

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

NEIL PARROTT *
20005 Lindenhurst Court
Hagerstown, Maryland 21742 *

RAY SERRANO *
10401 Hickory Ridge Road Apt L
Columbia, Maryland 21044 *

CAROL SWIGAR *
702 S. Stepney Road
Aberdeen, Maryland 21001 *

DOUGLAS RAAUM *
69 Harbor Heights Dr.
Annapolis, Maryland 21401 *

Case No. _____

RONALD SHAPIRO *
103 Norman Road
Pasadena, Maryland 21122 *

DEANNA MOBLEY *
1252 Vintage Dr.
Harwood, Maryland 20776 *

GLEN GLASS *
311 Fords Lane
Aberdeen, Maryland 21001 *

ALLEN FURTH *
3 King Charles Place
Annapolis, Maryland 21401 *

JEFF WARNER *
8 Lakeview Circle
Greenbelt, Maryland 20770 *

JIM NEALIS *
8321 Rhode Island Avenue
College Park 20740 *

DR. ANTONIO CAMPBELL *
1212 Brixton Rd.
Baltimore, Maryland 21239 *

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|--|---|
| SALLIE TAYLOR | * |
| 1260 Guilford Road | |
| Eldersburg, Maryland 21784 | * |
| Plaintiffs, | * |
| v. | * |
| LINDA H. LAMONE, in her official | * |
| capacity as State Administrator of the | |
| Maryland State Board of Elections and | * |
| WILLIAM G. VOELP, Chair of the | |
| Maryland State Board of Elections, | * |
| 151 West Street, Suite 200 | |
| Annapolis, Maryland 21401 | * |
| STATE OF MARYLAND | * |
| Defendants. | * |

**COMPLAINT FOR DECLARATORY AND OTHER RELIEF REGARDING THE
REDISTRICTING OF MARYLAND’S CONGRESSIONAL DISTRICTS**

Plaintiffs Neil Parrott, Ray Serrano, Carol Swigar, Douglas Raaum, Ronald Shapiro, Deanna Mobley, Glen Glass, Allen Furth, Jeff Warner, Jim Nealis, Dr. Antonio Campbell, and Sallie Taylor, for their complaint, by and through their attorneys, allege as follows:

INTRODUCTION

1. This action challenges Maryland’s 2021 congressional redistricting plan (the “Plan”) on the ground that it diminishes Plaintiffs’ rights to participate in elections for the U.S. Congress on an equal basis with other Maryland voters, in violation of Article 7 of the Declaration of Rights of the Maryland Constitution; and on the ground that the Plan’s districts violate the requirements for district boundaries prescribed by Article III, Section 4 of the Maryland Constitution. It is an action pursuant to § 3-409 of the Courts and Judicial Proceedings Article.

2. Plaintiffs are individual registered voters in each of the Plan's eight congressional districts.

3. Plaintiffs seek a declaratory judgment that the Plan is a political gerrymander that violates the state constitution, and they seek temporary and permanent injunctive relief preventing Defendants Linda H. Lamone and William G. Voelp, in their official capacities, and the State of Maryland, from calling, holding, or certifying any elections under the Plan.

JURISDICTION AND VENUE

4. Jurisdiction is appropriate in this Court pursuant to § 1-501 of the Courts and Judicial Proceedings Article of the Maryland Code.

5. Venue is appropriate in this Court pursuant to § 6-201 of the Courts and Judicial Proceedings Article of the Maryland Code.

THE PARTIES

6. Plaintiff Neil Parrott is a citizen of Maryland, is registered to vote as a Republican, and resides in the Sixth Congressional District of the new Plan. Mr. Parrott has registered to run for Congress in 2022 in that district. Mr. Parrott is currently a member of the Maryland House of Delegates.

7. Plaintiff Ray Serrano is a citizen of Maryland, is registered to vote as a Republican, and resides in the Third Congressional District of the new Plan.

8. Plaintiff Carol Swigar is a citizen of Maryland, is registered to vote as a Republican, and resides in the First Congressional District of the new Plan.

