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June 16, 2008

VIA E-FILING

The Honorable Anne K. Quinlan
Acting Secretary
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

**RE: *The Kansas City Southern Railway Company – Abandonment Petition
for Exemption – Line in Warren County, MS
Docket No. AB-103 (Sub-No. 21X)***

Dear Acting Secretary Quinlan:

The Kansas City Southern Railway Company ("KCSR"), petitioner in the above-captioned proceeding, hereby urgently reiterates its May 28, 2008 request that Chairman Nottingham immediately lift the "housekeeping stay" issued in this matter on May 21 - now nearly a month ago - and set an immediate deadline for Raymond B. English and James Riffin (together, "Offerors") to close on their purchase of the rail property involved in this case. Allowing the stay to remain in place risks significantly increasing KCSR's damages from Offerors' default, and serves no useful purpose.

Because the Board's decision setting the terms and conditions was not rejected, and indeed was affirmatively accepted, Offerors are required to close on the transaction. At this time, however, it appears extremely unlikely that Offerors will fulfill their legal obligation to close. Although the statute does not allow one to do so, Mr. English has attempted to repudiate his obligation and it will likely require a Board and court order to force specific performance. As for Mr. Riffin, KCSR has learned that Mr. Riffin was jailed on June 13 for contempt of court by Judge Susan Souder of the Circuit Court of Baltimore County, Maryland. The last entry on the attached docket sheet for Maryland Department of The Environment and Baltimore County, MD v. James Riffin and The Six M Co., Civil Case No. 03-CO-4008920, printed from a Maryland state court website, states in pertinent part:

Baker & Miller PLLC
Honorable Anne K. Quinlan
June 16, 2008
Page 2

Defendant [*i.e.*, Mr. Riffin] found in contempt of Court Order. Defendant remanded to Baltimore C[o]unty Detention Center no bail. Plaintiff's Motion for Sanctions Granted in part.

KCSR was informed subsequent to the court's action that Mr. Riffin was granted the right to post \$250,000 cash bail. Whether he has done so is not known to KCSR. Given this development, it appears that a Board and court order may also be required to force Mr. Riffin to close, assuming Mr. Riffin could even do so.

Prolonging the invalid "housekeeping stay" in this matter serves no purpose; rather, it merely encourages further untimely and unwarranted filings, such as Mr. Riffin's June 9 filing in this matter, and encourages further manipulation of the Board's procedures and parties' obligations under 49 U.S.C. §10904. KCSR respectfully and urgently requests that Chairman Nottingham lift the "housekeeping stay" in this matter immediately and set an immediate deadline for closing by Offerors. If Offerors fail to close on that deadline, the Board should make it clear that KCSR's abandonment authorization will be fully effective, subject to issuance of a notice of interim trail use, and that Offerors are liable for any and all damages that KCSR may suffer due to Offerors' breach of their statutory obligations.

Respectfully submitted,



William A. Mathis

Enclosures
cc: Partics of Record

Circuit Court of Maryland

[Go Back](#)**Case Information**Court System: **Circuit Court for Baltimore County - Civil System**Case Number: **03C04008920**Title: **Maryland Dept Of The Environment, et al vs Riffin, et al**Case Type: **Other Civil** Filing Date: **08/25/2004**Case Status: **Reopened/Active**

Case Disposition: Disposition Date:

