ORDER RECEIVED FOR FILES

IN RE: PETITION FOR SPECIAL HEARING
N/S of Paper Mill Road, 1,600 ft. W
intersection of Paper Mill Road and
Old York Road
10th Election District
3rd Councilmanic District
(2824 Paper Mill Road)

2824 Paper Mill Road, LLC Petitioner BEFORE THE

DEPUTY ZONING COMMISSIONER

* OF BALTIMORE COUNTY

CASE NO. 04-113-SPH

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before this Deputy Zoning Commissioner as a Petition for Special Hearing filed by the legal owner of the subject property, 2824 Paper Mill Road, LLC. The Petitioner is requesting special hearing relief for property they own at 2824 Paper Mill Road in the Cockeysville area of Baltimore County. The special hearing request is to approve an amendment to the Order granted in Case No. 97-316-SPH to approve the owner's right to expand existing storage and office structure to add second story floor area pursuant to Section 500.7 of the Baltimore County Zoning Regulations (B.C.Z.R.).

The property was posted with Notice of Hearing on October 16, 2003, for 15 days prior to the hearing, in order to notify all interested citizens of the requested zoning relief. In addition, a Notice of Zoning hearing was published in "The Jeffersonian" newspaper on October 16, 2003 to notify any interested persons of the scheduled hearing date.

Applicable Law

Section 500.7 of the B.C.Z.R. Special Hearings

The Zoning Commissioner shall have the power to conduct such other hearings and pass such orders thereon as shall in his discretion be necessary for the proper enforcement of all zoning regulations, subject to the right of appeal to the County Board of Appeals. The power given hereunder shall include the right of any interested persons to petition the Zoning Commissioner for a public hearing after advertisement and notice to determine the existence of

any non conforming use on any premises or to determine any rights whatsoever of such person in any property in Baltimore County insofar as they may be affected by these regulations.

Zoning Advisory Committee Comments

The Zoning Advisory Committee (ZAC) comments are made part of the record of this case and contain the following highlights: None.

Interested Persons

Appearing at the hearing on behalf of the requested special hearing relief were Richard Truelove, the engineer who prepared the plan to accompany, Matthew Thompson and Paul Botzler. Lawrence F. Haislip, Esquire, represented the Petitioner.

Philip Bayle, Roosevelt Parker and Dandy Verderamo appeared at the hearing as Protestants. People's Counsel, Peter Max Zimmerman, entered the appearance of his office in this case.

Testimony and Evidence

Notice is taken that the property, which is the subject of this special hearing request, is zoned BL/CR and R.C.4. The Petitioner is asking for special hearing to allow a second floor office to be added to the existing office located in the rear of the property. That building is bisected by the RC 4 / BL zoning line. The Petitioner maintains this building should have been included the BL zone but was bisected in a zoning drafting error. This situation has gone on at least since 1997 when the petitioner successfully asked the Zoning Commissioner to determine that the office as it existed at the time could be continued irrespective of the zoning line. See Case No. 97-316 SPH. That request was supported by the Greater Jacksonville Association in appreciation of the Petitioner turning what was a derelict site into a respectable business with substantial improvements to the property.

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Mr. Haislip, proffered that the Petitioner operates the Lothorian Pool Service from the property and that the business having grown now needs additional office space for drafting and storage. They propose to build a second story on top of the existing one story structure keeping the look and siding of the existing building. Mr. Haislip indicated that the drafting and storage facilities were actually already on site housed in a temporary trailer. If the Petitioner's request is granted this trailer would be eliminated from the site. Petitioner's Exhibit No. 1 shows a line of existing juniper screening which will be preserved and an additional screening to augment the existing plantings.

The Protestants had no actual complaint about the business. Mr. Bayle expressed his concern that the office trailer had been moved onto the property, and that certain equipment was not stored inside a building along with construction supplies. He opposed any increase in use of the property as a construction site or marshaling yard. Mr. Parker expressed his concerns that he would be able to continue to cross the Petitioner's property to get to his property on the east side of the property. The Petitioner agreed. The Protestants, however, complimented the Petitioner on the improvement to the buildings, but wanted to have the area better screened than what is currently proposed by the Petitioner.

Eventually, the parties agreed to negotiate a landscape plan that would better protect the community from the business uses on the property. This plan is attached as Joint Exhibit No. 1 and is incorporated herein.

Findings of Fact and Conclusions of Law

I find, in reviewing Case No. 97-316-SPH, that there was substantial confusion as to where the RC 4/BL zone line actually ran. Based upon the testimony before the Commissioner, he found that the rear building had been used for many years in a commercial manner, permits

for same had been issued by Baltimore County, and that the RC 4/BL zone line should have been drawn to include the rear building in the BL zone. Consequently, he held that the commercial use of the building would continue and the Petitioner could maintain, use, repair and renovate the building in such a manner. The Order, however, did not include the ability of the Petitioner to expand the use, which is the subject of this request. I note that although the prior holding was akin to finding a non-conforming use, the Commissioner never gave that holding. This is important since the statute controlling non-confirming uses specifically prohibits expansion of same greater than 25 percent. See Section 104.3 of B.C.Z.R. The proposal is to expand the building 100 % by adding a second floor for the drafting and storage facilities.

I also note that the Petitioner has filed Issue 3-093 on the Comprehensive Zoning Map Process to clarify the location of the BL/RC 4 line, which may well solve the problem for the Petitioner. Finally, the Petitioner is referred to Section 26-134 of the Baltimore County Code for procedures to correct zoning maps.

I find that the proposed expansion would not be a detriment to the health, safety or welfare of the community, especially in light of the screening agreement reached by the Petitioner and the community representatives. I will grant the requested relief and incorporate as a condition the additional landscaping required under the parties' agreement dated March 24, 2004, a copy of which is attached hereto and made a part hereof.

Pursuant to the advertisement, posting of the property, and public hearing on this petition held, and for the reasons given above, the special hearing request shall be granted.

THEREFORE, IT IS ORDERED, by the Deputy Zoning Commissioner for Baltimore County, this 3 day of March, 2004 that the Special Hearing Request to approve an amendment to the Order granted in Case No. 97-316-SPH, to approve the owner's right to

FOR FILMS

ORDER RECEIVED

expand existing storage and office structure and to add second story floor area, pursuant to Section 500.7 of the Baltimore County Zoning Regulations (B.C.Z.R.), be and is hereby GRANTED subject to the following condition:

1. That the Petitioner shall install and maintain the landscape screening shown in the parties' agreement dated March 24, 2004, a copy of which is attached hereto and made a part hereof, and which agreement shall be enforceable by Baltimore County.

IT IS FURTHER ORDERED, that the Petitioner shall allow pedestrian access from and between 2824 Paper Mill Road and the front portion of 2820 Paper Mill Road subject to the Petitioner's reasonable security measures pursuant to the attached agreement between the parties dated March 24, 2004.

IT IS FURTHER ORDERED, that any appeal of this decision must be made within thirty (30) days of the date of this Order.