9. Plaintiff Douglas Raaum is a citizen of Maryland, is registered to vote as a Republican, and resides in the First Congressional District of the new Plan.

10. Plaintiff Ronald Shapiro is a citizen of Maryland, is registered to vote as a

Republican, and resides in the Second Congressional District of the new Plan.

11. Plaintiff Deanna Mobley is a citizen of Maryland, is registered to vote as a Republican, and resides in the Fourth Congressional District of the new Plan.

12. Plaintiff Glen Glass is a citizen of Maryland, is registered to vote as a Republican, and resides in the First Congressional District of the new Plan.

13. Plaintiff Allen Furth is a citizen of Maryland, is registered to vote as a Republican, and resides in the Fourth Congressional District of the new Plan.

14. Plaintiff Jeff Warner is a citizen of Maryland, is registered to vote as a Republican, and resides in the Fourth Congressional District of the new Plan. Mr. Warner intends to run for Congress in 2022 in that district.

15. Plaintiff Jim Nealis is a citizen of Maryland, is registered to vote as a Republican, and resides in the Fifth Congressional District of the new Plan.

16. Plaintiff Dr. Antonio Campbell is a citizen of Maryland, is registered to vote as a Republican, and resides in the Seventh Congressional District of the new Plan.

17. Plaintiff Sallie Taylor is a citizen of Maryland, is registered to vote as a Republican, and resides in the Eight Congressional District of the new Plan.

18. Defendant Linda Lamone is sued in her official capacity as Election Administrator for the Maryland State Board of Elections. Defendant Lamone is Maryland's chief election official and is responsible for the conduct of elections within the State.

19. Defendant William G. Voelp I is sued in his official capacity as Chair of the Maryland State Board of Elections. As Chair of the State Board, Defendant Voelp is responsible for supervising the conduct of elections in the State.

20. Defendant State of Maryland is a sovereign state of the United States of America.

FACTUAL ALLEGATIONS

A. The Adoption of Maryland's New Congressional District Plan.

21. Maryland's recent history of partisan gerrymandering is no secret. The congressional district map crafted by the Maryland legislature in 2011 remains one of the most notorious partisan gerrymanders in U.S. history. A federal district judge openly doubted that it could provide "fair and effective representation for all citizens."¹ Another called it "absurd" to suggest "that there is a community of interest" in a district described as a "Rorschach-like eyesore."² An appellate judge of the Court of Appeals for the Fourth Circuit famously described the same district as "a broken-winged pterodactyl, lying prostrate across the center of the state."³

22. A *Washington Post* article from 2014 referred to the same district as a "praying mantis," and concluded that, when it came to congressional districts, "Maryland and North Carolina are essentially tied for the honor of most-gerrymandered state."⁴

23. After years of protracted litigation over the 2011 congressional map, a three-judge panel found the state of Maryland had engaged in such an egregious partisan gerrymander that it violated voters' First Amendment rights under the U.S. Constitution. This decision was later vacated, however, when the U.S. Supreme Court rejected federal claims based on partisan

¹ *Benisek v. Mack*, 11 F. Supp. 3d 516, 526 (D. Md.) (quoting *Reynolds v. Sims*, 377 U.S. 533, 565-68 (1964)), *aff'd*, 584 F. App'x 140 (4th Cir. 2014), *rev'd sub nom. Shapiro v. McManus*, 577 U.S. 39 (2015).

² *Fletcher v. Lamone*, 831 F. Supp. 2d 887, 906 (D. Md. 2011) (Titus, J., concurring), *summarily aff'd*, 567 U.S. 930 (2012).

³ *Id.* at 902 n.5 (opinion of Niemeyer, J.).

⁴ Christopher Ingraham, *America's most gerrymandered congressional districts*, WASH. POST (May 15, 2014), available at <https://www.washingtonpost.com/news/wonk/wp/2014/05/15/americas-most-gerrymandered-congressional-districts/>.

gerrymandering.⁵

24. In response to the bipartisan public outcry over Maryland's congressional districts, Maryland Governor Larry Hogan signed an executive order on August 6, 2015, which created the Maryland Redistricting Reform Commission. Governor Hogan's goal in creating the commission was to "put Maryland's redistricting process on a new path toward transparency, fair representation, and election integrity."

