IN RE: PETITION FOR SPECIAL HEARING
N/W side of Old Court Road, 100 feet
N/E of Carlson Lane
2nd Election District
4th Councilmanic District
(5412 Old Court Road)

* DEPUTY ZONING COMMISSIONER

* OF BALTIMORE COUNTY

* CASE NO. 06-556-SPH

BEFORE THE

Old Court Nursing Center, LLC

Legal Owner and Petitioner

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before this Deputy Zoning Commissioner on a Petition for Special Hearing for the property located at 5412 Old Court Road in the Liberty Road area of Baltimore County. The Petition was filed by Old Court Nursing Center, LLC, Legal Owner and Petitioner. Special Hearing relief is requested pursuant to Section 500.7 of the Baltimore County Zoning Regulations (B.C.Z.R.), for an amendment to site plan approved in Case No. 69-273-X for the purpose of adding two proposed additions and bringing site plan up to date.

The property was posted with Notice of Hearing on June 5, 2006, 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 June 6, 2006, 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.

Survivor BORRO

Zoning Advisory Committee Comments

The Zoning Advisory Committee (ZAC) Comments are made part of the record of this case and contain the following highlights: A ZAC comment letter was received from the Bureau of Development Plans Review dated May 17, 2006 which is made a part hereof.

Interested Persons

Appearing at the hearing on behalf of the requested special hearing were Tom Church, professional engineer who prepared the site plan for Old Court Nursing Center, LLC, the Legal Owner and Petitioner. Arnold Jablon, Esquire, appeared as the Petitioner's attorney. No protestants or citizens appeared at the hearing. People's Counsel, Peter Max Zimmerman, entered the appearance of his office in this case.

Testimony and Evidence

The property is the location of the Old Court Nursing Center which Mr. Jablon proffered has been operating at this location for the past 35 years. The site contains 2.31 acres, and is zoned DR 16. The use as a nursing home was approved in 1970 by special exception in case no. 69-273-X. The subject site is located across Old Court Road from Northwest Hospital, adjacent to medical office buildings and apartments.

The Petitioner would like to make three small additions to the existing building which will change the footprint to some degree. As shown in Petitioner's exhibit 2, outlined in yellow, the Petitioner would like to reconfigure the eastern end of the building by filling in on both sides of the existing building protrusion. This means that 20 x 20 foot and 20 x 13 foot additions would be constructed as shown. Also see Petitioner's exhibit 5 A, a photograph of the existing protrusion. In addition the Petitioner would like to add another new structure, 44 x 25 feet with

a basement, along the southern wall of the existing building again as shown in exhibits 2 and 5 B.

Mr. Jablon proffered that these additions were for the enjoyment and comfort of the nursing home residents to provide more recreational and meeting room. He emphasized that the nursing home was not asking for more beds but merely bringing the site plan current with present and proposed uses. He particularly noted that today patients are likely to have more visitors then in the past. In response to this change the Center proposes to add 25 new parking spaces as shown bringing the total number of spaces to 49 spaces. 15 spaces are required. He noted that no variances are being requested.

Mr. Church noted that he completed the flood plain study requested by Development Plans Review who has approved the study. He opined that the new plan meet all criteria of Section 502.1 of the BCZR and would not adversely affect the health, safety and welfare of the neighborhood.

Findings of Fact and Conclusions of Law

I find that the revised site plan meets the criteria of Section 502.1 of the BCZR and will not adversely affect the neighborhood. The new additions will be for the comfort and convenience of the residents of the nursing home. No new beds are being sought. I think these additions will improve the health, safety and welfare of the residents. In addition the Petitioner is adding parking above the minimum requirements for the convenience of visitors to the nursing home. Therefore I will approve the revised site plan.

Pursuant to the advertisement, posting of the property, and public hearing on this petition held, and after considering the testimony and evidence offered by the Petitioner, I find that the Petitioners' request for special hearing should be GRANTED.

THEREFORE, IT IS ORDERED, by the Deputy Zoning Commissioner for Baltimore County, this 21st day of June, 2006, that the Petitioners' request for Special Hearing relief filed pursuant to Section 500.7 to Section 500.7 of the Baltimore County Zoning Regulations (B.C.Z.R.), for an amendment to site plan approved in Case No. 69-273-X for the purpose of adding two proposed additions and bringing site plan up to date, and is granted.

