous, as distinguished from lying near or adjacent; but this is not necessarily the meaning of the word in all connections, and the word may be employed as meaning adjacent, close or near to, or nearest or most accessible. The meaning of the word as employed in a particular case must be gathered from the context, the intention, and the particular circumstances under which it is used. . ."

(Underscored added.)

-2-

Here, the facts meet even the strict definition of "actual contact and touch." See also, 1 Am. Jur. 2d, Adjoining Landowners, Sec. 1, referring to premises which touch or are connected.

With respect to the determination of the meaning of the phrase "immediately adjoin" attention is directed to the case of Fralinger v. Cooley, 108 Md. 682. There the Plaintiff owned property on one side of Myers Street in Baltimore and the Defendant resided directly opposite on the other side. At issue was a dispute concerning a permit for the erection of certain structures when a city ordinance required that copies of all such applications be served upon "adjoining property owners." At page 687 of the Opinion, the Court stated that the word adjoining "carries with it the idea of actual contact and touch." Accordingly, it was held that notice was not required to the property on the opposite side of the street without regard to whether the fee of the street was owned either by the city or by the Applicant subject to a public easement.

The cardinal rule is to ascertain and apply the intention of the local legislative body. The same body which passed the original regulation in 1955 also more recently enacted the zoning maps and hence had actual knowledge that many business properties adjoined 2 or sometimes 3 or more types of residential zones. The Commissioner should interpret the regulation so that it has meaning and effect. This is particularly true where a statute, such as zoning regulations, is in derogation of common law and property rights.

The regulation in question does not authorize any administrative official to grant or withhold approval based upon vague ideas of which

-3-

of two residential zones might have the greatest adjoining boundaries, which of two or more residential uses might be more suitable, etc. Instead, the regulation permits as a matter of right, uses permitted in "the residential zone immediately adjoining." Had the County Council desired, it could very easily have limited the use to the "most restrictive residential zone immediately adjoining" or "the residential zone having the greatest adjoining boundary or the like. It seems obvious that the only reasonable interpretation to give to the regulation is to read the same as permitting uses permitted in any residential zoning immediately adjoining. See 86 C.J.S., "The", page 656.

Such a construction gives meaning and effect to the regulation, is consonant with the principal that statutes in derogation of the common law are to be strictly construed and gives practical consideration to the fact that the legislative body which adopted the regulation had actual knowledge of untold instances where large tracts of land were surrounded by several different zoning classifications.

Respectfully submitted,

Richard C. Murray,
Attorney for Applicant.

I HEREBY CERTIFY, that on this 3rd day of December, 1972, a copy of the foregoing Memorandum was mailed to Melvin J. Caldwell, Esquire, 700 E. Joppa Road, Towson, Maryland 21204, Attorney for Plaintiffs.

Richard C. Murray

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Mr. S. Eric DiNenna, Zoning Commissioner Date: October 25, 1972
FROM: Norman E. Gerber, Office of Planning
SUBJECT: Petition #73-98-SPH. South side of Church Road 150 feet, more or less East of Brenbrook Road.
Petition for Special Hearing for Permitted Uses.
Liberty Plaza Enterprises, Inc. - Petitioner
2nd District
HEARING: Wednesday, October 25, 1972 (10:30 A.M.)

The Office of Planning and Zoning has reviewed the subject petition and has the following comments to offer:

While some apartment development on this site may have merit, especially behind the existing shopping center building, we question whether the County has the authority to grant variances or other modifications to the "use" regulations of Sec. 235.A.1. A petition for reclassification appears to be a more appropriate vehicle on which to discuss the merits of the proposal.



REVIEWED BY THE BALTIMORE COUNTY JOINT SUBDIVISION PLANNING COMMITTEE

DEVELOPER'S STATEMENT

Developer - Liberty Plaza Shopping Center, c/o Howard Cohen
8200 Liberty Plaza, Randallstown, Md. 21133
Engineer - Joseph D. Thompson, Shell Bldg., 200 E. Joppa Rd.
Towson, Md. 21204
District - 2
Location - S/S of Church Lane, E/S of Brenbrook Rd.
Lot Type - R-1 No. of Units: 60 No. of Acres: 1.2
Facilities - Contemplated: Water & Sewer

Representatives Present:

Representing Developer: Robert Spellman, Harry Caplin
Representing Developer's Section: Edw. A. McDonough, Paul Koch

The Developer presented a 10-scale plan of the proposed apartment development located south of Church Lane and east of the Liberty Plaza Shopping Center. The Committee's comments are:

The area being proposed for apartments was zoned for commercial use. However, due to technicalities involved concerning this use in this area, a special hearing is required. It is requested that the Developer contact Mr. James Dyer of the Office of Zoning with reference to this zoning matter.

