

In the
Maryland Circuit Court
for
Anne Arundel County

Matthew O'Reilly

Plaintiff, Pro Se

Case No.: C-02-CV-24-000546

v.

Waste Management, *et al.*

Defendants

RESPONSE TO MOTION TO SET TIME TO RESPOND TO
VERIFIED COMPLAINT

Defendants Tsottles and Palmer have requested a 16-day extension to file a response to the Verified Complaint in this case.

As offered previously, I will not oppose the extension of time to respond provided WM Defendants agree to guarantee that they will file an answer to the Verified Complaint.

Mr. Gamble declined to accept the offer due to a concern that some defenses would be waived or forfeited if they are filed after an answer.

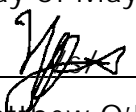
To address this concern: I will not oppose this extension if WM Defendants agree to file an answer immediately following any procedural motions, or an affidavit admitting to the true facts in the Verified Complaint coincident with whatever procedural motions are filed. This would preserve WM Defendants' procedural posture while maximizing judicial economy.

Otherwise, I respectfully request that the Court deny WM Defendants' Motion to Set Time for the following reasons:

1. All parties have been on notice of the contents of the Verified Complaint, which is functionally identical to the amended complaint filed in Federal Court, since July 2020.
2. WM Defendants have been represented in this action by Mr. Gamble's firm since 2018, and each WM Defendant participated in the Federal suit.
3. Mr. Gamble, counsel for all the WM Defendants, was provided with a copy of the Verified Complaint through MDEC on 4 March 2024.
4. In addition to already having been provided sufficient time to respond by the Maryland Rules, Msrs. Tsottles and Palmer are represented by counsel, which provides them a massive advantage in litigation, and they are in no way unfairly prejudiced by being required to respond in the time allotted.

For these reasons, I humbly request that the Court require defendants Tsottles and Palmer to file their responses by the original deadline, unless the WM Defendants agree to file an answer or admissions before or coincident with any procedural responses, and for any other relief the Court finds just or appropriate.

Respectfully submitted this 17th day Of May, 2024.


Matthew O'Reilly
Plaintiff, Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May, 2024, a copy of the foregoing was served via first class mail, postage prepaid, to:

Geoffrey M. Gamble
SAUL EWING LLP
1001 Fleet Street, 9th Floor
Baltimore, Maryland 21202
(p) 410-332-8848
(f) 410-332-8115
geoff.gamble@saul.com

Nicole E. Chammas
Saul Ewing LLP
1919 Pennsylvania Avenue, NW Suite 550
Washington, DC 20006
(202) 295-6613
(202) 337-6065 (fax)
nicole.chammas@saul.com

*Counsel for Defendants Waste Management, Inc.,
Adam Tsottles, and Roy Palmer*



Matthew O'Reilly
Plaintiff, Pro Se