JOHN V. MURPHY

DEPUTY ZONING COMMISSIONER

FOR BALTIMORE COUNTY

JVM:raj



IN THE MATTER OF
THE APPLICATION OF
2824 PAPER MILL ROAD, LLC PETITIONER FOR VARIANCE SPECIAL
HEARING ON PROPERTY LOCATED ON
THE N/S PAPER MILL ROAD, 1,600' W OF
INTERSECTION OF PAPER MILL ROAD
AND OLD YORK ROAD
(2824 PAPER MILL ROAD)
10TH ELECTION DISTRICT
3RD COUNCILMANIC DISTRIC

BEFORE THE

COUNTY BOARD OF APPEALS

OF

BALTIMORE COUNTY

Case No. 04-113-SPH

ORDER OF DISMISSAL OF PETITION

This case comes to the Board on appeal filed by Peter Max Zimmerman, People's Counsel for Baltimore County, and Carole S. Demilio, Deputy People's Counsel, from the March 31, 2004 Order of the Deputy Zoning Commissioner in which the subject Petition was granted.

WHEREAS, the Board is in receipt of a letter of withdrawal of Petition filed November 12, 2004 by Lawrence F. Haislip, Esquire, Counsel for 2824 Paper Mill Road, LLC, Petitioner (a copy of which is attached hereto and made a part hereof); and

WHEREAS, said Counsel for Petitioner indicates in his letter of withdrawal that the subject request has been mooted by the rezoning of the subject property in the 2004 Comprehensive Zoning Map Process; and

WHEREAS, said Counsel for Petitioner requests that the Petition for Special Hearing filed in the above-referenced Petition be withdrawn as of November 12, 2004, and the matter closed,

IT IS THEREFORE. this // day of MILLIN 2004, by the County Board of Appeals of Baltimore County

ORDERED that said Petition filed in Case No. 04-113-SPH be and is hereby WITHDRAWN AND DISMISSED, rendering moot the appeal filed in this matter.

COUNTY BOARD OF APPEALS OF BALTIMORE COUNTY

wrence S. Wescott, Chairman

Margaret Worrall

John P. Quinn

MILES & STOCKBRIDGE P.C.

Lawrence F. Haislip 410.823.8234 ihaislip@milesstockbridge.com

November 11, 2004

Kathleen C. Bianco, Administrator County Board of Appeals of Baltimore County Old Courthouse Room 49 400 Washington Avenue Towson, MD 21204

Re:

2824 Paper Mill Road LLC

Case No. 04-113-SPH

Dear Ms. Bianco:

Subsequent to the issuance of Findings of Fact and Conclusions of Law dated March 31, 2004 by the Baltimore County Deputy Zoning Commissioner in the above entitled case, and the entry of an appeal by the People's Counsel for Baltimore County to the County Board of Appeals with respect to the same, the property owner filed a request (Issue No.3-083) for rezoning of the property in the 2004 comprehensive rezoning process. The property owner's request was approved, thereby mooting the request which was the subject of the Petition for Special Hearing. Therefore, on behalf of the Petitioner, 2824 Papermill Road LLC, I am requesting that the Petitioner's Petition be withdrawn and that the matter be closed. The matter is currently assigned for hearing on Thursday, November 18th at 10:00 a.m.

Sincerely,

Lawrence F. Haislip

LFH

cc:

Mr. Matthew Thompson

Peter Max Zimmerman, Esquire

NOV 1 2 2004

BALTIMORE COUNTY
BOARD OF APPEALS



Petition for Special Hearing

to the Zoning Commissioner of Baltimore County

for the property located at 2428 Paper Mill Road

which is presently zoned BL/CR & RC-4

This Petition shall be filed with the Department of Permits and Development Management. The undersigned, legal owner(s) 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 should approve

Amendment to Order granted in 97-316 SPH to approve Owner's right to expand existing storage and office structure to add second story floor area.

Property is to be posted and advertised as prescribed by the zoning regulations.

I, or we, agree to pay expenses of above Special Hearing, advertising, posting, etc. and further agree to and are to be bounded by the zoning regulations and restrictions of Baltimore County adopted pursuant to the zoning law for Baltimore County.

			I/We do solemnly declare a perjury, that I/we are the legistry is the subject of this Petition	gal owner(s) of	r the penalties of the property which
Contract Purchaser/L	essee:		Legal Owner(s):		
Name - Type or Print		· · · · · · · · · · · · · · · · · · ·	2428 Papermill Roa Name - Type or Print	d LLC	· · · · · · · · · · · · · · · · · · ·
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Address	· · · · · · · · · · · · · · · · · · ·	Telephone No.	Lawrence F. Haisli; Name - Type or Print	p, Attorney	·
City	State	Zip Code	Signature		
Attorney For Petitione	<u>:r:</u>		2428 Papermill Road	<u>d</u>	410-785-1000
Lawrence F. Haislip			Phoenix	MD	Telephone No. 21131-1320
Name - Type or Print Signature	<u></u>		City Representative to be	State Contacted:	Zip Code
Miles & Stockbridge	P.C.	······································	Lawrence F. Haisli)	
Company 600 Washington Aven	ue Suite 3	00 410-823-8234	Name Miles & Stock	_	
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Towson	MD	21204	Towson	MD	Telephone No. 21204
City	State	Zip Code	City	State	Zip Code
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			ESTIMATED LENGTH	OF HEARING	; }
Case No. 04-11	3-SPH		UNAVAILABLE FOR HE	ARING	
REV 9/15/98		Revieu	ved By JNP	Date	1/4/03

Zoning Commissioner

Suite 405, County Courts Building 401 Bosley Avenue Towson, Maryland 21204 Tel: 410-887-3868 • Fax: 410-887-3468





James T. Smith, Jr., County Executive Lawrence E. Schmidt, Zoning Commissioner

March 18, 2004

Lawrence F. Haislip, Esquire Miles & Stockbridge, P.C. 600 Washington Avenue, Suite 300 Towson, Maryland 21204

> Re: Petition for Special Hearing Case No. 04-113-SPH Property: 2428 Paper Mill Road

Dear Mr. Haislip:

I am in receipt of Mr. Bayle's letter of January 18, 2004 concerning the above-captioned case. His correspondence refers to a letter from Mr. Thompson dated December 12, 2003 which outlines a landscape proposal and some further agreement between Mr. Parker and the Petitioners regarding access. I have not yet received copies of these documents and, therefore, have not yet issued a decision on this case. I understand that the Petitioner and Protestants have reached agreement in this regard.

It would be appreciated if you would send me a copy of these documents so that I can issue my decision in this case. Thank you for your attention and cooperation in this matter.

Very truly yours,

John V. Murphy

Deputy Zoning Commissioner

Dan menskry

JVM:raj

Copies to:

Phillip C. Bayle 2814 Paper Mill Road Phoenix, Maryland 21131

Roosevelt & Lucille Parker 2820 Paper Mill Road Phoenix, Maryland 21131

Dandy Verderamo 2838 Paper Mill Road Phoenix, Maryland 21131

Matt & Robert Thompson Lothorian Pools 2824 Paper Mill Road Phoenix, MD 21131

Tom & Marilyn McDermott 2818 Paper Mill Road Phoenix, MD 21131

Stephen Kirsch Greater Jacksonville Association P. O. Box 126 Phoenix, MD 21131

Eric & Melody Wagner 2816 Paper Mill Road Phoenix, MD 21131

Zoning Commissioner

Suite 405, County Courts Building 401 Bosley Avenue Towson, Maryland 21204 Tel: 410-887-3868 • Fax: 410-887-3468



Baltimore County

James T. Smith, Jr., County Executive Lawrence E. Schmidt, Zoning Commissioner

November 18, 2003

Lawrence F. Haislip, Esquire Miles & Stockbridge, P.C. 600 Washington Avenue, Suite 300 Towson, Maryland 21204

Phillip C. Bayle 2814 Paper Mill Road Phoenix, Maryland 21131 Roosevelt Parker 2820 Paper Mill Road Phoenix, Maryland 21131

Dandy Verderamo 2838 Paper Mill Road Phoenix, Maryland 21131

Re: Petition for Special Hearing
Case No. 04-113-SPH

Property: 2428 Paper Mill Road

Dear Messrs. Haislip, Bayle, Parker & Ms. Verderamo:

My notes indicate that I was to hold the record open in this case until November 14, 2003, to allow you time to arrive at a solution to screening and other issues. I have not heard from you in this regard. If you need more time, please let me know. If you cannot resolve these issues, I can make my decision on the existing record. I would appreciate a written note from you as to how I should proceed.