1. The Petitioners may apply for their building permit and be granted same upon receipt of this Order; however, Petitioners are hereby made aware that proceeding at this time is at their own risk until such time as the 30 day appellate process from this Order has expired. If, for whatever reason, this Order is reversed, the Petitioners would be required to return, and be responsible for returning, said property to its original condition.

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:pz





JAMES T. SMITH, JR. County Executive

WILLIAM J. WISEMAN III

Zoning Commissioner

ARNOLD JABLON, ESQUIRE VENABLE, BAETJER & HOWARD, LLP 210 ALLEGHENY AVENUE TOWSON, MD 21204

Re: Petitions for Special Hearing & Variance Case No. 06-556-SPHA

Property: 5412 Old Court Road

Dear Mr. Jablon:

Enclosed please find the decision rendered in the above-captioned case. The petitions for special hearing and variance have been granted in accordance with the enclosed Order.

In the event the decision rendered is unfavorable to any party, please be advised that any party may file an appeal within thirty (30) days from the date of the Order to the Department of Permits and Development Management. If you require additional information concerning filing an appeal, please feel free to contact our appeals clerk at 410-887-3391.

Very truly yours,

John V. Murphy

Deputy Zoning Commissioner

JVM:pz Enclosure

c: T.A. Church, Development Engineering Consultants, Inc., 6603 York Road, Baltimore MD 21212



REU 9115198

Petition for Special Hearing

to the Zoning Commissioner of Baltimore County

for the property lo	cated a	t				
	which	is pre	sently zo	nedDR	16	
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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 site plan approved in Case No. 69-273X for purpose of adding two proposed additions and bringing site plan up to date

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. IWe do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition. Contract Purchaser/Lessee: Legal Owner(s): Old Court Nursing Center, LLC by Gary Attman, Member Name - Type or Print Name - Type or Print Signature Signature Address Telephone No. Name - Type or Print City State Zip Code Signature Attorney For Petitioner: 8028 Ritchie Hwy, Suite 118 Address Telephone No. 410 766-1995 Arnold Jablon Pasadena, Md 21122 Name - Type or Print City Zip Code State Venable, LLP Representative to be Contacted: Signature <u>Arnold Jablon</u> Company Name Allegheny Ave <u>210</u> 410- 494-6298 210 Allegheny Ave 410 494 - 6298 Address Telephone No. Address Telephone No. Towson, Maryland 21204 Towson, Md 21204 City State Zip Code City Zip Code State OFFICE USE ONLY ESTIMATED LENGTH OF HEARING

ZONING DESCRIPTION FOR 5412 OLD COURT ROAD

BEGINNING AT A POINT on the northwest side of Old Court Road, 70 feet wide, said point being 100 feet, more or less northeast of the centerline of Carlson Lane, 60 feet wide.

Thence the following courses and distances:

- 1) South 66 degrees 40 minutes 29 seconds West, 496.71 feet,
- 2) Curve to the right with a radius of 512.00 feet and an arc length of 54.20 feet,
- 3) North 24 degrees 13 minutes 04 seconds East, 292.62 feet,
- 4) South 39 degrees 02 minutes 00 seconds East, 30.00 feet,
- 5) North 62 degrees 00 minutes 00 seconds East, 164.90 feet,
- 6) North 65 degrees 47 minutes 30 seconds East, 103.25 feet,
- 7) Curve to the right with a radius of 1,319.00 feet and an arc length of 71.59 feet,
- 8) South 23 degrees 52 minutes 50 seconds East, 18.13 feet,
- 9) South 19 degrees 02 minutes 40 seconds East, 168.05 feet to the point of beginning.

Being the same parcel of land described in Deed Liber 12879, folios 60 and 70 and recorded in the Land Records of Baltimore County, Maryland containing 84,195 square feet or 1.93 acres, more or less.

Also known as #5412 Old Court Road located in the 2nd Election District.

