

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY

Robynn D. Squires et al

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Plaintiffs

\*

v.

\*

Case No. 02-C-08-131337

Riverbea Corporation et al

\*

Defendants

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\* \* \* \* \*

MOTION TO SHORTEN TIME TO RESPOND AND TO SET EXPEDITED HEARING

Plaintiffs for their Motion to Shorten Time and for an Expedited Hearing state as follows.

Plaintiffs request that pursuant to Rule 1-204 that all of the Defendants be ordered to respond to the Motion and Complaint in a shortened time period. The record reflects that Plaintiffs have been stipulating to extensions of time for Defendants to respond. However the discussions which led to the stipulations have broken off, so expedited relief for Plaintiffs is necessary.

2. Plaintiffs as well as over 1,100 other Property Owners in Riviera Beach will be irreparably injured if the Defendants are not immediately enjoined and restrained from continuing to waste community assets.

3. Further, the Court should immediately appoint a Receiver for Riverbea Corporation, due to the fact that the Defendant Directors secretly sold community property and have been wasting and spending community funds.

4. Plaintiffs request an expedited hearing on their Complaint and Motion for Temporary Injunction and Appointment of a Receiver.

5. Rule 1-351 Certification. I certify that I notified the attorneys for the Defendants by emailing and faxing them that I would be filing this Motion to Shorten Time and for Expedited Hearing on this date.


6. Further I am notifying them that I intend to present this Motion to the Chambers Judge on July 16, 2008, at approximately 11:00 am or 1:30 pm.

WHEREFORE, Plaintiffs pray:

CIVIL DEPARTMENT 2008 JUL 15 PM 1 56

- A. That the Court order the Defendants to file their responses in this case in an expedited time period.
- B. That the Court order an expedited hearing in this case;
- C. That the Court order the Defendants to show cause why all of the foregoing relief should not be granted.
- D. That the Court grant such other and further relief as the nature of their cause may merit.

Dated: July 15, 2008

  
\_\_\_\_\_  
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**STATEMENT OF POINTS AND AUTHORITIES**

Hanley v. Stulman, 212 Md. 273, 129 A.2d 132 (1957)

Mavromoustakos v. Padussis, 112 Md.App. 59, 684 A.2d 51 (1996).

Maryland Rule of Procedure 1-204

Maryland Rule of Procedure 15-502 (adequate remedy in damages is not a bar to an injunction)

Anne Arundel County v. Whitehall Venture, 39 Md.App. 197 (1978)

**CERTIFICATE OF SERVICE**

A copy of this Pleading has been mailed or faxed or emailed on this date to:

Kevin J. Best, Esq.  
145 Main Street  
Annapolis, Maryland 21401

Henry D. McGlade, Esq.  
1460 Governor Ritchie Highway, Suite 207  
Arnold, Maryland 21012

Dated: July 15, 2008

  
\_\_\_\_\_  
Daniel J. Mellin (djm@hbdlaw.com)

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\* \* \* \* \*

ORDER GRANTING MOTION TO SHORTEN TIME

Upon consideration of the Motion filed herein, good cause having been shown therefor, the Circuit Court for Anne Arundel County orders as follows:

ORDERED, That the Motion to Shorten Time to Respond is GRANTED, and the Defendants shall file responses to the Complaint and the Motion within \_\_\_\_\_ days after the date of this Order.

ORDERED, that an expedited hearing shall be scheduled before the Court on the \_\_\_\_\_ day of \_\_\_\_\_, 2008.

Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
Circuit Court Judge

Copies to:

Kevin J. Best, Esq.  
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Annapolis, Maryland 21401

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IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

ROBYNN D. SQUIRES, ET AL.

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Plaintiffs

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vs.

\* Case Number: 02-C-08-131337

\*

RIVERBEA CORPORATION, ET AL.

\*

\*

Defendants

\*

\* \* \* \* \*

SHOW CAUSE ORDER

It is this \_\_\_\_ day of \_\_\_\_\_, 2008, by the Circuit Court of Maryland for Anne Arundel County,

ORDERED, that Defendants show cause, by filing a verified Answer within \_\_\_\_ days from the date of service of this Show Cause Order upon their counsel, why the relief prayed in the Complaint and Motions filed herein should not be granted; and it is further

ORDERED, that this case shall be set down for a hearing on the \_\_\_\_ day of \_\_\_\_\_, 2008, at \_\_\_\_ o'clock a.m./p.m., and the Defendants are advised of their right to appear and present evidence at the hearing; and it is further

ORDERED, that Defendants are hereby advised that if they fail to file a timely verified Answer, that the relief requested by the Plaintiffs may be granted without a hearing, and this Court may pass Orders granting relief to the Plaintiffs; and it is further

Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
Circuit Court Judge

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