Church Lane is to be improved with a 60-foot right-of-way requiring improvements for the full frontage of this property and the adjacent property owned by the same company.

Public water and sewer are available to serve this property.

This subdivision must comply with State regulations for underground electrical distribution and telephone services.

A grading plan is required for this subdivision. Grading shall be done and open areas stabilized with temporary seedings. A diversion berm shall be required to protect the bank. This work shall be done in accordance with Baltimore County Sediment Control Regulations as covered in Sections 4 and 8 of the Manual.

The minimum shall be a minimum of 30 feet as requested by the Fire Department.

After the zoning has been clearly established for this property, this plan may be submitted for processing.

BALTIMORE COUNTY ZONING ADVISORY COMMITTEE

Richard C. Murray, Esq.,
409 Washington Avenue
Towson, Maryland 21204

RE: Special Hearing Petition
Item 37
Liberty Plaza Enterprises, Inc. and
Court Plaza Realty Company - Petitioners

Dear Mr. Murray:

Since the above referenced petition is strictly a Special Hearing for the Zoning Commissioner to make an administrative decision, the Zoning Advisory Committee is withholding all comments at this time. We, of course, remind you that your clients are expected to comply with all applicable standards regarding the proposed development in the future.

Very truly yours,

John J. Dillon, Jr.,
Chairman,
Zoning Advisory Committee

3:10:33

BOARD OF EDUCATION
OF BALTIMORE COUNTY

TOWSON, MARYLAND 21204

Date: August 23, 1972

Mr. S. Eric DiNenna
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: Item #37 ZAC meeting of August 22, 1972
Property Owner: Liberty Plaza Enterprises and Court Plaza Realty Co.
Location: S/S Church Rd., 150' E of Brenbrook Rd.
Present Zoning: R-1
Proposed Zoning: Special Hearing for uses of the subject property for uses as permitted in a D.R. 16 zone pursuant to Section 230.1

District: 2
No. Acres: 3.6 acres

Dear Mr. DiNenna:

No bearing on student population.

Very truly yours,

W. Nick Petrovich
Field Representative

WNP:d

ANSWER TO MEMORANDUM OF APPLICANT
AND
MEMORANDUM ON BEHALF OF COMPLAINANTS

Your Complainants in this brief contend that any such use as proposed by the Applicant herein is detrimental to the health, safety and general welfare of the people residing in the area, the community and the locality involved, in addition to causing congestion and serious hazards to Church Lane.

QUESTIONS PRESENTED

c. Create a potential hazard from fire, panic or other dangers;

- d. Tend to overcrowd land and cause undue concentration of population;
- e. Interfere with adequate provisions for schools, parks, water, sewerage, transportation or other public requirements, conveniences, or improvements;
- f. Interfere with adequate light and air.

We feel that Your Applicant's Petition is not properly before the Commissioner since the Planning Board has approved the Zoning Map of 1970 which included the area in question, the plans of Your Applicant for the use and zoning of the entire area were approved. Your Applicant has not proven he cannot use the area as originally zoned and he cannot justify the use for which he now petitions.

We recognize and understand the reason for the Baltimore County Zoning Regulations and the Planning Board and we feel that the plans for the area have been approved and if the Applicant wants a change it would be subject to the approval of the Planning Board and approval of the Applicants request as a Special Exemption therefrom and from his present zoning.

Respectfully submitted,

Melvin J. Caldwell
Melvin J. Caldwell
700 East Joppa Road
Towson, Maryland 21204
494-5034
Attorney for Complainants

The questions are:

1. CAN A PORTION OF AN AREA ALREADY ZONED AS B.M. AND BEING USED AS SUCH BE USED FOR PURPOSES NOT PERMITTED IN A B.M. AREA?
2. CAN A PORTION OF AN AREA ALREADY ZONED AS B.M. AND BEING USED AS SUCH BE REZONED OR A SPECIAL EXCEPTION BE GRANTED WITHOUT THE PETITIONER BEING REQUIRED TO MEET THE REQUIREMENTS OF THE BALTIMORE COUNTY ZONING REGULATIONS?
3. HAS THE APPLICANT HEREIN PROPERLY SET FORTH ITS PETITION TO THE ZONING COMMISSIONER?

ARGUMENT

The area on the north side of the area (3.2 acres) in question is zoned residential D.R. 5.5 and, in fact, practically all the property bordering the northerly side of Church Lane is so zoned. Also, most of the land on the south side of Church Lane is also zoned D.R. 5.5 except the area in question (B.M.) and some few other areas. In addition, on the very plat presented by the Applicant to describe the area of 3.2 acres it wants to use for apartments, parking lots, and driveways it shows that this area (3.2 acres) for which the special exception is requested is completely surrounded by areas zoned B.M., except for the area on the north (where many of your Complainants live) which is zoned residential, D.R. 5.5

Therefore, even if we accept (which we do not) the Argument of the Applicant, no Applicant would not in fact be entitled to use the area of 3.2 acres which borders only on a D.R. 5/5 residential zone for apartments, etc., since use of the area would be limited to the uses of the residential zone D.R. 5/5 which adjoins such property.

