

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

CITY OF ANNAPOLIS, MARYLAND,

Plaintiff,

v.

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

Defendants.

CASE NO.: 21-cv-00772-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. 148, 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 Amended Memorandum of Points and Authorities in support of its 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,

/s/ D. Michael Lyles

D. Michael Lyles  
City Attorney, #13120  
Joel A. Braithwaite  
Assistant City Attorney, #28081  
CITY OF ANNAPOLIS  
OFFICE OF LAW  
160 Duke of Gloucester Street  
Annapolis, Maryland 21401  
T: 410-263-7954  
F: 410-268-3916  
dmlyles@annapolis.gov  
jabraithwaite@annapolis.gov

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

/s/ Ty Kelly Cronin

Ty Kelly Cronin (Bar No. 27166)  
Alison C. Schurick (Bar No. 19770)  
Kyle S. Kushner (Bar No. 20305)  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ P.C.  
100 Light Street, 19th Floor  
Baltimore, MD 21202  
Telephone: (410) 862-1049  
Facsimile: (410) 547-0699  
Email: tykelly@bakerdonelson.com  
Email: aschurick@bakerdonelson.com  
Email: kskushner@bakerdonelson.com

Theodore J. Boutrous, Jr., (*pro hac vice*  
forthcoming)  
William E. Thomson, (*pro hac vice*  
forthcoming)  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: 213.229.7000  
Facsimile: 213.229.7520  
tboutrous@gibsondunn.com  
wthomson@gibsondunn.com

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

Andrea E. Neuman, (*pro hac vice*  
forthcoming)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: 212.351.4000  
Facsimile: 212.351.4035  
aneuman@gibsondunn.com

Thomas G. Hungar, (*pro hac vice*  
forthcoming)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.,  
Washington, DC 20036  
Telephone: 202.955.8500  
Facsimile: 202.467.0539  
thungar@gibsondunn.com

Joshua D. Dick, (*pro hac vice* forthcoming)  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306  
jdick@gibsondunn.com

*Attorneys for Defendants Chevron  
Corporation and Chevron U.S.A. Inc.*

/s/ Martha Thomsen  
Martha Thomsen (Bar No. 18560)  
Megan H. Berge (*pro hac vice*)  
BAKER BOTTS LLP  
700 K Street, N.W.  
Washington, D.C. 20001-5692  
Telephone: (202) 639-7863  
Facsimile: (202) 508-9329  
Email: martha.thomsen@bakerbotts.com  
Email: megan.berge@bakerbotts.com

J. Scott Janoe (*pro hac vice*)  
BAKER BOTTS LLP  
910 Louisiana Street  
Houston, Texas 77002  
Telephone: (713) 229-1553

Facsimile: (713) 229-7953  
Email: scott.janoe@bakerbotts.com

*Attorneys for Defendant Hess Corp.*

/s/ Tracy A. Roman

Tracy A. Roman, Bar Number 11245  
Kathleen Taylor Sooy (*pro hac vice*)  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: (202) 624-2500  
Fax: (202) 628-5116  
troman@crowell.com  
ksooy@crowell.com

Honor R. Costello (*pro hac vice*)  
CROWELL & MORING LLP  
590 Madison Avenue, 20<sup>th</sup> Fl.  
New York, NY 10022  
Tel.: (212) 223-4000  
Fax: (212) 223-4134  
hcostello@crowell.com

*Attorneys for CONSOL Energy Inc. and  
CONSOL Marine Terminals LLC*

/s/ Daniella A. Einik

JONES DAY  
Noel J. Francisco (*application for admission  
approved; registered for admission  
ceremony*)  
Daniella A. Einik (Bar No. 20245)  
David M. Morrell (*pro hac vice*)  
J. Benjamin Aguiñaga (*pro hac vice*)  
51 Louisiana Avenue, N.W.  
Washington, DC 20001  
Telephone: (202) 879-3939  
Facsimile: (202) 626-1700  
E-mail: njfrancisco@jonesday.com  
E-mail: deinik@jonesday.com  
E-mail: dmorrell@jonesday.com  
E-mail: jbaguinaga@jonesday.com

