

IN RE: PETITION FOR SPECIAL HEARING *
AND SPECIAL EXCEPTION

NE/S Liberty Road, 573' W of c/line of *
Marriottsville Road *
(9946-9948 Liberty Road) *

2nd Election District *
4th Council District *

Kings Point Associates, LLC, *Legal Owner* *
Shirelle A. Thorne, *Contract Lessee* *

BEFORE THE
ZONING COMMISSIONER
OF
BALTIMORE COUNTY

Case No. 2009-0244-SPHX

* * * * *

AMENDED ORDER

This matter came before the undersigned Zoning Commissioner for consideration of a Motion for Reconsideration filed by M. Leo Storch Management Corporation, on behalf of the property owner, Kings Point Associates, LLC, and Shirelle A. Thorne, contract lessee, through their attorney, Benjamin Bronstein, Esquire. Petitioners sought approval to use approximately 6,158 square feet of the Kings Point Square Shopping Center (Shopping Center) for a community building and a catering hall that features live entertainment. Following the public hearing, I denied the requested special exception and dismissed as moot the special hearing relief by written Order dated June 24, 2007. Subsequently, on July 2, 2009 and with specificity on July 22, 2009, the Petitioners filed their Motion seeking a modification of the denial. Essentially, it is pointed out that clarification is needed regarding the appropriate parking requirements applicable to a shopping center that has a total gross floor area of over 100,000 square feet. My Order, at Page 3, erroneously required an *additional 124 parking spaces* for the subject community building, thereby failing to recognize the use (a community building – with its off-street parking spaces) were actually being provided for within the Shopping Center's existing parking requirements.

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Date

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By

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In an effort to correct the record and address the concerns of the Petitioners, the Motion was granted and continued proceedings were resumed on Monday, September 21, 2009.

By way of background, the subject property contains 9.819 acres located within the B.L.-C.C.C. (Business, Local) – (Commercial, Community Core) zoning classification. The 47-year old Shopping Center positioned at the intersection of Marriottsville, Liberty and Deer Park Roads is improved with 108,153 square feet of floor area requiring 541 parking spaces ($108.153 \times 5 = 540.765$). Thus, the 595 parking spaces provided are adequate. In this regard, Bruce Levine, Kings Point Shopping Center's Property Manager, testified that many of the center's occupants are of an "office" nature operating 8:00 AM to 5:00 PM during weekdays only. He stated that in his 21 years at the center, he has never seen the parking lot filled.

Keith Garner and Arthur Allen operate Diamondz Event Center, a catering hall facility in the Kings Point Shopping Center, that is available to the public for weddings, parties, crab feasts, etc. It has on-site food preparation and serves alcoholic beverages. This is to be distinguished from the proposed Pray'ers Club that is operated by Shirelle A. Thorne. Ms. Thorne testified that this is a limited operation, in that it will be operated as a Christian-based facility promoting faith oriented activities. There will be no on-site food preparation or use of alcoholic beverages. It will not be available for rent to the public for weddings, etc. There will be aerobic classes, light exercise equipment, entertainment, including but not limited to poetry night, jazz night and plays, which will be written and produced by its management. Any food served on the premises will be brought in rather than prepared on site.

Ms. Thorne, the principal of the Pray'ers Club, testified that she is willing to limit the occupancy to a maximum of 150 persons. The parking is more than adequate, particularly since some of the uses such as the day care center are not operational during the time that either

Diamondz or the Pray'ers Club are likely to schedule activities. While one can understand that Diamondz may be concerned about competition, it is unfounded here, nor should it be the basis for a denial of the Pray'ers Club zoning request. See *Kreatchman v. Ramsburg, et al* 224 Md. 209 (1961).

Mr. Rosenfelt, the Petitioner's engineer, based on these enlightened facts, opined that the use meets with all the criteria of Section 502.1 of the B.C.Z.R. Mr. Bronstein cited the leading special exception cases in Maryland, i.e., *Schultz v. Pritts*, 291 Md. 1 (1981) and *People's Counsel for Baltimore County v. Loyola*, 406 Md. 54 (2008). These cases quoted for the premise of law that a special exception use is part of the Comprehensive Zoning Plan and thus, shares the presumption that it is in the interest of the general welfare and therefore valid. The *Schultz* Court set out the standard for adjudging the merits of a special exception use. In this regard, a comparison of uses permitted by right versus those permitted by special exception is not to be applied. Rather, the administrative body must determine whether a particular special exception use proposed at the particular location proposed would have an adverse affect above and beyond those inherently associated with such a use, irrespective of its location within the zone.

In *Mossburg v. Montgomery Co.*, 107 App. 1 (1995), the Court considered an appeal out of Montgomery County regarding a proposed solid waste treatment plant. The *Mossburg* Court recognized that such a use would, by its very nature, have adverse impacts on the surrounding locale. Indeed, the Court recognized that any special exception use would have adverse effects. These adverse effects are anticipated in the first instance by making the use a special exception, rather than a use permitted by right. The proper question, as framed by the

Court, is whether the adverse effects are above and beyond (i.e., greater at the proposed location) than they would generally be elsewhere.

In considering the argument and evidence presented and the legal standards to be applied, I am persuaded that the Petition for Special Exception should be GRANTED. Although I am appreciative of Messrs. Gardner, Allen and McPhaul's objections, I do not find the requested relief will adversely impact upon them or other adjacent properties.

NOW THEREFORE, in consideration of Petitioners' request for modification, my Order of June 24, 2009, shall be amended in accordance with the following:

IT IS ORDERED by the Zoning Commissioner for Baltimore County this 8 day of October 2009, that the Petition for Special Exception filed pursuant to Section 230.3 of the Baltimore County Zoning Regulations (B.C.Z.R.), to permit a community building and a catering hall, in accordance with Petitioners' Exhibit 1, be and is hereby GRANTED; and,

IT IS FURTHER ORDERED that the Petition for Special Hearing to allow live entertainment in a community building/catering hall, be and is hereby GRANTED, subject to the following restrictions, which are conditions precedent to the relief granted herein:

1. Petitioners are hereby made aware that proceeding at this time is at their own risk until such time as the thirty (30) day appeal period from the date of this Order has expired. If an appeal is filed and this Order is reversed, the relief granted herein shall be rescinded.
2. The Petitioners, their successors and assigns, shall be limited to no more than 150 persons on the subject property at any one time, including cast members, employees and supporting staff.
3. No retail sales or uses of alcohol shall be permitted.
4. The Petitioners shall permit a representative of the Code Enforcement Division of the Department of Permits and Development Management (DPDM) reasonable access to the subject leased space to insure compliance with this Order.

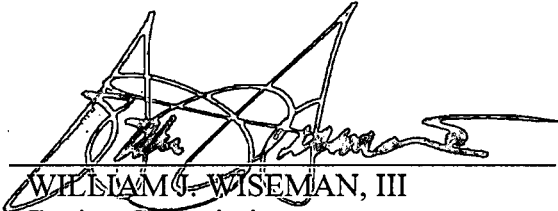
CORDER RECEIVED FOR FILING

Date

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IT IS FURTHER ORDERED that any appeal of this decision shall be made within thirty (30) days of the date of this Order in accordance with Baltimore County Code Section 32-3-401.


WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

WJW:dlw

- c: Benjamin Bronstein, Esquire, Suite 205, Susquehanna Building, 29 W. Susquehanna Avenue, Towson, MD 21204
Robert S. Rosenfelt, P.E., Vice President, Colbert, Matz & Rosenfelt, Inc.,
2835 Smith Avenue, Suite G, Baltimore, MD 21209
Shirelle A. Thorne, 4119 Spider Lily Way, Owings Mills, MD 21117
Bruce Levine, 25 Hooks Lane, Suite 312, Baltimore, MD 21208
Keith L. Garner, 3 Newbridge Court, Randallstown, MD 21133
Arthur Allen, 13362 Grinstead Court, Sykesville, MD 21784
John F. McPhaul, President, Liberty Road Community Council,
3627 Forest Garden Avenue, Gwynn Oak, MD 21207
Sharon Ray, Body Holiday Spa, 9940 Liberty Road, Randallstown, MD 21133
Jonzetta Carter, Pinky's Bridal & Special Occasion, 9988 Liberty Road,
Randallstown, MD 21133
Charleen Wylie, Liberty Road Business Association, P.O. Box 1417,
Randallstown, MD 21133
Aaron Plymouth, Stevenswood Improvement Association, Inc., 8546 Stevenswood Road,
Windsor Mill, MD 21244
Danny M. Blount, Hernwood Heights Community Association, Inc., 30 Millstone Road,
Randallstown, MD 21133
People's Counsel; Dave Green, Office of Planning; Code Enforcement Division, DPDM;
File

ORDER RECEIVED FOR FILING

Date 10-8-09

Bv 103

IN RE: PETITIONS FOR SPECIAL HEARING	*	BEFORE THE
AND SPECIAL EXCEPTION		
NE/S Liberty Road, 573' W of c/line of	*	ZONING COMMISSIONER
Marriottsville Road		
(9946-9948 Liberty Road)	*	OF
2 nd Election District	*	BALTIMORE COUNTY
4 th Council District		
	*	
Kings Point Associates, LLC, <i>Legal Owner</i>		
Shirelle A. Thorne <i>Contract Lessee</i>	*	Case No. 2009-0244-SPHX
Petitioners	*	

* * * * *

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before the Zoning Commissioner for consideration of Petitions for Special Hearing and Special Exception filed by Lee Brahlin, managing member on behalf of the property owner, Kings Point Associates, LLC, and Shirelle A. Thorne, contract lessee, through their attorney, Benjamin Bronstein, Esquire. Petitioners request a special exception to use the subject property for a community building and a catering hall, pursuant to Section 230.3 of the Baltimore County Zoning Regulations (B.C.Z.R.). In addition, a special hearing is requested, pursuant to B.C.Z.R. Section 500.7 to approve live entertainment in the community building/catering hall under consideration. The subject property and requested relief are more particularly described on the site plan submitted, which was accepted into evidence and marked as Petitioners' Exhibit 1.

Appearing at the requisite public hearing were Shirelle Thorne, contract lessee; Robert S Rosenfelt, P.E., Vice President of Colbert, Matz & Rosenfelt, Inc., who prepared the site plan for this property, and Benjamin Bronstein, Esquire, counsel for Petitioners. The issues presented in this case generated significant public interest. Appearing in opposition to the requests were

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Keith L. Garner and Arthur Allen, managing members of Diamondz, LLC, t/a Diamondz Event Center, a nearby (9980 Liberty Road) business/competitor; John F. McPhaul, President of the Liberty Road Community Council, comprised of approximately 31 neighboring organizations. Additionally, written letters were submitted into evidence as Protestant's Exhibits 1 - 7 by business owners in the shopping center and community association leaders, namely: Sharon Ray - Body Holiday Spa; Jonzetta Carter - Pinky's Bridal & Special Occasion; Charleen Wylie - Liberty Road Business Association; Aaron Plymouth - Stevenswood Improvement Association, Inc., Danny M. Blount - Hernwood Heights Community Association, Inc.; and John McPhaul - Liberty Road Community Council, Inc.¹ It is also to be noted that David A. Green, a senior planner with the Office of Planning, assigned to the fourth councilmanic district, appeared and participated at the hearing in opposition to an additional event hall at this location.

An appreciation of the property's past history and use is relevant and briefly outlined. Prior to Petitioner's, Kings Point Associates, LLC, purchase of the shopping center's 9.819 acres of B.L.-C.C.C. (Business, Local) - (Commercial, Community Core) zoned land from the prior owner DP Limited Partnership in 2007, Deputy Zoning Commissioner John V. Murphy, by his Order dated September 19, 2005, in Case No. 06-012-X, granted special exception use to allow a 6,400 square foot community building (catering hall) on the same premises that required 128 parking spaces. (See Petitioners' Exhibit 2). As evidenced by Murphy's Order, the number of overall parking spaces at that time amounted to 776 and included a parking field with the adjacent bowling alley which DP Limited previously owned and shared parking spaces with the center. Following the sale of this bowling alley to Istar Bowling Centers, the available parking

¹ These witnesses/letters each offered their own individual assertions, but the clear tenor and theme of their remarks was that the Petitioners proposed community building use and attendant parking needs would conflict with other businesses and have a negative affect on available shopping center parking spaces.

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By [Signature]

at the subject shopping center was reduced to 577 spaces. A zoning variance in Case No. 83-6-A was approved to reduce the required parking by 18 spaces, allowing these spaces to be calculated, i.e., 577 spaces + 18 varianced (83-6-A) = 595 spaces. In any event, the current shopping center's total leasable building area of 108,153 square feet requires 588 parking spaces that are allocated to the Food Lion, Prime American Insurance Company, convenience store, bank, karate school, Divine Wisdom Church, Diamondz, Body Holiday Spa, and various other commercial tenants. The proposal before me will require an additional 124 spaces for the proposed community building (9946 -- 48 Liberty Road).²

On behalf of the Petitioners, Bob Rosenfelt offered testimony and evidence that the area surrounding the 47-year old shopping center, located at the intersections of Marriottsville Road, Liberty Road and Deer Park Road, was commercial, with a bowling alley, fuel service stations, and another shopping center in the immediate vicinity. He noted that this center had undergone extensive renovations and was anchored by a primary tenant -- the Food Lion store positioned in the center's northeast quadrant. As illustrated on the colorized site plan in green (Exhibit 1), Ms. Thorne, currently an insurance agent and fitness instructor, would like to operate a multi-functional community building for civic, social, recreational and educational activities pursuant to Section 230.3 of the zoning regulations. During the weekdays, the primary use of the leased 6,158 square foot building space would be for educational workshops providing health, fitness programs, financial counseling and for the administrative functions that support the programs. There will be office space and a hall area for Christian entertainment on weekends and open

² The 128 parking spaces for the prior community building and catering hall (now occupied by Diamondz) are located in the westerly parking field (See Petitioners' Exhibit 2) while the present request of Ms. Thorne for an additional community building and catering hall requires 124 parking spaces that will be adjacent to and east of the Diamondz allocated parking. Combined these two uses would consume 252 of the shopping center's 595 available spaces.

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space for aerobics and light exercise equipment for aerobic classes that she will offer to the community. When questioned by Messrs. Garner, Allen and McPhaul, Ms. Thorne indicated her hours of operation would be from 9:00 AM to 8:00 PM Mondays through Thursdays and from 8:00 PM to 1:00 AM on Fridays and Saturdays. She stated that there were no kitchen facilities contemplated and most of the food needs would be provided by a catering service. She projected the maximum number of people at any one time would be approximately 200 and that the peak hours of her operation would be during the shopping center's "off hours". After several objections³ and discussions with counsel, Ms. Thorne agreed to a restriction, as a condition of approval that she would neither rent nor sublet her space to other organizations and that the demised premises would be used only for her own multi-use based activities. Following this colloquy, Mr. Rosenfelt continued his testimony and stated that the plan and Petitioners proposed use met all criteria of Section 502.1 of the B.C.Z.R. He noted that there will be no adverse impact on the community since all events will be conducted inside the building, the tenant space meets all code requirements, including fire codes, and there is a surplus of parking at this center and the outlined programs above would be conducted primarily in the evening hours.