Plaintiff/Petitioner Information*(Each Plaintiff/Petitioner is displayed below)*Party Type: **Plaintiff** Party No.: **2**Business or
Organization Name: **Baltimore County Maryland**Address: **401 Washington Avenue**City: **Baltimore** State: **MD** Zip Code: **21204****Attorney(s) for the Plaintiff/Petitioner**Name: **Loskot, Jr, C. Robert**Practice Name: **Assistant County Attorney**Address: **400 Washington Avenue****2nd Floor, Room 219**City: **Towson** State: **MD** Zip Code: **21204**Name: **Mayhew, Esq, Paul McLane**Practice Name: **Assistant County Attorney**Address: **Old Courthouse, 2nd Floor****400 Washington Avenue**City: **Towson** State: **MD** Zip Code: **21204**Name: **Snyder, Esq, Adam D**Practice Name: **Maryland Dept Of The Environment**Address: **Asst Attorney General****1800 Washington Blvd**City: **Baltimore** State: **MD** Zip Code: **21230**Name: **Barmach, Esq, Jeffrey A**Practice Name: **Council, Baradel, Kosmarl & Nolan**Address: **125 West Street 4th Fl.****P.O. Box 2289**City: **Annapolis** State: **MD** Zip Code: **21404-2289**Name: **Rosenblatt, Esq, Adam M**Practice Name: **Assistant County Attorney**Address: **400 Washington Ave****Second Floor**City: **Towson** State: **MD** Zip Code: **21204**Party Type: **Plaintiff** Party No.: **1**Business or
Organization Name: **Maryland Dept Of The Environment**Address: **1800 Washington Boulevard**City: **Baltimore** State: **MD** Zip Code: **21230**

Attorney(s) for the Plaintiff/Petitioner

Name: Loskot, Jr, C. Robert
Practice Name: Assistant County Attorney
Address: 400 Washington Avenue
2nd Floor, Room 219
City: Towson State: MD Zip Code: 21204
Name: Snyder, Esq, Adam D
Practice Name: Maryland Dept Of The Environment
Address: Asst Attorney General
1600 Washington Blvd
City: Baltimore State: MD Zip Code: 21230
Name: Barmach, Esq, Jeffrey A
Practice Name: Council, Baradel, Kosmerl & Nolan
Address: 125 West Street 4th FL
P.O. Box 2289
City: Annapolis State: MD Zip Code: 21404-2289

Defendant/Respondent Information

(Each Defendant/Respondent is displayed below)

Party Type: Defendant Party No.: 1
Name: Riffin, James
Address: 1941 Greenspring Drive
City: Timonium State: MD Zip Code: 21093

Aliases Defendant/Respondent

Name: Northern Central Railroad The

Party Type: Defendant Party No.: 2
Business or
Organization Name: Six M Co The
Address: Slate Hill Road
City: Delta State: PA Zip Code: 17314
Address: 1940 Castleton Road
City: Darlington State: MD Zip Code: 21034

Attorney(s) for the Defendant/Respondent

Name: Roddy, Patrick H
Practice Name: Rifkin Livingston Levitan & Silver L L C
Address: 600 Washington Ave
Ste 305
City: Towson State: MD Zip Code: 21204

Court Scheduling Information

Event Type: Civil Non-Jury Trial Notice Date:
Event Date: 09/09/2004 Event Time: 09:30 AM
Result: Held/Concluded Result Date: 09/09/2004

Event Type: Motion Hearing (Civil) Notice Date: 10/19/2004
Event Date: 11/18/2004 Event Time: 09:30 AM
Result: Held/Concluded Result Date: 11/18/2004

Event Type: **Hearing: Show Cause** Notice Date:
Event Date: **10/12/2006** Event Time: **09:30 AM**
Result: **Postponed/Reset** Result Date: **09/28/2006**

Event Type: **Hearing: Show Cause** Notice Date:
Event Date: **11/15/2006** Event Time: **09:30 AM**
Result: **Held/Concluded** Result Date: **11/15/2006**

Event Type: **Hearing: Show Cause** Notice Date: **01/17/2007**
Event Date: **03/07/2007** Event Time: **09:30 AM**
Result: **Held/Concluded** Result Date: **03/07/2007**

Event Type: **Hearing: Show Cause** Notice Date:
Event Date: **12/14/2007** Event Time: **09:30 AM**
Result: **Held/Concluded** Result Date: **12/14/2007**