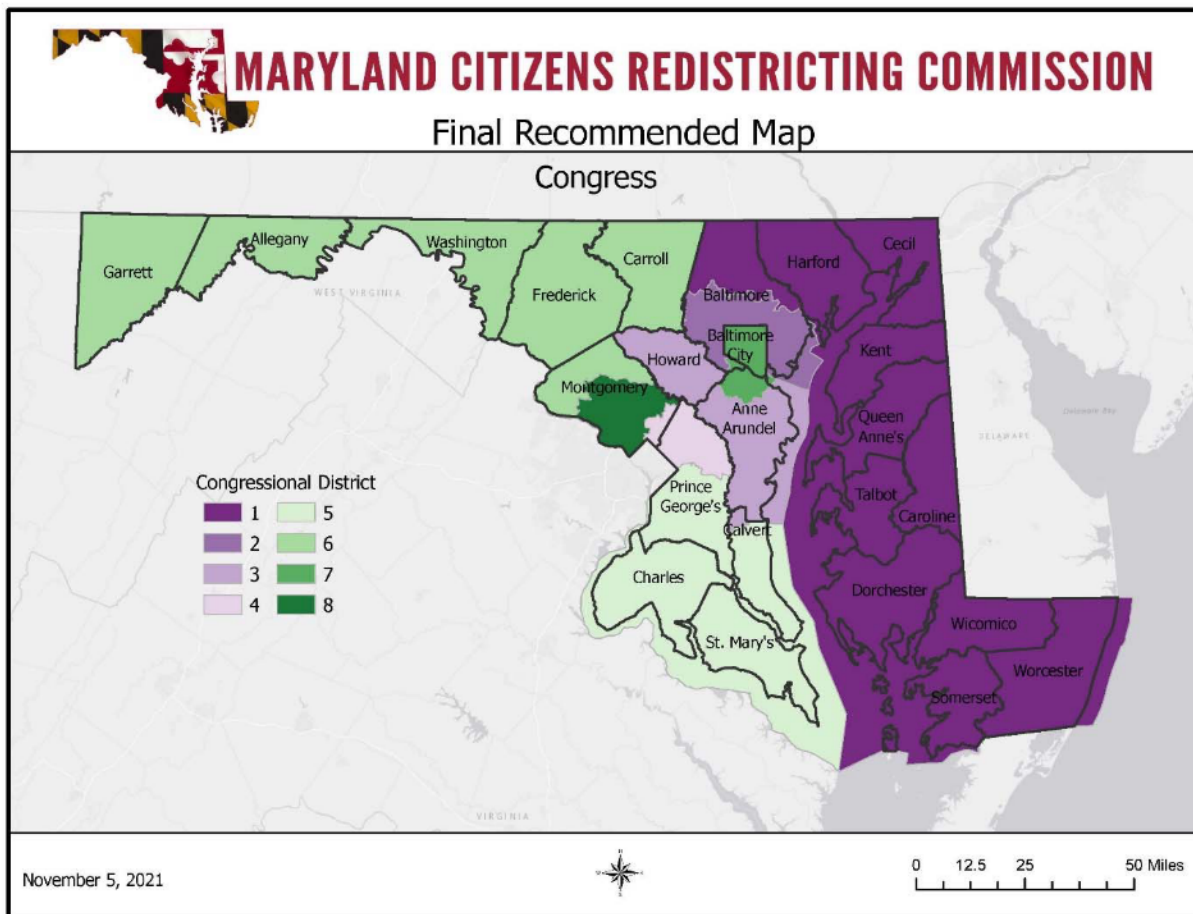
25. The Commission was comprised of seven members appointed by the Governor and four members appointed by the majority and minority leaders in the Maryland Legislature. The Governor's appointees consisted of three Republicans, three Democrats, and one not affiliated with any party. The Legislature's appointments consisted of two Democrats and two Republicans. After several months of soliciting input from citizens and legislators across the State, the Commission recommended, among other things, that districting criteria include compactness, contiguity, congruence, substantially equal population, and compliance with the Voting Rights Act and other applicable federal laws. The Commission also recommended the creation of an independent redistricting body charged with reapportioning the state's districts every ten years after the decennial census.