MARY MARKET

556

Our Contract No.: 98-104

February 28, 2006

BALTIMORE COUNTY, MARYLAND OFFICE OF BUDGET & FINANCE MISCELLANEOUS RECEIPT

ACCOUNT \mathcal{Z} DATE 4

AMOUNT

RECEIVED FROM: FOR:

DISTRIBUTION WHITE - CASHIER

PINK - AGENCY

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nd)

YELLOW - CUSTOMER

BALTIMORE COUNTY, MARYLAND FFICE OF BUDGET & FINANCE MISCELLANEOUS RECEIPT MISCELLANEOUS RECEIPT
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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: #06-556-SPH

5412 Old Court Road Northwest side of Old Court Road, 100 feet northeast

of Carlson Lane

2nd Election District — 4th Councilmanic District Legal Owner(s): Old Court Nursing Center, LLC, Gary Attman, Member

Special Hearing: to allow an amendment to site plan approved in Case No. 69-273-X for purpose of adding two proposed additions and bringing site plan up to date.

Hearing: Tuesday, June 20, 2006 at 11:00 a.m. in Room 407, County Courts Building, 401 Bosley Ave-

nue, Towson 21204.

WILLIAM J. WISEMAN, III

Zoning Commissioner for Baltimore County
NOTES: (1) Hearings are Handicapped Accessible; for special accommodations Please Contact the Zoning Commissioner's Office at (410) 887-3868/4386.

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

IT 6/609 June 6

JT 6/608 June 6 ______

CERTIFICATE OF PUBLICATION

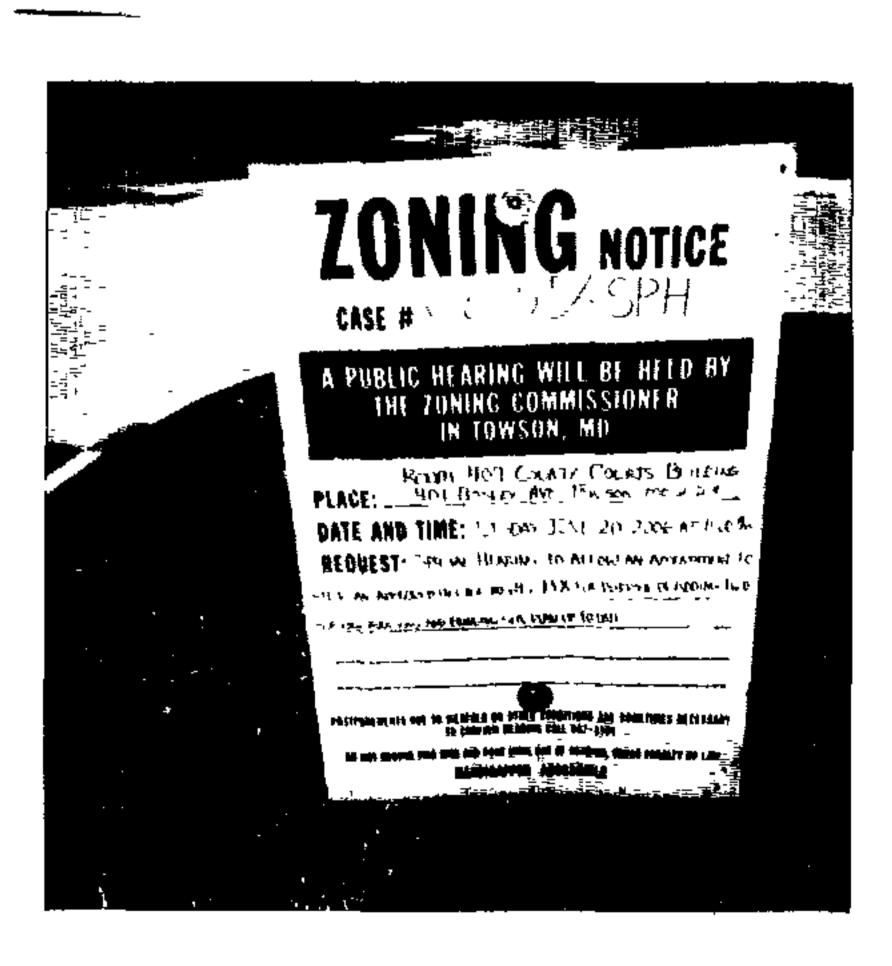
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once in each ofsuccessive weeks, the first publication appearing on C	THIS IS TO CERTIFY, that the annexed advertisement was published
The Jeffersonian Arbutus Times Catonsville Times Towson Times Owings Mills Times NE Booster/Reporter North County News	in the following weekly newspaper published in Baltimore County, Md.,
☐ The Jeffersonian ☐ Arbutus Times ☐ Catonsville Times ☐ Towson Times ☐ Owings Mills Times ☐ NE Booster/Reporter ☐ North County News	once in each ofsuccessive weeks, the first publication appearing
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	☐ NE Booster/Reporter
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The state of the s	S. Wilkinger