David C. Kiernan (*pro hac vice*)  
555 California Street, 26th Floor  
San Francisco, CA 94104  
Telephone: (415) 626-3939  
Facsimile: (415) 875-5700  
E-mail: dkiernan@jonesday.com

*Attorneys for Defendant CNX Resources Corp.*

/s/ Mark S. Saudek

Mark S. Saudek  
GALLAGHER EVELIUS & JONES LLP  
218 North Charles Street, Suite 400  
Baltimore, Maryland 21201  
Ph.: (410) 347-1365  
Fax: (410) 468-2786  
msaudek@gejlaw.com

Robert Reznick (admitted *pro hac vice*)  
ORRICK, HERRINGTON & SUTCLIFFE,  
LLP  
1152 15th Street NW  
Washington, DC 20005  
Tel.: (202) 339-8600  
Fax: (202) 339-8500  
rreznick@orrick.com

James Stengel (admitted *pro hac vice*)  
ORRICK, HERRINGTON & SUTCLIFFE,  
LLP  
51 West 52nd Street  
New York, New York 10019-6142  
Tel.: (212) 506-5000  
Fax: (212) 506-5151  
jstengel@orrick.com

Catherine Y. Lui (admitted *pro hac vice*)  
ORRICK, HERRINGTON & SUTCLIFFE,  
LLP  
405 Howard Street  
San Francisco, CA 94105-2669  
Tel: (415) 773-5571  
Fax: (415) 773-5759  
clui@orrick.com

Attorneys for Defendants Marathon Oil  
Corporation and Marathon Oil Company

/s/ Craig A. Thompson

Craig A. Thompson (CPF No. 9512140211)  
VENABLE LLP  
750 East Pratt Street, Suite 900  
Baltimore, MD 21202  
Telephone: (410) 244-7605  
Facsimile: (410) 244-7742  
Email: cathompson@venable.com

Theodore V. Wells, Jr. (*pro hac vice*  
forthcoming)  
Daniel J. Toal (*pro hac vice* forthcoming)  
Yahonnes Cleary (*pro hac vice* forthcoming)  
Caitlin E. Grusauskas (*pro hac vice*  
forthcoming)  
PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Telephone: (212) 373-3089  
Facsimile: (212) 492-0089  
Email: twells@paulweiss.com  
Email: dtoal@paulweiss.com  
Email: ycleary@paulweiss.com  
Email: cgrusauskas@paulweiss.com

*Attorneys for Defendants EXXON MOBIL  
CORPORATION and EXXONMOBIL  
OIL CORPORATION*

/s/ Perie Reiko Koyama

Perie Reiko Koyama (CPF No. 1612130346)  
PKoyama@huntonak.com  
HUNTON ANDREWS KURTH LLP  
2200 Pennsylvania Avenue, NW  
Washington, DC 20037  
Telephone: (202) 955-1500  
Facsimile: (202) 778-2201

Shannon S. Broome (*pro hac vice*)  
SBroome@HuntonAK.com  
Ann Marie Mortimer (*pro hac vice*)  
AMortimer@HuntonAK.com  
HUNTON ANDREWS KURTH LLP  
50 California Street, Suite 1700  
San Francisco, CA 94111  
Telephone: (415) 975-3700  
Facsimile: (415) 975-3701

Shawn Patrick Regan (*pro hac vice*)  
SRegan@HuntonAK.com  
HUNTON ANDREWS KURTH LLP  
200 Park Avenue, 52<sup>nd</sup> Floor  
New York, NY 10166  
Telephone: (212) 309-1000  
Facsimile: (212) 309-1100