26. Consistent with these recommendations, on January 12, 2021, Governor Hogan issued an executive order establishing the Maryland Citizens Redistricting Commission (MCRC) for the purposes of redrawing the state's congressional districting map. The MCRC was comprised of nine Maryland citizens: three registered Republicans, three registered Democrats, and three registered with neither party.

⁵ *Benisek v. Lamone*, 348 F. Supp. 3d 493, 517 (D. Md. 2018), *vacated on other grounds sub nom. Rucho v. Common Cause*, 139 S. Ct. 2484 (2019).

27. Over the course of the following months, the MCRC held over 30 public meetings with a total of more than 4,000 attendees from around the State. The Commission provided a public online application portal for citizens to prepare and submit maps, and it received a total of 86 maps for consideration.

28. After extensive public input and deliberations, on November 5, 2021, the MCRC recommended the following congressional redistricting map to Governor Hogan:



29. The proposed MCRC map complied with all of Governor Hogan’s directives and the Maryland and U.S. Constitution. It satisfied the requirements of the Voting Rights Act, as well as the federal constitutional provisions of the Equal Protection Clause. It also respected natural boundaries and the geographical integrity and continuity of municipal, county, and other political

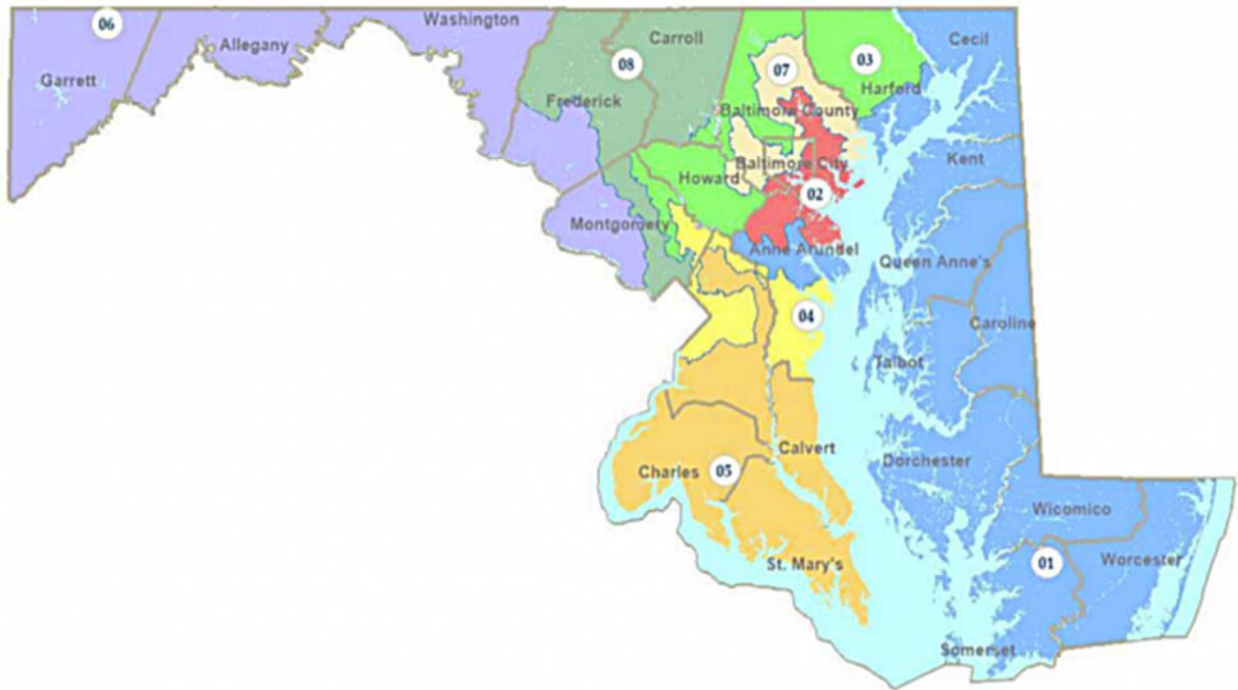
subdivisions, and its districts were geographically compact.