LEGAL ADVERTISING

CERTIFICATE OF POSTING

	RE: Case No.: 06-556-5P4
	Petitioner/Developer: QLD COURT
	NURSING CENTER
	Date of Hearing/Closing: 6-20-0
Baltimore County Department of Permits and Development Management County Office Building, Room 111 111 West Chesapeake Avenue Fowson, Maryland 21204	
ATTN: Kristen Matthews {(410) 887-3394}	i ·
Ladies and Gentlemen:	
This letter is to certify under the penalties of perjury the posted conspicuously on the property located at:	at the necessary sign(s) required by law were
. 5412 OLD COURT	ROAD
*	
The sign(s) were posted on	5.06
	h, Day, Year)

Sincerely,



-	Robert Black 6:6-06
	(Signature of Sign Poster) (Date)
	SSG Robert Black
-	(Print Name)
	1508 Leslie Road
	(Address)
	Dundalk, Maryland 21222
	(City, State, Zip Code)
	(410) 282-7940
•	(Telephone Number)

TO: PATUXENT PUBLISHING COMPANY

Tuesday, June 6, 2006 Issue - Jeffersonian

Please forward billing to:

Amy Dontell Venable, LLP 210 Allegheny Avenue Towson, MD 21204

410-494-6244

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: 06-556-SPH

5412 Old Court Road

Northwest side of Old Court Road, 100 feet northeast of Carlson Lane

2nd Election District – 4th Councilmanic District

Legal Owner: Old Court Nursing Center, LLC, Gary Attman, Member

Special Hearing to allow an amendment to site plan approved in Case No. 69-273-X for purpose of adding two proposed additions and bringing site plan up to date.

Hearing: Tuesday, June 20, 2006 at 11:00 a.m. in Room 407, County Courts Building, 401 Bosley Avenue, Towson 21204

WILLIAM J. WISEMAN III

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

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



Baltimore County

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

May 9, 2006

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: 06-556-SPH

5412 Old Court Road

Northwest side of Old Court Road, 100 feet northeast of Carlson Lane

2nd Election District – 4th Councilmanic District

Legal Owner: Old Court Nursing Center, LLC, Gary Attman, Member

Special Hearing to allow an amendment to site plan approved in Case No. 69-273-X for purpose of adding two proposed additions and bringing site plan up to date.

Hearing: Tuesday, June 20, 2006 at 11:00 a.m. in Room 407, County Courts Building, 401 Bosley Avenue, Towson 21204

Timothy Kotroco

Director

TK:klm

C: Arnold Jablon, 210 Allegheny Avenue, Towson 21204 Gary Attman, 8028 Ritchie Highway, Ste. 118, Pasadena 21122

NOTES: (1) THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY MONDAY, JUNE 5, 2006.

- (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.



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.

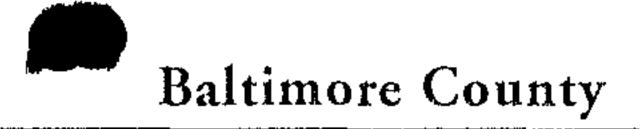
OPINIONS MAY NOT BE ISSUED UNTIL ALL ADVERTISING COSTS ARE PAID.

