

200 SAME ✓
1000 ✓
DOCKET ✓
MERO
ZC

L. ROBERT EVANS
HARRIS JAMES GEORGE
BENJAMIN BRONSTEIN

MICHAEL J. CHOMEL
DOUGLAS A. STUBBS
WILLIAM R. LEVASSOUR, JR.

LAW OFFICES
EVANS, GEORGE AND BRONSTEIN
SUSQUEHANNA BUILDING, SUITE 205
29 WEST SUSQUEHANNA AVENUE
TOWSON, MARYLAND 21204
(301) 296-0200

RECEIVED
OCT 21 1987
ZONING OFFICE

October 20, 1987

The Honorable Robert Haines
Zoning Commissioner
County Office Building, Room 113
111 W. Chesapeake Avenue
Towson, Maryland 21204

Dear Mr. Haines:

Enclosed is a true test copy of a Writ of Mandamus by Consent signed by the Honorable J. William Hinkel on September 14, 1987. This Writ of Mandamus was obtained on behalf of Joseph H. Seipp, Jr., in order to correct a mistake in the 1984 Comprehensive Rezoning of Baltimore County which affected the classification of Joseph Seipp's Baltimore County property located at 9711 Monroe Street.

As of today (October 20, 1987), this correction has not yet been made by the Zoning Office. Mr. Joseph V. Maranto, area planner in the Office of Planning and Zoning, has made the change on his "work map".

The purpose of this letter is to request that at your earliest convenience you make the change in zoning on Mr. Seipp's property in accordance with the enclosed Mandamus order on two maps:

1. the "official" 200 scale zoning map; and
2. the 1000 scale zoning map.

I would very much appreciate having your office inform me when the above changes have been effected.

Sincerely,

EVANS, GEORGE & BRONSTEIN

Ben Bronstein
Benjamin Bronstein

BB/bd

Enclosure

cc: Mr. Joseph V. Maranto

JOSEPH H. SEIPP, JR.
4100 North Charles Street
Baltimore, MD 21218

Plaintiff

13.

BALTIMORE COUNTY, MD
County Office Building
Towson, Maryland 21204

SERVE ON:
The Honorable Arnold Jablon
County Attorney
Office of Law
County Office Building
Towson, Maryland 21204

and

NORMAN E. GERBER, Director
Office of Planning & Zoning
County Courts Building
4th Floor
Towson, Maryland 21204

306

THE HONORABLE ROBERT HAYNES
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Defendants

WRIT OF HABEAS CORPUS BY CONSENT

TO THE HONORABLE ROBERT HAYNES, ESQUIRE, BALTIMORE COUNTY ZONING COMMISSIONER AND CUSTODIAN OF THE BALTIMORE COUNTY ZONING MAPS, GREETINGS:

WHEREAS, Counsel for the Plaintiff and Defendants have agreed and stipulated that the appropriate zoning map should be adjusted to reflect that the zoning classification for the entire parcel known as 9711 Monroe Street, Baltimore, Maryland, more fully described as the fifth parcel in a deed from Edward L. Blanton, Jr. to Joseph H. Seipp, Jr. and recorded among the Land Records of Baltimore County in Liber 6325, Folio 183 (hereinafter "subject property") should be an RD classification in order to carry out the Baltimore County Council's

• IN THE

* CIRCUIT COURT

• **FOR**

• BALTIMORE COUNTY

87 CSP 3133/35/25/

MAP NW 157
3D
E. D. 8
DATE 10/27/6
200
1000
DP

Intent as to the rezoning of the subject property and that a Writ of Mandamus be directed to the Honorable Robert Haymes, Esquire, in his capacity as Baltimore County Zoning Commissioner (the duties of which include, among other duties, the care, custody, control, and exhibition of the official Baltimore County Zoning Maps) and that this Court should issue the relief hereinafter set forth, accordingly this Writ of Mandamus by Consent is issued this 14 day of Sept., 1987, and

YOU ARE HEREBY COMMANDED upon receipt of this Writ to forthwith correct and properly locate the zoning for the subject property on the 1984 Zoning Map, Sheet NW-15A. More specifically, all official zoning maps, including, but not limited to 1000-scale and 200-scale maps and zoning records of Baltimore County in the care, custody and control of the Zoning Commissioner and the Office of Planning and Zoning are to be forthwith brought to conformity with the designations heretofore mentioned in the Complaint for Writ of Mandamus, namely, that the RD zoning classification for 12 feet of the subject property shall continue so as to include all of the subject property, including the 12 northernmost feet of this property be zoned as RD by eliminating that strip of land presently shown as DR 3.5 on said zoning map and changing the same to an RD zone.

ISSUED this 14 day of Sept, 1987.

WITNESS the hand and seal of the Judge of the Third Judicial Circuit of Maryland.