Also, I am enclosing a copy of a letter I received from the Greater Jacksonville Association dated November 12, 2003. Their representative did not attend the hearing on October 31, 2003 and therefore the association is not an "interested party" as that term is legally defined. Consequently, although I do not doubt the truth of their statements, I must hear directly from you as to the status of your negotiations and this case.

Very truly yours,

John V. Murphy

Deputy Zoning Commissioner

JVM:raj



Visit the County's Website at www.baltimorecountyonline.info

NOTICE OF ZONING.

The Zoning Commissioner of Baltimore County will hold a public hearing in Towson Marviand on the property identified herein as follows: Case #04-113-SPH 2428 Paper Mill Road 1,600 feet west of Old York Road 10th Election District Legal Owner(s): Lawrence Haistip Special Hearing: to approve the Amendment to Order granted in 97-318 to approve owner's right to expand existing storage and office structure to add second story floor area. Hearing: Friday, October 31, 2003 at 11:00 a.m. in Room 106, County Office Building, 111 W. Chesapeake Avenue.

LAWRENCE E. SCHMIDT Zoning Commissioner for Baltimore County NOTES: (1) Hearings are Handicapped Accessible; for special accommodations Please Contact the Zoning Commissioner's Office at (410) 887-4386.

(2) For Information concerning the File and/or Hearing, Contact the Zoning Review Office at (410) 887-3391.

10/208 Oct 18 C631833

CERTIFICATE OF PUBLICATION

1016,2003	
THIS IS TO CERTIFY, that the annexed advertisement was public	lished
in the following weekly newspaper published in Baltimore County,	Md.,
once in each ofsuccessive weeks, the first publication appea	aring
on 10/16/,2003	
N-A	
The Jeffersonian	
🖵 Arbutus Times	
☐ Catonsville Times	
☐ Towson Times	
Owings Mills Times	
□ NE Booster/Reporter	
☐ North County News	
S. Wilkinger	الاستون در الاستون الوالية والاستون وا
LEGAL ADVERTISING	

406 WEST PENNSYLVANIA AVE. TOWSON, MARYLAND 21204-4228

> (410) 494-4914 FAX (410)296-5326

ZONING DESCRIPTION

Beginning for the same at a point on the northerly side of Paper Mill Road, 80 feet wide. Said point lying in the northerly right-of-way line of Paper Mill Road 40 feet northerly of the centerline of said Paper Mill Road approximately 1600 feet west of the intersection of Paper Mill Road and Old York Road. Thence the following courses and distances viz:

- (1) North 27° 24' 03" West 188.34 feet thence,
- (2) South 70° 46' 16" West 69.91 feet thence,
- (3) South 07° 13' 47" East 6.02 feet thence,
- (4) By a curve to the right with a radius 125.00 feet, and a length of 114.97 feet thence,
- (5) South 45° 28' 18" West 218.02 feet thence,
- (6) By a curve to the left with a radius 40.00 feet, a length of 62.54 feet,
- (7) South 44° 06' 02" East 48.13 feet thence,
- (8) By a curve to the right with a radius 2885.00 feet, and a length of 120.30 feet thence,
- (9) By a curve to the right with a radius 662.00 feet, and a length of 161.86 feet thence,
- (10) South 27° 12' 20" East 11.43 feet thence,
- (11) By a curve to the right with a radius 650.57 feet, and a length of 20.38 feet thence,
- (12) North 25° 24' 38" West 11.43 feet thence,
- (13) By a curve to the right with a radius 662.00 feet, and a length of 42.65 feet thence,
- (1) (14) North 68° 15' 50" East 33.22.13 feet to the point of beginning.

Containing 47,263 square feet, or 1.085 acres of land, more or less.

Being all of that property recorded in the land records of Baltimore County in Liber SM 17477 Folio 121, and shown as Lot 5 on the plat of Victoria Woods (Plat Book 065 Folio 097). Located in the Tenth Election District, and Third Councilmanic District, of Baltimore County, Maryland. Also known as 2824 Paper Mill Road.

July 23, 2003 reports\zondesc\Lotharian.doc

Padri Ville 7/23/03
Richard John Truelove P.E.

recycled paper

04-113-5PH

BALTIMORE COUNTY, MARYLAND OFFICE OF BUDGET & FINANCE MISCELLANEOUS RECEIPT	No. 28126
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FOR: Special Heaving CH	-113-SPH)
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Baltimore County, Maryland
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THOMAS J. HOFF, IN 406 W. Pennsylvania Ave. 2nd Floor TOWSON, MARYLAND 21204

LETTE OF TRANSMITTAL

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DATE

SIGNED: 10M25 Julian If enclosures are not as noted, kindly notify us at once.

APPEAL SIGN POSTING REQUEST

CASE NO.: 04-113-SPH

2824 PAPER MILL ROAD, LLC – LEGAL OWNER

2824 PAPER MILL ROAD

10TH ELECTION DISTRICT

APPEALED: 4/15/2004

ATTACHMENT - (Plan to accompany Petition - Petitioner's Exhibit No. 1)

CERTIFICATE OF POSTING

TO:

Baltimore County Board of Appeals

400 Washington Avenue, Room 49

Towson, Maryland 21204

Attention:

Kathleen Bianco

Administrator

CASE NO.: 04-113-SPH

Petitioner/Developer:

2824 PAPER MILL ROAD, LLC

This is to certify that the necessary appeal sign was posted conspicuously on the property located at:

2824 PAPER MILL ROAD

The sign was posted on $5/2$, 2004
By: Buy Keund	
(Signature of Sign Poster)	
GARY FREUND	ı
(Printed Name)	-



RE: Case No. 04-113-SPH
Petitioner/Developer:
Lawrence Haislip
Hearing Date: 10/31/2003

Baltimore County Department of Permits and Development Management County Office Building, Room 111 111 West Chesapeake Avenue Towson, MD 21204

Attention: Ms. Becky Hart:

Ladies and Gentlemen:

This letter is to certify under the penalties of perjury that the necessary sign(s) required by law were posted conspicuously on the property located 2824 Paper Mill Road.

The sign(s) were posted on 10/16/03.