Event Type: **Hearing: Show Cause** Notice Date:
Event Date: **06/13/2008** Event Time: **09:30 AM**
Result: **Held/Concluded** Result Date: **06/13/2008**

Document Tracking

(Each Document listed. Documents are listed in Document No./Sequence No. order)

Doc No./Seq No.: **1/0**

File Date: **08/25/2004** Close Date: **09/02/2004** Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: **Complaint for Injunctive Relief and Civil Penalties**
Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County
Maryland

Doc No./Seq No.: **2/0**

File Date: **08/25/2004** Close Date: **08/25/2004** Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: **Writ of Summons - Civil**

Doc No./Seq No.: **3/0**

File Date: **08/25/2004** Close Date: **08/25/2004** Decision:

Party Type: **Defendant** Party No.: **2**

Document Name: **Writ of Summons - Civil**

Doc No./Seq No.: **4/0**

File Date: **08/30/2004** Close Date: **08/30/2004** Decision:

Document Name: **Hearing Notice**

Doc No./Seq No.: **5/0**

File Date: **08/26/2004** Close Date: **09/02/2004** Decision:

Document Name: **Summons Request to Reissue**

Doc No./Seq No : **6/0**

File Date: 08/30/2004 Close Date: 08/30/2004 Decision:
Party Type: Defendant Party No.: 1
Document Name: Writ of Summons - Civil

Doc No./Seq No.: 7/0
File Date: 08/30/2004 Close Date: 09/02/2004 Decision:
Party Type: Plaintiff Party No.: 1
Document Name: *Verification of Notice of Request for Temporary Restraining Order

Doc No./Seq No.: 8/0
File Date: 09/02/2004 Close Date: 09/02/2004 Decision:
Document Name: Motion To Dismiss For Lack Of Jurisdiction With Memorandum

Doc No./Seq No.: 9/0
File Date: 09/02/2004 Close Date: 08/31/2004 Decision: Granted
Document Name: Motion And Order For Preliminary Injunction And temporary
Restraining Order Enjoining From Conducting Any Further Earth Moving And
Construction Activities At The Property As Specified, etc.

Doc No./Seq No.: 9/1
File Date: 09/13/2004 Close Date: 11/23/2004 Decision:
Party Type: Defendant Party No.: 1
Document Name: Opposition to Motion

Doc No./Seq No.: 10/0
File Date: 09/02/2004 Close Date: 09/02/2004 Decision:
Document Name: Memorandum Of Law In Support Of Motion For Preliminary Injunction
& Temporary Restraining Order, Exhibits

Doc No./Seq No.: 11/0
File Date: 09/02/2004 Close Date: 09/02/2004 Decision:
Document Name: Notice of Removal to U.S. District Court

Doc No./Seq No.: 12/0
File Date: 09/03/2004 Close Date: 09/08/2004 Decision:
Party Type: Defendant Party No.: 2
Document Name: Attorney Appearance Filed

Doc No./Seq No.: 13/0
File Date: 09/09/2004 Close Date: 11/23/2004 Decision:
Document Name: Open Court Proceeding
September 9, 2004. Hon. John O. Hennegan. Hearing had re: Preliminary
Injunction. The court converts the Defendant's motion to dismiss to a motion for
Summary Judgment - Denied. Plaintiff's motion for Preliminary Injunction -
Granted. Order to be filed.