For Newspaper Advertising:
Item Number or Case Number: 06 556 5PH Petitioner: Old Court Nursing Center, UC
Address or Location: 5412 Old Court Road
PLEASE FORWARD ADVERTISING BILL TO: Name: Amy Contell Address: 210 Alegheny Avenue Tauson, HD. 21204
Address: 210 Allegheny Avenue
Tauson, 40: 21204
Telephone Number: (410) 494 - 10 244

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

'June 15, 2006

Arnold Jablon 210 Allegheny Ave. Towson, MD 21204

Dear: Mr. Jablon

RE: Case Number: 06-556-SPH, 5412 Old Court Rd.

The above referenced petition was accepted for processing by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on May 3, 2006.

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. Callala.

WCR:sma

Enclosures

c: People's Counsel Gary Attman 8028 Ritchie Hwy. Suite 118 Pasadena, MD, 21122



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

BALTIMORE COUNTY, MARYLAND

INTEROFFICE CORRESPONDENCE

TO:

Timothy M. Kotroco, Director

DATE: May 17, 2006

Department of Permits & Development

Management

FROM:

Dennis A. Kennedy, Supervisor

Bureau of Development Plans Review

SUBJECT:

Zoning Advisory Committee Meeting

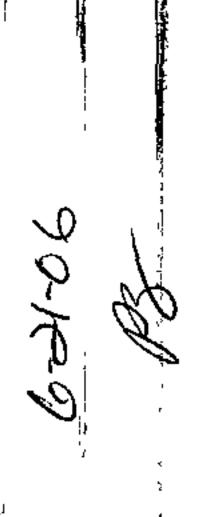
For May 22, 2006

Item No. 556

The Bureau of Development Plans Review has reviewed the subject zoning item and we have the following comment(s).

A grading permit is required for the proposed work. A flood plain study may be needed to ensure that the proposed grading does not encroach on the flood plain. This is despite the note shown on the plan at lower right.

DAK:CEN:clw cc: File ZAC-ITEM NO 556-05172006.doc



Fire Department

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



Baltimore County

James T. Smith, Jr., County Executive John J. Hohman, Chief

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

May 8,2006

ATTENTION: Zoning Review Planners

Distribution Meeting of: May 15,2006

Item Numbers: 537 thru 557

556

Pursuant to your request, the referenced plan(s) have been reviewed by this Bureau and the comments below are applicable and required to be corrected or incorporated into the final plans for the property.

1. The Fire Marshal's Office has no comments at this time.

Lieutenant Roland P Bosley Jr. Fire Marshal's Office 410-887-4881 (C)443-829-2946 MS-1102F

cc: File



BALTIMORE COUNTY, MARYLAND

INTEROFFICE CORRESPONDENCE

TO:

Timothy M. Kotroco, Director

DATE: May 12, 2006

Department of Permits & Development

Management

FROM:

Dennis A. Kennedy, Supervisor

Bureau of Development Plans Review

SUBJECT:

Zoning Advisory Committee Meeting

For May 15, 2006

Item Nos: 441, 537, 538, 539, 540, 542, 544, 547, 548, 549, 550, 551, 552, 553, 554, 555, (556) and 557

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

DAK:CEN:clw

cc: File

ZAC-NO COMMENTS-05102006.doc

Am-

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO:

Timothy M. Kotroco, Director

DATE: June 14, 2006

Department of Permits and Development Management

FROM:

Arnold F. 'Pat' Keller, III

Director, Office of Planning

SUBJECT: Zoning Advisory Petition(s): Case(s) 6-556- Special Hearing

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 Dave Green in the Office of Planning at 410-887-3480.

Prenared By:

Division Chief:

CM/LL

RECEIVED
JUN 1 4 2006

Post-it® Fax Note 7671 Date # of pages 6

To TOM CHURCH From PaH:

Co./Dept. Co

Phone # Phone #

Fax #U10-377-2635 Fax #



Robert L. Ehrlich, Jr., Governor Michael S. Steele, Lt. Governor Robert L. Flanagan, Secretary Neil J. Pedersen, Administrator

Maryland Department of Transportation

Date: 5.5.04

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

RE: Baltimore County

Item No. 556) (

Dear, Ms. Matthews:

This office has reviewed the referenced item and we have no objection to approval as it does not access a State roadway and is not affected by any State Highway Administration 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,

Steven D. Foster, Chief

1. 1. Undh

Engineering Access Permits Division

RE:	PETITION FOR SPECIAL HEARING
	5412 Old Court Road; NW/S Old Court
	Road, 100' NE Carlson Lane
	2 nd Election & 4 th Councilmanic Districts
	Legal Owner(s): Old Court Nursing
	Center, LLC by Gary Attman, Member
	Petitioner(s)

* BEFORE THE

ZONING COMMISSIONER

* FOR

*

* BALTIMORE COUNTY

* 06-556-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 and all documentation filed in the case.

