

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.



CERTIFICATE OF SERVICE

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

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*Counsel for Defendants Waste Management, Inc.,  
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/s/  
Matthew O'Reilly  
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