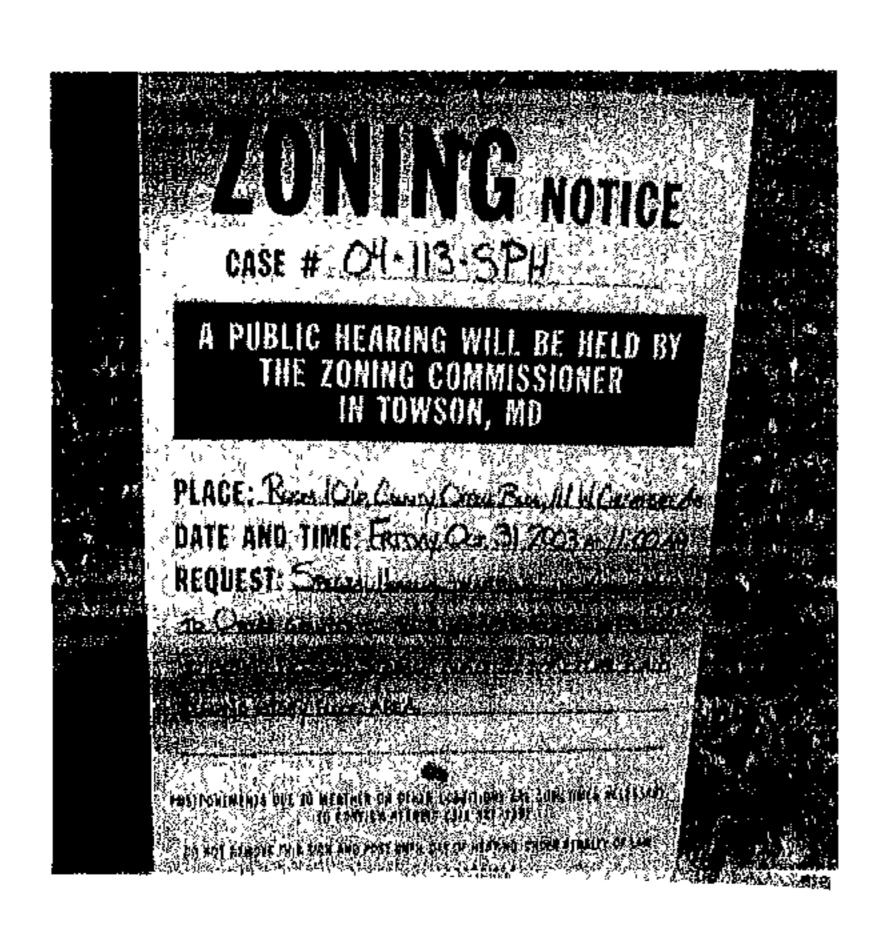
Diana Sugiuchi
Thomas J. Hoff, Inc.

406 West Pennsylvania Avenue

Towson, MD. 21204

410-296-3668

Sincerel



Department of Permits a Development Management

Director's Office County Office Building 111 W. Chesapeake Avenue Towson, Maryland 21204 Tel: 410-887-3353 • Fax: 410-887-5708





James T. Smith, Jr., County Executive Timothy M. Kotroco, Director

September 25, 2003

NOTICE OF ZONING HEARING

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing in Towson, Maryland on the property identified herein as follows:

CASE NUMBER: 04-113-SPH

2428 Paper Mill Road
N/side of Paper Mill Road, 1, 600 feet west of Old York Road
10th Election District – 3rd Councilmanic District
Legal Owner: Lawrence Haislip

Special Hearing to approve the Amendment to Order granted in 97-316 to approve owner's right to expand existing storage and office structure to add second story floor area.

Hearings:

Friday, October 31, 2003, at 11:00 a.m. in Room 106, County Office Building, 111 W. Chesapeake Avenue

Timothy Kotroco

Director

TK:klm

C: Lawrence Haislip, Miles & Stockbridge, 600 Washington Avenue, Stel 300, Towson 21204 2428 Paper Mill LLC, Lawrence Haislip, 2428 Paper Mill Road, Phoenix 21131-1320

NOTES: (1) THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY THURSDAY, OCTOBER 16, 2003.

(2) HEARINGS ARE HANDICAPPED ACCESSIBLE; FOR SPECIAL ACCOMMODATIONS PLEASE CALL THE ZONING COMMISSIONER'S OFFICE AT 410-887-4386.

(3) FOR INFORMATION CONCERNING THE FILE AND/OR HEARING, CONTACT THE ZONING REVIEW OFFICE AT 410-887-3391.

TO: *PATUXENT PUBLISHING COMPANY
Thursday, October 16, 2003 Issue - Jeffersonian

Please forward billing to:
Lawrence Haislip
Miles & Stockbridge
600 Washington Avenue
Towson, MD 21204

410-823-8234

NOTICE OF ZONING HEARING

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing in Towson, Maryland on the property identified herein as follows:

CASE NUMBER: 04-113-SPH

2428 Paper Mill Road N/side of Paper Mill Road, 1, 600 feet west of Old York Road 10th Election District – 3rd Councilmanic District Legal Owner: Lawrence Haislip

Special Hearing to approve the Amendment to Order granted in 97-316 to approve owner's right to expand existing storage and office structure to add second story floor area.

Hearings:

Friday, October 31, 2003, at 11:00 a.m. in Room 106, County Office

Building, 111 W. Chesapeake Avenue

LAWRENCE E. SCHMIDT ZONING COMMISSIONER FOR BALTIMORE COUNTY

NOTES: (1) HEARINGS ARE HANDICAPPED ACCESSIBLE; FOR SPECIAL ACCOMODATIONS, PLEASE CONTACT THE ZONING COMMISSIONER'S OFFICE AT 410-887-4386.

(2) FOR INFORMATION CONCERNING THE FILE AND/OR HEARING, CONTACT THE ZONING REVIEW OFFICE AT 410-887-3391.

DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT

ZONING REVIEW

ADVERTISING REQUIREMENTS AND PROCEDURES FOR ZONING HEARINGS

The <u>Baltimore County Zoning Regulations</u> (BCZR) require that notice be given to the general public/neighboring property owners relative to property which is the subject of an upcoming zoning hearing. For those petitions which require a public hearing, this notice is accomplished by posting a sign on the property (responsibility of the petitioner) and placement of a notice in a newspaper of general circulation in the County, both at least fifteen (15) days before the hearing.

Zoning Review will ensure that the legal requirements for advertising are satisfied. However, the petitioner is responsible for the costs associated with these requirements. The newspaper will bill the person listed below for the advertising. This advertising is due upon receipt and should be remitted directly to the newspaper.

OPINIONS MAY NOT BE ISSUED UNTIL ALL ADVERTISING COSTS ARE PAID.

·	
For Newspaper Advertising:	
Item Number or Case Number: D4-113-5PH	
Petitioner: 2428 Papermill Road, LLC	
Address or Location: 2428 Paper Mill Road	
	· · · · · · · · · · · · · · · · · · ·
PLEASE FORWARD ADVERTISING BILL TO:	
Name: LAWRENCE F HAISLIP	
Address: MILES + STOCKLESSE PC	
600 Wishmeron Avenue	
Touson the surfued 2/2004	, *
Telephone Number: 4/2 8234.	



County Board of Appeals of Baltimore County

OLD COURTHOUSE, ROOM 49 400 WASHINGTON AVENUE TOWSON, MARYLAND 21204 410-887-3180

FAX: 410-887-3182

Hearing Room – Room 48 Old Courthouse, 400 Washington Avenue

August 12, 2004

Morrison of Market of the Colon of the Colon

NOTICE OF ASSIGNMENT

CASE #: 04-113-SPH

IN THE MATTER OF: 2824 PAPER MILL ROAD, LLC -

Retitioner 2824 Paper Mill Road

10th Election District; 3rd Councilmanic District

3/31/04 D.Z.C.'s Order in which special hearing relief was GRANTED with condition.