As noted above, the individuals who appeared in opposition to this request and letters submitted by surrounding community associations primarily objected to traffic and parking problems. Diamondz was previously licensed for 265 people and the instant proposal is for another 200. As illustrated on the site plan, the entranceways are next to each other and it is conceivable that 465 people would be using the same entrance area at the same time. Additionally, other businesses, based on observations, currently use a large volume of parking

³ Mr. Bronstein aptly pointed out that detrimental impacts to Diamondz Event Center brought about by the Petitioners competitive services were, if in fact true, not a proper element to be considered in a zoning case. See *Kreatchman v. Ramsburg, et al* 224 Md. 209 (1961).

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Date 6-24-09
By [Signature]

spaces. It was the combined consensus that the current parking venue cannot support the addition of 124 more parking spaces required by the B.C.Z.R. This would cause less available parking for the other business owners and institutional users of the center that would ultimately prove detrimental to existing tenants and customers and exacerbate further parking problems in the neighborhood. Let it also be noted that the Office of Planning recommended a denial of this special exception on the basis that they concluded it "would be detrimental to efforts to provide parking for existing uses on the site ... the addition of another 'community building' (catering hall) is just not an appropriate land-use".

The undersigned is required to focus upon the impacts of the proposed use and how they particularly affect the locality involved. The undersigned has reviewed the proposal in that light and I find that the special exception request has failed to meet the test set out in B.C.Z.R. Sections 502.1.A as it will be ("Detrimental to the health, safety or general welfare of the locality involved") and D also ("tend to overcrowd land and cause undue concentration of population"). In sum, I find that the proposed use does not meet the applicable criteria set forth in *Schultz v. Pritts*, 291 Md. 1, 432 A.2d 1319 (1981). Based upon the testimony and evidence presented, I am persuaded to deny this request.

Pursuant to the advertisement, posting of the property, and public hearing on these Petitions held, and for the reasons set forth herein, the Petitions for Special Hearing and Special Exception shall be denied.

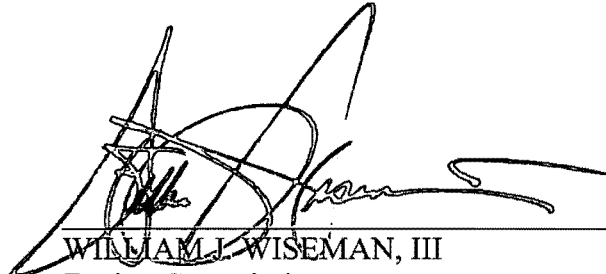
THEREFORE, IT IS ORDERED by the Zoning Commissioner of Baltimore County, this 24th day of June 2009, that the Petition for Special Exception filed pursuant to pursuant to Section 230.3 of the Baltimore County Zoning Regulations (B.C.Z.R.), to permit a

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community building and a catering hall, in accordance with Petitioners' Exhibit 1, be and is hereby DENIED.

IT IS FURTHER ORDERED that the Petition for Special Hearing to allow live entertainment in a community building/catering hall, be and is hereby DISMISSED AS MOOT.

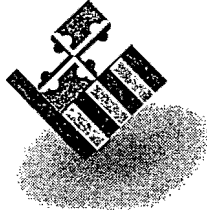
Any appeal of this decision must be taken in accordance with Section 32-3-401 of the Baltimore County Code and filed within thirty (30) days of the date of this Order.



WILLIAM J. WISEMAN, III
Zoning Commissioner
of Baltimore County

WJW:dlw

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Date 6-24-09
By [Signature]



BALTIMORE COUNTY

M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

June 24, 2009

WILLIAM J. WISEMAN III
Zoning Commissioner

Benjamin Bronstein, Esquire
Suite 205, Susquehanna Building
29 W. Susquehanna Avenue
Towson, MD 21204

IN RE: PETITIONS FOR SPECIAL HEARING AND SPECIAL EXCEPTION

NE/S Liberty Road, 573' W of c/line of Marriottsville Road

(9946-9948 Liberty Road)

2nd Election District - 4th Council District

Kings Point Associates, LLC, *Legal Owner*;

Shirelle A. Thorne *Contract Lessee* - Petitioners

Case No. 2009-0244-SPHX

Dear Mr. Bronstein:

Enclosed please find a copy of the decision rendered in the above-captioned matter. The Petition for Special Hearing has been dismissed as moot and the Petition for Special Exception has been denied, in accordance with the attached Order.

In the event any party finds the decision rendered is unfavorable, any party may file an appeal to the County Board of Appeals within thirty (30) days of the date of this Order. For further information on filing an appeal, please contact the Department of Permits and Development Management office at 887-3391.

Very truly yours,

A handwritten signature in black ink, appearing to read "William J. Wiseman III", written over a horizontal line.

WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

WJW:dlw
Enclosure

- c: Robert S Rosenfelt, P.E., Vice President, Colbert, Matz & Rosenfelt, Inc.,
2835 Smith Avenue, Suite G, Baltimore, MD 21209
Shirelle A. Thorne, 4119 Spider Lily Way, Owings Mills, MD 21117
Keith L. Garner, 3 Newbridge Court, Randallstown, MD 21133
Arthur Allen, 13362 Grinstead Court, Sykesville, MD 21784
John F. McPhaul, President, Liberty Road Community Council,
3627 Forest Garden Avenue, Gwynn Oak, MD 21207
Sharon Ray, Body Holiday Spa, 9940 Liberty Road, Randallstown, MD 21133
Jonzetta Carter, Pinky's Bridal & Special Occasion, 9988 Liberty Road, Randallstown, MD 21133
Charleen Wylie, Liberty Road Business Association, P.O. Box 1417, Randallstown, MD 21133
Aaron Plymouth, Stevenswood Improvement Association, Inc., 8546 Stevenswood Road,
Windsor Mill, MD 21244
Danny M. Blount, Hernwood Heights Community Association, Inc., 30 Millstone Road,
Randallstown, MD 21133
People's Counsel; Dave Green, Office of Planning; File



Petition for Special Hearing

to the Zoning Commissioner of Baltimore County

for the property located at: 9946 – 9948 Liberty Road

which is presently zoned BL-CCC

Deed Reference 26355 / 523

Tax Account # 2100001188

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 of thereof, hereby petition for a Special Hearing under 500.7 of the Zoning Regulations of Baltimore County, to determine whether or not the Zoning Commission should approve

Live entertainment in a community building/catering hall.

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 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:

Name – Type or Print

Signature

Address

Telephone No.

City

State Zip Code

Attorney For Petitioner:

Benjamin Bronstein, Esq.

Name – Type or Print

Signature

Company

29 W. Susquehanna Avenue

410-296-0200

Address

Telephone No.

Towson

MD 21204

City

State Zip Code

Legal Owner(s):

Kings Point Associates, LLC

Lee Brahlin, Managing Member

Name – Type or Print

Signature

Name – Type or Print

Signature

1535 Chestnut Street, Suite 200

Address

Telephone No.

Philadelphia

PA 19102

City

State Zip Code

Representative to be Contacted:

Robert S Rosenfelt, P.E.

COLBERT MATZ ROSENFELT, INC

2835 Smith Avenue, Suite G

410-653-3838

Address

Telephone No.

Baltimore

MD 21209

City

State Zip Code

OFFICE USE ONLY

ESTIMATED LENGTH OF HEARING

UNAVAILABLE FOR HEARING

Reviewed By

Date 3/17/09

Case No. 2009-0244-SPHX

ADDED RECEIVED FOR FILING

Date 6-24-09

By [Signature]

[Signature]



Petition for Special Exception

to the Zoning Commissioner of Baltimore County

for the property located at: 9946-9948 Liberty Road

which is presently zoned BL-CCC

Deed Reference 26355 / 523

Tax Account # 2100001188

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 of hereof, hereby petition for a Special Exception under the Zoning Regulations of Baltimore County, to use the herein described property for

A community building and catering hall, pursuant to Section 230.3, BCZR.

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

I, or we, agree to pay expenses of above Special Exception, 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 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:

Name - Type or Print SHARLE THORNE
Signature Sharle Thorne
Address 4119 SPIDER LILY Way
DWINGS MILLS MD 21117
City State Zip Code

Attorney For Petitioner:

Name - Type or Print Benjamin Bronstein, Esq.
Signature [Signature]
Company
Address 29 W. Susquehanna Avenue Telephone No. 410-296-0200
City Towson State MD Zip Code 21204

Legal Owner(s):

Kings Point Associates, LLC
Lee Brahlin, Managing Member
Name - Type or Print
Signature
Name - Type or Print
Signature
1535 Chestnut Street, Suite 200
Address Telephone No.
Philadelphia PA 19102
City State Zip Code

Representative to be Contacted:

Robert S Rosenfelt, P.E.
COLBERT MATZ ROSENFELT, INC
2835 Smith Avenue, Suite G 410-653-3838
Address Telephone No.
Baltimore MD 21209
City State Zip Code

Case No. 2009-0244-SPHX

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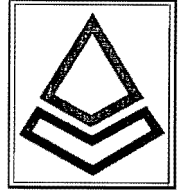
Date 6-24-09
By [Signature]

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ESTIMATED LENGTH OF HEARING
UNAVAILABLE FOR HEARING
Reviewed By [Signature] Date 3/17/09

Disp off

Colbert Matz Rosenfelt, Inc.

Civil Engineers • Surveyors • Planners



ZONING DESCRIPTION SPECIAL HEARING KING'S POINT SQUARE SHOPPING CENTER

Beginning at a point on the northeast side of Liberty Road, which is 85 feet wide, at a point 573 feet, more or less, west of the centerline of Marriottsville Road, which is 60 feet wide.

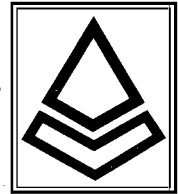
Being Lot 2 in the Resubdivision of Deer Park Plaza, as recorded in Baltimore County Plat Book 57, folio 112. Containing 9.819 acres and located in the 2nd Election District, 4th Councilmanic District.



2009-0244-SPHX

Colbert Matz Rosenfelt, Inc.

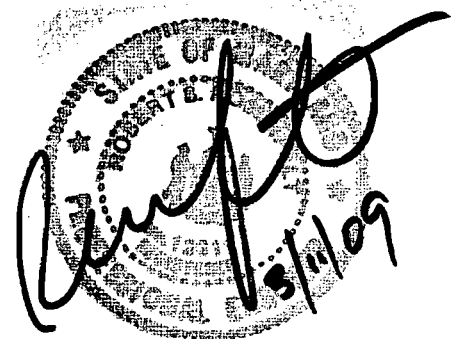
Civil Engineers • Surveyors • Planners



ZONING DESCRIPTION SPECIAL EXCEPTION 9946-9948 LIBERTY ROAD

Beginning at a point located North 43°59'24" East 15.48 feet of a point located North 33°26'23" East, 140.00 feet distant from a point on the north side of Liberty Road, which is 85 feet wide, at a distance of 573 feet, more or less, west of the centerline of Marriottsville Road, which is 60 feet wide. Thence the following courses and distances:

North 56°40'32" West, 192.00 feet;
North 33°19'28" East, 105.38 feet;
South 56°40'32" East, 6.90 feet;
North 33°21'20" East, 134.19 feet;
North 56°31'46" West, 21.85 feet;
North 33°21'20" East, 50.08 feet;
North 56°31'46" West, 20.00 feet;
North 33°21'20" East, 33.62 feet;
South 56°43'00" East, 108.07 feet;
South 33°20'36" West, 33.98 feet;
North 56°31'46" West, 39.60 feet;
South 33°20'36" West, 50.08 feet;
South 56°31'46" East, 3.36 feet;
South 33°21'20" West, 134.11 feet;
South 56°40'32" East, 318.35 feet;
South 33°19'28" West, 184.79 feet;
North 56°40'32" West, 88.00 feet;
North 33°19'28" East, 158.79 feet;
North 56°40'32" West, 52.77 feet;
South 33°19'28" West, 61.36 feet;
North 56°40'32" West, 22.48 feet; thence
South 33°19'28" West, 18.02 feet, to the Point of Beginning.



Containing 49,936 square feet (1.15 acres) and being a portion of Lot 2 in the Resubdivision of Deer Park Plaza, as recorded in Baltimore County Plat Book 57, folio 112. Also known as 9946-9948 Liberty Road and located in the 2nd Election District. 4th Councilmanic District.

2009-0244-SPHX

BALTIMORE COUNTY, MARYLAND
OFFICE OF BUDGET AND FINANCE
MISCELLANEOUS CASH RECEIPT

No. **35205**

Date **3/17/04**

Fund	Dept	Unit	Sub Unit	Obj	Source/	Sub	Rev/	Dept	Obj	BS	Acct	Amount
001	800	0000		6150								380.00
001	800	0000		6150								325.00
Total												705.00

Rec From:

Kings Point Associates

For:

9946-5948 / 6150 *2007-0294-SHIX*

DISTRIBUTION

WHITE - CASHIER PINK - AGENCY YELLOW - CUSTOMER GOLD - ACCOUNTING
 PLEASE PRESS HARD!!!!

**CASHIER'S
 VALIDATION**

**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: #2009-0244-SPHX
9946-9948 Liberty Road

N/east side of Liberty Road,
573 feet west of centerline
of Marriottsville Road,
2nd Election District

4th Councilmanic District
Legal Owner(s): Kings Point
Associates, LLC, Lee Brahlin,
Managing Member

Special Hearing: to permit
live entertainment in a
community building / cater-
ing hall. **Special Excep-**
tion: to permit a communi-
ty building and a catering
hall.

Hearing: Thursday, May
14, 2009 at 10:00 a.m. in
Room 106, County Office
Building, 111 West Chesapeake
Avenue, Towson
21204

WILLIAM J. WISEMAN, III
Zoning Commissioner for
Baltimore County

NOTES: (1) Hearings are
Handicapped Accessible;
for special accommoda-
tions Please Contact the
Zoning Commissioner's Of-
fice at (410) 887-4386.

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

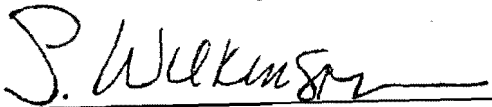
IT 4/766 Apr. 28 199757

CERTIFICATE OF PUBLICATION

4/30/2009

THIS IS TO CERTIFY, that the annexed advertisement was published
in the following weekly newspaper published in Baltimore County, Md.,
once in each of 1 successive weeks, the first publication appearing
on 4/28/2009.

