

**U.S. District Court
District of Maryland (Greenbelt)
CIVIL DOCKET FOR CASE #: 8:08-cv-02455-AW**

Fraternal Order of Police Lodge No. 89 et al v. Prince George's County, Maryland
Assigned to: Judge Alexander Williams, Jr
Case in other court: the Circuit Court for P.G. County, Maryland, CAL08-24323
Cause: 28:1441 Petition for Removal- Breach of Contract

Date Filed: 09/19/2008
Date Terminated: 08/18/2009
Jury Demand: None
Nature of Suit: 190 Contract: Other
Jurisdiction: Federal Question

Plaintiff

Fraternal Order of Police Lodge No. 89

represented by **Bruce R Lerner**
Bredhoff and Kaiser PLLC
805 15th St NW Ste 1000
Washington , DC 20005
12028422600
Fax: 12028421888
Email: blerner@bredhoff.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

International Fire Fighters Association
Prince George's County Local 1619, Inc.

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Deputy Sheriff's Association
Prince George's County

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Prince George's County Correctional Officers Association, Inc.

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Police Civilian Employees Association

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Ismael V. Canales

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Douglas Bartholomew

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Robert A. Cease

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Curtis Knowles

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Arthur C. Emery

represented by **Bruce R Lerner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Intervenor Plaintiff

**Maryland Public Employees Council 67
a/w American Federation of State,
County and Municipal Employees,
AFL-CIO**

represented by **Darragh L Inman**
Kahn Smith and Collins PA
201 N Charles St 10th Fl
Baltimore , MD 21201
14102441010
Fax: 14102448001
Email: jinman@kahnsmith.com
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Joel A Smith
Kahn Smith and Collins PA
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Baltimore , MD 21201
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ATTORNEY TO BE NOTICED

Intervenor Plaintiff

**American Federation of State, County
and Municipal Employees, AFL-CIO,
Local 241**

represented by **Joel A Smith**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Darragh L Inman
(See above for address)
ATTORNEY TO BE NOTICED

Intervenor Plaintiff

**American Federation of State, County
and Municipal Employees, AFL-CIO,
Local 1170**

represented by **Joel A Smith**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Darragh L Inman
(See above for address)
ATTORNEY TO BE NOTICED

Intervenor Plaintiff

**American Federation of State, County
and Municipal Employees, AFL–CIO,
Local 2462**

represented by **Joel A Smith**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Darragh L Inman
(See above for address)
ATTORNEY TO BE NOTICED

Intervenor Plaintiff

**American Federation of State, County
and Municipal Employees, AFL–CIO,
Local 3389**

represented by **Joel A Smith**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Darragh L Inman
(See above for address)
ATTORNEY TO BE NOTICED

Intervenor Plaintiff

**American Federation of State, County
and Municipal Employees, AFL–CIO,
Local 2735**

represented by **Joel A Smith**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Darragh L Inman
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

Prince George's County, Maryland

represented by **Rajeshanand Kumar**
Office of Law for Prince Georges County
14741 Governor Oden Bowie Dr Ste 5121
Upper Marlboro , MD 20772
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Fax: 13019523071
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
09/19/2008	<u>1</u>	NOTICE OF REMOVAL from the Circuit Court for Prince George's County, Maryland, case number CAL08–24323. (Filing fee \$ 350 receipt number 84637013143), filed by Prince George's County, Maryland. (Attachments: # <u>1</u> Civil Cover Sheet)(ch, Deputy Clerk) (Entered: 09/19/2008)
09/19/2008	<u>2</u>	COMPLAINT against Prince George's County, Maryland, filed by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association. (Attachments: # <u>1</u> Attachment A–Resolution from the County Council of Prince George's County, Maryland, # <u>2</u> Civil Non Domestic Case Information Report)(ch, Deputy Clerk) (Entered: 09/19/2008)
09/19/2008	<u>3</u>	Writ of Summons Issued 30 days as to Prince George's County, Maryland. (ch, Deputy Clerk) (Entered: 09/19/2008)
09/19/2008	<u>4</u>	Notice of Filing Notice of Removal by Prince George's County, Maryland (ch, Deputy Clerk) (Entered: 09/19/2008)