*Attorneys for Defendants MARATHON  
PETROLEUM CORPORATION and  
SPEEDWAY LLC*

/s/ David B. Hamilton  
David B. Hamilton (Bar No. 04308)  
Sarah E. Meyer (Bar No. 29448)  
Hillary V. Colonna (Bar No. 19704)  
WOMBLE BOND DICKINSON (US) LLP  
100 Light Street, 26<sup>th</sup> Floor  
Baltimore, MD 21202  
Telephone: (410) 545-5800  
Facsimile: (410) 545-5801  
Email: david.hamilton@wbd-us.com  
Email: sarah.meyer@wbd-us.com  
Email: hillary.colonna@wbd-us.com

Steven M. Bauer (*pro hac vice*)  
Margaret A. Tough (*pro hac vice*)  
Katherine A. Rouse (*pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111-6538  
Telephone: (415) 391-0600  
Facsimile: (415) 395-8095  
Email: steven.bauer@lw.com  
Email: margaret.tough@lw.com  
Email: katherine.rouse@lw.com

Matthew J. Peters (Bar No. 21902)  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, DC 20004-1304  
Telephone: (202) 637-2200  
Facsimile: (202) 637-2201  
Email: matthew.peters@lw.com

Jameson R. Jones (*pro hac vice*)  
Daniel R. Brody (*pro hac vice*)  
BARTLIT BECK LLP  
1801 Wewatta Street, Suite 1200  
Denver, CO 80202  
Telephone: (303) 592-3100  
Facsimile: (303) 592-3140  
Email: jameson.jones@bartlit-beck.com  
E-mail: dan.brody@bartlit-beck.com

*Attorneys for Defendants ConocoPhillips and  
ConocoPhillips Company*

/s/ Matthew J. Peters  
Matthew J. Peters (Bar No. 21902)  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, DC 20004-1304  
Telephone: (202) 637-2200  
Facsimile: (202) 637-2201  
Email: matthew.peters@lw.com

Steven M. Bauer (*pro hac vice*)  
Margaret A. Tough (*pro hac vice*)  
Katherine A. Rouse (*pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111-6538  
Telephone: (415) 391-0600  
Facsimile: (415) 395-8095  
Email: steven.bauer@lw.com  
Email: margaret.tough@lw.com  
Email: katherine.rouse@lw.com

*Attorneys for Defendants Phillips 66 and  
Phillips 66 Company*



/s/ Ava E. Lias-Booker

Ava E. Lias-Booker  
McGuireWoods LLP  
500 E. Pratt Street, Suite 1000  
Baltimore, Maryland 21202-3169  
(410) 659-4400 Office  
(410) 659-4599 Fax  
alias-booker@mcguirewoods.com

Melissa O. Martinez  
McGuireWoods LLP  
500 E. Pratt Street, Suite 1000  
Baltimore, Maryland 21202-3169  
(410) 659-4400 Office  
(410) 659-4599 Fax  
mmartinez@mcguirewoods.com

Andrew G. McBride (*pro hac vice*  
forthcoming)  
McGuireWoods LLP  
888 16th Street N.W., Suite 500  
Black Lives Matter Plaza  
Washington, DC 20006-4103  
(202) 857-2487 Office  
(202) 828-2987 Fax  
amcbride@mcguirewoods.com

Brian D. Schmalzbach (*pro hac vice*  
forthcoming)  
McGuireWoods LLP  
800 East Canal Street  
Richmond, VA 23219  
(804) 775-4746 Office  
(804) 698-2304 Fax  
bschmalzbach@mcguirewoods.com

*Attorneys for American Petroleum Institute*

/s/ James M. Webster, III

David C. Frederick (*pro hac vice*)  
James M. Webster, III (Bar No. 23376)  
Daniel S. Severson (*pro hac vice*)  
Grace W. Knofczynski (*pro hac vice*)

