

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

D. GREGORY SINGLETON, *et al* :
Plaintiff :

V. : CASE NUMBER: 02-C-03-091246

HILLSMERE SHORES IMPROVEMENT:
ASSOCIATION, INCORPORATED, *et al*
Defendants :

* * * * *

RESPONSE – JOINING MOTION RAISING PRELIMINARY OBJECTIONS

1. I agree with the Motion Raising Preliminary Objections – Motion to Strike, as amended by the Amended Motion Raising Preliminary Objections – Motion to Dismiss, filed by the **HILLSMERE SHORES IMPROVEMENT ASSOCIATION, INC.**, I also make the same Motions under Rule 2-322(e) of the Maryland Rules of Procedure, by incorporating it here by reference; and
2. I claim the automatic extension of time to file an Answer, until fifteen (15) days after the Court rules on said Motion Raising Preliminary Objections – Motion to Strike; and
3. I claim the automatic extension to file a Response to the Motion for Summary Judgment until the extended time for filing my initial pleading; and
4. I claim the automatic extension to file responses to any Discovery until fifteen (15) days after the time for my initial pleading to the Complaint is due pursuant to Rule 2-321(c).

Signed: _____

Print Name: _____

Address: _____

Telephone: _____

Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _____ day of _____, 2006, I served the foregoing Response – Joining Motion Raising Preliminary Objections, by causing it to be mailed to:

William M. Simmons, Esquire
20 West Street, P.O. Box 2266
Annapolis, Maryland 21404-2266
Attorney for Plaintiffs

And

Michael J. Ragland, Sr.
7 King Charles Place
Annapolis, Maryland 21401-2622
Attorneys for Defendant H.S.I.A.

Signed