09/19/2008	<u>5</u>	Civil Case Summary–Docket Entries from the Circuit Court for Prince George's County, Maryland (ch, Deputy Clerk) (Entered: 09/19/2008)
09/19/2008	<u>6</u>	Certification of Case signed by the Clerk from the Circuit Court for Prince George's County, Maryland (ch, Deputy Clerk) (Entered: 09/19/2008)
09/19/2008		The above pleadings #2–#6 are copies filed in the Circuit Court for Prince George's County, Maryland (ch, Deputy Clerk) (Entered: 09/19/2008)
09/19/2008	<u>7</u>	Correspondence re: Removal Notification Letter to Jeffrey L. Gibbs (ch, Deputy Clerk) (Entered: 09/19/2008)
09/29/2008	<u>8</u>	MOTION to Dismiss <i>or in the Alternative Motion for Summary Judgment</i> by Prince George's County, Maryland Responses due by 10/16/2008 (Attachments: # <u>1</u> Table of Contents, # <u>2</u> Memorandum of Law in Support of Motion to Dismiss or in the Alternative Motion for Summary Judgment, # <u>3</u> Notice of Filing of Lengthy Exhibits)(Kumar, Rajeshanand)LENGTHY EXHIBITS RECEIVED 9/30/08–FILED SEPARATELY Modified on 9/30/2008 (ch, Deputy Clerk). (Entered: 09/29/2008)
10/09/2008	<u>9</u>	Correspondence re: Corrected Exhibits (Kumar, Rajeshanand)(Corrected Exhibits Received 10/10/08–Filed Separately) Modified on 10/10/2008 (ch, Deputy Clerk). (Entered: 10/09/2008)
10/14/2008	<u>10</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>8</u> MOTION to Dismiss <i>or in the Alternative Motion for Summary Judgment</i> by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association. Responses due by 10/31/2008 (Attachments: # <u>1</u> Text of Proposed Order)(Lerner, Bruce) (Entered: 10/14/2008)
10/15/2008	11	PAPERLESS ORDER "Granting" <u>10</u> Consent Motion for Extension of Time to File Response/Reply Signed by Judge Alexander Williams, Jr on 10/15/08 (Williams, Alexander) (Entered: 10/15/2008)
10/21/2008	<u>12</u>	Cross MOTION for Summary Judgment <i>with Regard to Count I of the Complaint</i> by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association Responses due by 11/7/2008 (Attachments: # <u>1</u> Memorandum in Support of Cross Motion for Summary Judgment and Opposition to Defendant's Motion to Dismiss, # <u>2</u> Affidavit of Ismael Canales, # <u>3</u> Affidavit of Douglas Bartholomew, # <u>4</u> Rule 56(f) Declaration of Bruce R. Lerner, # <u>5</u> Exhibit 1)(Lerner, Bruce) (Entered: 10/21/2008)
10/21/2008	<u>13</u>	MOTION for Discovery by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association Responses due by 11/7/2008 (Lerner, Bruce) (Entered: 10/21/2008)
10/24/2008	<u>14</u>	MOTION to Intervene by Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL–CIO, American Federation of State, County and Municipal Employees, AFL–CIO, Local 241, American Federation of State, County and Municipal Employees, AFL–CIO, Local 1170, American Federation of State, County and Municipal Employees, AFL–CIO, Local 2462, American Federation of State, County and Municipal Employees, AFL–CIO, Local 3389, American Federation of State, County and Municipal Employees, AFL–CIO, Local 2735 Responses due by 11/10/2008 (Attachments: # <u>1</u> Memorandum in Support of Motion for Intervention, # <u>2</u> Appendix Complaint in Intervention, # <u>3</u> Text of Proposed Order Proposed Order)(Smith, Joel) (Entered: 10/24/2008)
11/07/2008	<u>15</u>	RESPONSE re <u>12</u> Cross MOTION for Summary Judgment <i>with Regard to Count I of the Complaint Defendant Prince George's County Maryland's REPLY to Plaintiffs Cross–Motion for Summary Judgment with Regard to Count I and Defendant's Reply to Plaintiffs Opposition to Defendant's Motion to Dismiss</i> filed by Prince George's County, Maryland. (Attachments: # <u>1</u> Exhibit Defendant's Reply Exhibit 1, # <u>2</u> Exhibit