- ☒ The Jeffersonian
- ☐ Arbutus Times
- ☐ Catonsville Times
- ☐ Towson Times
- ☐ Owings Mills Times
- ☐ NE Booster/Reporter
- ☐ North County News



LEGAL ADVERTISING

CERTIFICATE OF POSTING

ATTENTION: KRISTEN MATHHEWS

DATE: 05/03/09

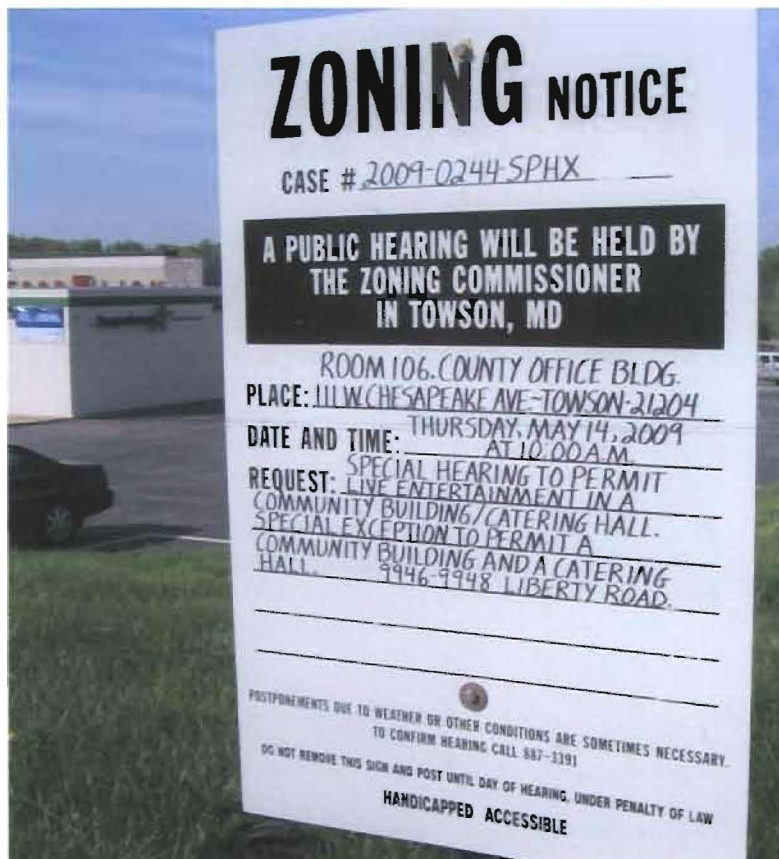
Case Number: 2009-0244-SPHX

Petitioner / Developer: BENJAMIN BRONSTEIN, ESQ.~LEE BRAHIN~
ROBERT ROSENFELT

Date of Hearing (Closing): MAY 14, 2009

This is to certify under the penalties of perjury that the necessary sign(s)
required by law were posted conspicuously on the property located at:
9946-9948 LIBERTY ROAD

The sign(s) were posted on: APRIL 29, 2009



Linda O'Keefe
(Signature of Sign Poster)

Linda O'Keefe
(Printed Name of Sign Poster)

523 Penny Lane
(Street Address of Sign Poster)

Hunt Valley, Maryland 21030
(City, State, Zip of Sign Poster)

410 - 666 - 5366
(Telephone Number of Sign Poster)

DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT
ZONING REVIEW

ADVERTISING REQUIREMENTS AND PROCEDURES FOR ZONING HEARINGS

The Baltimore County Zoning Regulations (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.

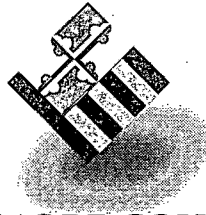
For Newspaper Advertising:

Item Number or Case Number: 2009-0244-SPHX
Petitioner: Kings Point Associates LLC (Lee Brakin, Managing Member)
Address or Location: 9946-9948 Liberty Rd.

PLEASE FORWARD ADVERTISING BILL TO:

Name: BENJAMIN BRONSTEIN Esq.
Address: 29 W. SUSQUEHANNA AVE
TOWSON MD. 21204

Telephone Number: 410-296-0200



BALTIMORE COUNTY
MARYLAND

JAMES T. SMITH, JR.
County Executive

April 9, 2009
TIMOTHY M. KOTROCO, Director
Department of Permits and
Development Management

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: 2009-0244-SPHX

9946-9948 Liberty Road

N/east side of Liberty Road, 573 feet west of centerline of Marriottsville Road

2nd Election District – 4th Councilmanic District

Legal Owners: Kings Point Associates, LLC, Lee Brahlin, Managing Member

Special Hearing to permit live entertainment in a community building/catering hall. Special Exception to permit a community building and a catering hall.

Hearing: Thursday, May 14, 2009 at 10:00 a.m. in Room 106, County Office Building,
111 West Chesapeake Avenue, Towson 21204

A handwritten signature in black ink that reads "Timothy Kotroco".

Timothy Kotroco
Director

TK:klm

C: Benjamin Bronstein, 29 W. Susquehanna Avenue, Towson 21204

Lee Brahlin, Kings Point Associates, 1535 Chestnut St., Ste. 200, Philadelphia PA 19102

Robert Rosenfelt, 2835 Smith Avenue, Ste. G, Baltimore 21209

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY WEDNESDAY, APRIL 29, 2009.**
- (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
Tuesday, April 28, 2009 Issue - Jeffersonian

Please forward billing to:
Benjamin Bronstein
29 W. Susquehanna Avenue
Towson, MD 21204

410-296-0200

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: 2009-0244-SPHX

9946-9948 Liberty Road

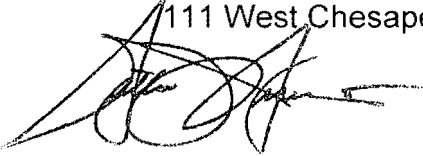
N/east side of Liberty Road, 573 feet west of centerline of Marriottsville Road

2nd Election District – 4th Councilmanic District

Legal Owners: Kings Point Associates, LLC, Lee Brahlin, Managing Member

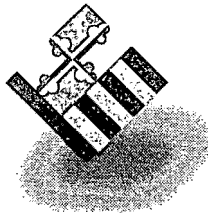
Special Hearing to permit live entertainment in a community building/catering hall. Special Exception to permit a community building and a catering hall.

Hearing: Thursday, May 14, 2009 at 10:00 a.m. in Room 106, County Office Building,
111 West Chesapeake 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.



BALTIMORE COUNTY
M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

TIMOTHY M. KOTROCO, *Director*
Department of Permits and
Development Management
May 7, 2009

Benjamin Bronstein, Esq.
29 W. Suquehanna Ave.
Towson, MD 21204

Dear: Benjamin Bronstein

RE: Case Number 2009-0244-SPHX, 9946-9948 Liberty Rd.

The above referenced petition was accepted for processing **ONLY** by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on March 17, 2009. This letter is not an approval, but only a **NOTIFICATION**.

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,

A handwritten signature in black ink, reading "W. Carl Richards, Jr." in a cursive style.

W. Carl Richards, Jr.
Supervisor, Zoning Review

WCR:lnw

Enclosures

c: People's Counsel
Lee Brahlin: Kings Point Assoc.; 1535 Chestnut St. Ste. 200; Philadelphia, PA 19102
Robert Rosenfelt; Colbert Matz Rosenfelt, Inc.; 2835 Smith Ave., Ste. G; Baltimore, MD 21209



BALTIMORE COUNTY
M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

JOHN J. HOHMAN, *Chief*
Fire Department

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

April 9, 2009

ATTENTION: Zoning Review Planners

Distribution Meeting Of: April 9, 2009

Item Numbers ~~0244~~, 0250 and 0254

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.

3. The site shall be made to comply with all applicable parts of the Baltimore County Fire Prevention Code prior to occupancy or beginning of operation.

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
Department of Permits &
Development Management

FROM: Dennis A. Kennedy, Supervisor
Bureau of Development Plans
Review

SUBJECT: Zoning Advisory Committee Meeting
For April 13, 2009
Items Nos. 2009-238, ~~244~~ 247, 248,
249, 250, 251, 252, 253, 254, 255 and 256

DATE: April 9, 2008

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

DAK:CEN:cab

cc: File

ZAC-04072008-NO COMMENTS



Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

State Highway
Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

April 7, 2009

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

RE: Baltimore County
case No. 2009-0244 SPHX
MD 26 (9946-9948 Liberty Road)
Kings Point Associates, LLC
Special Hearing- Live Entertainment
Special Exception

Dear Ms. Matthews:

Thank you for the opportunity to review the plan to accompany petition for special exception and special hearing on the subject of the above captioned, which was received on April 6th. We have reviewed the referenced plan and have no objection to approval for case number 2009-0244 SPHX. Based on a field inspection we have determined that the existing entrances on to MD 26 are acceptable to the State Highway Administration (SHA) at this time. Also, please note that this development is not affected by any SHA projects. However, should the property be considered for re-development, SHA may require the owner/developer to construct improvements within the public right-of-way.

If you have any questions or need clarifications regarding this matter, please feel free to contact Michael Bailey at 410-545-5593 or 1-800-876-4742 extension 5593. Also, you may E-mail him at (mbailey@sha.state.md.us). Thank you for your attention.

Very truly yours,


Steven D. Foster, Chief
for Engineering Access Permits
Division

SDF/mb

cc; Mr. Dennis A. Kennedy, Development Plans Review, SHA
Ms. Erin Kuhn, ADE-Traffic, SHA
Mr. David Malkowski, Metropolitan District Engineer, SHA
Mr. W. Carl Richards, Zoning Review DRC/ZAC, Baltimore County

My telephone number/toll-free number is _____
Maryland Relay Service for Impaired Hearing or Speech: 1.800.735.2258 Statewide Toll Free

Street Address: 707 North Calvert Street · Baltimore, Maryland 21202 · Phone: 410.545.0300 · www.marylandroads.com



BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Timothy M. Kotroco, Director
Department of Permits and
Development Management

DATE: May 6, 2009

FROM: Arnold F. 'Pat' Keller, III
Director, Office of Planning

RECEIVED

SUBJECT: 9946-9948 Liberty Road

MAY 08 2009

INFORMATION:

ZONING COMMISSIONER

Item Number: 9-244

Petitioner: Kings Point Associates, LLC

Zoning: BL-CCC

Requested Action: Special Exception and Special Hearing

SUMMARY OF RECOMMENDATIONS:

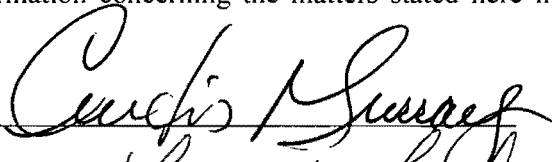
The proposed site is located in a Master Plan Designated Revitalization District. As indicated on the site plan accompanying this request, the site currently has parking relief (a 18 space variance was previously granted).

A special exception to allow a community building (catering hall) with restrictions and conditions, and a special hearing to have live entertainment in requested community center is not supported by the Office of Planning. This office feels that the subject proposal in conjunction with the existing non-traditional tenants at the shopping center (a daycare center and a church) would be detrimental to efforts to provide parking for existing uses on the site.

Furthermore, the petitioner has not clearly shown how adequate parking exists and can be provided to support all proposed uses. The addition of another "community building (catering hall) is just not an appropriate land-use.

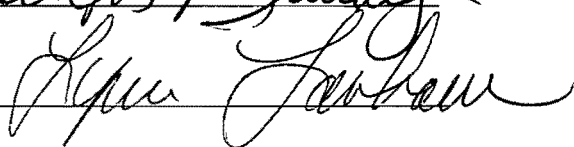
For further information concerning the matters stated here in, please contact Dave Green at 410-887-3480.

Prepared by:



Division Chief:

AFK/LL: CM



BW
5-14-09
10am

BALTIMORE COUNTY, MARYLAND**Inter-Office Correspondence****RECEIVED****MAY 04 2009****ZONING COMMISSIONER**

TO: Timothy M. Kotroco

FROM: Dave Lykens, DEPRM - Development Coordination

DATE: May 4, 2009

SUBJECT: Zoning Item # 09-244-SPHX
Address 9946-9948 Liberty Road
(Kings Point Associates, LLC)

Zoning Advisory Committee Meeting of April 6, 2009

X The Department of Environmental Protection and Resource Management has no comments on the above-referenced zoning item.

Reviewer: JWL

Date: 5/4/09

RE: PETITION FOR SPECIAL HEARING * BEFORE THE
AND SPECIAL EXCEPTION
9946-9948 Liberty Road; NE/S Liberty Road* ZONING COMMISSIONER
573' W c/line of Marriottsville Road
2nd Election & 4th Councilmanic Districts * FOR
Legal Owner(s): Kings Point Associates, LLC
Petitioner(s) * BALTIMORE COUNTY
* 09-244-SPHX

* * * * *

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

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

Carole S. Demilio

CAROLE S. DEMILIO
Deputy People's Counsel
Jefferson Building, Room 204
105 West Chesapeake Avenue
Towson, MD 21204
(410) 887-2188

RECEIVED

APR 20 2009

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of April, 2009, a copy of the foregoing Entry of Appearance was mailed to Robert S. Rosenfelt, P.E., Colbert Matz Rosenfelt, Inc, 2835 Smith Avenue, Suite G, Baltimore, MD 21209, and Benjamin Bronstein, Esquire, 29 W. Susquehanna Avenue, Towson, Maryland 21204, Attorney for Petitioner(s).

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

From: Debra Wiley
To: keigar@comcast.net
Date: 5/22/2009 12:57 PM
Subject: Fwd: Case No. 2009-0244-SPH - Kings Pt. Shop. Ctr.

The Commissioner's Office acknowledges receipt of your letter, dated May 19, 2009. Please be advised that Zoning Commissioner Wiseman is on a 2-week vacation and will review this as well as prepare an Order upon his return.

Thank you.

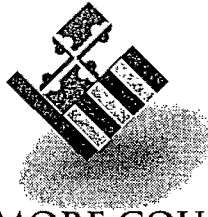
Debbie Wiley
Legal Administrative Secretary
Office of the Zoning Commissioner
105 West Chesapeake Avenue, Suite 103
Towson, Md. 21204
410-887-3868
410-887-3468 (fax)
dwiley@baltimorecountymd.gov

>>> Debra Wiley 5/19/2009 12:23 PM >>>
Good Afternoon,

Commissioner Wiseman is asking that I follow-up on the 5/14 meeting for the above-referenced case regarding the lease that you were going to get to him.

Please advise. Thanks.

Debbie Wiley
Legal Administrative Secretary
Office of the Zoning Commissioner
105 West Chesapeake Avenue, Suite 103
Towson, Md. 21204
410-887-3868
410-887-3468 (fax)
dwiley@baltimorecountymd.gov



BALTIMORE COUNTY
MARYLAND

JAMES T. SMITH, JR.
County Executive

WILLIAM J. WISEMAN III
Zoning Commissioner

September 1, 2009

Benjamin Bronstein, Esquire
Suite 205, Susquehanna Building
29 W. Susquehanna Avenue
Towson, MD 21204

RE: **MOTION FOR RECONSIDERATION - PETITIONS FOR SPECIAL HEARING
AND SPECIAL EXCEPTION**
NE/S Liberty Road, 573' W of c/line of Marriottsville Road
(9946-9948 Liberty Road)
2nd Election District - 4th Council District
Kings Point Associates, LLC, *Legal Owner*;
Shirelle A. Thorne *Contract Lessee* - Petitioners
Case No. 2009-0244-SPHX

Dear Mr. Bronstein:

This letter is to confirm that the above-captioned matter is scheduled for Monday, September 21, 2009, at 9:00 A.M. but lasting no longer than two hours (11:00 A.M.), in Room 104, of the Jefferson Building, 105 West Chesapeake Avenue, Towson, Maryland, 21204. In the event anyone feels we will need additional time than allotted, please let me know ASAP.