ASSIGNED FOR:

THURSDAY, NOVEMBER 18, 2004 at 10:00 a.m.

NOTICE:

This appeal is an evidentiary hearing; therefore, parties should consider the

advisability of retaining an attorney.

Please refer to the Board's Rules of Practice & Procedure, Appendix B, Baltimore County Code.

IMPORTANT: No postponements will be granted without sufficient reasons; said requests must be in writing and in compliance with Rule 2(b) of the Board's Rules. No postponements will be granted within 15 days of scheduled hearing date unless in full compliance with Rule 2(c).

If you have a disability requiring special accommodations, please contact this office at least one week prior to hearing date.

Kathleen C Bianco Administrator

c:

Appellant

: Office of People's Counsel for Baltimore County

Counsel for Petitioner
Petitioner

: Lawrence F. Haislip, Esquire

2824 Paper Mill Road, LLC

/Matthew Thompson \

Phillip C. Bayle Roosevelt Parker Dandy Verderamo

Lawrence E. Schmidt /Zoning Commissioner Pat Keller, Planning Director Timothy M. Kotroco, Director /PDM

Department of Permits a Development Management

Development Processing County Office Building 111 W. Chesapeake Avenue Towson, Maryland 21204



Baltimore County

James T. Smith, Jr., County Executive
Timothy M. Kotroco, Director

October 24, 2003

Lawrence Haislip Miles & Stocbridge 600 Washington Avenue, Ste. 300 Towson, MD 21204

Dear Mr. Haislip:

RE: Case Number: 04-113-SPH, 2428 Paper Mill Road

The above referenced petition was accepted for processing by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on September 4, 2003.

The Zoning Advisory Committee (ZAC), which consists of representatives from several approval agencies, has reviewed the plans that were submitted with your petition. All comments submitted thus far from the members of the ZAC are attached. These comments are not intended to indicate the appropriateness of the zoning action requested, but to ensure that all parties (zoning commissioner, attorney, petitioner, etc.) are made aware of plans or problems with regard to the proposed improvements that may have a bearing on this case. All comments will be placed in the permanent case file.

If you need further information or have any questions, please do not hesitate to contact the commenting agency.

Very truly yours,

W. Carl Richards, Jr. Supervisor, Zoning Review

U. Callibal)

WCR:klm

Enclosures

c: People's Counsel 2428 Paper Mill Road, LLC, 2428 Paper Mill Rd., Phoenix 21131-1320

BALTIMORE COUNTY, MARYLAND

Board of Appeals of Baltimore County Interoffice Correspondence

DATE:

January 12, 2005

TO:

Timothy Kotroco, Director

Permits & Development Management

Attn.: David Duvall

FROM:

Theresa R. Shelton ()

Board of Appeals

SUBJECT:

CLOSED APPEAL CASE FILES

The following case(s) have been finalized and the Board of Appeals is closing the copy of the appeal case file(s) and returning the file(s) and exhibits (if applicable) attached herewith.

BOARD OF APPEALS CASE NUMBER	PDM FILE NUMBER	NAME	LOCATION
04-330-A	04-330-A	DANIEL COLHOUN	16347 TRENTON ROAD
04-113-SPH	04-113-SPH	2824 PAPER MILL ROAD	2824 PAPER MILL ROAD
03-093-SPHA	03-093-SPHA	L&B ENTERPRISES LLC	506 MARLYN AVE

Attachment: SUBJECT FILE(S) / EXHIBIT(S) ATTACHED;

7m/31

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO:

Timothy M. Kotroco, Director

Department of Permits and Development Management

FROM:

Arnold F. 'Pat' Keller, III

Director, Office of Planning

SUBJECT: Zoning Advisory Petition(s): Case 04-113

The Office of Planning has reviewed the above referenced case(s) and has no comments to offer. For further questions or additional information concerning the matters stated herein, please contact Mark A. Cunningham in the Office of Planning at 410-887-3480.

Prepared By:

Section Chief

AFK/LL

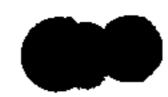
RECEIVED

DATE: October 28, 2003

NOV 1 2003

ZONING COMMISSIONER





DATE: September 30, 2003

BALTIMORE COUNTY, MARYLAND

INTEROFFICE CORRESPONDENCE

TO:

Timothy M. Kotroco, Director

Department of Permits & Development Management

Robert W. Bowling, Supervisor Bureau of Development Plans Review

SUBJECT:

Zoning Advisory Committee Meeting

For September 29, 2003 Item Nos. 113, 114, 115, 116, 117, 118, 122, 125, 126, 128, 130, and

136

The Bureau of Development Plans Review has reviewed the subject-zoning items, and we have no comments.

RWB:CEN:jrb

cc: File



700 East Joppa Road Towson, Maryland 21286-5500 410-887-4500

County Office Building, Room 111 Mail Stop #1105 111 West Chesapeake Avenue Towson, Maryland 21204 September 24, 2003

ATTENTION: Rebecca Hart

Distribution Meeting of: September 22, 2003

Item No.:

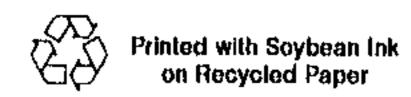
Dear Ms. Hart:

Pursuant to your request, the referenced property has been surveyed by this Bureau and the comments below are applicable and required to be corrected or incorporated into the final plans for the property.

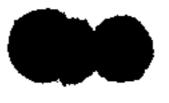
4. The site shall be made to comply with all applicable parts of the Baltimore County Fire Prevention Code, (2000 edition of NFPA 1 & 101), prior to occupancy or beginning of operation.

LIEUTENANT JIM MEZICK Fire Marshal's Office PHONE 887-4881 MS-1102F

cc: File







Robert L. Ehrlich, Jr., Governor Michael S. Steele, Lt. Governor

Robert L. Flanagan, Secretary Neil J. Pedersen, Administrator

MARYLAND DEPARTMENT OF TRANSPORTATION

Date:

9.23.03

Ms. Rebecca Hart
Baltimore County Office of
Permits and Development Management,
County Office Building, Room 109
Towson, Maryland 21204

RE:

Baltimore County

Item No. // 3

JAP

Dear Ms. Hart:

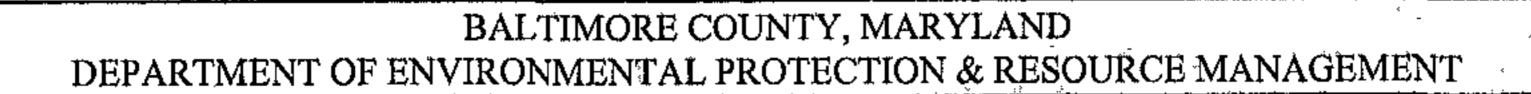
We have reviewed the referenced item and have no objection to approval, as a field inspection reveals that the existing entrance(s) on to MD/US 145. are acceptable to the State Highway Administration (SHA) and this development is not affected by any SHA projects.

Should you have any questions regarding this matter, please contact Larry Gredlein at 410-545-5606 or by E-mail at (lgredlein@sha.state.md.us).