Section 233 of the Zoning Regulation sets forth the uses permitted (which does not permit apartments). Paragraph 233.1 sets forth "uses permitted in a B. L. Zone. This does not say that the Applicant herein may change his plans which have already been approved and accepted under the Baltimore County Planning Board and Zoning Commissioner which would in effect permit him to

I HEREBY CERTIFY, that on this 2nd day of March, 1973, a copy of the foregoing Answer to Memorandum of Applicant and Memorandum on Behalf of Complainants were mailed to Richard C. Murray, Esquire, Mercantile-Towson Building, 409 Washington Avenue, Towson, Maryland 21204

Melvin J. Caldwell

[illegible]

CERTIFICATE OF PUBLICATION

TOWSON, MD. October 5, 1972.

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper printed and published in Towson, Baltimore County, Md., ~~on the 5th~~ on one time several weeks before the 25th day of October, 1972, the first publication appearing on the 5th day of October 1972.

THE JEFFERSONIAN.
Arch. Smith
 Manager

Cost of Advertisement, \$.....

[illegible]

OFFICE OF
THE
COMMUNITY **TIMES**
RANDALLSTOWN, MD. 21133 Oct. 10, 1981

THIS IS TO CERTIFY, that the annexed advertisement of
S. Eric Binenna, Zoning Commissioner
of Baltimore County
was inserted in THE COMMUNITY TIMES, a weekly newspaper published
in Baltimore County, Maryland, once a week for One ~~XXXXXX~~
week before the 10th day of Oct., 1972 that is to say, the same
was inserted in the issue of October 5, 1972.

STROMBERG PUBLICATIONS, Inc.

By Rick Morgan

73-98-SPH

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District: 2nd Date of Posting: OCT. 7-1972
 Posted for: SPECIAL HEARING
 Petitioner: LIBERTY PLAZA ENTERPRISES, INC.
 Location of property: 1/2 OF CHURCH ROAD 150 FT. E. OF BREEN BROOK RD.
 Location of Signs: ① 1/2 OF CHURCH RD. 175 FT. E. OF BREEN BROOK RD.
② 1/2 OF CHURCH RD. 325 FT. E. OF BREEN BROOK RD.
 Remarks: _____
 Posted by: Charles M. O'Neil Date of return: OCT. 13-1972
 Signature

PETITION MAPPING PROGRESS SHEET

FUNCTION	Wall Map		Original		Duplicate		Tracing		200 Sheet	
	date	by	date	by	date	by	date	by	date	by
Descriptions checked and outline plotted on map										
Petition number added to outline										
Denied										
Granted by ZC, BA, CC, CA										
Reviewed by: <u>[Signature]</u>	Revised Plans:									
Previous case: _____	Change in outline or description _____ Yes									
	Map # _____ No									