30. The MCRC's proposed map paired communities in rural Western Maryland counties and rural portions of northern Montgomery County in the Sixth District. It also kept the communities of the Eastern Shore together in the First, the DC suburbs in the Eighth and Fourth, Southern Maryland in the Fifth, central Maryland and Anne Arundel County in the Fourth, and Baltimore and its suburbs in the Second and Seventh Districts.

31. According to the nonpartisan Princeton Gerrymandering Project, the MCRC's congressional map split counties only five times and had an overall Polsby-Popper compactness score of 29.9%. The proposed map received an overall "A" grade for fairness.

32. On November 5, 2021, Governor Hogan accepted the MCRC's proposed final map and issued an order transmitting the maps to the Maryland General Assembly for adoption at a special session on December 6, 2021.

33. On December 6, 2021, the Maryland General Assembly's Legislative Redistricting Advisory Commission (LRAC), comprised of four Democrats and two Republicans from the Maryland Legislature, voted on a straight party-line vote to recommend instead House Bill 1, which contained the Plan that is the subject of this lawsuit:



34. On December 7, 2021, the Maryland House voted to reject an amendment that would have substituted the MCRC's map for the Plan. The vote was along party lines, the only exceptions being two Democrats who joined all of the Republicans in voting to substitute the MCRC's map for the Plan.

35. On December 8, 2021, the Plan was adopted. The vote was along party lines in both chambers of the Maryland Legislature, with the lone exception being a Democrat who voted against the Plan.

36. On December 9, 2021, Governor Hogan vetoed the Plan.

37. On December 9, 2021, the Plan was enacted into law by means of a veto override. The vote was along party lines in both chambers of the Maryland Legislature, with the lone exception being a Democrat who voted against the override.

38. The Plan adopted by Maryland Democrats is similar to the gerrymandered map that was the subject of universal abuse ten years ago as the worst gerrymander in the country.

B. *Maryland's Congressional District Plan is a Partisan Gerrymander.*

39. Gerrymandering means arranging the voting populations of electoral districts in a way that maximizes the effectiveness of one's own supporters.

40. Because voters do not choose where to live to suit political partisans, a gerrymanderer must distort district lines until they "capture" the preferred mix of voters.

41. As a result of the process involved in gerrymandering, district boundaries tend to become distorted and noncompact.

42. As a result of the process involved in gerrymandering, district boundaries tend to deviate from and to cross existing political boundaries.

43. As a result of the process involved in gerrymandering, electoral districts tend to fracture and divide communities of interest.

44. The three effects described above are apparent in Maryland's Plan.

45. Maryland's Plan splits Anne Arundel County into three congressional districts. The middle of Anne Arundel County is split in half, connected to the Eastern Shore's First Congressional District. The two areas are held together solely via the Chesapeake Bay Bridge.

46. Baltimore is divided among three congressional districts.

47. Baltimore County is divided among three congressional districts.

48. Montgomery County is divided among four congressional districts.

49. The Third, Fourth, Fifth, and Seventh congressional districts are held together by the same narrow ribbons of territory that evoked comparisons of the 2011 district plan to a "praying mantis," a "Rorschach-like eyesore," and a "broken-winged pterodactyl, lying prostrate across the

center of the State.”

50. A roughly 20-mile trip north on the Baltimore-Washington Parkway from Cheverly, Maryland, a DC suburb, to Jessup, Maryland, an area outside the Baltimore Washington International Airport, would cross congressional boundaries six times and lead a traveler through five different congressional districts.

51. The district distortions and noncompactness evident in the Plan were designed to accomplish specific partisan objectives sought by Democrats.

52. For example, the Plan splits Anne Arundel County into three districts in order to diminish the electoral prospects of First District Representative Andy Harris, the last remaining Republican representative from Maryland, by adding Democratic voters from that county to his district.