Should anyone have any questions on the subject, please do not hesitate to call me.

Very truly yours,

A handwritten signature in black ink, appearing to read "William J. Wiseman III", written over a large, stylized "X" mark.

WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

WJW:dlw

c: Robert S Rosenfelt, P.E., Vice President, Colbert, Matz & Rosenfelt, Inc., 2835 Smith Avenue,
Suite G, Baltimore, MD 21209
Shirelle A. Thorne, 4119 Spider Lily Way, Owings Mills, MD 21117
Keith L. Garner, 3 Newbridge Court, Randallstown, MD 21133
Arthur Allen, 13362 Grinstead Court, Sykesville, MD 21784
John F. McPhaul, President, Liberty Road Community Council, 3627 Forest Garden Avenue,
Gwynn Oak, MD 21207
Sharon Ray, Body Holiday Spa, 9940 Liberty Road, Randallstown, MD 21133
Jonzetta Carter, Pinky's Bridal & Special Occasion, 9988 Liberty Road, Randallstown, MD 21133
Charleen Wylie, Liberty Road Business Association, P.O. Box 1417, Randallstown, MD 21133
Aaron Plymouth, Stevenswood Improvement Association, Inc., 8546 Stevenswood Road,
Windsor Mill, MD 21244
Danny M. Blount, Hernwood Heights Community Association, Inc., 30 Millstone Road,
Randallstown, MD 21133
People's Counsel; Dave Green, Office of Planning; Kristen Matthews, Zoning Review; File

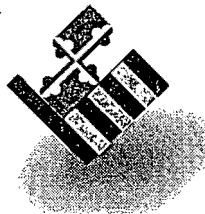
From: Debra Wiley
To: Matthews, Kristen
Date: 9/1/2009 12:32 PM
Subject: 2009-0244-SPHX - Motion for Reconsideration

Hi Kristen,

Per our conversation yesterday, please find attached the letter scheduling the hearing on the Motion for Sept. 21st at 9:00 AM before Bill. I have put a copy in interoffice mail today as well.

Thanks.

Debbie Wiley
Legal Administrative Secretary
Office of the Zoning Commissioner
105 West Chesapeake Avenue, Suite 103
Towson, Md. 21204
410-887-3868
410-887-3468 (fax)
dwiley@baltimorecountymd.gov



BALTIMORE COUNTY
M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

WILLIAM J. WISEMAN III
Zoning Commissioner

July 7, 2009

Benjamin Bronstein, Esquire
Suite 205, Susquehanna Building
29 W. Susquehanna Avenue
Towson, MD 21204

RE: **PETITIONS FOR SPECIAL HEARING AND SPECIAL EXCEPTION**
NE/S Liberty Road, 573' W of c/line of Marriottsville Road
(9946-9948 Liberty Road)
2nd Election District - 4th Council District
Kings Point Associates, LLC, *Legal Owner*;
Shirelle A. Thorne *Contract Lessee* - Petitioners
Case No. 2009-0244-SPHX

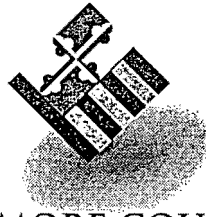
Dear Mr. Bronstein:

I have received your letter of July 2, 2009 for reply. The Zoning Commissioner's Rules of Practice and Procedure state in pertinent part:

Appendix G, Rule 4(K) – Motion for Reconsideration:

"A party may file a motion for reconsideration of an order issued by the Zoning Commissioner. Such a motion must be made in writing, within 30 days of the date of the original order. The motion must state, with specificity, the grounds and reasons for the request ..."

Certainly your statement that I "misapplied the law and the decision is against the weight of evidence" while sufficient to support an appeal – falls short of the specificity required to support your Motion. Upon return from your vacation, I ask that you provide the required reasons for the request and provide a copy to the Office of People's Counsel and all persons who attended the public hearing.



BALTIMORE COUNTY
MARYLAND

JAMES T. SMITH, JR.
County Executive

WILLIAM J. WISEMAN III
Zoning Commissioner

Set for
9/21
@ 9AM
104
per
Kristen
8/31
3:50
pm.

August 21, 2009

Benjamin Bronstein, Esquire
Susquehanna Building, Suite 205
29 West Susquehanna Avenue
Towson, Maryland 21204

RE: MOTION FOR RECONSIDERATION
Case No.: 2009-0244-SPHX

Dear Mr. Bronstein:

I am writing this letter in further response to your Motion for Reconsideration of the Order issued in the aforementioned case.

Under Rule 4(K) of the Zoning Commissioner's Rules of Procedure, "at his [the Zoning Commissioner's] discretion, the Zoning Commissioner may reconvene a hearing to receive testimony and/or argument on the Motion." In light of the contents of the letter I received from you dated July 22, 2009, I am granting your Motion for Reconsideration of Case No.: 2009-0244-SPHX.

Accordingly, I hereby waive the requirement of Rule 4(K) of the Zoning Commissioner's Rules of Procedure mandating final resolution of a Motion for Reconsideration within 30 days from the date which the motion is accepted for filing.

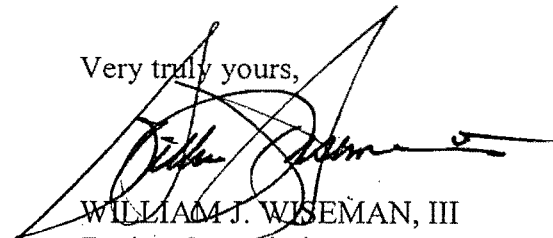
Please contact Ms. Kristen Matthews, with the Department of Permits & Development Management at 410-887-3391 to schedule an appropriate time for a hearing on the issue(s) at hand.

I am further waiving any requirement of the Petitioner to post notice of the hearing. Rather, please schedule the hearing with Ms. Matthews so as to allow sufficient time for the Zoning Commissioner's Office to directly contact all interested parties in this matter by mail.

Benjamin Bronstein, Esquire
2009-0244-SPHX – Motion for Reconsideration
Page 2 – August 21, 2009

In the meantime, should you or anyone have any questions, please do not hesitate to call me.

Very truly yours,



WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

WJW:esl

- c: Robert S Rosenfelt, P.E., Vice President, Colbert, Matz & Rosenfelt, Inc.,
2835 Smith Avenue, Suite G, Baltimore, MD 21209
Shirelle A. Thorne, 4119 Spider Lily Way, Owings Mills, MD 21117
Keith L. Garner, 3 Newbridge Court, Randallstown, MD 21133
Arthur Allen, 13362 Grinstead Court, Sykesville, MD 21784
John F. McPhaul, President, Liberty Road Community Council,
3627 Forest Garden Avenue, Gwynn Oak, MD 21207
Sharon Ray, Body Holiday Spa, 9940 Liberty Road, Randallstown, MD 21133
Jonzetta Carter, Pinky's Bridal & Special Occasion, 9988 Liberty Road,
Randallstown, MD 21133
Charleen Wylie, Liberty Road Business Association, P.O. Box 1417,
Randallstown, MD 21133
Aaron Plymouth, Stevenswood Improvement Association, Inc., 8546 Stevenswood Road,
Windsor Mill, MD 21244
Danny M. Blount, Hernwood Heights Community Association, Inc., 30 Millstone Road,
Randallstown, MD 21133
Kristen Matthews, Office of Zoning Review, DPDM
People's Counsel; Dave Green, Office of Planning; File

BENJAMIN BRONSTEIN

ATTORNEY AT LAW
SUSQUEHANNA BUILDING, SUITE 205
29 WEST SUSQUEHANNA AVENUE
TOWSON, MARYLAND 21204
(410) 296-0200
FAX: (410) 296-3719
Benbronstein@terralaw.net

March 16, 2009

Timothy Kotroco, Director
Dept of Permits & Development Mgt
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

RE: Kings Point Square Shopping Center

Dear Mr. Kotroco:

In reference to the above-entitled property I am hereby enclosing the following:

1. Petition for Special Hearing in triplicate;
2. Petition for Special Exception in triplicate;
3. Twelve (12) copies of the Plat to Accompany Petition;
4. Three copies of the description under seal;
5. Copy of the 200 Scale Zoning Map; and
6. Check to cover costs.

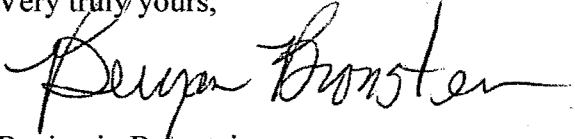
Please bill all advertising to me.

There are no known violations.

Please enter my appearance on behalf of the Petitioner and advise me as to the hearing date.

Please do not schedule this case from May 1 through May 10, 2009.

Very truly yours,



Benjamin Bronstein

BB/mlh
Enclosures

BW 5/14

BENJAMIN BRONSTEIN

ATTORNEY AT LAW
SUSQUEHANNA BUILDING, SUITE 205
29 WEST SUSQUEHANNA AVENUE
TOWSON, MARYLAND 21204
(410) 296-0200
FAX: (410) 296-3719
Benbronstein@terralaw.net

RECEIVED

JUL 06 2009

ZONING COMMISSIONER

July 2, 2009

The Honorable William J. Wiseman
Zoning Commissioner for Baltimore County
The Jefferson Building - Suite 103
105 West Chesapeake Avenue
Towson, Maryland 21204

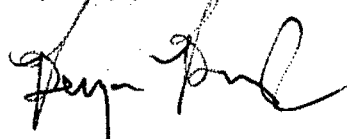
RE: Kings Point Associates, LLC, Legal Owner
Shirelle A. Thorne, Contract Lessee
Case No.: 2009-0244-SPHX

Dear Commissioner Wiseman:

Please treat this letter as a Motion for Reconsideration of your decision dated June 24, 2009 in the above-entitled case. The basis of the Motion is that the Zoning Commissioner misapplied the law and the decision is against the weight of evidence.

Thank you for your kind consideration and attention to this matter.

Very truly yours,



Benjamin Bronstein

BB/mlh

cc: Mr. Bruce Levine

Shirelle A. Thorne, 4119 Spider Lily Way, Owings Mills, MD 21117

BENJAMIN BRONSTEIN

ATTORNEY AT LAW
SUSQUEHANNA BUILDING, SUITE 205
29 WEST SUSQUEHANNA AVENUE
TOWSON, MARYLAND 21204
(410) 296-0200
FAX: (410) 296-3719
Benbronstein@terralaw.net

July 22, 2009

HAND DELIVERED

The Honorable William J. Wiseman
Zoning Commissioner for Baltimore County
The Jefferson Building - Suite 103
105 West Chesapeake Avenue
Towson, Maryland 21204

RE: Kings Point Associates, LLC, Legal Owner
Shirelle A. Thorne, Contract Lessee
Case No.: 2009-0244-SPHX

Dear Commissioner Wiseman:

Please consider this a Motion for Reconsideration of your Order dated June 24, 2009.

On page 3 of your Zoning Order, the last two sentences of the first paragraph imply that parking is allocated by use. Further, at the top of page 5, the Order states that "It was the combined consensus that the current parking venue cannot support the addition of 124 more parking spaces required by the BCZR."

In fact, parking requirements for the entire shopping center are determined by an overall parking calculation of 5 spaces per 1,000 square feet of area, which applies to a shopping center with a total gross floor area of over 100,000 square feet. In this case, the shopping center has 108,153 square feet. The only uses specifically excluded from this calculation in the County Zoning Regulations are theaters, which are to be treated as a separate use, with a separate parking calculation. Presumably, if the County had intended to exclude community buildings or catering halls, it would have done so.

For the 108,153 square feet of floor area in the shopping center, the parking requirement is 541 spaces ($108.153 \times 5 = 540.765$). Thus, the 595 spaces of the shopping center are more than adequate by the County's own standards.

The 124 spaces shown on the plan for the proposed community building were shown for illustrative purposes only. They were in no way intended to be reserved for the exclusive use of the catering hall visitors.

The Honorable William J. Wiseman
Zoning Commissioner for Baltimore County
July 22, 2009
Page 2

2. The testimony of Keith L. Ganer and Arthur Allen, Managing members of Diamondz, LLC should not have been admitted. In *Grooms v. Landvale Zoning Board*, 27 Md. App 266, 340 A2d 385 (1975) the court held that a person whose sole reason for appealing a decision from the Zoning Board is to protect his established business against competition does not have standing.

The Zoning Commissioner's finding that the special exception has failed to meet the test set out in the BCZR, Section 502.1 A and D was not supported by any testimony and evidence.

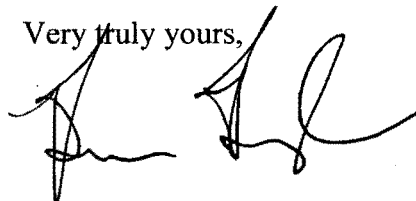
Mr. Rosenfelt, a respected professional engineer opined that the use met with all the criteria of Section 502.1 BCZR.

In *Schultz v. Pritts*, 291 Md. 1, 432 A2d 1319 (1981) the Court of Appeals held that the applicant has the burden of adducing testimony which will show that his use meets the prescribed standards and requirements, he does not have the burden of establishing affirmatively that his proposed use would be a benefit to the community. If he shows to the satisfaction of the Board that the proposed use would be conducted without real detriment to the neighborhood and would not actually adversely affect the public interest, he has met his burden. The extent of any harm or disturbance to the neighboring area and uses is, of course, material. There was no probative evidence of harm or disturbance in light of the nature of the zone involved.

In summary, since the parking meets the regulations the use is within the existing improvements and there was no evidence to support a finding that the use was detrimental to the health, safety or general welfare and/or tends to overcrowd land, the Petitioner requests you reconsider your Order. The Petitioner respectfully requests you reconvene a hearing to hear testimony and argument.

Thank you for your kind consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Benjamin Bronstein', written over the words 'Very truly yours,'.