		Defendant's Reply Exhibit 2, # <u>3</u> Exhibit Defendant's Reply Exhibit 3, # <u>4</u> Exhibit Defendant's Reply Exhibit 4, # <u>5</u> Exhibit Defendant's Reply Exhibit 5, # <u>6</u> Exhibit Defendant's Exhibit 6, # <u>7</u> Exhibit Defendant's Reply Exhibit 7, # <u>8</u> Exhibit Defendant's Reply Exhibit 8, # <u>9</u> Exhibit Defendant's Reply Exhibit 9)(Kumar, Rajeshanand) Hard Copies Received 11/12/08–Modified on 11/12/2008 (ch, Deputy Clerk). (Entered: 11/07/2008)
11/07/2008	<u>16</u>	RESPONSE re <u>13</u> MOTION for Discovery <i>Defendant's Opposition to Plaintiff's Motion for Discovery Under Rule 56(f)</i> filed by Prince George's County, Maryland. (Kumar, Rajeshanand) (Entered: 11/07/2008)
11/10/2008	<u>17</u>	RESPONSE re <u>14</u> MOTION to Intervene <i>Prince George's County, Maryland's Reply to Applicants Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL–CIO, et al, Motion for Leave to Intervene</i> filed by Prince George's County, Maryland. (Kumar, Rajeshanand) (Entered: 11/10/2008)
11/17/2008	<u>18</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>15</u> Response,, by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association Responses due by 12/4/2008 (Attachments: # <u>1</u> Text of Proposed Order)(Lerner, Bruce) (Entered: 11/17/2008)
11/18/2008	<u>19</u>	Correspondence re: Motion for Leave to Intervene (Smith, Joel) (Entered: 11/18/2008)
11/19/2008	<u>20</u>	ORDER granting <u>18</u> Motion for Extension of Time to File Response/Reply; Plaintiffs' papers in reply to County's opposition to the Plaintiffs' Cross–Motion for Summary Judgment with Regard to Count I shall be due on November 24,2008. Signed by Judge Alexander Williams, Jr on 11/18/08. (chs, Deputy Clerk) (Entered: 11/19/2008)
11/21/2008	<u>21</u>	ORDER GRANTING <u>14</u> Motion to Intervene; the Applicants in Intervention are joined as plaintiffs; The Clerk shall file the Applicants' Complaint in Intervention; The Defendant County shall have twenty days within which to plead or otherwise respond to the Applicants' Complaint in Intervention. Signed by Judge Alexander Williams, Jr on 11/20/08. (ch, Deputy Clerk) (Entered: 11/21/2008)
11/21/2008	<u>22</u>	COMPLAINT In Intervention, filed by Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL–CIO, American Federation of State, County and Municipal Employees, AFL–CIO, Local 241, American Federation of State, County and Municipal Employees, AFL–CIO, Local 1170, American Federation of State, County and Municipal Employees, AFL–CIO, Local 2462, American Federation of State, County and Municipal Employees, AFL–CIO, Local 3389, American Federation of State, County and Municipal Employees, AFL–CIO, Local 2735.(ch, Deputy Clerk) (Entered: 11/21/2008)
11/24/2008	<u>23</u>	Cross MOTION for Summary Judgment <i>with Regard to Counts II and III</i> by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association Responses due by 12/11/2008 (Lerner, Bruce) (Entered: 11/24/2008)
11/24/2008	<u>24</u>	Memorandum re <u>23</u> Cross MOTION for Summary Judgment <i>with Regard to Counts II and III</i> , <u>12</u> Cross MOTION for Summary Judgment <i>with Regard to Count I of the Complaint</i> , <u>13</u> MOTION for Discovery <i>under Rule 56(f)</i> filed by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association. (Lerner, Bruce) (Entered: 11/24/2008)
12/05/2008	<u>25</u>	Letter/ORDER setting hearing on all pending motions for January 12, 2009 at 9:30 a.m.. Signed by Judge Alexander Williams, Jr on 12/5/08. (ch, Deputy Clerk) (Entered: 12/05/2008)