KELLOGG, HANSEN, TODD, FIGEL  
& FREDERICK, P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, D.C. 20036  
Tel.: (202) 326-7900  
Fax: (202) 326-7999  
Email: dfrederick@kellogghansen.com  
Email: jwebster@kellogghansen.com  
Email: dseverson@kellogghansen.com  
Email: gknofczynski@kellogghansen.com

*Attorneys for Defendants Shell plc (f/k/a  
Royal Dutch Shell plc) and Shell USA, Inc.  
(f/k/a Shell Oil Company)*

/s/ Thomas K. Prevas  
Thomas K. Prevas (Bar No. 29452)  
Michelle N. Lipkowitz (Bar No. 27188)  
SAUL EWING ARNSTEIN & LEHR LLP  
Baltimore, Maryland 21202-3133  
Telephone: (410) 332-8683  
Facsimile (410) 332-8123  
Email: thomas.prevas@saul.com  
Email: michelle.lipkowitz@saul.com  
Attorneys for Defendants CROWN  
CENTRAL  
LLC, CROWN CENTRAL NEW  
HOLDINGS LLC and ROSEMORE, INC.

•  
/s/ Warren N. Weaver  
Warren N. Weaver (CPF No. 8212010510)  
WHITEFORD TAYLOR &  
PRESTON LLP  
7 Saint Paul Street., Suite 1400  
Baltimore, MD 21202  
Telephone: (410) 347-8757  
Facsimile: (410) 223-4177  
Email: wwweaver@wtplaw.com

EIMER STAHL LLP  
Nathan P. Eimer, (*pro hac vice* forthcoming)  
Pamela R. Hanebutt, (*pro hac vice*  
forthcoming)  
Lisa S. Meyer, (*pro hac vice* forthcoming)

224 South Michigan Avenue, Suite 1100  
Chicago, IL 60604  
Tel: (312) 660-7600  
neimer@eimerstahl.com  
phanebutt@eimerstahl.com  
lmeyer@eimerstahl.com

Robert E. Dunn, (*pro hac vice* forthcoming)  
99 S. Almaden Blvd. Suite 642  
San Jose, CA 95113  
Tel: (408) 889-1690  
rdunn@eimerstahl.com

*Attorneys for Defendant CITGO Petroleum Corporation*

/s/ John B. Isbister  
John B. Isbister (Bar No. 00639)  
Jaime W. Luse (Bar No. 27394)  
TYDINGS & ROSENBERG LLP  
One East Pratt Street, Suite 901  
Baltimore, MD 21202  
jisbister@Tydings.com  
jluse@Tydings.com  
Tel: 410-752-9700  
Fax: 410-727-5460

ARNOLD & PORTER KAYE  
SCHOLER LLP  
Nancy Milburn, (*pro hac vice*)  
nancy.milburn@arnoldporter.com  
Diana Reiter, (*pro hac vice*)  
diana.reiter@arnoldporter.com  
250 West 55th Street  
New York, NY 10019-9710  
Telephone: (212) 836-8000  
Facsimile: (212) 836-8689

Matthew T. Heartney, (*pro hac vice*)  
matthew.heartney@arnoldporter.com  
John D. Lombardo, (*pro hac vice*)  
john.lombardo@arnoldporter.com  
777 South Figueroa Street, 44th Floor  
Los Angeles, CA 90017-5844  
Telephone: (213) 243-4000

Facsimile: (213) 243-4199

Jonathan W. Hughes, (*pro hac vice*)  
jonathan.hughes@arnoldporter.com  
Three Embarcadero Center, 10th Floor  
San Francisco, CA 94111-4024  
Telephone: (415) 471-3156  
Facsimile: (415) 471-3400

*Attorneys for BP plc, BP America Inc., and  
BP Products North America Inc.*

SO ORDERED.

Dated: \_\_\_\_\_

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Stephanie A. Gallagher  
United States District Judge

**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* \_\_\_\_\_

Ty Kelly Cronin