Benjamin Bronstein

BB/mlh

The Honorable William J. Wiseman
Zoning Commissioner for Baltimore County
July 22, 2009
Page 3

cc: Mr. Bruce Levine

Robert S. Rosenfelt, P.E., Vice President, Colberg, Matz & Rosenfelt, Inc.
2835 Smith Avenue, Suite G, Baltimore, MD 21209

Shirelle A. Thorne, 4119 Spider Lily Way, Owings Mills, MD 21117

Keith L. Garner, 3 Newbridge Court, Randallstown, MD 21133

Arthur Allen, 13362 Grinstead Court, Sykesville, MD 21784

John F. McPhaul, President, Liberty Road Community Council
3627 forest Garden Avenue, Gwynn Oak, MD 21207

Sharon Ray, Body Holiday Spa, 9940 Liberty Road, Randallstown, MD 21133

Jonzetta Carter, Pinky's Bridal & Special Occasion
9988 Liberty Road, Randallstown, MD 21133

Charleen Wylie, Liberty Road Business Association, PO Box 1417, Randallstown, MD 21133

Aaron Plymouth, Stevenson Improvement Association, Inc.
8546 Stevenswood Road, Windsor Mill, MD 21244

Danny M. Blount, Hernwood Heights Community Association, Inc.
30 Millstone Road, Randallstown, MD 21133

People's Counsel

Dave Green, Office of Planning

BENJAMIN BRONSTEIN

ATTORNEY AT LAW
SUSQUEHANNA BUILDING, SUITE 205
29 WEST SUSQUEHANNA AVENUE
TOWSON, MARYLAND 21204
(410) 296-0200
FAX: (410) 296-3719
Benbronstein@terralaw.net

RECEIVED

SEP 29 2009

ZONING COMMISSIONER

September 24, 2009

The Honorable William J. Wiseman
Zoning Commissioner for Baltimore County
The Jefferson Building - Suite 103
105 West Chesapeake Avenue
Towson, Maryland 21204

RE: Petition for Special Exception
Case No.: 06-012-X
Property: 9980 Liberty Road

Dear Commissioner Wiseman:

Reference is made to the recent hearing pertaining to the above-entitled case. The purpose of this letter is to distinguish the proposed Pray'ers Club operation from that of Diamondz.

Diamondz, operates as a catering hall facility, is available to the public for weddings, parties, crab feasts, etc. It has onsite food preparation and serves alcoholic beverages. The proposed Pray'ers Club is a limited operation, in that it will be operated as a Christian based facility promoting faith oriented activities. There will be no onsite food preparation or use of alcoholic beverages. It will not be available for rent to the public for weddings, etc. There will be aerobic classes, light exercise equipment, entertainment, including but not limited to poetry night, jazz night and plays which will be written and produced by its management. Any food served on the premises will be brought in rather than prepared onsite.

Ms. Thorne, the principal of the Pray'ers Club, is willing to limit the occupancy to a maximum of 150 persons. The parking is more than adequate, particularly since some of the uses such as the daycare center are not operational during the time that either Diamondz or the Pray'ers Club are likely to schedule activities. While one can understand that Diamondz may be concerned about competition, it is unfounded here, nor should it be the basis for a denial of the Pray'ers Club zoning request.

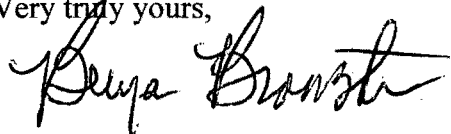
Of special importance is the testimony of Bruce Levine, property manager, of the Kings Point Center, who testified that he has never seen the parking lot filled in 21 years.

The Honorable William J. Wiseman
Zoning Commissioner for Baltimore County
September 24, 2009
Page 2

If you are in need of any further information following your site visit, please don't hesitate to contact me.

Thank you for your patience and understanding.

Very truly yours,

A handwritten signature in black ink, appearing to read "Benjamin Bronstein", written in a cursive style.

Benjamin Bronstein

BB/mlh

M. Leo Storch MANAGEMENT CORPORATION

Hooks Village • Suite 312
25 Hooks Lane • Baltimore, Maryland 21208
410-486-0800 • Fax 410-486-0801

April 20, 2009

Keith Garner
Diamondz,
3 Newbridge Court
Randallstown, Maryland 21133

RE: Diamondz, LLC, 9980 Liberty Road Lease

Welcome to Kings Point Square Shopping Center. Enclosed for your safekeeping please find a fully executed lease for the above-referenced premises.

If you haven't already done so, please be advised that the following items should be addressed at your earliest convenience:

1. Utilities: Pursuant to Section 10, you are required to transfer all utilities into your name. The phone numbers to the utility companies follow:

BGE 800-685-0123
Water 301-262-6200

2. HVAC Maintenance Contract: Pursuant to Section 14, you are required to have a preventive maintenance/service contract with a maintenance contractor for servicing all hot water heater, heating and air conditioning ("HVAC") systems and equipment within the Premises. Requirements enclosed.
3. Insurance: Pursuant to Section 19 of your Lease, you are required to carry insurance for the above-referenced Premises. If you have not already done so, please make arrangements to send Landlord a Certificate of Insurance to evince that such coverage is in place. The Landlord should be listed on the Certificate of Insurance as an additional insured as follows:

Kings Point Associates, LLC
1535 Chestnut Ave
Philadelphia, PA 19102

4. Emergency Contact Information Form: Please fill out and return the enclosed form listing emergency contact information. Should an

emergency arise, we would like to be able to notify the pertinent party (i.e. store manager and/or owner).

Beginning July 1, 2009, your monthly rent shall be as follows:

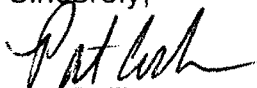
Minimum Rent	\$5,386.67
Estimated CAM	\$1,077.33
Real Estate Tax Recovery	\$301.65
Insurance	\$75.41

Total Monthly Rent	\$6,841.06
--------------------	------------

Please make checks payable to Kings Point Associates LLC.

Should you have any questions, please do not hesitate to contact me. Once again, welcome!

Sincerely,



Pat Collier
Lease Administrator

Enclosures

cc: Bruce I. Levine
Tenant File KP

BILL OF SALE

KNOW ALL MEN BY THESE PRESENTS that Kings Point Associates, LLC (referred to as the "Seller"), in consideration of Eighteen Thousand One Hundred Forty Nine Dollars 33/100 (\$18,149.33) received from Diamondz, LLC (referred to as the "Buyer"), the receipt and sufficiency of which are hereby acknowledged, has granted, bargained, sold, conveyed, transferred, and delivered and by these presents does bargain, sell, grant, convey, transfer, and deliver unto Buyer the following goods and chattels:

The Equipment identified in Attachment A

The Equipment is referred to as the "Property"

To have and to hold the same unto Buyer, its successors and assigns forever.

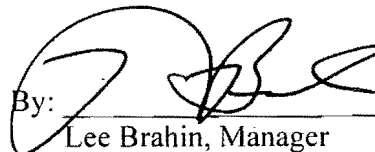
Seller warrants and represents to Buyer that the title conveyed is good, its transfer is rightful, and the Property is delivered free from any security interest or other lien or encumbrance.

Buyer acknowledges that the Seller has made no inspection of the Property, and Seller makes no warranty of the condition of the Property or its fitness for a particular use. Further, Buyer acknowledges that it is purchasing the Property "AS IS", "WHERE IS".

Seller, for Seller and for Seller's executors, administrators and assigns, covenants and agrees with Buyer to warrant and defend title to the Property hereby sold unto the Buyer, its successors and assigns against all and every person and persons whomsoever.

IN WITNESS WHEREOF, Seller has hereunto executed and delivered this Bill of Sale this ____ day of _____, 2009.

KINGS POINT ASSOCIATES, LLC

By:  (SEAL)
Lee Brahlin, Manager

Arthur Allen
Kevin Garner

ATTACHMENT A

- 1- Beverage Case
- 1- 3 part Stainless Steel Sink
- 1- Ice Maker
- 1- 2 Door Stainless Steel Refrigerator
- 2- Warming Stations
- 2- Stainless Steel Work Tables
- 1- Micro Wave
- 1- Water Tank
- 1- File Cabinet
- 2- Podiums
- 1- 19 in TV
- 1- Time Clock
- 300- Chairs
- 28- Round Tables
- 7- Long Tables
- 6- Chandeliers
- 2- Desks
- 1- Fountain
- 5- Chairs in Foyer
- 12- Sconce

Stevenswood Improvement Association, INC.

8546 Stevenswood Road
Windsor Mill, MD 21244-2217
410-922-4124
aaron.plymouth@verizon.net

September 21, 2009

Mr. William J. Wiseman, III, Zoning Commissioner
Zoning Review Office
Baltimore County Office Building Room 111
111 West Chesapeake Avenue
Towson, MD 21204

Dear Mr. Wiseman,

I wrote a letter to you dated June 15, 2009 respectfully requesting you to oppose the application for special exception to operate another catering hall in the Kings Point Square Shopping Center. Following the hearing, you reviewed the Case *Law* and determined that the amount of parking spaces was not sufficient enough to support another catering hall at that proposed location. After you reconsider that testimony during today's hearing, please sustain your previous decision in which you denied the application for special exception to the zoning regulations.

The following is s recapitulations of my opposition as stated in my June 15 letter to you, Mr. Wiseman. The residents of Stevenswood are opposed to permitting another catering hall to operate for the following reasons:

- There are numerous businesses located within close proximity to one another. Many of them host functions that attract patrons with vehicles. Thus, there is competition for limited parking spaces. That strip shopping center is unique in that it has 2 parallel strips of stores and businesses very close to each other. Sadly, there is only one parking lot which was built many years ago based on a configuration to accommodate fewer cars. Today, there are lots of customers with SUV's, crossover vehicles, and mini vans seeking to park in the same spaces and facing tight 90 degree angle parking. Two or more catering halls will place tremendous impacts on the parking lot and will pose undue challenges to people hoping to park in close proximity to the stores and businesses they wish to patronize.
- The ingress/egress from Liberty and Marriottsville Road will create traffic problems for people seeking to enter and leave the parking lot and will cause additional traffic problems for nearby apartment dwellers and homeowners. The only traffic light is at the Liberty and Marriottsville Roads intersection.

- The residents in the Greater Randallstown community as well as the residents in Stevenswood are confident that Diamondz Events is capable of providing quality services for our weddings, birthdays, banquets, reunions, anniversaries, engagement parties, business meetings, social meetings, seminars, graduations, bull roasts, crab feasts, repasts, and other needs. Stevenswood believes in smart growth and does not believe in a proliferation of businesses in close proximity offering identical or very similar services, especially caterers located in the same shopping center just a few feet apart.
- The Greater Randallstown community enthusiastically and wholeheartedly welcomes and embraces the new owners and operators of the new and improved Diamondz Events. Moreover, the owners have formed partnerships with many of the local communities and pledged support of our upcoming activities.

In summary, the residents of the Stevenswood Community are unanimously opposed to yet another catering hall receiving permission to operate anywhere within the Kings Point Square Shopping Center for all the aforementioned reasons and respectfully request you to sustain your decision to deny the application for special exception to open a catering hall in the Kings Point Square Shopping Center in Randallstown, MD

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Plymouth".

Aaron Plymouth
President



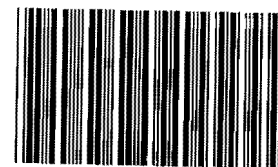
From: PAT COLLIER
Phone: 410-486-0800
25 HOOKS LANE Suite: 312
PIKESVILLE, MD 21208



www.shipndx.com
1-866-SHIP-NDX
1-866-744-7639

Trk

#6002681



BALMD

DV: 0
Ref: KP-Diamondz
Scheduled

Shipping Date: Apr 20, 2009
Weight: 0

3

Due Date: Tue, 04/21/09
NEXT DAY P.M. SERVICE

Delivery without signature: **NO**
410-925-8796

To: **DIAMONDZ**
Attn: Keith Garner
3 Newbridge Court

**Randallstown, MD
21133**

NDX A

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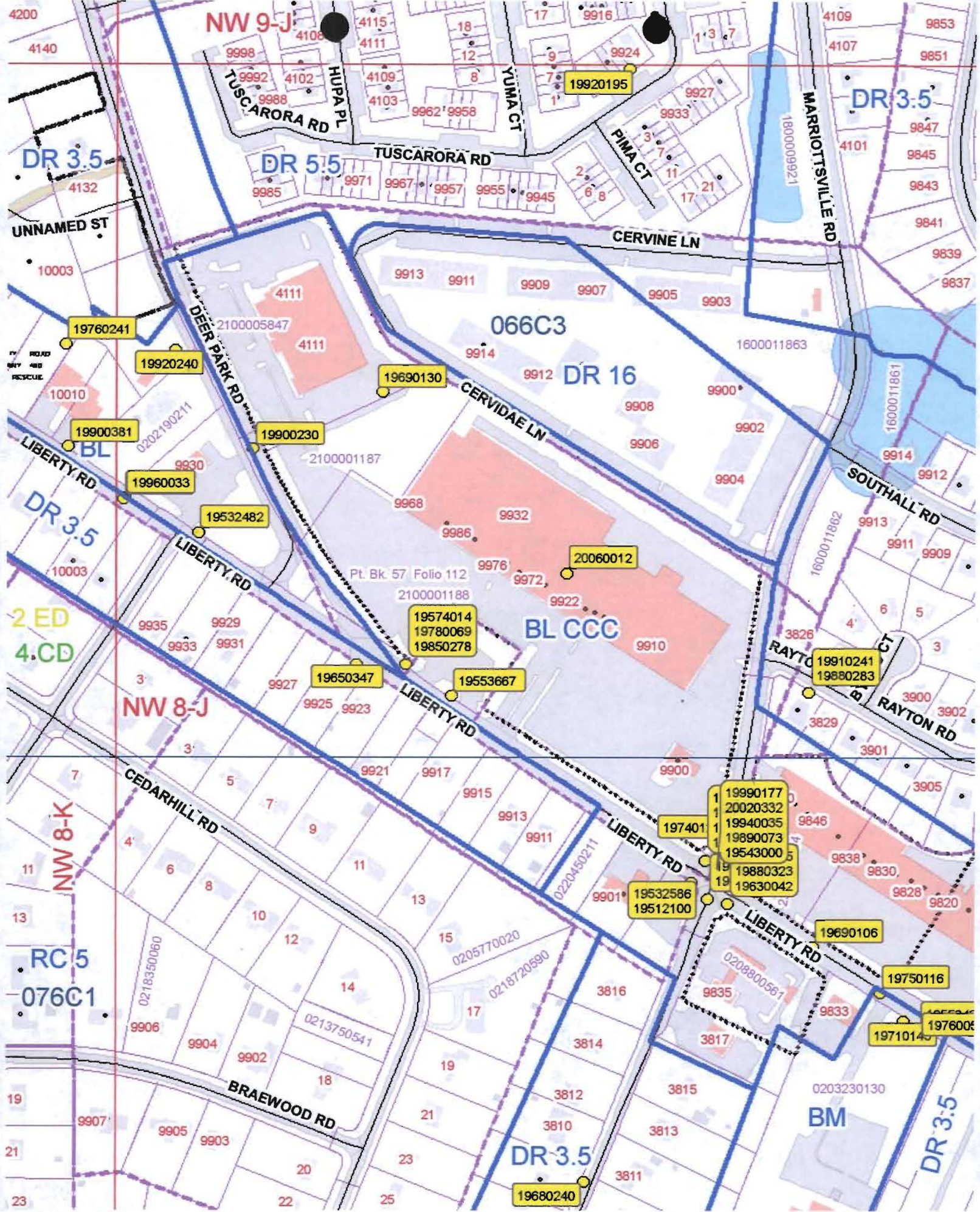
ZONING COMMISSIONER