RECEIVED

MIN O : 2000

PETER MAX ZIMMERMAN

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 8th day of May, 2006, a copy of the foregoing Entry of Appearance was mailed to, Arnold Jablon, Esquire, Venable, LLP, 210 Allegheny Avenue, Towson, MD 21204, Attorney for Petitioner(s).

PETER MAX ZIMMERMAN

People's Counsel for Baltimore County



210 Allegheny Avenue Post Office Box 5517 Towson, Maryland 21285-5517 Telephone 410-494-6200 Facsimile 410-821-0147 www.venable.com

(410) 494-6244

aldontell@venable.com

April 24, 2006

HAND DELIVERED

Mr. W. Carl Richards
Department of Permits and Development Management
County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Re: Petition for Special Hearing

Petitioner: Old Court Nursing Center, LLC

Location: 5412 Old Court Road

Dear Mr. Richards:

I am drop filing the enclosed Petition for Special Hearing for the abovereferenced property. This property is not in violation of any zoning laws. With this letter, I have enclosed the following documents:

- 1. Petition for Special Hearing (3)
- 2. Zoning Descriptions (3)
- 3. Site Plans (12)
- 4. Newspaper advertising form (1)
- 5. Check in the amount of \$350.00

If you have any questions or concerns regarding this filing, please give me a call.

Very truly yours,

Amy Dontell

Paralegal

ALD Enclosures

cc: Arnold Jablon, Esquire

TO1DOCS1/#225874v1

Old Court Nursing Center, LLC

8028 Ritchic Highway, Suite 118 Pasadona, MO 21 122 (410)766-6484 * FAX: (410)553-6668

April 12, 2006

Department of Permits and Development Management 111 W. Chesapeake Avenue Towson, Maryland 21204

Attention: Zoning Office

Dear Sir/Madame:

Please be advised that we, the undersigned, have authorized Amold Jablon, Esquire, of Venable, LLP, 210 Allegheny Avenue, Towson, Maryland 21204, to be our attorney-infact and attorney-at-law, and on our behalf file the attached petitions for zoning relief.

OLD COURT NURSING CENTER, LLC (OWNER)

By:

Gary i. Atuman

Member

56

206 556 SPH

FREQUENT FLYER ATTORNEYS DROP OFF ZONING PETITIONS POLICY PROCEDURES

Keep in Toning Files

The following zoning policy is related to the filing of zoning petitions and is aimed at expediting the petition filing process with this office.

- 1. The Director of the Office of Permits and Development Management (PDM) allows zoning attorneys who frequently file for zoning hearings and who are capable of filing petitions that comply with <u>all</u> technical aspects of the zoning regulations and petitions filing requirements can file their petitions with this office without the necessity of an appointment for review by zoning personnel.
- 2. Any attorney using this system should be fully aware that they are responsible for the accuracy and completeness of any such petition. In the event that the petition has not been filed correctly, there is the possibility that another hearing will be required or the zoning commissioner may deny the petition due to errors or incompleteness. All petitions filed in this manner will receive a cursory review and if necessary they will be commented on by zoning personnel prior to the hearing. A corrective memo by zoning review may be placed in the hearing file to be considered by the Hearing Officer.
- 3. When a petition has been dropped off by the attorney, it will only be reviewed for very basic necessary input, logging, and distribution information.

THE PARKING CALCULATIONS REQUIPED VS. PROVIDED DON'T AGREE WITH THE #OF SPACES (MUCH MORE THAN 19) SHOWN OAD THE PLAN AS EXIST/PROP.