Very truly yours,

1-

Kenneth A. McDonald Jr., Chief Engineering Access Permits Division



TO:

Tim Kotroco

FROM:

R. Bruce Seeley 265 MT

DATE:

October 22, 2003

Zoning Petitions

Zoning Advisory Committee Meeting of September 22, 2003

SUBJECT: NO COMMENTS FOR THE FOLLOWING ZONING ITEMS:

04-113,114,118,119,120,121,122,123,127,128,129,130,136

Baltimore County, Maryland



OFFICE OF PEOPLE'S COUNSEL

Room 47, Old CourtHouse 400 Washington Ave. Towson, MD 21204

> 410-887-2188 Fax: 410-823-4236

PETER MAX ZIMMERMAN People's Counsel CAROLE S. DEMILIO Deputy People's Counsel

April 15, 2004

Timothy Kotroco, Director Department of Permits and Development Management 111 W. Chesapeake Avenue Towson, MD 21204

Hand-delivered

Re:

PETITION FOR SPECIAL HEARING
N/S of Paper Mill Road, 1,600' W intersection
of Paper Mill Road & Old York Road
(2824 Paper Mill Road)
10th Election District; 3rd Council District
2824 Paper Mill Road, LLC - Petitioner(s)

Case No.: 04-113-SPH

Dear Mr. Kotroco:

Please enter an appeal by the People's Counsel for Baltimore County to the County Board of Appeals from the Findings of Fact and Conclusions of Law dated March 31, 2004 by the Baltimore County Deputy Zoning Commissioner in the above-entitled case

Please forward copies of any papers pertinent to the appeal as necessary and appropriate.

Very truly yours, Pet Max Zinnerman

Peter Max Zimmerman

People's Counsel for Baltimore County

PMZ/mw

cc: Lawrence F. Haislip, Esquire

RECEIVED

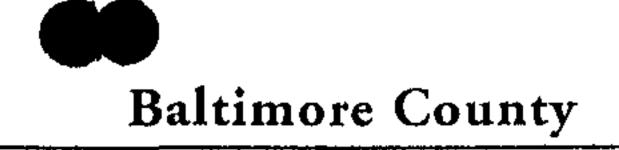
APR 1 5 2004

Per.....

Department of Permits and Development Management

Director's Office County Office Building 111 W. Chesapeake Avenue Towson, Maryland 21204 Tel: 410-887-3353 • Fax: 410-887-5708





James T. Smith, Jr., County Executive Timothy M. Kotroco, Director

April 28, 2004

Lawrence Haislip Miles & Stockbridge 600 Washington Ave., Ste. 300 Towson, MD 21204

Dear Mr. Haislip:

RE: Case 04-113-SPH, 2428 Paper Mill Road

Please be advised that an appeal of the above-referenced case was filed in this office on April 15, 2004 by Peoples Counsel of Baltimore County. All materials relative to the case have been forwarded to the Baltimore County Board of Appeals (Board).

If you are the person or party taking the appeal, you should notify other similarly interested parties or persons known to you of the appeal. If you are an attorney of record, it is your responsibility to notify your client.

If you have any questions concerning this matter, please do not hesitate to call the Board at 410-887-3180.

Sincerely, Kotroco

Timothy Kotroco
Director

TK:klm

c: Lawrence E. Schmidt, Zoning Commissioner
 Timothy Kotroco, Director of PDM
 People's Counsel
 2428 Paper Mill Road, LLC, 2428 Paper Mill Road, Phoenix 21131-1320

Case No. 04-113-SPH

In the Matter of: 2824 Paper Mill Road, LLC - Petitioner

SPH – To approve amendment to Order in Case No. 97-316-SPH to approve owner's right to expand existing storage and office structure to add second story floor area pursuant to § 500.7 of BCZR.

3/31/04 - D.Z.C.'s Order in which requested special hearing relief was GRANTED with condition.

8/12/04 -Notice of Assignment sent to following; assigned for hearing on Thursday, November 18, 2004 at 10 a.m.:

Office of People's Counsel for Baltimore County
Lawrence F. Haislip, Esquire
2824 Paper Mill Road, LLC
/Matthew Thompson
Phillip C. Bayle
Roosevelt Parker
Dandy Verderamo
Lawrence E. Schmidt /Zoning Commissioner
Pat Keller, Planning Director
Timothy M. Kotroco, Director /PDM

11/12/04 – Letter of withdrawal of Petition filed by Lawrence F. Haislip, Esquire, counsel for Petitioner; property owner filed request for rezoning in 2004 CZMP; approved by County Council; subject request is not moot. Order of Dismissal to be issued; case pulled from docket and panel notified.



March 24, 2004

Mr. & Mrs. Roosevelt Parker 2820 Paper Mill Road 🕟 Phoenix, MD 21131-1320

Dear Mr. & Mrs. Parker,

This letter will confirm the grant of a license to you for your use as pedestrian access to, from and between 2824 Paper Mill Road, and the front portion of your adjacent property, 2820 Paper Mill Road. Access will be granted subject to reasonable prior notice to us, and that it is consistent with measures which we need to take from time to time to maintain security for the property and improvements located on our property.

Please sign and return a copy of this letter to acknowledge your receipt of it.

Sincerely,

2824 Paper Mill Road, LLC.

Manager

MILES & STOCKBRIDGE P.C.

Lawrence F. Haislip 410.823.8234 lhaislip@milesstockbridge.com

March 29, 2004

John V. Murphy
Deputy Zoning Commissioner
Office of the Zoning Commissioner for
Baltimore County
Suite 405
County Courts Building
401 Bosley Avenue
Towson, Maryland 21204

RECEIVED

MAR 3 0 2004

ZONING COMMISSIONER

Re: 2824 Paper Mill Road; Zoning Special Hearing 04-113-SPH

Dear Deputy Commissioner Murphy:

I enclose a copy of Mr. Matt Thompson's March 24th letter to me, along with a copy of the landscape plan and the license letter referred to in his letter. I believe that you are now in possession of everything necessary in order to permit you to render your opinion in the matter. If you have any questions or need anything further please give me a call. Otherwise, we look forward to the issuance of your opinion and order.

Best regards.

Sincerely,

Lawrence F. Haislip

LFH

Cc (w/o encl.): Mr. Matthew Thompson



March 24, 2004

Mr. Lawrence F. Haislip, Esquire Miles and Stockbridge, P.C. 600 Washington, MD 21204

Subject:

Petition for Special Hearing

Case No. 04-113-SPH

Property: 2824 Paper Mill Road

Dear Mr. Haislip,

In response to yours and Mr. Murphy's request I have included a copy of the Landscape plan as it was agreed upon between the interested parties and I. Additionally a copy of the License Agreement that I forward to Mr. Parker is attached for your benefit.

As of today, a significant portion of the landscaping has been installed with the few remaining items to be planted after the last frost, within the next 2 weeks. The fences have been installed per plan and the warehouse has been cleaned and prepared for paint, which is to take place prior to months end.

I believe this addresses all of the items requested.

Kindly review and forward this information to Mr. Murphy for his records.

Respectfully,

Matthew S. Thompson

Member

2824 Paper Mill Road LLC

JANIS COMMISSIONER

January 18, 2004

John V. Murphy
Deputy Zoning Commissioner
Baltimore County Maryland
Suite 405, County Courts Building
401 Bosley Avenue
Towson, Maryland 21204

Re:

Petition for Special Hearing

Case No. 04-113-SPH

Property: 2428 Paper Mill Rd.

