

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

**BALTIMORE COUNTY BRANCH
OF THE NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF
COLORED PEOPLE, *et al.***

Plaintiffs,

-vs.-

**BALTIMORE COUNTY,
MARYLAND, *et al.***

Defendants.

Civil Action No. 21-cv-03232-LKG

STIPULATION

Plaintiffs Baltimore County Branch of the National Association for the Advancement of Colored People, League of Women Voters of Baltimore County, Common Cause Maryland, Charles Sydnor, Anthony Fugett, Dana Vickers Shelley, Danita Tolson, Sharon Blake, Gerald Morrison, and Niesha McCoy (collectively, “Plaintiffs”) and Defendant Baltimore County Board of Elections (“BOE”) hereby jointly request that the Court enter an Order in accordance with the following Stipulation of the parties:

1. Plaintiffs filed their Complaint with the Court on December 21, 2021 (Doc. No. 1).
2. BOE accepted service of the Complaint on December 30, 2021.
3. The date by which BOE must file and serve a responsive pleading to Plaintiffs’ Complaint is February 28, 2022.
4. Plaintiffs filed a Motion for Preliminary Injunction on January 19, 2022 (Doc. No. 28).

5. Through this Stipulation, and with the Court's approval, the parties hereby stipulate and agree as follows:

a. The date by which BOE must file and serve a responsive pleading to Plaintiffs' Complaint is extended;

b. BOE shall file a responsive pleading to Plaintiffs' Complaint on or before 30 days after the Court enters an Order on Plaintiff's Motion for Preliminary Injunction;

c. BOE shall not participate in the briefing or argument on Plaintiffs' Motion for Preliminary Injunction; and

d. Notwithstanding the forgoing, BOE agrees to act in compliance with any order entered on Plaintiffs' Motion for Preliminary Injunction.

6. In entering into this Stipulation, BOE expressly reserves all rights and defenses it may have to this action, including the right to file a motion to dismiss on any and all claims raised in the Complaint.

Dated: January 31, 2022

Respectfully and jointly submitted,

For Plaintiffs

For Defendant Baltimore County Board of Elections

/s/ Andrew D. Freeman (w/ Authority)

Andrew D. Freeman (Bar #03867)

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IT IS SO ORDERED this ____ day of
_____ 2022.

The Honorable Lydia Kay Griggsby
United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **31st** day of **January, 2022**, I caused a true and correct copy of the foregoing Stipulation to be served upon counsel of record via the Court' s CM/ECF system.

Dated: January 31, 2022

/s/ Aaron A. Nichols

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