Doc No./Seq No.: 14/0
File Date: 09/10/2004 Close Date: 09/10/2004 Decision:
Document Name: Pre Trial Hearing Letter Issued

Doc No./Seq No.: **15/0**

File Date: **09/10/2004** Close Date: **11/23/2004** Decision:

Document Name: **Notice of Appeal to COSA or COA 12/333**

Doc No./Seq No.: **16/0**

File Date: **09/13/2004** Close Date: **09/13/2004** Decision:

Document Name: **Reopen Case**

Doc No./Seq No.: **17/0**

File Date: **09/13/2004** Close Date: **09/09/2004** Decision: **Granted**

Document Name: **Order for preliminary Injunction**

Doc No./Seq No.: **18/0**

File Date: **09/09/2004** Close Date: **11/23/2004** Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: ***Motion for Leave to File Supplemental Memorandum in Support of defts Motion to Dismiss**

Doc No./Seq No.: **19/0**

File Date: **09/10/2004** Close Date: **11/23/2004** Decision:

Document Name: ***Voluntary Dismissal as to the Six M co without prejudice**

Doc No./Seq No.: **20/0**

File Date: **09/15/2004** Close Date: **09/17/2004** Decision:

Document Name: ***Order from the US District Court remanding case to the Circuit Court**

Doc No./Seq No.: **21/0**

File Date: **09/27/2004** Close Date: **11/23/2004** Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: ***Motion to Dismiss Counterclaim
Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland**

Doc No./Seq No.: **21/1**

File Date: **10/18/2004** Close Date: **11/23/2004** Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: ***Answer with Request for Hearing**

Doc No./Seq No.: **21/2**

File Date: **10/18/2004** Close Date: **11/23/2004** Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: ***Memorandum in Support of Riffin's Answer to Plt's Motion to Dismiss Counterclaim**

Doc No /Seq No.: **22/0**

File Date: **09/27/2004** Close Date: **11/23/2004** Decision:

Party Type: **Plaintiff** Party No.: **1**
Document Name: ***Cross Motion for Summary Judgment**
Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland

Doc No./Seq No.: **22/1**
File Date: **10/18/2004** Close Date: **11/23/2004** Decision:
Party Type: **Defendant** Party No.: **1**
Document Name: ***Answer To Cross Motion For Summary Judgment**

Doc No./Seq No.: **22/2**
File Date: **10/18/2004** Close Date: **11/23/2004** Decision:
Party Type: **Defendant** Party No.: **1**
Document Name: ***Answer**

Doc No./Seq No.: **23/0**
File Date: **09/27/2004** Close Date: **11/23/2004** Decision:
Party Type: **Plaintiff** Party No.: **1**
Document Name: ***Response to defts Motion to Dismiss/Summary Judgment and Memorandum in Support of Motion to Dismiss Counterclaim and Cross Motion for Summary Judgment Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland**

Doc No./Seq No.: **24/0**
File Date: **10/18/2004** Close Date: **11/23/2004** Decision:
Party Type: **Defendant** Party No.: **1**
Document Name: ***Request for Hearing (linked up to 22001)**

Doc No./Seq No.: **25/0**
File Date: **10/19/2004** Close Date: **10/19/2004** Decision:
Document Name: **Hearing Notice**

Doc No./Seq No.: **26/0**
File Date: **11/01/2004** Close Date: **11/23/2004** Decision:
Document Name: **Order to proceed w/out prehearing conf.**

Doc No./Seq No.: **27/0**
File Date: **11/18/2004** Close Date: **11/23/2004** Decision:
Document Name: **Open Court Proceeding**
November 18, 2004- Hon. VBW.Hearing had re: motions. Order to be filed.

Doc No./Seq No.: **28/0**
File Date: **11/16/2004** Close Date: **11/23/2004** Decision:
Party Type: **Defendant** Party No.: **1**
Document Name: ***Motion to Dismiss for Lack of Standing and/or for Failure to State a Cause of Action w/memorandum and affidavit**

Doc No./Seq No.: **29/0**
File Date: **11/23/2004** Close Date: **11/19/2004** Decision: **Granted**

Document Name: **Order for permanent injunction, dismissing counterclaim, granting summary judgment as a matter of law and denying the Motion to dismiss**

Doc No./Seq No.: **30/0**

File Date: **11/18/2004** Close Date: **11/23/2004** Decision:

Document Name: ***Memorandum of Law in Support of Riffins Motion to Dismiss for Lack of Standing and/or for failure to state a cause of Action**

Doc No./Seq No.: **31/0**

File Date: **12/02/2004** Close Date: **12/02/2004** Decision:

Document Name: **Pre Trial Hearing Letter Issued**

Doc No./Seq No.: **32/0**

File Date: **12/02/2004** Close Date: **11/21/2006** Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: ***Notice of Appeal to COSA or COA (13/R1-2)**

Doc No./Seq No.: **33/0**

File Date: **12/08/2004** Close Date: **11/21/2006** Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: ***Motion to Stay Enforcement of Permanent Injunction w/memorandum**

Doc No./Seq No.: **33/1**

File Date: **12/23/2004** Close Date: **11/21/2006** Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: ***Opposition to Motion to Stay Enforcement of Permanent Injunction Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland**

Doc No./Seq No.: **34/0**

File Date: **12/28/2004** Close Date: **11/21/2006** Decision:

Document Name: **Original Record sent to COSA sent by certified mail, 2 volumes, exhibits, 2 transcripts, #7099 3220 0003 8140 8771**

Doc No./Seq No.: **35/0**

File Date: **06/19/2006** Close Date: **11/21/2006** Decision:

Document Name: **Acknowledgment of receipt of petition for writ of certiorari**

Doc No./Seq No.: **36/0**

File Date: **08/30/2006** Close Date: **08/30/2006** Decision:

Document Name: **Reopen Case**

Doc No./Seq No.: **37/0**

File Date: **09/06/2006** Close Date: **11/21/2006** Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: **Motion to Enforce Judgment w/exhibits**

Doc No./Seq No.: 38/0

File Date: 09/06/2006 Close Date: 11/21/2006 Decision: Dismissed

Party Type: Plaintiff Party No.: 1

Document Name: Pet. for Contempt w/ Show Cause Order

(copies sent to atty for pps) Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland

Doc No./Seq No.: 38/1

File Date: 11/06/2006 Close Date: 11/21/2006 Decision:

Party Type: Defendant Party No.: 1

Document Name: Answer In Proper Person

Doc No./Seq No.: 39/0

File Date: 09/06/2006 Close Date: 09/06/2006 Decision:

Party Type: Plaintiff Party No.: 1

Document Name: Attorney Appearance Removed

C. R Loskot

Doc No./Seq No.: 40/0

File Date: 09/06/2006 Close Date: 09/06/2006 Decision:

Party Type: Plaintiff Party No.: 2

Document Name: Attorney Appearance Removed

Adam D Snyder

Doc No./Seq No.: 41/0

File Date: 09/29/2006 Close Date: 11/21/2006 Decision:

Party Type: Plaintiff Party No.: 1

Document Name: Show Cause Order of Court (copy sent to atty for pps)

Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland

Doc No./Seq No.: 42/0

File Date: 10/04/2006 Close Date: 10/05/2006 Decision:

Document Name: Affidavit of Service Motion to Enforce Judgment and Petition for Civil Contempt served on James Riffin on 9/28/06 pps. Reissued Show Cause Order mailed to James Riffin on 10/4/06.

Doc No./Seq No.: 43/0

File Date: 11/06/2006 Close Date: 11/21/2006 Decision:

Party Type: Defendant Party No.: 1

Document Name: Petition for Writ of Certiorari to the Maryland Court of Appeals

Doc No./Seq No.: 44/0

File Date: 11/15/2006 Close Date: 11/21/2006 Decision:

Document Name: Open Court Proceeding

Nov.15,2006 Hon.Patrick Cavanaugh.Proceedings stayed per Standing Order of the United States District Court.