12/10/2008	<u>26</u>	[FILED IN ERROR] RESPONSE re <u>22</u> Intervenor Complaint,, <i>Motion to Dismiss AFSCME Complaint in Intervention</i> filed by Prince George's County, Maryland. (Attachments: # <u>1</u> Memorandum of Law in Support of Motion To Dismiss, # <u>2</u> Exhibit Affidavit of Donna Brown with Attachments 1 &2, # <u>3</u> Exhibit AFSCME Official Grievance, # <u>4</u> Exhibit Affidavit of Johnathan Seeman with Attachments 1 &2, # <u>5</u> Exhibit Affidavit of Joanne Bonacci with Attachments 1 &2)(Kumar, Rajeshanand) Modified on 12/11/2008 (elt, Deputy Clerk). (Entered: 12/10/2008)
12/10/2008	<u>27</u>	MOTION to Dismiss <i>AFSCME Complaint In Intervention</i> by Prince George's County, Maryland Responses due by 12/29/2008 (Attachments: # <u>1</u> Memorandum of Law in Support of Motion to Dismiss, # <u>2</u> Exhibit Affidavit of Donna Brown with Attachments 1 &2, # <u>3</u> Exhibit AFSCME Official Grievance, # <u>4</u> Exhibit Affidavit of Johnathan Seeman with Attachments 1 &2, # <u>5</u> Exhibit Affidavit of Joanne Bonacci)(Kumar, Rajeshanand) (Entered: 12/10/2008)
12/11/2008	<u>28</u>	RESPONSE re <u>23</u> Cross MOTION for Summary Judgment <i>with Regard to Counts II and III</i> filed by Prince George's County, Maryland. (Kumar, Rajeshanand) (Entered: 12/11/2008)
12/12/2008	<u>29</u>	Consent MOTION for Extension of Time <i>to Respond to County's Motion to Dismiss</i> by Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL-CIO, American Federation of State, County and Municipal Employees, AFL-CIO, Local 241, American Federation of State, County and Municipal Employees, AFL-CIO, Local 1170, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2462, American Federation of State, County and Municipal Employees, AFL-CIO, Local 3389, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2735 Responses due by 12/29/2008 (Attachments: # <u>1</u> Text of Proposed Order)(Smith, Joel) (Entered: 12/12/2008)
12/12/2008	30	PAPERLESS ORDER "Granting" <u>29</u> Consent Motion for Extension of Time Signed by Judge Alexander Williams, Jr on 12/12/08 (Williams, Alexander) (Entered: 12/12/2008)
12/18/2008	<u>31</u>	RESPONSE re <u>28</u> Response <i>in Opposition to Plaintiff's Motion for Summary Judgement with Regard to Counts II and III of the Complaint</i> filed by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association. (Lerner, Bruce) (Entered: 12/18/2008)
12/18/2008	<u>32</u>	Letter/ORDER scheduling hearing on all pending motions for January 12, 2009 at 9:30 a.m.. Signed by Judge Alexander Williams, Jr on 12/18/08. (ch, Deputy Clerk) (Entered: 12/19/2008)
12/31/2008	<u>33</u>	Cross MOTION for Summary Judgment <i>and in the Alternative, for Deferral of Summary Judgment Pending Document Discovery</i> by Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL-CIO, American Federation of State, County and Municipal Employees, AFL-CIO, Local 241, American Federation of State, County and Municipal Employees, AFL-CIO, Local 1170, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2462, American Federation of State, County and Municipal Employees, AFL-CIO, Local 3389, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2735 Responses due by 1/20/2009 (Attachments: # <u>1</u> Memorandum in Support of Plaintiff AFSCME Union's Cross-Motion for Summary Judgment and, in the Alternative, for Deferral of Summary Judgment Pending Document Discovery, # <u>2</u> AFSCME Exh. A, # <u>3</u> AFSCME Exh. B, # <u>4</u> AFSCME Exh. C, # <u>5</u> AFSCME Exh. D, # <u>6</u> AFSCME Exh. E, # <u>7</u> AFSCME Exh. F, # <u>8</u> AFSCME Exh. G, # <u>9</u> AFSCME Exh. H, # <u>10</u> Affidavit Glenard S. Middleton, Sr, # <u>11</u> AFSCME Exh. J, # <u>12</u> AFSCME Exh. K, # <u>13</u> AFSCME Exh. L, # <u>14</u> AFSCME Exh. M, # <u>15</u> AFSCME Exh. N, # <u>16</u> Affidavit of Joel A. Smith)(Smith, Joel) (Entered: 12/31/2008)
01/01/2009	<u>34</u>	RESPONSE in Opposition re <u>27</u> MOTION to Dismiss <i>AFSCME Complaint In Intervention</i> filed by Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL-CIO, American