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

No. 5051

DATE Oct. 3, 1972 ACCOUNT 01-662AMOUNT \$25.00

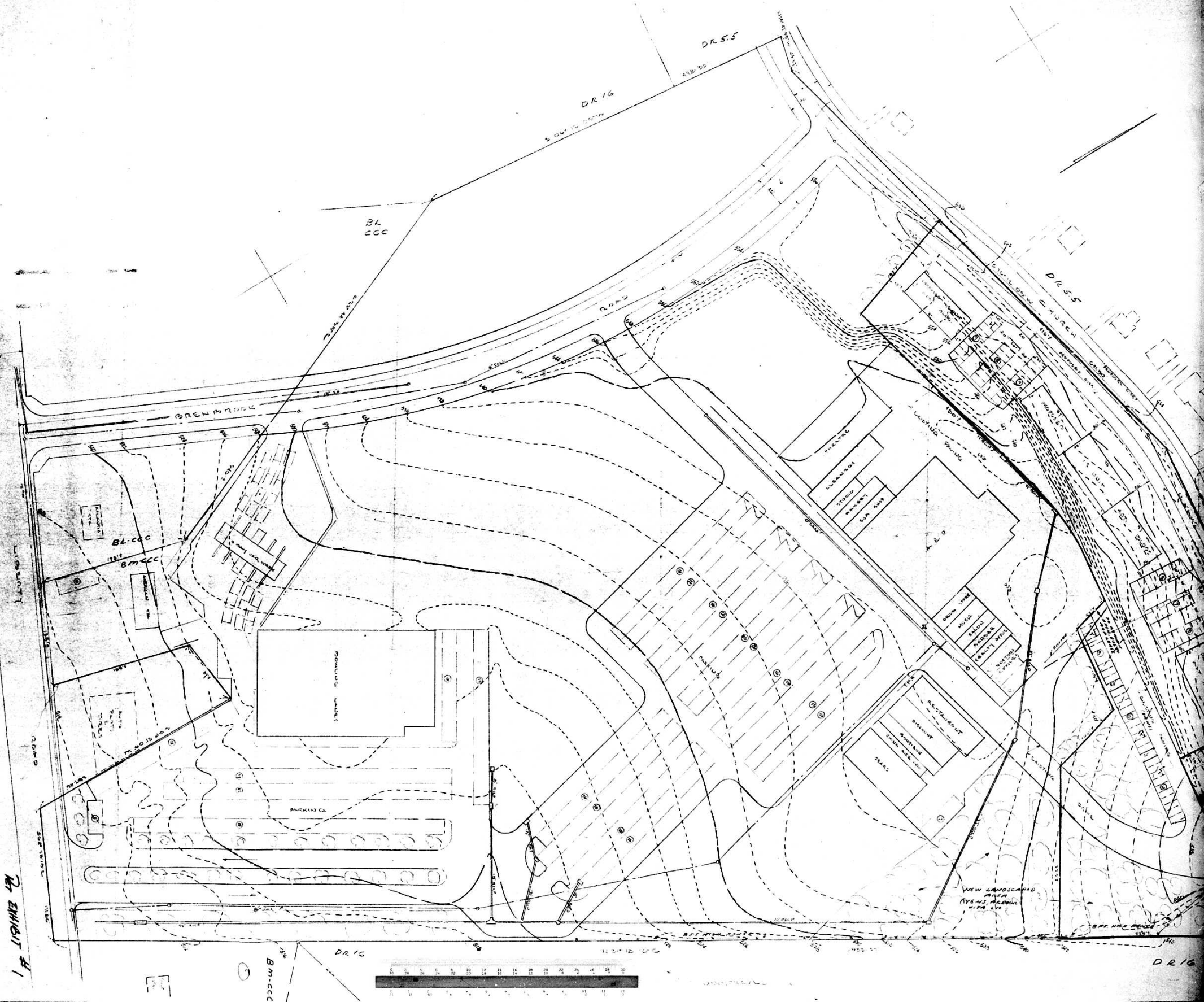
WHITE - CASHIER DISTRIBUTION YELLOW - CUSTOMER
 Messrs. Cook, Mudd, Murray & Howard
 1409 Washington Ave.
 Towson, Md. 21204
 Petition for Special Hearing for Liberty Plaza
 Enterprises, Inc.
 #73-98-SPH 25.00 ENC.

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

No. 5715

DATE Oct. 25, 1972 ACCOUNT 01-662AMOUNT \$36.50

WHITE - CASHIER DISTRIBUTION YELLOW - CUSTOMER
 Liberty Plaza Enterprises, Inc.
 P.O. Box 268
 Randallstown, Md. 21133
 Advertising and posting of property
 #73-98-SPH 36.50 ENC.



THIS DRAWING IS THE PROPERTY OF THE U.S. GOVERNMENT AND IS LOANED TO YOU BY THE U.S. GOVERNMENT. IT IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT PERMISSION IN WRITING FROM THE U.S. GOVERNMENT.



27 ENH 12 1

Bm-ccc

DR 16

1. FOR THE PURPOSES OF THIS MAP, THE FOLLOWING ASSUMPTIONS HAVE BEEN MADE:
 A. ALL DISTANCES ARE IN FEET, UNLESS OTHERWISE SPECIFIED.
 B. ALL ANGLES ARE IN DEGREES, UNLESS OTHERWISE SPECIFIED.
 C. ALL CURVES ARE CIRCULAR, UNLESS OTHERWISE SPECIFIED.
 D. ALL ELEVATIONS ARE IN FEET, UNLESS OTHERWISE SPECIFIED.
 E. ALL AREAS ARE IN SQUARE FEET, UNLESS OTHERWISE SPECIFIED.
 F. ALL VOLUMES ARE IN CUBIC FEET, UNLESS OTHERWISE SPECIFIED.
 G. ALL WEIGHTS ARE IN POUNDS, UNLESS OTHERWISE SPECIFIED.
 H. ALL MEASUREMENTS ARE TO THE CENTER OF GRAVITY, UNLESS OTHERWISE SPECIFIED.
 I. ALL MEASUREMENTS ARE TO THE CENTER OF GRAVITY, UNLESS OTHERWISE SPECIFIED.
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 Z. ALL MEASUREMENTS ARE TO THE CENTER OF GRAVITY, UNLESS OTHERWISE SPECIFIED.