APPROVED AS TO FORM:

Stanley J. Schapiro
Assistant County Attorney

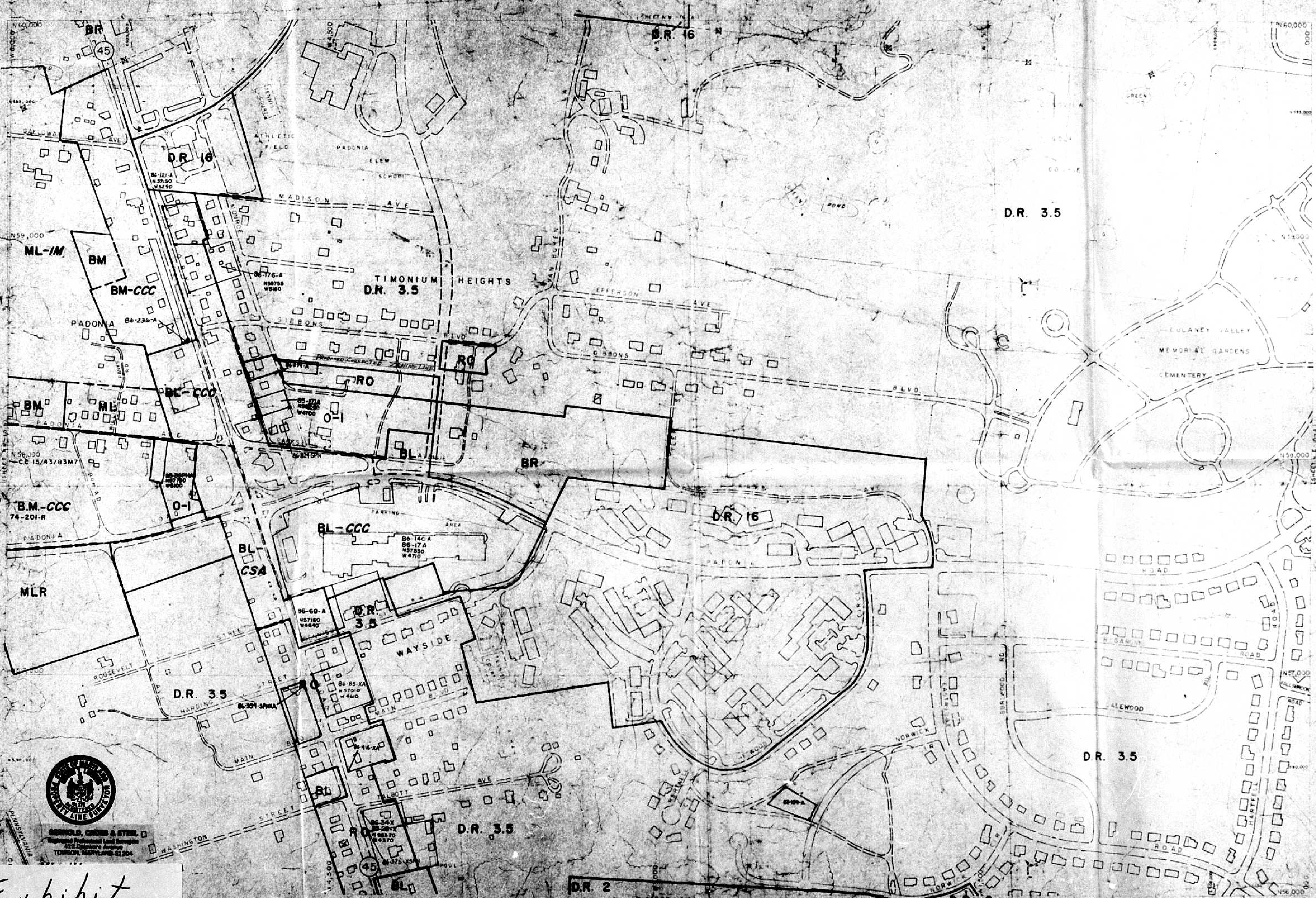
Benjamin Branstien
Attorney for Plaintiff

True Copy Test
SUZANNE MENGH, Clerk
Diane J. Williams
Assistant Clerk

FROM THE DESK OF J. ROBERT HAINES

TO: Ann Nastarowicz
James E. Dyer
W. Carl Richards
James H. Thompson

See me immediately
Discuss with me
Prepare draft response
✓ Please follow up
Collect \$20.00 fee
Please handle
Please attend meeting
Prepare written report
✓ Please file
Set up conference
Other



GEORGE, CROSS & STEEL
Registered Professional Land Surveyors
252 Calverton Avenue
TOWSON, MARYLAND 21204

Exhibit
B

1964 COMPREHENSIVE ZONING MAP
ADOPTED BY THE
BALTIMORE COUNTY COUNCIL
NOV. 13, 1964
BILL NOS. 133
136-84, 137-84

BALTIMORE COUNTY COUNCIL

PHOTOGRAMMETRIC MAP OF BALTIMORE COUNTY METROPOLITAN AREA

D. REVISIONS
BY DATE
Photometric MAPS, INC. 1970
SCALE 1" = 200'
DATE OF PHOTOGRAPHY
APRIL, 1953
Compiled By Photogrammetric Methods
AERO SERVICE CORPORATION - PHILADELPHIA, PA.

LOCATION
PADONIA
SHEET
NW
157A