MAY 21 2009

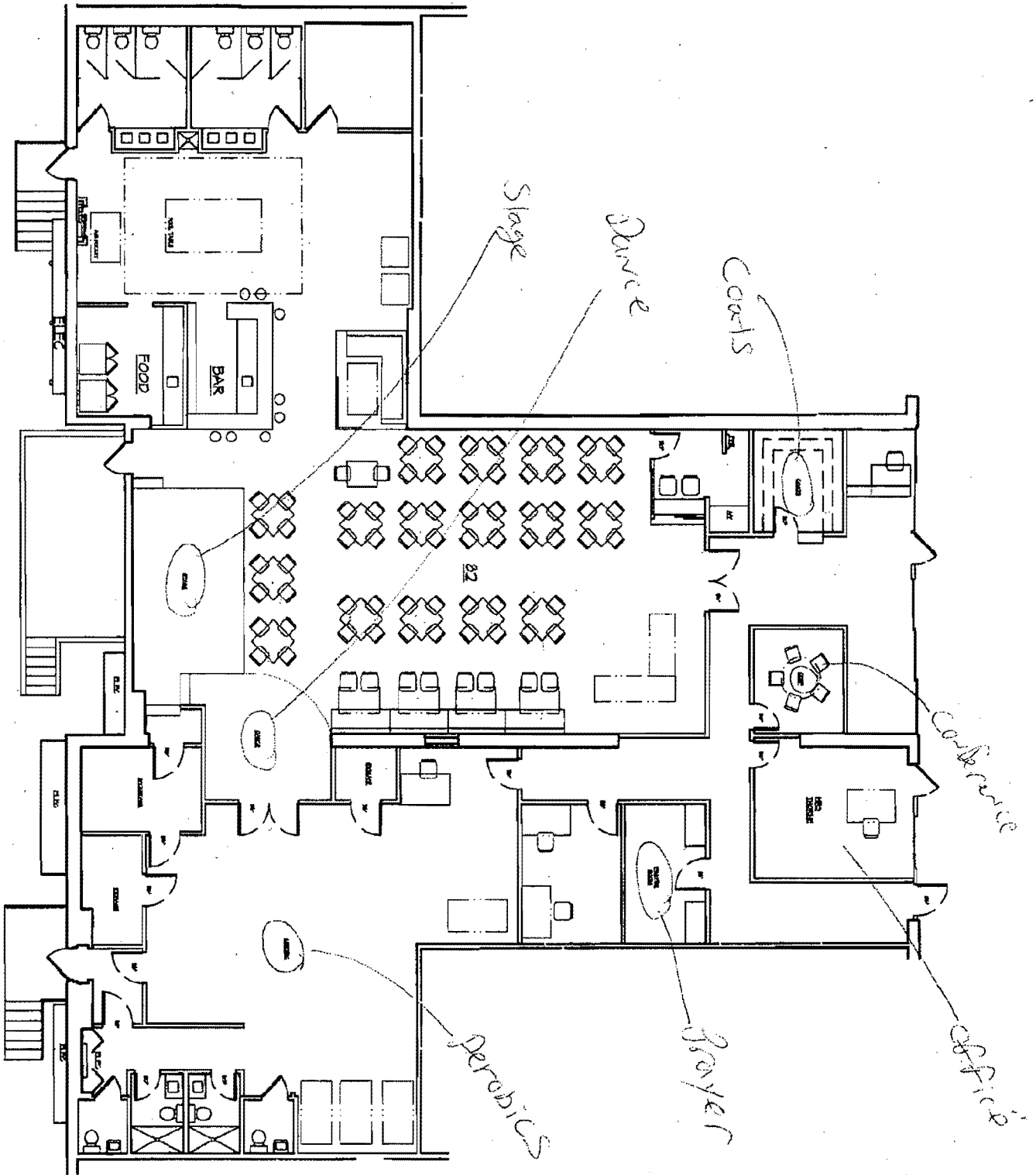
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2009-0244-SPHX



SK3 PROPOSED PLAN	DATE: 11.11.08 DRAWING: 08039 SCALE: NTS	9946 - 9948 KINGSPPOINT PLAZA	ARCHISERV, LLC www.archiserv.org 410-466-1034 (o) 410-949-7249 (c) north@archiserv.org	10' 0" x 10' 0" 1/4" = 1'-0" 1/8" = 1'-0" 1/16" = 1'-0" 1/32" = 1'-0" 1/64" = 1'-0" 1/128" = 1'-0" 1/256" = 1'-0" 1/512" = 1'-0" 1/1024" = 1'-0" 1/2048" = 1'-0" 1/4096" = 1'-0" 1/8192" = 1'-0" 1/16384" = 1'-0" 1/32768" = 1'-0" 1/65536" = 1'-0" 1/131072" = 1'-0" 1/262144" = 1'-0" 1/524288" = 1'-0" 1/1048576" = 1'-0" 1/2097152" = 1'-0" 1/4194304" = 1'-0" 1/8388608" = 1'-0" 1/16777216" = 1'-0" 1/33554432" = 1'-0" 1/67108864" = 1'-0" 1/134217728" = 1'-0" 1/268435456" = 1'-0" 1/536870912" = 1'-0" 1/1073741824" = 1'-0" 1/2147483648" = 1'-0" 1/4294967296" = 1'-0" 1/8589934592" = 1'-0" 1/17179869184" = 1'-0" 1/34359738368" = 1'-0" 1/68719476736" = 1'-0" 1/137438953472" = 1'-0" 1/274877906944" = 1'-0" 1/549755813888" = 1'-0" 1/1099511627776" = 1'-0" 1/2199023255552" = 1'-0" 1/4398046511104" = 1'-0" 1/8796093022208" = 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The Stage Play that's also a
comedy show & concert

Singing Sensation **TANYA BLOUNT**

Saxophonist **ERIC MARNER** &

Comedian **LARRY LANCASTER**

November 7, 2009 @ 8:00PM

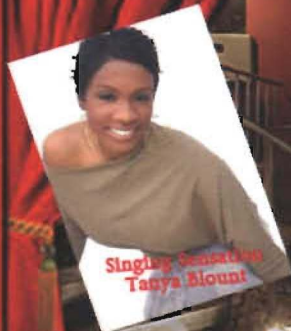
The Murphy Fine Arts Center @

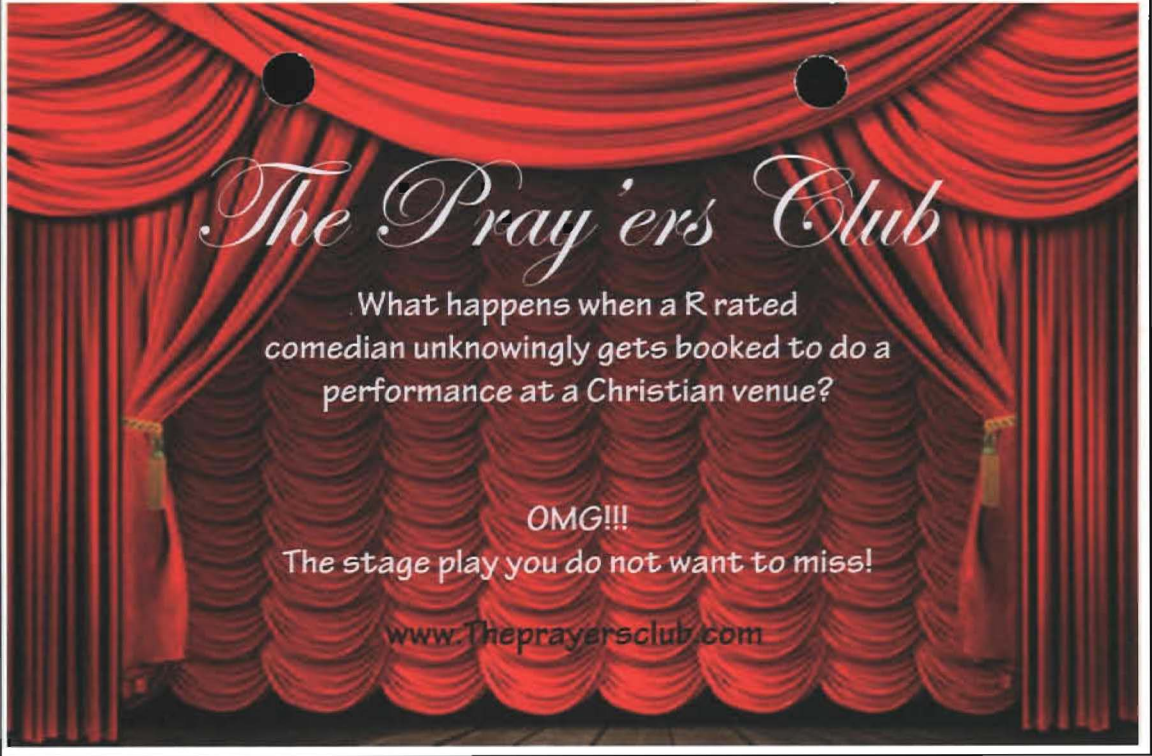
Morgan State University

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comedian unknowingly gets booked to do a
performance at a Christian venue?

OMG!!!

The stage play you do not want to miss!

www.Theprayersclub.com

9946 - 9948

CASE NAME Liberty Bell
CASE NUMBER 2009-0244-SPI-X
DATE 5-14-09

PLEASE PRINT CLEARLY

CITIZEN'S SIGN-IN SHEET

[illegible]

9946-9948
CASE NAME Lucy Re.
CASE NUMBER 2609-6244-SH-X
DATE 5-14-69

[illegible]

Question for Reconsideration
CASE NAME 9946-9948 Liberty Road
CASE NUMBER 2009-0244 SP4X
DATE 9-21-09

[illegible]

Application for Reconsideration
CASE NAME 9946-9948 Liberty Rd.
CASE NUMBER 2009-0244-SATX
DATE 9-21-09

[illegible]

I thought he was
 one of those that showed
 up for Wednesdays hearing
 as did George Hammond

Case No.: 2009-0244-SPHX 9946-9948 LIBERTY RD

Exhibit Sheet

Petitioner/Developer

Protestant

No. 1	SITE PLAN	Letter in Opposition (tenant) Body Holiday Spa
No. 2	ZONING PLAN CASE NO. 06-012-X Parking does not overlap with current request	Letter in Opposition (tenant) Pinkie's Bridal & Special Occasions
No. 3		Liberty Road Business Association Charleen Wylie - President
No. 4		Stevenswood Improv. Assoc Inc Aaron Plymouth - President
No. 5		Hernwood Heights Community Assoc. Inc Danny M. Blount - President
No. 6		Liberty Road Community Council Inc John McPhaul - President
No. 7		Diamondz, LLC LEASE Agreement and Correspondence } Keith Garner Arthur Allen } McPhaul
No. 8		
No. 9		
No. 10		
No. 11		
No. 12		



Body Holiday
Kings Point Square Entrance #2
9940 Liberty Road
Randallstown, MD. 21133
Ofc 410.496.6400 Fax 410.496.9200 E-mail BodyHolidaySpa@aol.com Web www.BodyHolidaySpa.com

May 14, 2009

Re: Special Permit for a Community Building/Catering Hall at 9946-48 Liberty Road

To Whom It May Concern:

Due to the fact that I'm unable to attend today's hearing, I'd like to submit a letter of concern to be considered in absentia.

It is my understanding that at the address of 9946-48 Liberty Road, inside the King's Point Square Shopping Center, there are plans to open a "Community Building/Catering Hall", which will house events accommodating hundreds of guests. It is my opinion that it would:

- a) Jeopardize the quiet, safe environment the business owners, who now occupy the areas inside the shopping center, have come to enjoy.
- b) Deplete what little parking spaces are available, taking into account the major businesses which already have large number of patrons (e.g. Food Lion, Primerica, Diamondz, Divine Wisdom).
- c) Conflict with the line of business for Diamondz Event Hall.

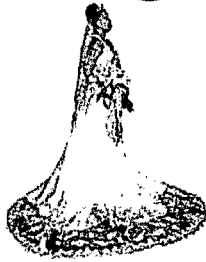
Therefore, I am against the approval for the aforementioned permit.

Yours truly,

Sharon Ray, Manager
Body Holiday Spa

PROTESTANT' S

EXHIBIT NO. 1



Pishey's Bridal & Special Occasion
9988 Liberty Road
Randallstown, MD 21133
410 922-2800
Fax 410 922-1881

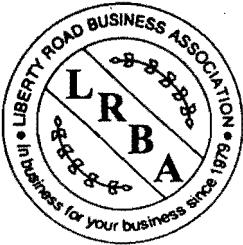
To Whom it May Concern:

I am a business owner in the Kings Point Square Shopping Center and I have a concern regarding another hall rental facility on the premises. Weekend parking is very challenging when there several events taking place. On Saturday May 2, there was a repass at the Diamondz Event Center, an event at Primerica, and a baby shower at the church. The parking lot was practically full and customers of other businesses, including mine, had to park closer to the bowling alley or Food Lion and walk over. Right now, there are 4 businesses that hold events in the shopping center. My customers have to carry heavy bridal gowns in and out of my business and additional parking will add the already congested situation.

Sincerely,
Jonzetta Carter

PROTESTANT' S

EXHIBIT NO. 2



LIBERTY ROAD BUSINESS ASSOCIATION

"In Business For Your Business"

P.O. Box 1417

Randallstown Maryland 21133

Tel: 410-655-7766 • Fax: 410-655-7767

May 19, 2009

RECEIVED

MAY 21 2009

ZONING COMMISSIONER

Commissioner William Wiseman
Zoning Commissioner
Zoning Commissioner Office
105 W. Chesapeake Avenue, Suite 103
Towson, Maryland 21204

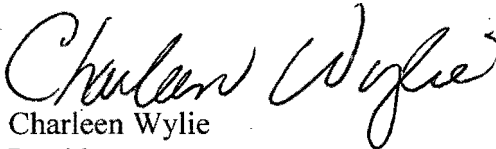
Re: 2009-0244-SPHX

Dear Mr. Wiseman:

I am writing on behalf of the Liberty Road Business Association in reference to the above mentioned case. We are asking that you do not approve the request for live entertainment in a community building/catering hall. There is a catering hall already located at this facility. We believe that this would not only be a bad business decision, but it would also create a parking problem. There are several other businesses in this shopping center that utilizes quite a bit of the parking in this area. If all of them had events during the same times, it would be impossible to find parking.

Thank you for your consideration in this matter.

Regards,


Charleen Wylie
President

PROTESTANT' S

E-mail: LRBA@verizon.net
Website: LRBA.biz

EXHIBIT NO. 3

Stevenswood Improvement Association, INC.