53. The Fifth District includes a “umbilical cord” extending north to include Democratic voters in College Park as a counterbalance to the more Republican voters in the southern part of the state.

54. The Eighth District connects the suburbs of Washington, DC to the more Republican rural areas of Frederick and Carroll Counties at the Pennsylvania border.

55. The Sixth Congressional District connects one of the poorest areas of the state in Garrett County, the westernmost rural county which borders Pennsylvania and West Virginia, with one of the wealthiest, Potomac, Maryland, which is a suburb of Washington, DC. These two populations do not form a “community of interest.” As a federal court commented about the Sixth District in 2011, which made a similar linkage between these populations, it brings together voters “who have an interest in farming, mining, tourism, paper production, and the hunting of bears ... with voters who abhor the hunting of bears and do not know what a coal mine or paper mill even

looks like.”⁶ These two groups have “different climate[s], root for different sports teams, and read different newspapers.”⁷

56. The noncompactness of the Plan’s districts can be quantified using standard measures of geographical compactness. The Polsby-Popper test, for example, is commonly used to assess the geographical compactness of electoral districts. It compares the area of a district with the area of a hypothetical circle with the same perimeter length. It scores compactness on a scale from 0% to 100%, with higher scores representing greater compactness.

57. The Polsby-Popper compactness scores for the Plan’s districts, ranked from lowest (least compact) to highest (most compact), compared to the scores for the districts proposed by the MCRC, ranked from lowest to highest, are as follows:

| MD Plan | Polsby-Popper score | MCRC Prop. | Polsby-Popper score | Extent to which MCRC score > Plan score |
|----------------|----------------------------|-------------------|----------------------------|---|
| Dist. 4 | 8.4% | Dist. 6 | 11.1% | 33% |
| Dist. 7 | 8.9% | Dist. 2 | 19.6% | 122% |
| Dist. 3 | 8.9% | Dist. 3 | 23.5% | 165% |
| Dist. 6 | 9.0% | Dist. 8 | 25.0% | 179% |
| Dist. 8 | 17.5% | Dist. 1 | 33.6% | 92% |
| Dist. 2 | 18.5% | Dist. 4 | 39.2% | 112% |
| Dist. 1 | 26.6% | Dist. 5 | 42.2% | 59% |
| Dist. 5 | 26.9% | Dist. 7 | 44.5% | 65% |
| Average | 15.6% | Average | 29.9% | 92% |

58. The Plan’s districts are not compact.

59. The Plan’s districts are far less compact than the districts proposed by the MCRC.

60. The lowest scoring MCRC district still scores higher (at 11.1%) than any of the

⁶ *Fletcher*, 831 F. Supp. 2d at 906 (Titus, J., concurring).

⁷ *Id.*

four lowest scoring districts in the Plan.

61. The highest scoring district from the Plan (at 26.9%) would only rank *fifth* among the MCRC districts.

62. The average score for MCRC districts (29.9%) is almost *twice as high* as the average score for the Plan's districts (15.6%).

63. The fact that every one of the MCRC's districts is significantly more compact than the ranked counterpart in the Plan means that its low scores are *not* due to Maryland's unusual geographic shape.

64. The extent to which a district plan ignores the boundaries of political subdivisions can be quantified, for example, by counting the number of times any county is "split" at least once by a district boundary.

65. In the MCRC's proposed map, five of Maryland's 24 counties are split at least once by a district boundary.

66. In the Plan, nine of Maryland's 24 counties are split at least once by a district boundary. This figure is 80% higher than the number of splits in the MCRC's map.

67. Eight Maryland counties—Anne Arundel, Baltimore, Carroll, Frederick, Harford, Howard, Montgomery, and Prince George's—are divided by the Plan's district boundaries into a total of 24 "fragments."

68. The Plan's district lines cross an excessive number of political boundaries and divide Maryland counties into an excessive number of fragments.

69. The Plan fails to show due regard for the boundaries of political subdivisions.

70. The district noncompactness and the crossing of political boundaries evident in the Plan are due to the efforts of those who designed it to gerrymander, *i.e.*, to arrange voters in ways

that favor the Democrats.