Doc No./Seq No.: 45/0

File Date: 11/13/2006 Close Date: 11/21/2006 Decision:

Party Type: Defendant Party No.: 1

Document Name: Notice of Removal to U.S. District Court*

Doc No./Seq No.: 46/0

File Date: 12/08/2006 Close Date: 01/04/2007 Decision: Denied

Party Type: Defendant Party No.: 1

Document Name: *Motion to Stay Enforcement of Permanent Injunction

Doc No./Seq No.: 46/1

File Date: 12/22/2006 Close Date: Decision:

Party Type: Plaintiff Party No.: 1

Document Name: *Memorandum in Opposition to Defts Motion to Stay Enforcement of Permanent Injunction

Doc No./Seq No.: 47/0

File Date: 11/30/2006 Close Date: Decision:

Document Name: Order remanding case from US District Court to Circuit Court of Balt Co *

Doc No./Seq No.: 48/0

File Date: 11/30/2006 Close Date: 12/12/2006 Decision:

Document Name: Reopen Case

Doc No./Seq No.: 49/0

File Date: 01/17/2007 Close Date: 01/17/2007 Decision:

Document Name: Hearing Notice

Doc No./Seq No.: 50/0

File Date: 02/13/2007 Close Date: 03/06/2007 Decision: Denied

Party Type: Defendant Party No.: 1

Document Name: Motion to Dismiss for lack of subject matter jurisdiction wit exhibit

Doc No./Seq No.: 51/0

File Date: 02/21/2007 Close Date: 02/28/2007 Decision:

Party Type: Plaintiff Party No.: 1

Document Name: Memorandum in opposition to defendants motion to dismiss for lack of subject matter jurisdiction

Doc No./Seq No.: 52/0

File Date: 02/21/2007 Close Date: 02/28/2007 Decision:

Party Type: Plaintiff Party No.: 1

Document Name: Memorandum in response to defendants motions for additional argument and to reschedule

Doc No./Seq No.: 53/0

File Date: 03/07/2007 Close Date: Decision:

Document Name: Open Court Proceeding

March 7, 2007. Hon. Dana M. Levitz. Hearing had in re: Show Cause. The Petition for Contempt is dismissed without prejudice.

Doc No./Seq No.: 54/0

File Date: **09/27/2007** Close Date: Decision:
Document Name: **Open Court Proceeding**
Sept. 25, 2007 - Hon. Michael J. Finifter. Hearing had in re: Preliminary Injunction and Temporary Restraining Order. Ruling held Sub-Curia.

Doc No./Seq No.: **55/0**
File Date: **11/08/2007** Close Date: Decision:
Party Type: **Plaintiff** Party No.: **1**
Document Name: **Pet. for Contempt w/ Show Cause Order (copies sent to atty for pps)**
Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland

Doc No /Seq No.: **56/0**
File Date: **11/16/2007** Close Date: **11/21/2007** Decision:
Document Name: **Affidavit of Service 11/16/07 (Petition,show cause)**

Doc No./Seq No.: **57/0**
File Date: **11/26/2007** Close Date: Decision:
Party Type: **Defendant** Party No.: **1**
Document Name: **Motion to Dismiss Court's November 8, 2007 Show Cause Order**

Doc No /Seq No.: **57/1**
File Date: **12/07/2007** Close Date: Decision:
Party Type: **Plaintiff** Party No.: **2**
Document Name: **Opposition to Motion ***

Doc No./Seq No.: **58/0**
File Date: **12/14/2007** Close Date: Decision:
Document Name: **Open Court Proceeding**
December 14, 2007 Hon. Judith C. Ensor. Hearing had. Testimony taken. Defendant is found to be in contempt of filing, excavating, grading and constructing on subject property. Defendant may purge contempt within 30 days by removing all construction equipment and vehicles as specified in open court. Defendant's Motion to Dismiss - Denied. Defendant's Oral Motion to Dismiss - Denied. Defendant must post a bond in the amount of \$250,000. Order to be filed.