8546 Stevenswood Road
Windsor Mill, MD 21244-2217
410-922-4124
aaron.plymouth@verizon.net

May 18, 2009

RECEIVED

MAY 21 2009

ZONING DEPARTMENT

Mr. William J. Wiseman, III
Zoning Commissioner
Zoning Review Office
111 West Chesapeake Avenue
Towson, MD 21204

Dear Mr. Wiseman,

The Stevenswood Improvement Association is a two hundred ten single family dwelling community located near Northwest Hospital in Randallstown. We are opposed to permitting yet another catering hall to operate in the Kings Point Square Shopping Center. There is already an existing banquet hall named Diamondz Events, which replaces the Mirage Hall located in the Kings Point Square Shopping Center, 9980 Liberty Road, Randallstown. Member of my community have used the Mirage Hall and seek to use the new and improved Diamondz Events.

The residents of Stevenswood are opposed to permitting another catering hall to operate for the following reasons:

- There are numerous businesses located within close proximity to one another. Many of them host functions that attract patrons with vehicles. Thus, there is competition for limited parking spaces. That strip shopping center is unique in that it has 2 parallel strips of stores and businesses very close to each other. Sadly, there is only one parking lot which was built many years ago based on a configuration to accommodate fewer cars. Today, there are lots of customers with SUV's and mini vans seeking to park in the same spaces and facing tight 90 degree angle parking. Two or more catering halls will place tremendous impacts on the parking lot and will pose undue challenges to people hoping to park in close proximity to the stores and businesses they wish to patronize.
- The ingress/egress from Liberty and Marriottsville Road will create traffic problems for people seeking to enter and leave the parking lot and will cause additional traffic problems for nearby apartment dwellers and homeowners. The only traffic light is at the Liberty and Marriottsville Roads intersection.
- The residents in the Greater Randallstown community as well as the residents in Stevenswood are confident that Diamondz Events is capable of providing quality services for our weddings, birthdays, banquets, reunions, anniversaries, engagement parties, business meetings, social meetings, seminars, graduations,

PROTESTANT' S

EXHIBIT NO. 4

bull roasts, crab feasts, repasts, and other needs. Stevenswood believes in smart growth and does not believe in a proliferation of businesses in close proximity offering identical or very similar services, especially caterers located in the same shopping center just a few feet apart.

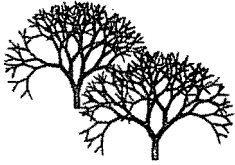
- The Greater Randallstown community enthusiastically and wholeheartedly welcomes and embraces the new owners and operators of the new and improved Diamondz Events. Moreover, the owners have formed partnerships with many of the local communities and pledged support of our upcoming activities.
- I have conferred with many of the other lease holders and operators of other businesses located within the same shopping center. They, too, think that the problems resulting from the operation of another catering hall will attract additional cars which clearly will have a deleterious impact on traffic as well as compete for the same customers during this economic downturn.

In summary, the residents of the Stevenswood Community are unanimously opposed to yet another catering hall receiving permission to operate anywhere within the Kings Point Square Shopping Center for all the aforementioned reasons.

Thank you for your consideration.

Sincerely,


Aaron Plymouth
President



HERNWOOD HEIGHTS

Community Association, Inc.

30 Millstone Road
Randallstown, Maryland 21133-1535

May 19, 2009

Mr. Bill Wiseman
Zoning Commissioner
101 Chesapeake Avenue
Towson, Maryland 21204
(410)887-3468
(410)887-4386 fax

RECEIVED

MAY 21 2009

ZONING COMMISSIONER

Re: Zoning request case# 09-244

Dear Mr. Wiseman:

We, the Community of Hernwood Heights, oppose the zoning request for case# 09-244. Our community is right across the street from the Kings Point Square Shopping Center (Liberty Rd / between Marriottsville Rd and Sheraton Rd). I have witnessed first hand the parking and traffic congestions that occur when events take place at the businesses listed below.

- Prime America
- Church
- Food Lion
- Dance Studio
- Karate
- Diamondz (formerly \ The Mirage Hall)
- Pinky Apparel

This request being made will be detrimental to our community, for having another Event Hall will cause additional congested parking for our community and is not needed. We the community of Hernwood Heights recommend that you office hear our voice and support our concerns and not permit this zoning request change as requested.

PROTESTANT' S

EXHIBIT NO.

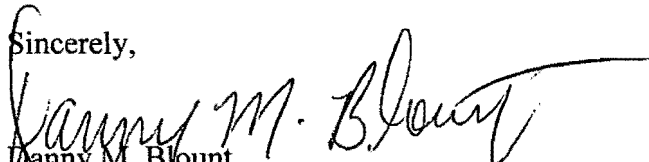
5

continue pg.2

Additionally, the sign for this hearing request was not posted the required 14 days in advance as your office requires. The first time that I notice a sign for a hearing was on May 12, 2009 the day before the hearing, which did not allow for anyone to attend in my community.

We appreciate you prompt attention to this most important community matter.
Feel free to contact me at (410) 496-4576.

Sincerely,

A handwritten signature in black ink, reading "Danny M. Blount". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Danny M. Blount
Hernwood Heights Community Association
President

Cc: HHCA / file

LIBERTY ROAD COMMUNITY COUNCIL, INC
Post Office Box 31613 Gwynn Oak, Maryland 21207

May 13, 2009

RECEIVED

MAY 21 2009

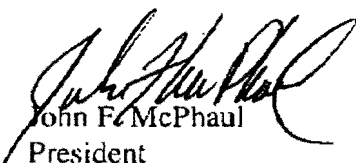
TO: Baltimore County
Planning Board

ZONING COMMISSIONER

The Liberty Road Community Council at it's monthly meeting on the 12th of May 2009, Considered the request for the establishment of an additional Catering and entertainment Hall at 9946 Liberty Road in Randallstown with the following results.

The Council felt that due to the close proximity of the existing Catering Hall at 9980 Liberty Road in Randallstown, and additional Catering Hall would create too much Congestion in the parking area which would impact very heavy on the existing facility.

The vote was unanimous to oppose the application for another Catering Hall at 9946 Liberty Road in Randallstown.


John F. McPhaul
President

PROTESTANT' S

EXHIBIT NO.

6

RECEIVED

May 19, 2009

MAY 21 2009

Diamondz Event Center
9980 Liberty Road
Randallstown, MD 21133
410-521-1155
410-521-3611 Fax

ZONING COMMISSIONER

Dear Commissioner William J. Wiseman:

We (Arthur Allen and Keith Garner) are the new owners of Diamondz Event Center, located at 9980 Liberty Road, Randallstown, MD 21133. We have been informed that another business has applied for zoning at the same shopping mall as Diamondz. We are asking that zoning for this business be denied because there is not enough parking to accommodate both businesses. One of our main advertising features for having an event at Diamondz is ample parking. We are licensed for 265 people and they want to be licensed for 200 people. Their entrance is right next to ours, therefore, all 465 people would be using the same entrance at the same time. There is no back parking lot.

There are other businesses which currently use a large volume of parking spaces too. They are:

Devine Wisdom Church
Prime America Insurance Company
Body Holiday Spa

Our observation has been that the current parking venue cannot support the addition of 200 more parking spaces required by the new zoning applicant. Less parking spaces for our and the other business owners, would be detrimental to the service we pride ourselves in providing our customers.

Thanking you in advance your consideration to this important matter. If any additional information is required; please contact either of us on our cell phone – Keith Garner 410-925-8796 or Arthur Allen 410-404-1773.

Sincerely,

Keith Garner
and
Arthur Allen

PROTESTANT' S

EXHIBIT NO. 7

LEASE

THIS LEASE ("Lease") is made this 13 day of April, 2009 by and between **KINGS POINT ASSOCIATES, LLC** hereinafter referred to as "Landlord", and **DIAMONDZ, LLC.**, hereinafter referred to as "Tenant".

WITNESSETH, that Landlord does hereby let and demise to Tenant and Tenant does hereby rent from Landlord, certain premises situated in Baltimore County, Maryland ("County") in the Kings Point Square Shopping Center ("Shopping Center") containing approximately **6,464 square feet** and having an address of **9980 LIBERTY ROAD, Randallstown, Maryland** ("Premises") as shown on the plan attached as Exhibit G, together with a non-exclusive revocable license in common with others entitled thereto to the parking areas, driveways, sidewalks, and alley in the rear, if any (hereinafter collectively referred to as "Common Areas"), subject however to the terms and conditions of this Lease and to rules and regulations for the use thereof as prescribed from time to time by Landlord. The total square footage of the Premises and the rent reserved under this Lease are calculated on a per square foot basis and may be adjusted in accordance with actual field measurements.

IN CONSIDERATION THEREOF, Landlord and Tenant covenant and agree as follows:

1. **LEASE OF PREMISES.** The Recitals set forth above are incorporated by reference as a part of this Lease.

2. **TERM.**

2.1 Commencement Date. The Term of this Lease shall be for a period of **five (5) years and three (3) months** and commencing on **April 1, 2009** ("Commencement Date") and ending on the **June 30, 2014** ("Term"). Upon determination of the Commencement Date, Tenant agrees, upon the request of Landlord, to execute and deliver to Landlord, without charge, a written declaration confirming the Commencement Date and expiration date of the Term of this Lease. For the purposes of measuring the first Lease year, the days from the Commencement Date to the first full calendar month after the Commencement Date shall be included as part of the first Lease year, which shall terminate twelve (12) months from and after the first day of the first full calendar month of the Term. All gross sales made during the days from the Commencement Date to the first full calendar month after the Commencement Date shall be included as part of the Gross Sales for the first Lease year.

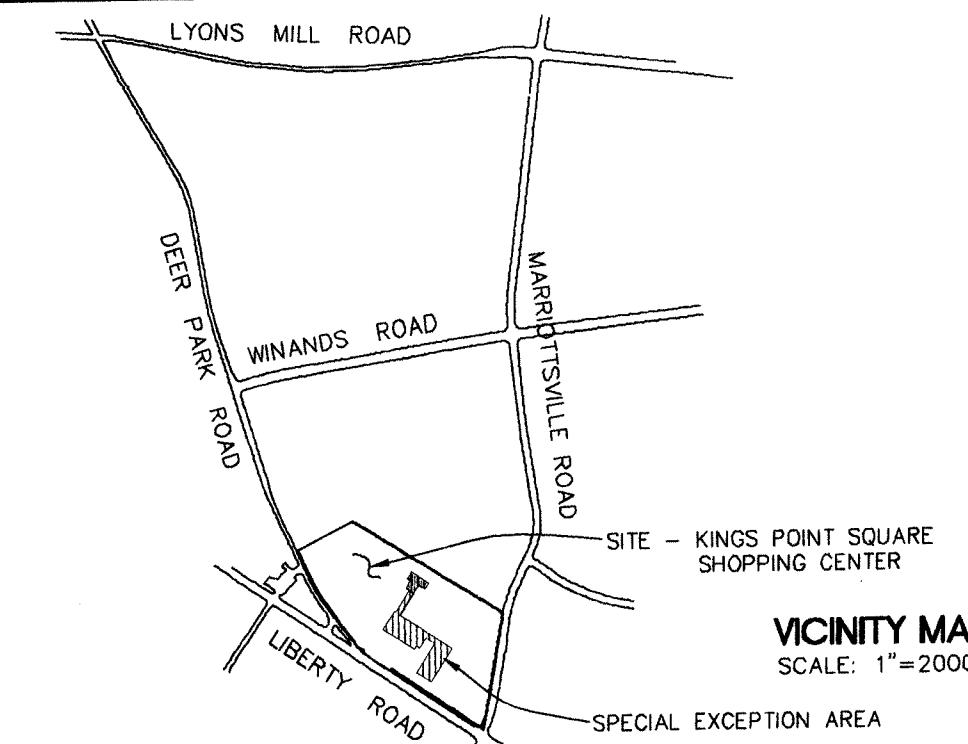
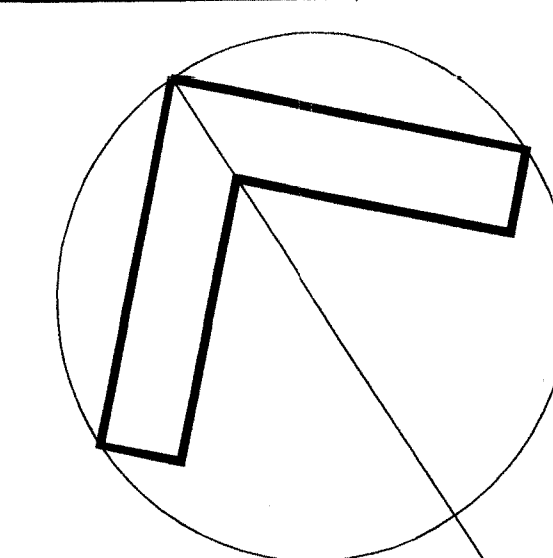
2.2 Rent Commencement Date. The payment of rent hereunder shall begin on **July 1, 2009** ("Rent Commencement Date"). However, if the Rent Commencement Date takes place other than the first of the month, then the rent shall be apportioned from the actual date of rent commencement to the month following. Anything in this Lease to the contrary notwithstanding, Tenant shall commence the payment of Tenant's pro-rata share of operating costs on the Rent Commencement Date.