		Federation of State, County and Municipal Employees, AFL-CIO, Local 241, American Federation of State, County and Municipal Employees, AFL-CIO, Local 1170, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2462, American Federation of State, County and Municipal Employees, AFL-CIO, Local 3389, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2735. Replies due by 1/15/2009. (Smith, Joel) (Entered: 01/01/2009)
01/05/2009	<u>35</u>	Correcting Earlier Submission (Attachments: # <u>1</u> Exhibit Substituted Exh. J)(Smith, Joel) (Entered: 01/05/2009)
01/06/2009	<u>36</u>	Letter/ORDER that the hearing on all pending motions previously set for January 12, 2009 has been postponed. The hearing will now take place on February 13, 2009 at 10:00 a.m.. Signed by Judge Alexander Williams, Jr on 1/6/09. (ch, Deputy Clerk) (Entered: 01/06/2009)
01/15/2009	<u>37</u>	RESPONSE re <u>34</u> Response in Opposition to Motion,, <i>Reply to AFSCME Opposition to County's Motion to Dismiss Complaint in Intervention</i> filed by Prince George's County, Maryland. (Kumar, Rajeshanand) (Entered: 01/15/2009)
01/21/2009	<u>38</u>	Consent MOTION for Extension of Time by Prince George's County, Maryland Responses due by 2/9/2009 (Attachments: # <u>1</u> Exhibit Holy Cross Admission Record)(Kumar, Rajeshanand) (Entered: 01/21/2009)
01/21/2009	39	PAPERLESS ORDER "Granting" <u>38</u> Consent Motion for Extension of Time Signed by Judge Alexander Williams, Jr on 1/21/09 (Williams, Alexander) (Entered: 01/21/2009)
01/23/2009	<u>40</u>	STIPULATION <i>for Extension of Time for Prince George's County to File Responsive Pleadings on Monday, January 26, 2009 and for AFSCME Plaintiffs to File Any Responsive Pleadings on February 10, 2009</i> by Prince George's County, Maryland. (Kumar, Rajeshanand) (Entered: 01/23/2009)
01/26/2009	<u>41</u>	RESPONSE in Opposition re <u>33</u> Cross MOTION for Summary Judgment <i>and in the Alternative, for Deferral of Summary Judgment Pending Document Discovery County's Opposition to AFSCME Cross-Motion For Summary Judgment and in the Alternative, for Deferral of Summary Judgment Pending Document Discovery</i> filed by Prince George's County, Maryland. Replies due by 2/9/2009. (Attachments: # <u>1</u> Memorandum of Law In Support of County's Reply to AFSCME Opposition to Motion to Dismiss and In Support of Opposition to AFSCME Cross-Motion for Summary Judgment, # <u>2</u> Exhibit AFSCME Labor Negotiation Documents, # <u>3</u> Exhibit Emails of Agreement, # <u>4</u> Exhibit SAC Reports for FY05 through FY08, # <u>5</u> Exhibit CNN Money - The Crisis: A Timeline, # <u>6</u> Exhibit Letters To and From AFSCME)(Kumar, Rajeshanand) Hard Copies Received 1/30/09-Modified on 1/30/2009 (chs, Deputy Clerk). (Entered: 01/26/2009)
02/06/2009	<u>42</u>	REPLY to Response to Motion re <u>33</u> Cross MOTION for Summary Judgment <i>and in the Alternative, for Deferral of Summary Judgment Pending Document Discovery</i> filed by Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL-CIO, American Federation of State, County and Municipal Employees, AFL-CIO, Local 241, American Federation of State, County and Municipal Employees, AFL-CIO, Local 1170, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2462, American Federation of State, County and Municipal Employees, AFL-CIO, Local 3389, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2735. (Attachments: # <u>1</u> Exhibit AFSCME Reply Ex. A, # <u>2</u> Exhibit AFSCME Reply Ex. B, # <u>3</u> Exhibit AFSCME Reply Exh. C, # <u>4</u> Exhibit AFSCME Reply Ex. D, # <u>5</u> Exhibit AFACME Reply Exh. E)(Smith, Joel) (Entered: 02/06/2009)
02/13/2009	<u>43</u>	MOTION HEARING held before Judge Alexander Williams, Jr. on 2/13/2009 re <u>23</u> Cross MOTION for Summary Judgment with Regard to Counts II and III filed by Deputy Sheriff's Association, International Fire Fighters Association, Police Civilian Employees Association, Douglas Bartholomew, Fraternal Order of Police Lodge No. 89, Prince George's County Correctional Officers Association, Inc., Robert A. Cease, Curtis Knowles, Ismael V. Canales, Arthur C. Emery, <u>12</u> Cross MOTION for Summary Judgment <i>with Regard to Count I of the Complaint</i> filed by <i>Deputy Sheriff's Association, International Fire Fighters Association, Police Civilian Employees</i>