71. The Plan does, in fact, favor the Democrats' electoral prospects beyond what their numbers warrant.

72. The nonpartisan Princeton Gerrymandering Project estimates that, based on the 2020 presidential elections, every one of the eight districts in the Plan is likely to be won by a Democrat. Only one district (the First) is competitive.

73. By contrast, the Princeton Gerrymandering Project estimates that six of the eight districts proposed by the MCRC are likely to be won by a Democrat. The other two are likely to be won by a Republican.

74. In 2020, Republicans cast about 35% of all votes cast for Maryland congressional candidates.

75. If a party casts 35% of all votes in a set of eight local races, it is very unlikely to lose every one of those races in the absence of effective political gerrymandering.

76. The Plan was given an overall grade of "F" in terms of fairness and geographic compactness by the Princeton Gerrymandering Project.

C. *Maryland's Gerrymandered Congressional District Plan Injures Plaintiffs.*

77. The Plan's extremely noncompact, elongated and disunited districts impede vital constituent-representative communication, including with Plaintiffs.

78. The Plan's extremely noncompact, elongated, and disunited districts confuse voters, including Plaintiffs, regarding such basic matters as which congressional district they reside in, who represents them, who is running for office in their district, and where they go to vote.

79. Because its districts cross so many political boundaries, the Plan fails to preserve fixed and known features that enable voters, including Plaintiffs, to maintain an orientation about

their territorial areas and their political lives.

80. Because its districts cross so many political boundaries, the Plan ensures that representatives from these districts will face conflicting allegiances as to legislative initiatives that benefit one constituency at the expense of another. Because of these conflicts, representatives from these districts will represent their constituents, including Plaintiffs, less effectively.

81. The fact that the Plan's districts are noncompact and cross an excessive number of political boundaries forces candidates for congressional office, including Plaintiffs Parrott and Warner, to expend additional resources to educate voters about which district they reside in and which candidates they are voting for, and to expend additional resources on mass media campaigns that are harder to direct to target audiences and that reach many voters residing in other districts.

82. The Plan diminishes the ability of Republican voters, including Plaintiffs, to cast a meaningful and effective vote for the candidates they prefer.

83. The Plan inflicts on Republican voters, including Plaintiffs, an electoral misfortune on the basis of, and in retaliation for, the previous exercise of their constitutional rights to vote and to speak and express their views.

84. The Plan injures all Maryland voters, including Plaintiffs, regardless of their party preferences or how they would vote in a particular election, by giving state legislators the power to make choices regarding the state's congressional delegation that only the voters should make.

85. Maryland's Plan injures all Maryland voters, including Plaintiffs, by fracturing, and thereby diminishing the representation of, political communities and communities of interest to which they belong.

D. *Maryland's Gerrymandered Congressional District Plan Violates Plaintiffs' Rights Under Article 7 of the Maryland Declaration of Rights.*

86. Article 7 of the Maryland Declaration of Rights provides that

the right of the People to participate in the Legislature is the best security of liberty and the foundation of all free Government; for this purpose, elections ought to be free and frequent; and every citizen having the qualifications prescribed by the Constitution, ought to have the right of suffrage.

Md. Dec. of R. Art. 7.

87. Article 7's guarantees are intended to provide and encourage the fair and free exercise of the elective franchise.

88. Article 7's guarantees apply to Maryland voters when voting in U.S. congressional elections.

89. Article 7's guarantees have been held to be even more protective of rights of political participation than the provisions of the federal Constitution.

90. The injuries set forth above violate Plaintiffs' rights to participate in elections for the U.S. Congress on an equal basis with other Maryland voters.

91. The injuries set forth above discourage Plaintiffs' fair and free exercise of the elective franchise.

E. Maryland's Gerrymandered Congressional District Plan Violates Plaintiffs' Rights Under Article III, Sec. 4 of the Maryland Constitution.

92. Article III, Section 4 of the Maryland Constitution provides:

Each legislative district shall consist of adjoining territory, be compact in form, and of substantially equal population. Due regard shall be given to natural boundaries and the boundaries of political subdivisions.