INITIAL	
Landlord	AA
Tenant	KG

FLOOR AREA	
USE	SQUARE FEET
OFFICE	20,393
BANK	2,520
MEDICAL OFFICE	1,000
RETAIL & VACANT	56,187
COMM. RECREATION & NIGHTCLUB	17,985
RESTAURANT	1,322
DAY CARE	3,400
CHURCH	5,348
TOTAL	108,153

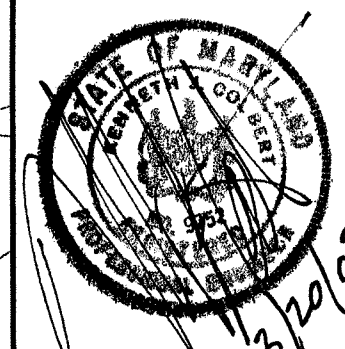
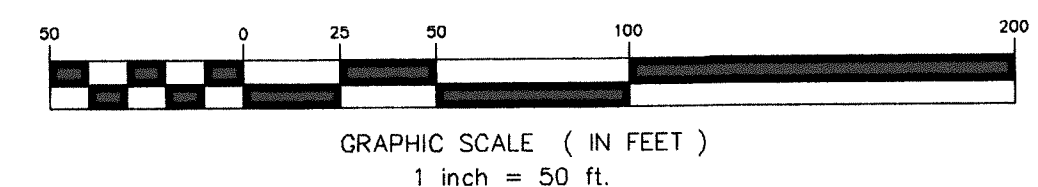
SHARED PARKING SUMMARY						
USE	WEEKDAY		WEEKEND			
	DAY	EVENING	DAY	EVENING	NIGHT	
OFFICE	100% = 80.9	10% = 8.1	10% = 8.1	5% = 4.1	5% = 4.1	
RESTAURANT	50% = 10.6	100% = 21.2	100% = 21.2	100% = 21.2	10% = 2.1	
RETAIL*	60% = 168.5	90% = 252.8	100% = 280.9	70% = 196.6	5% = 14.1	
COMM. RECREATION/ NIGHTCLUB	40% = 122.4	100% = 305.9	80% = 244.7	100% = 305.9	10% = 30.6	
DAY CARE	9	---	---	---	---	
CHURCH**	---	---	15	---	---	
TOTAL	392	588	555	529	52	

*INCLUDES VACANT SPACE
**60 SEATS



- GENERAL NOTES**
- OWNER: KINGS POINT ASSOCIATES, LLC
1535 CHESTNUT STREET, SUITE 200
PHILADELPHIA, PA. 19102
 - APPLICANT: M. LEO STORCH MANAGEMENT CORP.
HOOKS VILLAGE SUITE 312
25 HOOKS LANE
BALTIMORE, MD. 21208
410-488-0800
 - SITE DATA:
ADDRESS OF PREMISES: 8946-8948 LIBERTY ROAD
TAX ACCOUNT NO. 2100001188
DEED REFERENCE: 28355/523
PLAT REFERENCE: LOTS 2A, 3, RESUBDIVISION OF DEER PARK PLAZA (67112)
SITE AREA: 8.819 AC.
FLOOR AREA: 108,153 SQ. FT.
FLOOR AREA RATIO: 0.28
MAXIMUM PERMITTED F.A.R.: 4.0
BUILDING HEIGHT: 1 STORY
 - ZONED BL-COC
EXISTING USE: VACANT
PROPOSED USE: COMMUNITY BUILDING/CATERING HALL
AREA OF PROPOSED USE: 6,188 SQ. FT.
 - A CRO PLAN FOR THIS SITE WAS APPROVED 11/20/07. A REVISED CRO PLAN WAS APPROVED 10/11/09. A LIMITED EXEMPTION FOR TWO ADDITIONS TO THE SHOPPING CENTER WAS APPROVED BY THE DRC ON 12/6/09.
IN ZONING CASE NO. 83-6-A A VARIANCE WAS APPROVED TO REDUCE THE REQUIRED PARKING BY 18 SPACES. ON 12/27/09, THE ZONING OFFICE APPROVED THIS PLAN AS BEING WITHIN THE SPIRIT AND INTENT OF CASE NO. 83-6-A.
IN ZONING CASE NO. 97-285-SPH, A PETITION FOR A SPECIAL HEARING TO PERMIT A RESTAURANT WITH LIVE ENTERTAINMENT WAS DISMISSED WITHOUT PREJUDICE.
IN ZONING CASE NO. 06-012-X, ON SEPTEMBER 18, 2005, THE DEPUTY ZONING COMMISSIONER APPROVED A SPECIAL EXCEPTION TO ALLOW A COMMUNITY BUILDING (CATERING HALL) ON THE PREMISES AT 9980 LIBERTY ROAD, PURSUANT TO SEC. 230.13, BOZ.
 - OFF-STREET PARKING
TOTAL LEASABLE AREA - 108,153 SQ. FT. (SEE FLOOR AREA TABLE)
REQUIRED PARKING MAX: 588 SPACES
SEE SHARED PARKING TABLE
EXISTING PARKING - 577 SPACES + 18 VARIANCED (CASE NO. 83-6-A) = 595 SPACES
PARKING FOR PROPOSED COMMUNITY BUILDING/CATERING HALL:
6,188 SQ. FT. @ 1 SPACES/50 SQ. FT. = 124 SPACES
NOTE: PARKING IS SHOWN AS SEPARATE FOR THE CATERING HALL FOR PURPOSES OF THIS SPECIAL EXCEPTION. HOWEVER, THIS DOES NOT LIMIT USE BY PATRONS OF THE CATERING HALL TO THESE SPACES.
 - AMENITY OPEN SPACE
REQUIRED (GROSS FLOOR AREA X 0.2) = 21,831 SQ. FT.
EXISTING:
INTERIOR AND SIDEWALK: 27,500 SQ. FT.
PARKING LOT PLANTING AREAS: 47,500 SQ. FT.
 - PREVIOUS COMMERCIAL PERMITS: NONE ON FILE FOR THIS ADDRESS.
 - THE SITE IS NOT IN A CHESAPEAKE BAY CRITICAL AREA, 100-YEAR FLOODPLAIN OR HISTORIC DISTRICT. THE SITE HAS NO OUTSTANDING ZONING VIOLATIONS.
 - ZONING REQUEST:
SPECIAL EXCEPTION FOR A COMMUNITY BUILDING/CATERING HALL PURSUANT TO SECTION 230.3 OF THE BOZ.
SPECIAL HEARING TO PERMIT LIVE ENTERTAINMENT IN A COMMUNITY BUILDING/CATERING HALL.

PLAN TO ACCOMPANY PETITION FOR
SPECIAL EXCEPTION AND SPECIAL HEARING
#9946-#9948 LIBERTY ROAD
**KINGS POINT SQUARE
SHOPPING CENTER**
2ND ELECTION DISTRICT, 4TH COUNCILMANIC DISTRICT
BALTIMORE COUNTY, MD.



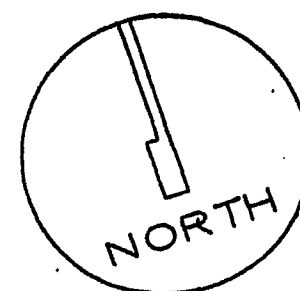
Colbert Matz Rosenfelt, Inc.
Engineers * Surveyors * Planners
2835 Smith Avenue, Suite G
Baltimore, Maryland 21209
Telephone: (410) 653-3838
Facsimile: (410) 653-7953

PETITIONER'S
EXHIBIT NO. 1

SCALE:	1" = 50'
DATE:	2/27/09
JOB NO.:	95084.5
DESIGNED:	RSR
DRAWN:	TNW/KML/DSL/RVB
CHECKED:	RSR
FILE:	95084_ZONING PLAN.dwg
DRAWING NUMBER:	2P-1

Professional Certification
I hereby certify that these documents were prepared or approved by me, and that I am a duly licensed professional engineer under the laws of the State of Maryland.
License No. 9752 Expiration Date: 02-28-2010

NO.	DATE	REVISIONS:	BY	SHEET 1 OF 1
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GENERAL NOTES

1. OWNER/APPLICANT:
DP LIMITED PARTNERSHIP
C/O M. LEO STORCH MANAGEMENT CORP.
HOOKS VILLAGE SUITE 312
25 HOOKS LANE
BALTIMORE, MD. 21208
410-486-0800

2. SITE DATA:
ADDRESS OF PREMISES: 9980 LIBERTY ROAD
TAX ACCOUNT NO. 210000188
DEED REFERENCE: 7594/121
PLAT REFERENCE: LOT 2 RESUBDIVISION OF DEER PARK PLAZA (57/112)
SITE AREA: 9.88 AC.
FLOOR AREA: 108,719 SQ. FT.
FLOOR AREA RATIO: 0.28
MAXIMUM PERMITTED FLOOR: 4.0
BUILDING HEIGHT: 1 STORY

3. ZONED BL-CCC
EXISTING USE: COMMERCIAL
PROPOSED USE: CATERING HALL
AREA OF PROPOSED USE: 52,243 SQ. FT.

4. A CRP PLAN FOR THIS SITE WAS APPROVED 11/25/87. A REVISED CRP PLAN WAS APPROVED 10/11/88. A LIMITED EXEMPTION FOR TWO ADDITIONS TO THE SHOPPING CENTER WAS APPROVED BY THE DRC ON 12/6/85.

IN ZONING CASE NO. 85-6-A, A VARIANCE WAS APPROVED TO REDUCE THE REQUIRED PARKING BY 18 SPACES. ON 12/27/85.
IN ZONING CASE NO. 97-285-5PH, A PETITION FOR A SPECIAL HEARING TO PERMIT A RESTAURANT WITH LIVE ENTERTAINMENT WAS DISMISSED WITHOUT PREJUDICE.

5. OFF-STREET PARKING

TOTAL LEASABLE AREA - 108,877 SQ. FT.
REQUIRED PARKING
CATERING HALL - 6,400 SQ. FT. = 118 / 50 SQ. FT. = 128 SPACES
RESTAURANT - 3,720 SQ. FT. = 1 SP/50 SQ. FT. = 75 SPACES
RETAIL - 49,822 SQ. FT. = 1 SP/200 SQ. FT. = 250 SPACES
ALL OTHER COMMERCIAL (NON-RETAIL COMMERCIAL, DENTAL OFFICE, OTHER OFFICE, INSTITUTIONAL) - 48,035 SQ. FT. = 1 SP/300 SQ. FT. = 160 SPACES
BOWLING ALLEY - 40 LANE = 3 SP, A LANE = 120 SPACES
TOTAL REQUIRED - 741 SPACES
EXISTING PARKING - 778 SPACES

NOTE: PARKING SHOWN AS SEPARATE FOR THE CATERING HALL FOR PURPOSES OF THIS SPECIAL EXCEPTION. HOWEVER, THIS DOES NOT LIMIT USE BY PATRONS OF THE CATERING HALL TO THESE SPACES.

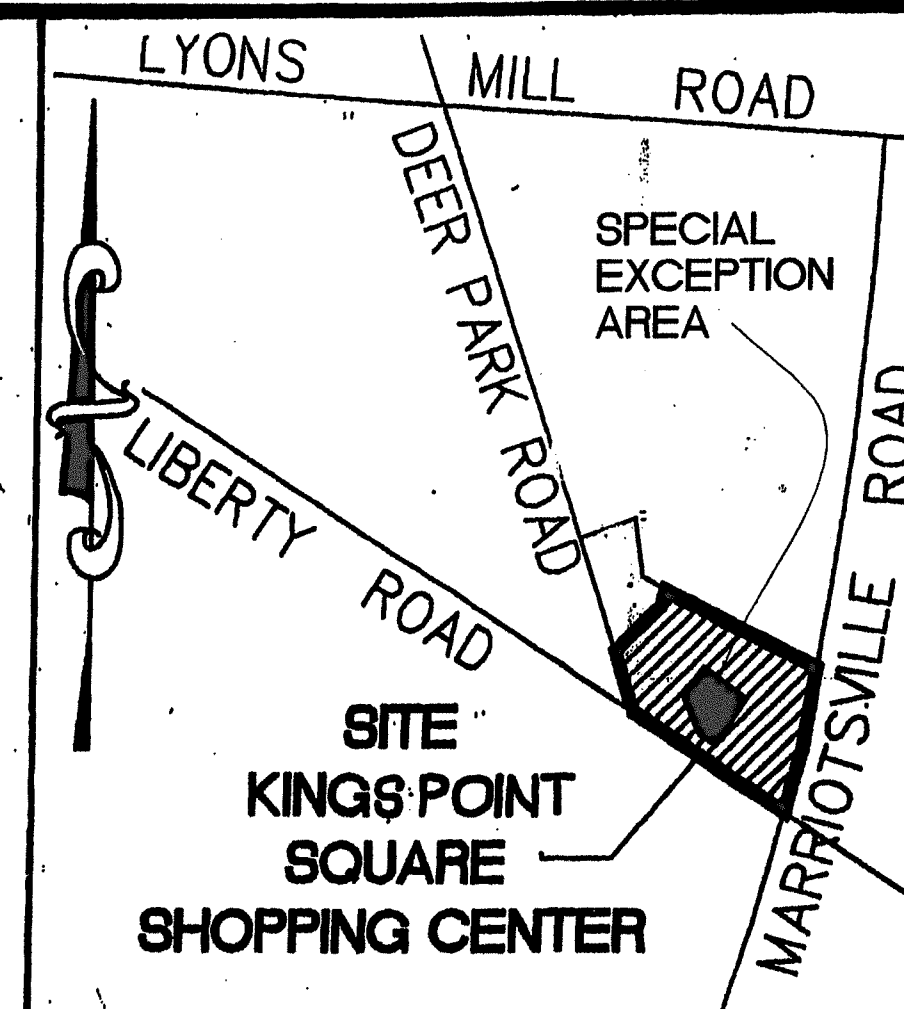
6. AMENITY OPEN SPACE
REQUIRED (GROSS FLOOR AREA X 0.2) = 21,744 SQ. FT.
EXISTING
INTERIOR AND SIDEWALK: 27,500 SQ. FT.
PARKING LOT PLANTING AREAS: 47,500 SQ. FT.

7. PREVIOUS COMMERCIAL PERMITS: NONE ON FILE FOR THIS ADDRESS.

8. THIS SITE IS NOT IN A CHESAPEAKE BAY CRITICAL AREA, 100 YEARS FLOODPLAIN OR HISTORIC DISTRICT AND HAS NO OUTSTANDING ZONING VIOLATIONS.

ZONING REQUEST:

SPECIAL EXCEPTION FOR A CATERING HALL PURSUANT TO SECTION 230.13 OF THE BCZ.



VICINITY MAP

SCALE: 1"=1000'

SINGLE-FAMILY RESIDENTIAL

RAYTON ROAD

SINGLE-FAMILY RESIDENTIAL

D.R.-5.5

BL-CCC

SHOPPING-CENTER

DEER PARK ASSOCIATES

DEER PARK ROAD

DEER PARK ROAD

DEER PARK ROAD

DEER PARK ROAD

DEER PARK ROAD

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DEER PARK ROAD

APARTMENTS
DEER PARK ASSOCIATES

D.R.-16

BL-CCC

D.R.-16

BL-CCC

CERVIDAE LANE

8 57' 58" 20" E

764.42'

S 65° 06' 30" E 550' 32" 02" E
83.31' 1725'

D/U EASMT.

EX. 8' FIRE SERVICE

EX. 4' W

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EX. 36' 5" D

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KINGS POINT SQUARE

FUTURE PROPOSED EXPANSION

PROPOSED CANOPY (10' x 24')

PROPOSED CONC. WALK

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PARKING AREA: 128 SPACES

SPECIAL EXCEPTION AREA: 52,243 SQ. FT. 120 AC.

EX. LIGHT POLE (17' H)

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EXIST. TRAFFIC LIGHT

LIBERTY ROAD

ROAD

7581 FT. FROM C. OF MARIOTTVILLE RD.

SINGLE-FAMILY RESIDENTIAL
PLAT 4/86
HERNWOOD

D.R.-3.5

BL-CCC

GAS STATION

PLAN TO ACCOMPANY SPECIAL EXCEPTION

PETITIONER'S

EXHIBIT NO. 2

KINGS POINT SQUARE
SHOPPING CENTER

4th. COUNCIL DISTRICT

2ND ELEC. DIST.

SCALE: 1"=50'

JOB # 950843

Colbert Matz Rosenfelt, Inc.

Engineers * Surveyors * Planners
2835 Smith Avenue, Suite G
Baltimore, Maryland 21209
Telephone: (410) 653-3838
Facsimile: (410) 653-7953