Dear Mr. Murphy:

Please accept this letter as our formal update of our position, as interested parties to this case, relating to the matters we raised during the 10/31/03 hearing and subsequent conversations with the petitioners. Hopefully this letter will communicate our position sufficiently to allow you to render a timely decision in the case.

Since the original hearing and your letter of 11/18/03, we have met twice with the Thompson's at the referenced property (11/29/03 and 01/17/04) and feel that we are in a position to drop our opposition to the proposed 20'x 24'second floor office expansion if certain actions are taken by the Thompson's. Those actions being:

- It is our understanding that the Thompson's will install and maintain the landscaping and fencing outlined in Mr. Matt Thompson's letter Landscape Plan dated 12/12/03.
- It is our understanding that the Thompson's and the Parker's come to a written agreement as it relates to the Parker's access to their (the Parker's) property adjacent to paper Mill Rd through Lothorian Pool's property.
- It is our understanding that the Thompson's will maintain their property in a neat and clean manner now (and over time).

Please note that it is our position that we are only addressing proposed second floor office expansion and not any other zoning issues relating to this property.

We would ask that the Thompson's or their council submit a letter of understanding from their perspective to you and to all of the communicants and include a copy of the Landscape Plan and agreement with the Parker's.

I assume we will need to agree to the petitioner's position/understanding before you can close the case. Please advise if you have any questions or need any additional information from us.

Very truly yours,

Ahilip C. Bayle 2814 Paper Mill Rd Phoenix, MD 21131

PCB/ss

Cc's:

Matt and Robert Thompson Lothorian Pools 2824 Paper Mill Rd. Phoenix, MD 21131

Lawrence F. Haislip, Esq. Miles & Stockbridge, PC 600 Washington Ave. Suite 300 Towson, MD 21204

Roosevelt & Lucille Parker 2820 Paper Mill Rd.

Tom & Marilyn McDermott 2818 Paper Mill Rd.

Eric & Melody Wagner 2816 Paper Mill Rd

Bob & Dandy Verderamo 2838 Paper Mill Rd.

Stephen Kirsch Greater Jacksonville Association P.O. Box 126 Phoenix, MD 21131

MILES & STOCKBRIDGE P.C.

RECEIVED

Lawrence F. Haislip 410.823.8234 lhaislip@milesstockbridge.com

DEC 4 2003

December 3, 2003

ZONING COMMISSIONER

John V. Murphy Deputy Zoning Commissioner Office of the Zoning Commissioner for **Baltimore County** Suite 405 **County Courts Building** 401 Bosley Avenue Towson, Maryland 21204

2824 Paper Mill Road; Zoning Special Hearing 04-113-SPH Re:

Dear Deputy Commissioner Murphy:

I am in receipt of your letter of the 18th of November, and enclosure. My client has met with the neighbors Bayle, Verderamo and Parker and is preparing a landscape plan for their review. We expect definitive agreement - if it can be reached - by the weekend of the 15th and so would request that the record be kept open until December 17th to permit the parties to reach agreement.

On behalf of the petitioner I strenuously object to the attempted participation of the Greater Jacksonville Association in this matter, in the fashion proposed in Mr. Kirsch's letter. As you have indicated, they are not an interested party in this matter, and their attempt to insinuate themselves into the matter, as a correspondent, is inherently prejudicial to petitioner. I am sure I can trust in your judgment and sense of fairness in this matter.

I will be in touch with you definitively on December 17th.

Sincerely,

Lawrence F. Haislip

LFH

Cc: Mr. Matthew Thompson

FACSIMILE COVER PAGE

4Page(s) including this cover

Phil Bayle Hub Group Mid-Atlantic, LLC

809 Gleneagles Ct., suite 300
Towson, MD 21286
Voice 410/847-1440 * Fax 410/583-5310
Email phayle@hubgroup.com

November 25, 2003

Fax to:

410/887-3468

Attn:

John V. Murphy

Deputy Zoning Commissioner Baltimore County, Maryland

Correction - to add attachment.

November 24, 2003

John V. Murphy Deputy Zoning Commissioner Baltimore County Maryland Suite 405, County Courts Building 401 Bosley Avenue Towson, Maryland 21204

Petition for Special Hearing Case No. 04-113-SPH

Property: 2428 Paper Mill Rd.

Dear Mr. Murphy:

Please accept this letter as our formal request for additional time to hold open the record in the referenced case so that we may attempt to reach an agreement with Lothdrian Pools.

It should be noted that in the hearing of October 31, 2003 we had agreed to contact Lothdrian Pools to set up a suitable date for the neighbors to visit Lothorian's property to discuss their operations and plans for expansion. Attached please find a copy of the email I personally sent on October 31, 2003 reaching out to Lothorian. I followed up with a phone call to Mr. Thompson on 11/07/03 as a "second request". Mr. Thompson contacted me on 11/10/03 but unfortunately I was just leaving town on business and we were unable to schedule a meeting with Lothorian.

Regardless of what has transpired up to this point we as neighbors still want to give Lothorian a chance to explain what their plans are to us face-to-face. We will communicate with Lothorian's council in writing to schedule an appropriate date to meet with them.

Once we have met with them we will correspond back to you in a reasonable time frame outlining our position in this matter.

As it relates to the letter from the Greater Jacksonville Association, while we appreciate the fact that they are not an "interested party" as legally defined, the fact that they have weighed in on the matter should indicate to you that there is a serious community wide concern over the actions of Lothorian Pools that you should consider in the matter.

Please feel free to contact me if you have any questions.

Very truly yours,

Philip 2. Bayle 2814 Paper Mill Rd Phoenix, MD 21131

PCB/ss

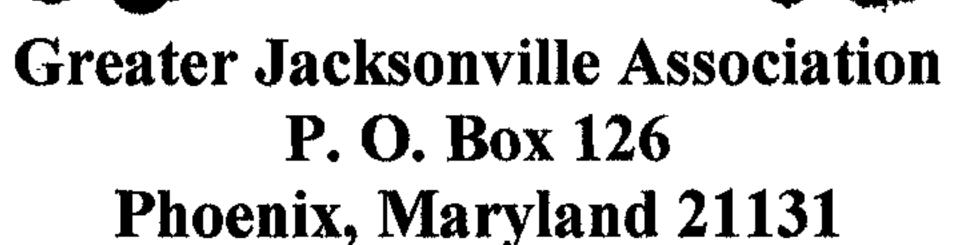
Cc's:

Lawrence F. Haislip, Esq. Miles & Stockbridge, PC 600 Washington Ave. Suite 300
Towson, MD 21204

Roosevelt Parker 2820 Paper Mill Rd. Phoenix, MD 21131

Dandy Verderamo 2838 Paper Mill Rd. Phoenix, MD 21131

Stephen Kirsch Greater Jacksonville Association P.O. Box 126 Phoenix, MD 21131



RECEIVED
NOV 1 3 2002

November 12, 2003/V/VG COMMISSIONER

John V. Murphy
Deputy Zoning Commissioner
Baltimore County Zoning
Commissioners Office
County Court House
401 Bosley Avenue
Room 405
Towson, Maryland 21204

Re: Case Name: 2428 Paper Mill Road, Case No. 04-113-SPH

Dear Mr. Murphy:

On November 10, 2003 the Board of Directors of the Greater Jacksonville Association met with several residents near the above address. Among these neighbors were Mr. and Mrs. Philip Bayle and Mr. Roosevelt Parker. They informed us the request before the Zoning Commission to grant permission for the owners of the above referenced property to have additional storage and office space. This association has been involved in previous years with this location.