Doc No./Seq No.: **59/0**
File Date: **12/17/2007** Close Date: **12/17/2007** Decision:
Document Name: **Pre Trial Hearing Letter Issued**

Doc No./Seq No.: **60/0**
File Date: **12/17/2007** Close Date: Decision:
Party Type: **Defendant** Party No.: **1**
Document Name: **Notice of Appeal to COA or COA (13R31) ***

Doc No./Seq No.: **61/0**
File Date: **12/18/2007** Close Date: **12/18/2007** Decision:
Document Name: **Pre Trial Hearing Letter Issued**

Doc No./Seq No : 62/0

File Date: 01/04/2008 Close Date: 01/04/2008 Decision: Granted

Party Type: Plaintiff Party No.: 2

Document Name: Motion to Shorten Time for response

Doc No./Seq No.: 62/1

File Date: 01/02/2008 Close Date: Decision:

Party Type: Defendant Party No.: 1

Document Name: Opposition to Motion To Shorten Time For Response In Proper Person*

Doc No./Seq No.: 63/0

File Date: 01/04/2008 Close Date: 01/04/2008 Decision: Granted

Document Name: Def James Riffin has been found in constructive civil contempt of Court, he may purge this contempt by fulfilling requirements as specified, must post cash security or a letter of credit as specified etc (link w/ docket entry 55000) *

Doc No./Seq No.: 64/0

File Date: 12/14/2007 Close Date: 01/08/2008 Decision:

Party Type: Defendant Party No.: 1

Document Name: Memorandum of Law in Support of Motion to Dismiss for Lack of Subject Matter
Jurisdiction with exhibits*

Doc No./Seq No.: 65/0

File Date: 01/02/2008 Close Date: Decision:

Party Type: Defendant Party No.: 1

Document Name: Request for Hearing(linked to 62001)*

Doc No./Seq No : 66/0

File Date: 01/04/2008 Close Date: Decision:

Party Type: Defendant Party No.: 1

Document Name: Opposition to plaintiffs motion for enforcement of appeal bond *

Doc No./Seq No.: 67/0

File Date: 02/05/2008 Close Date: 02/05/2008 Decision: Granted

Document Name: Order granting plt's motion for enforcement of an Appeal Bond for def James Riffin, def is required to post a cash appeal bond in the amount of \$250,000.00 on or before 2/15/08

Doc No./Seq No.: 68/0

File Date: 01/04/2008 Close Date: Decision:

Party Type: Plaintiff Party No.: 2

Document Name: Motion for enforcement of appeal bond *

Doc No./Seq No.: 69/0

File Date: 01/11/2008 Close Date: Decision:

Party Type: Defendant Party No.: 1

Document Name: *Status Report

Doc No./Seq No.: **70/0**

File Date: **02/15/2008** Close Date: **02/15/2008** Decision: **Denied**

Party Type: **Defendant** Party No.: **1**

Document Name: **Emergency Motion to Revise Court's January 25, 2008 Order**

Doc No./Seq No.: **71/0**

File Date: **02/15/2008** Close Date: **02/15/2008** Decision: **Granted**

Document Name: **Order of Court deleting specified paragraph from the order of December 17, 2007**

Doc No./Seq No.: **72/0**

File Date: **02/13/2008** Close Date: Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: **Emergency Motion to Revise Court's January 25, 2008 Order ***

Doc No./Seq No.: **73/0**

File Date: **03/21/2008** Close Date: **03/21/2008** Decision: **Denied**

Party Type: **Defendant** Party No.: **1**

Document Name: **Motion to Shorten Time to respond to motion to permit posting of real property DENIED AS MOOT as security for performance of a supersedeas bond**

Doc No./Seq No.: **74/0**

File Date: **03/21/2008** Close Date: **03/21/2008** Decision: **Denied**

Party Type: **Plaintiff** Party No.: **1**

Document Name: **Emergency Motion to permit posting of real property as security for performance of a supersedeas bond**