Md. Const. Art III, § 4.

93. The plain meaning of the term "legislative district" is any legislative district. By contrast, where the drafters of the relevant provisions of the Maryland Constitution intended to refer only to state legislative districts, they did so explicitly, as in Article III, Section 3 of the

Maryland Constitution (“legislative districts *for the election of members of the Senate and the House of Delegates*”), and Article III, Section 5 (“the legislative districts *for the election of members of the Senate and the House of Delegates*”; and “the legislative districting *of the State*”) (emphases added).

94. The authoritative interpretation of state law is a matter for the highest court in a state. The Maryland Court of Appeals has never ruled that Article III, Section 4 of the Maryland Constitution applies only to state legislative districts.

95. The districts in the Plan are not “compact in form.” To the contrary, they are exceedingly noncompact.

96. The districts in the Plan do not “consist of adjoining territory.”

97. The districts in the Plan do not show “due regard” for “the boundaries of political subdivisions.”

98. The failure of the congressional districts in the Plan to comply with Article III, Section 4 of the Maryland Constitution has injured Plaintiffs’ voting rights as set forth above.

FIRST CAUSE OF ACTION
(Violation of Md. Dec. of R. Art. 7)

99. Plaintiffs incorporate by reference and reallege all prior allegations.

100. Article 7 of the Maryland Declaration of Rights affords Plaintiffs the right to “free and frequent” elections and the “right of suffrage.”

101. Compelling evidence demonstrates that the Plan has subordinated this constitutional requirement to substantial improper considerations.

102. Defendants’ implementation of the Maryland Legislature’s partisan, gerrymandered Plan deprives Plaintiffs of their rights under Article 7.

103. Plaintiffs have no adequate remedy at law.

SECOND CAUSE OF ACTION
(Violation of Md. Const. Art III, § 4)

104. Plaintiffs incorporate by reference and reallege all prior allegations.

105. Article III, Section 4 of the Maryland Constitution requires that legislative districts, including congressional districts, “consist of adjoining territory, be compact in form” and give “due regard” to “the boundaries of political subdivisions.”

106. Compelling evidence demonstrates that the Plan has subordinated these constitutional requirements to substantial improper considerations.

107. Defendants’ implementation of the Maryland Legislature’s partisan, gerrymandered Plan deprives Plaintiffs of their rights under Article III, Section 4.

108. Plaintiffs have no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that the Court grant the following relief:

a. Issue a declaratory judgment finding the Plan illegally and unconstitutionally injures Plaintiffs and is unlawful;

b. Temporarily and permanently enjoin Defendants from calling, holding, or certifying any elections held under the Plan;

c. Order State authorities to adopt a new congressional districting plan before the June 2022 Maryland congressional primaries, consistent with the terms of this Court’s order and the requirements of the Maryland Constitution;

d. Until the State adopts such a plan, find that the MCRC plan is a product of extensive public involvement, complies with the Maryland Constitution, and is nonpartisan in intent and effect, and order its use in the June 2022 Maryland congressional primaries;

e. In the alternative, until the State adopts such a plan, order a new plan that complies

with the Maryland Constitution and is nonpartisan in intent and effect, and order its use in the June 2022 Maryland congressional primaries;

- f. Retain jurisdiction to issue any and all further orders necessary to comply with the law;
- g. Order Defendants to pay Plaintiffs' reasonable attorneys' fees and costs; and
- h. Award Plaintiffs any and all further relief that this Court deems just and proper.

Dated: December 21, 2021 Respectfully Submitted,

/S/ Eric W. Lee
Eric W. Lee, Esquire (Md. Bar No. 1612140001)
JUDICIAL WATCH, INC.
425 Third Street, S.W., Suite 800
Washington, DC 20024
Tel: (202) 646-5172
Email: elee@judicialwatch.org

Counsel for the Plaintiff

Respectfully Submitted,

/S/ William J. Holtzinger
William J. Holtzinger, Esquire
5308 Gold Mine Road
Frederick, Maryland 21703
(301) 788-1842
jholtzinge@aol.com
CPF # 9506210188

Counsel for the Plaintiff