After meeting with the above individuals and discussing the situation, the Board decided to support the neighbors in their request that the relief being requested by Mr. Matthew Thompson be denied. We were also informed that you are staying your decision for a period of two weeks from the hearing date of October 31, 2003 to allow the parties to work out a compromise. The effort to arrive at a compromise has failed.

On behalf of the Greater Jacksonville Association I am respectfully requesting that you continue the stay for an additional period to December 1, 2003 to permit our association to either submit testimony or a written submission for your consideration. I realize that the hearing was posted and the hearing date has come and gone, but there is information relevant to this request which the Greater Jacksonville Association is in a position to render. There is also much history to this property pertinent to the issues which we would like to submit for consideration. A few more days will not prejudice any party to this case.

You may reach me at 410-243-5100 for any additional comments.

Very truly yours,

Stephen Kirsch

President

PETITIONER'S SIGN-IN SHEET

		1	
tamtech @ mindspring.com	MONKTON, MB KHII	400 KBX 200	PAUL W. BOTELES, P.E.
bridge com	PHOENIX No 21151	2824 PAPER MILL BO	MATHEW THOMPSON
That slip Dmilessrock	,	411560	Chrisce Houseir
	4 Towson, MD. 21204	406 W. PENNISULVANIA AN.	RICHMED TRUELOUE
E- MAIL	CITY, STATE, ZIP	ADDRESS	NAME

CITIZEN'S SIGN-IN SHEET

		Philip C. BAYLE ROSSUMT: HARKER DANDY VERDERAMO
		ADDRESS 28H FREE M.II RO 2838 PAPER M.II RO
		Phoenix, MD 21131 Phoenix, Md 21131 Phoenix, Mb 21131
		PBAYLE @ HUBGSOUP.CO





RE: PETITION FOR SPECIAL HEARING *
2428 Paper Mill Road; N/side of Paper Mill
Road, 1,600' W Old York Road *
10th Election & 3rd Councilmanic Districts
Legal Owner(s): 2428 Papermill Road LLC; *
Lawrence E Haislin, Attorney

Lawrence F Haislip, Attorney
Petitioner(s)

BEFORE THE

ZONING COMMISSIONER

FOR

BALTIMORE COUNTY

04-113-SPH

* * * * * * * *

ENTRY OF APPEARANCE

Please enter the appearance of People's Counsel in the above-captioned matter. Notice should be sent of any hearing dates or other proceedings in this matter and the passage of any preliminary or final Order. All parties should copy People's Counsel on all correspondence sent documentation filed in the case.

PETER MAX ZIMMERMAN

People's Counsel for Baltimore Cou

People's Counsel for Baltimore County

CAROLE S. DEMILIO
Deputy People's Counsel
Old Courthouse, Room 47
400 Washington Avenue
Towson, MD 21204

(410) 887-2188

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day of September, 2003, a copy of the foregoing Entry of Appearance was mailed to Lawrence F. Haislip, Esquire, Miles & Stockbridge P.C., 600 Washington Avenue, Suite 300, Suite 300, Towson, MD 21204, Attorney for Petitioner(s).

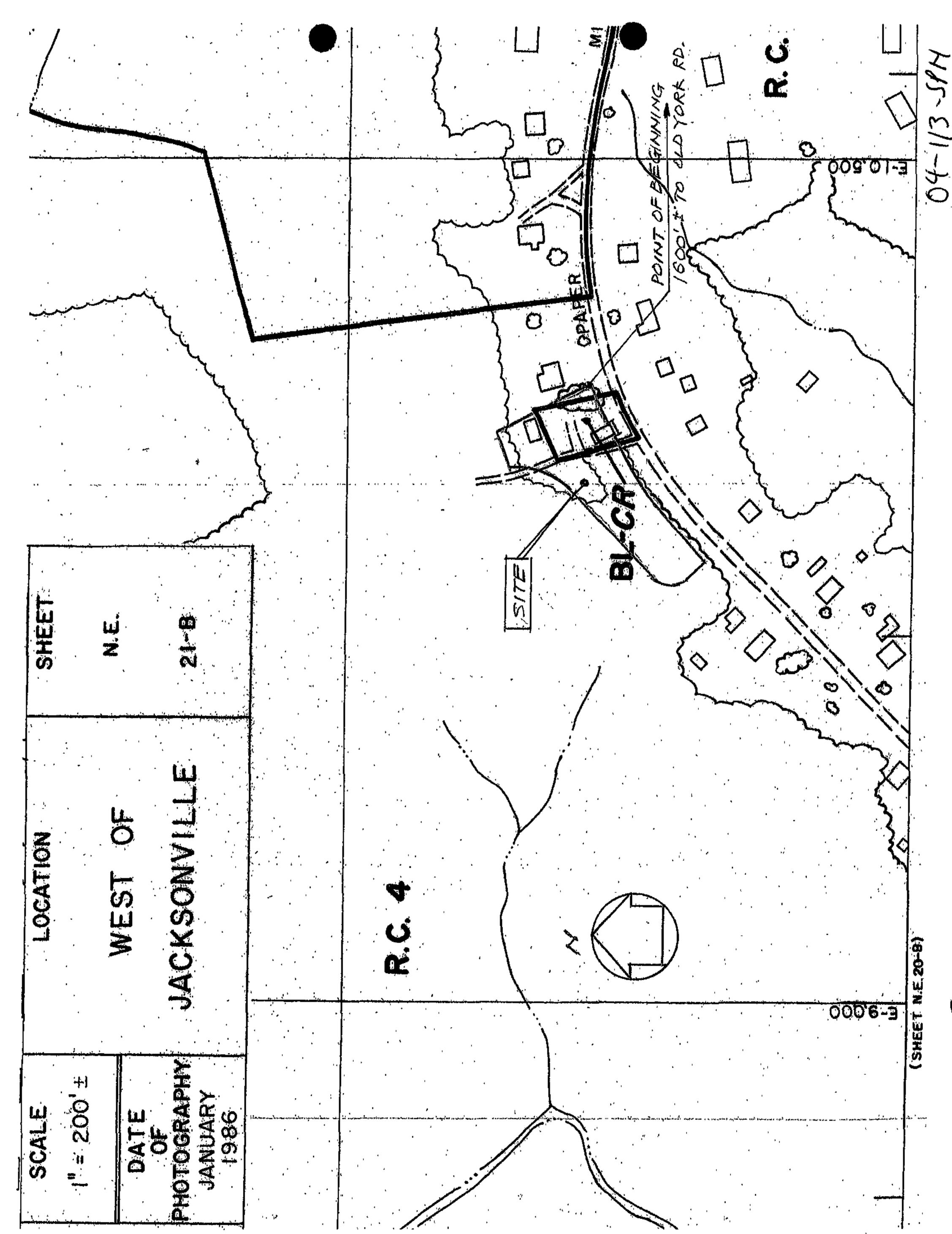
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
PETER MAX ZIMMERMAN

People's Counsel for Baltimore County

Per.



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C:/Land Projects R2/LOTHARIAN/dwg/ZONE.dwg, 07/23/2003 11:30:28 AM, RTPE, Inc.