

Christopher Eric Bouchat	*	In the
Plaintiff	*	Circuit Court
Vs.	*	For
State of Maryland	*	Carroll County
Defendant	*	Case No.: 06-C-15-068061

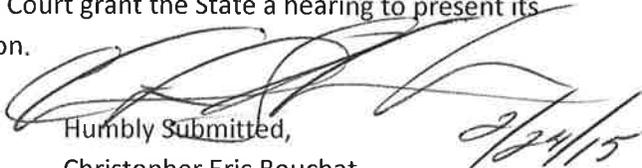
Plaintiff's Reply to Defendant's Motion to Dismiss & Request for Hearing

I, Christopher Eric Bouchat, do hereby humbly submit to the Honorable Court a request to deny the Defendant's Motion of Dismissal and grant a hearing to discuss the merits of both party's arguments.

For reasons as follows:

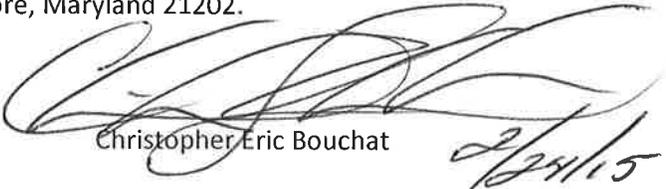
1. The State's argument of res judicata is moot and not relative to this case as proven by the arguments presented in their reply.
2. This case in question was filed in the Circuit Court of Carroll County and not the Court of Appeals precisely for the reasons stated by the State in its Dismissal.
3. The original case referenced by both the Plaintiff and Defendant was a challenge of the Maryland General Assembly Joint Resolution #1 concerning re-districting, which questioned the constitutionality of the state legislative districts in theory and as a whole.
4. This case presently before the Court is the Plaintiff as an individual citizen being denied his constitutionally guarantee voting rights as a voter in state legislative district 9A and his disenfranchisement also as a candidate for public office in the same district.
5. Plaintiff concedes that the base constitutional argument of both cases in question is identical, but they are explicitly different in content. Hence the proper jurisdiction is the present Court.
6. All reasonable legal minds can conclude that to restrict and block said Plaintiff from filing a petition to enforce his guaranteed voting rights because he legally challenged the State's 2012 re-districting resolution would be a denial of his Constitutional right of Due Process of the law.
7. For said Court to block this case would not only be injustice against an average citizen seeking to protect his voting rights, but would also set a horrible legal precedence that would deny anyone who challenges state re-districting from seeking Court relief in the future.
8. The State shall not proverbially "Black List" a citizen from Due Process because they challenged legislative re-districting in a different case.
9. Plaintiff deserves his case to be presented before this Court, so that the merits and evidence of the arguments be reviewed and ruled upon.

Therefore, I humbly request the Honorable Court grant the State a hearing to present its argument for dismissal and deny said motion.


Humbly Submitted,
Christopher Eric Bouchat
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Woodbine, MD 21797
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Certificate of Service

I Hereby certify that on this 24 day of February 2015, a copy of the foregoing Plaintiff's Reply to Defendant's Motion to Dismiss was mailed U.S. first class mail to: Jeffrey L. Darsie, Assistant Attorney General, 200 Saint Paul Place, 20th Floor, Baltimore, Maryland 21202.


Christopher Eric Bouchat