

HOWARD COUNTY BOARD OF APPEALS

IN THE MATTER OF

\*

Aidan Morrell, et al.

\*

Case No. BA-813D

REGARDING

\*

W.R. Grace

7500 Grace Drive

\*

Columbia, MD 21044

\*

\* \* \* \* \*

**SECOND WITHDRAWAL LINE**

Appellees, Aidan Morrell, Sara Morrell, Golash Adadey, Nana Adadey, Hari Srinivasan, Mustafa Khaliqi, Anwer Hasan, Aisha Hasan, Rasa Ramadas, Padma Swamy, Shamioka Preston, Raja Syed, Nusrat Siddique, Arundati Khuvel, Monica Tolentino, AmiCietta Clarke, Zain Qazi, and Senthil Achari (collectively, "Appellees"), by their attorney, Grant Amadeus Giel, file this Second Withdrawal Line and, for reasons, say:

1. Appellees Aisha Hasan and Zain Qazi were previously listed as petitioners in the initially filed BA-813D appeal;
2. Aisha Hasan and Zain Qazi are not continuing their appearance as named Appellees in these proceedings;
3. Aisha Hasan and Zain Qazi promptly informed Appellees' counsel and the Board administrator Kel Berg of their intent to withdraw when it became apparent for them to do so;
4. All other named Appellees are proceeding with their participation in the case;

5. On July 29, 2025, Appellees' first Withdrawal Line was rejected by Order for failure to identify the Howard County Department of Planning and Zoning ("DPZ") in the certificate of service;

6. Appellees, in the interest of complying with the Order, have provided an updated Certificate of Service with this Line to include DPZ, as well as the Howard County Office of Law, and will further comply with the terms of the order to serve DPZ and the Office of Law in all future filings;

7. Appellees further state that the DPZ is not currently a party to this case. The DPZ maintains a longstanding practice of not directly advocating for its positions before the Zoning Hearing Examiner ("ZHE") or Board of Appeals, and has thus far upheld that principle in this case. DPZ did not substantively participate and/or file memoranda before the ZHE, nor did DPZ enlist any member of the Office of Law to do so on its behalf, nor was DPZ served as a party in any of the prior communications or filed briefs by either participating Party before the ZHE, and DPZ's Director instead participated as a witness for the Appellant W.R. Grace. In the event that DPZ indicates its intent to participate, then it would become a party, but it has thus far not done so;

8. Appellees further state that the first Withdrawal Line was not precluded by Section 2.204(i) and does not constitute an *ex parte* communication "regarding the merits of a pending appeal," because there are no merits to discuss in the Line. The entirety of the Line's contents were presented for the sole procedural purpose of noting the intent to withdraw from the case by named Appellees Aisha Hasan and Zain Qazi, and they do not speak to any meritorious element of either the Appellees' or Appellant's respective cases,

and the named Appellees Aisha Hasan and Zain Qazi are entitled to withdraw their appearance at any time even without the communication of counsel on their behalf, as they affirmatively did by directly writing to this Board via email on Saturday, July 26, 2025.

WHEREFORE, Aisha Hasan and Zain Qazi are no longer named Appellees in the above-captioned case and will not be listed as such in any subsequent filings.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Grant Amadeus Giel', written over a horizontal line.

Grant Amadeus Giel  
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*Attorney for Appellees*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29<sup>th</sup> day of July, 2025, a copy of the foregoing  
Second Withdrawal Line was served electronically and/or by first class mail, postage  
prepaid, on:

Howard County Board of Appeals  
c/o Kel L. Berg, Board Administrator  
3430 Court House Drive  
Ellicott City, Maryland 21043

Howard County Department of Planning and Zoning  
3430 Court House Drive  
Ellicott City, Maryland 21043

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*Attorney for Appellant*

  
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Grant Amadeus Giel