

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

**PLAINTIFF’S STATEMENT IN RESPONSE TO PAPERLESS ORDER, DKT. NO. 147**

Plaintiff Anne Arundel County writes in response to the Court’s Order of September 27, 2022, Dkt. No. 147. The Court stated that it “intends to issue an opinion later this week granting the [Plaintiff’s] motion to remand this case to state court,” and asked whether the parties intended to seek a temporary stay of execution of any such order. *See id.* The County believes that if the Court grants the motion to remand that no stay is warranted and the order should issue without further delay. *See Mayor & City Council of Baltimore v. BP P.L.C., No. CV ELH-18-2357*, 2019 WL 3464667 (D. Md. July 31, 2019) (denying stay of remand order pending appeal); *Mayor & City Council of Baltimore v. BP P.L.C., No. 19-1644*, Dkt. 116 (4th Cir. Oct. 1, 2019) (same); *BP P.L.C. v. Mayor & City Council of Baltimore*, 140 S.Ct. 449 (2019) (same). The County does not seek or consent to any stay. If any Defendant seeks a stay of remand pending appeal, that request should be subject to expedited briefing or summarily denied.

Dated: September 28, 2022

Respectfully submitted,

**ANNE ARUNDEL COUNTY  
OFFICE OF LAW**

/s/ Gregory J. Swain

Gregory J. Swain (Bar No. 11793)  
County Attorney  
Hamilton F. Tyler (Bar No. 09423)

Deputy County Attorney  
2660 Riva Road, 4th Floor  
Tel: (410) 222-7888  
Fax: (410) 222-7835  
Email: gregory.swain@aacounty.org  
htyler@aacounty.org

**SHER EDLING LLP**

Victor M. Sher (*pro hac vice*)  
Matthew K. Edling (*pro hac vice*)  
Martin D. Quiñones (*pro hac vice*)  
100 Montgomery St., Ste. 1410  
San Francisco, CA 94104  
Tel: (628) 231-2500  
Fax: (628) 231-2929  
Email: vic@sheredling.com  
matt@sheredling.com  
marty@sheredling.com

*Attorneys for Plaintiff Anne Arundel County, Maryland*