		<p>Association, Douglas Bartholomew, Fraternal Order of Police Lodge No. 89, Prince George's County Correctional Officers Association, Inc., Robert A. Cease, Curtis Knowles, Ismael V. Canales, Arthur C. Emery, <u>33</u> Cross MOTION for Summary Judgment and in the Alternative, for Deferral of Summary Judgment Pending Document Discovery filed by American Federation of State, County and Municipal Employees, AFL-CIO, Local 1170, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2462, American Federation of State, County and Municipal Employees, AFL-CIO, Local 2735, Maryland Public Employees Council 67 a/w American Federation of State, County and Municipal Employees, AFL-CIO, American Federation of State, County and Municipal Employees, AFL-CIO, Local 241, American Federation of State, County and Municipal Employees, AFL-CIO, Local 3389, <u>13</u> MOTION for Discovery filed by Deputy Sheriff's Association, International Fire Fighters Association, Police Civilian Employees Association, Douglas Bartholomew, Fraternal Order of Police Lodge No. 89, Prince George's County Correctional Officers Association, Inc., Robert A. Cease, Curtis Knowles, Ismael V. Canales, Arthur C. Emery, <u>27</u> MOTION to Dismiss AFSCME Complaint In Intervention filed by Prince George's County, Maryland, <u>8</u> MOTION to Dismiss or in the Alternative Motion for Summary Judgment filed by Prince George's County, Maryland – argued – "Taken Under Advisement". Order to be entered by the Court (Court Reporter Gloria Williams) (has, Deputy Clerk) (Entered: 02/13/2009)</p>
02/17/2009	<u>44</u>	<p>ORDER GRANTING granting <u>13</u> Motion for Discovery; That the parties complete discovery within thirty (30) days; that the parties file any supplement briefs pertaining to new facts or information obtained through discovery within three (3) calendar weeks after discovery is completed. Signed by Judge Alexander Williams, Jr on 2/17/09. (ch, Deputy Clerk) Docket text modified Modified on 2/24/2009 (ch, Deputy Clerk). (Entered: 02/17/2009)</p>
04/06/2009	<u>45</u>	<p>NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Proceedings held on 2/13/09, before Judge Williams. Court Reporter/Transcriber G.I. Williams, Telephone number 301-344-3228. Total number of pages filed: 63. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained from the Court Reporter or through PACER.. Redaction Request due 4/24/2009. Redacted Transcript Deadline set for 5/4/2009. Release of Transcript Restriction set for 7/2/2009. (giw, Court Reporter) (Entered: 04/06/2009)</p>
04/06/2009	<u>46</u>	<p>Consent MOTION for Extension of Time to File <i>Supplemental Briefs</i> by Ismael V. Canales, Douglas Bartholomew, Robert A. Cease, Curtis Knowles, Arthur C. Emery, Fraternal Order of Police Lodge No. 89, International Fire Fighters Association, Deputy Sheriff's Association, Prince George's County Correctional Officers Association, Inc., Police Civilian Employees Association Responses due by 4/23/2009 (Attachments: # <u>1</u> Text of Proposed Order)(Lerner, Bruce) (Entered: 04/06/2009)</p>
04/07/2009	<u>47</u>	<p>ORDER granting <u>46</u> Motion for Extension of Time to File Document; that the supplemental briefs following discovery shall be due on April 17, 2009, and shall be filed simultaneously at 4:00 p.m. on that day. Signed by Judge Alexander Williams, Jr on 4/7/09. (ch, Deputy Clerk) (Entered: 04/08/2009)</p>
04/17/2009	<u>48</u>	<p>Supplemental to <i>Cross Motions for Summary Judgment</i>. (Attachments: # <u>1</u> Exhibit Seeman Depo. Transcript, # <u>2</u> Exhibit Depo. Ex. 1, # <u>3</u> Exhibit Depo. Ex. 2, # <u>4</u> Exhibit Depo. Ex. 3, # <u>5</u> Exhibit Depo. Ex. 4, # <u>6</u> Exhibit Depo. Ex. 5, # <u>7</u> Exhibit Depo. Ex. 6, # <u>8</u> Exhibit Depo. Ex. 7, # <u>9</u> Exhibit Depo. Ex. 8, # <u>10</u> Exhibit Depo. Ex. 9)(Inman, Darragh) (Entered: 04/17/2009)</p>
04/17/2009	<u>49</u>	<p>Supplemental to <i>Prince George's County Motions to Dismiss, or In the Alternative Motions for Summary Judgments to FOP and AFSCME Complaints and Cross Motions for Summary Judgments</i>. (Attachments: # <u>1</u> Exhibit Notice of Filing Lengthy Exhibits)(Kumar, Rajeshanand) LENGTHY EXHIBITS 1-2 RECEIVED 4/20/09 FILED SEPARATELY-Modified on 4/20/2009 (chs, Deputy Clerk). (Entered: 04/17/2009)</p>
04/17/2009	<u>50</u>	<p>Supplemental to <i>Cross Motions for Summary Judgment</i>. (Lerner, Bruce) (Entered: 04/17/2009)</p>