Doc No./Seq No.: **75/0**

File Date: **02/27/2008** Close Date: Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: **Motion for Reconsideration***

Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland

Doc No./Seq No.: **76/0**

File Date: **04/04/2008** Close Date: Decision:

Document Name: **Original Record sent to COSA**

Sent Certified Mail, 5 Volumes, 1 Transcript, 1 Rubberbanded folder Containing Exhibits #7006 0810 0002 4402 4970

Doc No./Seq No.: **77/0**

File Date: **03/11/2008** Close Date: Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: ***Emergency Motion To Permit Posting Of Real Property As Security For Performance Of A Supersedeas Bond***

Doc No./Seq No.: **77/1**

File Date: **03/12/2008** Close Date: Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: **Opposition to Motion ***

Doc No./Seq No.: **78/0**

File Date: **04/21/2008** Close Date: **04/21/2008** Decision:

Document Name: **Order by Court of Appeals of MD denying petition for a writ of certiorari ***

Doc No./Seq No.: **79/0**

File Date: **04/14/2008** Close Date: Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: **Motion for Sanctions with exhibits and affidavit**

Doc No./Seq No.: **79/1**

File Date: **04/17/2008** Close Date: Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: **Opposition to Motion For Sanctions**

Doc No./Seq No.: **79/2**

File Date: **05/05/2008** Close Date: Decision:

Party Type: **Plaintiff** Party No.: **1**

Document Name: **Reply to Opposition to Motion for Sanctions**
Filed by PLT001-Maryland Dept Of The Environment, PLT002-Baltimore County Maryland

Doc No./Seq No.: **79/3**

File Date: **06/02/2008** Close Date: Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: **Defendant's Reply to Plaintiff's Reply to Defendant's Opposition to ***
Plaintiff's Motion for Sanctions, etc.

Doc No./Seq No.: **79/4**

File Date: **06/05/2008** Close Date: Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: **Amended Reply to Answer***

Doc No./Seq No.: **80/0**

File Date: **05/20/2008** Close Date: **05/20/2008** Decision: **Granted**

Party Type: **Defendant** Party No.: **1**

Document Name: **Trial Notice***

Doc No./Seq No.: **81/0**

File Date: **05/30/2008** Close Date: **06/09/2008** Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: **Affidavit of Service**
Unable to serve Hearing Notice for 6/13/08 at 9:30am
does not have an office at this location

Doc No./Seq No.: **82/0**

File Date: **06/02/2008** Close Date: Decision:

Party Type: **Defendant** Party No.: **1**

Document Name: **Motion to Strike Judgment, etc. ***

Doc No./Seq No.: **83/0**

File Date: **06/02/2008** Close Date: Decision

Party Type: **Defendant** Party No.: **1**

Document Name: **Motion to Strike April 10, 2008 Affidavit of Kevin Sharbonda, and *
Motion to Impose Sanctions upon Kevin Sharbonda, etc.**

Doc No/Seq No.: **84/0**

File Date: **06/05/2008** Close Date: Decision

Party Type: **Defendant** Party No.: **1**

Document Name: **Motion to Correct, Supplement, Amend Motion to Strike April 10, 2008 Affidavit
of Kevin Sharbonda and Motion to Impose Sanctions Upon Kevin Sharbonda***

Doc No./Seq No.: **85/0**

File Date: **06/13/2008** Close Date: Decision:

Document Name: **Open Court Proceeding**

**June 13, 2008. Hon. Susan Souder. Hearing had in re: show cause (contempt).
Motion to strike affidavit of Kevin Sharbonda- Motion to strike judgment-
Motion to impose sanctions upon Kevin Sharbonda- Plaintiffs motion for
sanctions-**

**Defendant found in contempt of Court Order. Defendant remanded to Baltimore
Cunty Detention Center no bail. Plaintiff's Motion for Sanctions Granted in part.**

The complete case file can be obtained from the Circuit Courthouse.