ATTMY ADVISED

WON RES. SPH 15# BDS. GO NOT \$360.00 MILLIFIC

Tom Church.

FAY.8

110-377-2625

1100

1100

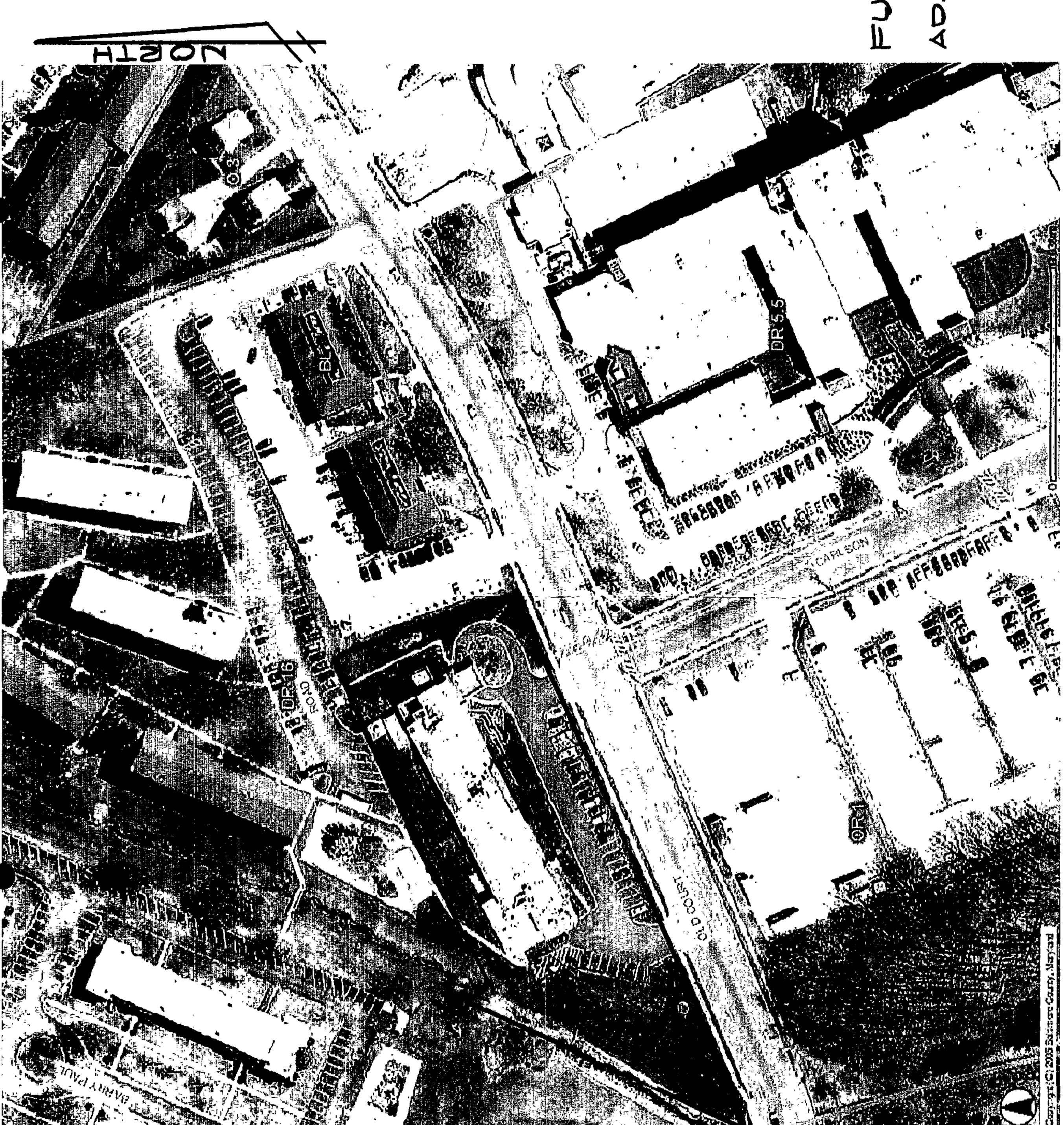
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PLEASE PRINT CLEARLY