05/21/2009	<u>51</u>	ORDER regarding the supplements to the Motion and Cross-Motion for Summary Judgment filed by both Plaintiffs and Defendant. Signed by Judge Alexander Williams, Jr on 5/21/09. (ch, Deputy Clerk) (Entered: 05/21/2009)
05/21/2009	<u>52</u>	RESPONSE re <u>51</u> Order <i>Defendant's Re-File of Supplemental Motion</i> filed by Prince George's County, Maryland. (Attachments: # <u>1</u> Exhibit Defendant's Supplemental Motion With Changes Highlighted)(Kumar, Rajeshanand) (Entered: 05/21/2009)
08/18/2009	<u>53</u>	MEMORANDUM OPINION. Signed by Judge Alexander Williams, Jr on 8/18/09. (ch, Deputy Clerk) (Entered: 08/18/2009)
08/18/2009	<u>54</u>	ORDER that <u>8</u> Defendant's Motion for Summary Judgment and <u>27</u> Defendant's Motion to Dismiss BE, and the same hereby IS GRANTED as to Count I and Count II of the Unions' Complaints and IS DENIED as to Count III; <u>23</u> Plaintiffs' Cross Motion for Summary Judgment and <u>33</u> Plaintiffs Cross Motion for Summary Judgment as to Count as to Count III of the Complaints BE and the same hereby ARE GRANTED and ARE DENIED as to Counts I and II of the Complaints (paper no 12 and 33); Parties are to consult and discuss means and manner of refunding any monies owed to Union employees as a result of having complied with the EFP, and, if necessary, submit a joint proposal for the Court's approval within ten (10) days of the entry of this Order; the Clerk of Court is to CLOSE this case. Signed by Judge Alexander Williams, Jr on 8/18/09. (ch, Deputy Clerk) (Entered: 08/18/2009)