

From: Tom Coale
Sent: Monday, November 10, 2025 11:01 AM
To: Berg, Kel <kberg@howardcountymd.gov>
Cc: Alex Votaw
Subject: Re: BA 22-023C&V: Citizen-Protestants' Written Proffer

Dear Ms. Berg,

I would ask that the Board be advised that Petitioner objects to all of the items included in Protestants' Written Proffer as these are far beyond "technical corrections". The remand relates to application of law to the administrative record and no new testimony is necessary. In the event Protestant is permitted to introduce such evidence, Petitioner should be entitled to a rebuttal as the party bearing the ultimate burden of proof.

In the event such evidence is not admitted, we can proceed in accordance with the Board's original Order with undersigned counsel and Protestants' counsel available to argue the interpretation of the relevant zoning regulations.

Sincerely,
Tom Coale