

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

ANNE ARUNDEL COUNTY, MARYLAND,

Plaintiff,

v.

BP P.L.C.; *et al.*,

Defendants.

CASE NO.: 21-cv-01323-SAG

**JOINT PROPOSAL AND [PROPOSED] ORDER REGARDING BRIEFING SCHEDULE  
ON MOTION FOR STAY AND MOTION FOR REMAND<sup>1</sup>**

Pursuant to the Court's April 27, 2022 Letter Order, Dkt. 110, Plaintiff and Defendants (the "Parties") jointly propose a motions briefing schedule for (1) briefing on Defendants' forthcoming motion to stay proceedings pending resolution of the pending petition for rehearing *en banc* in the Fourth Circuit and, if necessary, proceedings before the U.S. Supreme Court in *Mayor & City Council of Baltimore v. BP P.L.C.*, No. 19-1644 (4th Cir.); and (2) further briefing on Plaintiff's motion to remand. Having met and conferred and come to an agreement, the Parties jointly propose the following briefing schedule:

1. Defendants' Motion to Stay:
  - a. Defendants' Motion to Stay shall be filed by May 25, 2022;
  - b. Plaintiff's Opposition shall be filed by June 8, 2022;
  - c. Defendants' Reply shall be filed by June 22, 2022.

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<sup>1</sup> This submission does not operate as an admission of any factual allegation or legal conclusion and is submitted subject to and without waiver of any right, defense, affirmative defense, claim, or objection, including lack of subject matter jurisdiction, or lack of personal jurisdiction, insufficient process, or insufficient service of process.

2. Plaintiff's Motion to Remand:

- a. Plaintiff's Memorandum of Points and Authorities in Support of Motion to Remand shall be filed by July 15, 2022;
- b. Defendants shall coordinate their efforts to file a single Consolidated Opposition to Plaintiff's Motion to Remand, which shall be filed by August 16, 2022;<sup>2</sup>
- c. Plaintiff's Reply in support of Motion to Remand shall be due by September 6, 2022.

Dated: May 11, 2022

Respectfully submitted,

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<sup>2</sup> Defendants reserve the right to seek additional pages for their Opposition after reviewing Plaintiff's Memorandum to the extent they believe additional pages are necessary and appropriate.

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SO ORDERED.

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Stephanie A. Gallagher  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 11th day of May 2022, the foregoing document was filed through the ECF system and was thereby served on the registered participants identified on the Notice of Electronic Filing.

*/s/ Ty Kelly Cronin*

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