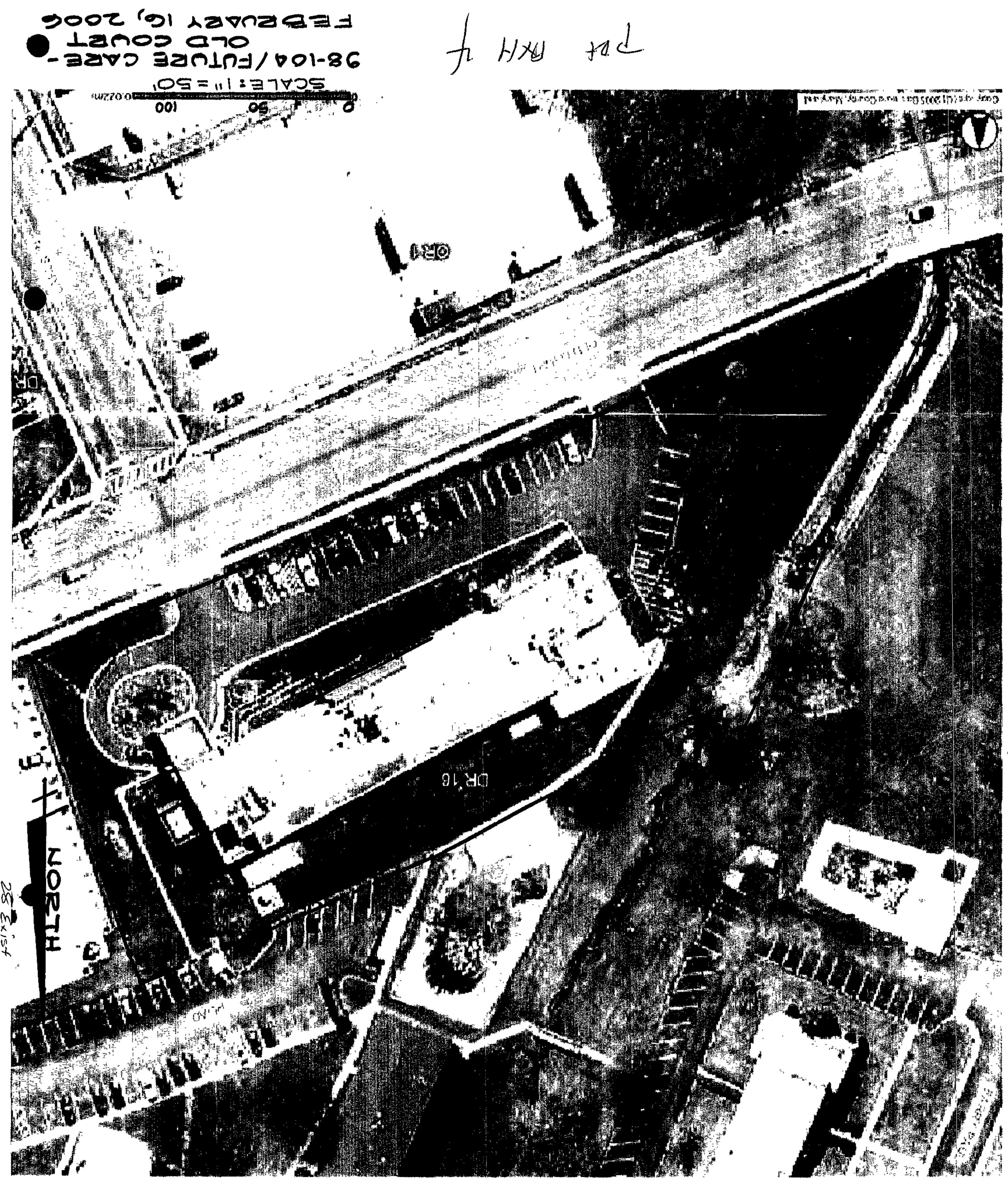
CASE NUMBER DATE

PETITIONER'S SIGN-IN SHEET

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CITY, STATE, ZIP	2,20%	owntry co										
ADDRESS	210 AURHUN MIN	6602 (May 1	Dev. Gulder Colosis Ct									
NAME	Arnold Labler		1. CT Currend									



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