

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

D. GREGORY SINGLETON, *et al* :

Plaintiff :

V. : CASE #: 02-C-03-091246 RP

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

Defendants :

* * * * *

MOTION FOR CONTINUANCE


COMES NOW the Defendant, **HILLSMERE SHORES IMPROVEMENT ASSOCIATION, INC.**, by and through its attorneys, **MICHAEL J. RAGLAND, SR.**, and requests a continuance of the Complex Motions Hearing currently scheduled for 1:31 P.M. on Monday, October 2, 2006, and in support thereof says as follows:

1. The Defendant, **HILLSMERE SHORES IMPROVEMENT ASSOCIATION, INC.**, by and through its attorneys, **MICHAEL J. RAGLAND, SR.** and the law firm of **BELL AND RAGLAND, P.A.**, filed a Motion Raising Preliminary Objections – Motion to Strike in these proceedings; and
2. On June 28, 2006 the Assignment Office scheduled a Complex Motion Hearing in the above entitled matter for October 2, 2006 at 1:31 PM and mailed notice thereof to all parties; and
3. On July 5, 2006 Counsel for this Defendant received a copy of said Notice; and
4. That Counsel for the Defendant, **HILLSMERE SHORES IMPROVEMENT ASSOCIATION, INC.**, is scheduled to leave the country on September 30, 2006 and will not return to this country until October 7, 2007 and will not return to the Annapolis area until October 8, 2006; and
5. The plans were part of a family group cruise that was arranged in March 2006 and Counsel committed to the trip in April 2006; and

6. That Counsel can not now change those plans which were planned and paid for prior to the hearing date being announced; and
7. Counsel and the attorney for the Plaintiffs have conferred with the Assignment Office and are prepared to attend the hearing on October 16, 2006 at 9:00 A.M., which is available according to the Assignment Office.

WHEREFORE, this Defendant respectfully prays this Honorable Court to continue the Complex Motions Hearing from 1:31 PM on October 2, 2006 until 9:00 AM on October 16, 2006.

BELL AND RAGLAND, P.A.

By: 
MICHAEL J. RAGLAND, SR.
7 King Charles Place
Annapolis, Maryland 21401-2622
410-267-5944 (Fax) 410-269-5999
Attorney for Defendant HSIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ____ day of July, 2006, I mailed via the United States mail, postage pre-paid, a copy of the foregoing Motion for Continuance to:

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

And

All Additional Named Defendants at their last known address

Bell and Ragland, P.A.
7 King Charles Place
Annapolis, MD 21401
410-267-5944

MICHAEL J. RAGLAND, SR.

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

D. GREGORY SINGLETON, *et al* :

Plaintiff :

V. : CASE NUMBER: C-2003-91401 QT

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

Defendants :

* * * * *

ORDER

UPON CONSIDERATION of the Motion for Continuance filed in the above entitled matter, it is this _____ day of _____, 2006, by the Circuit Court for Anne Arundel County, Maryland:

ORDERED that the Complex Motions Hearing scheduled in the above entitled matter for 1:31 PM on October 2, 2006 shall be and is hereby continued and reset to 9:00 AM on Monday, October 16, 2006.

JUDGE