

Donna Gorjón

Appellant,

v.

Howard County Department of Planning and Zoning,

Appellee.

Before the Howard County Board of Appeals

BA Case No. 829D / CE-26-17

Filed with: Kel L. Berg, Board Administrator, Howard County Board of Appeals

APPELLANT'S MOTION FOR LEAVE TO SUBMIT EXHIBIT 21 VIDEO FILE

Appellant Donna Gorjón, pro se, respectfully moves this Board for leave to submit the video file constituting Exhibit 21, and states as follows:

1. Exhibit 21 — described in the Table of Exhibits filed July 30, 2026 as “Video evidence — five deviations from measurement tool manufacturer's required procedure” — was cited in Appellant's Memorandum of Points and Authorities at §III.E and §IV, filed the same day. Appellee has accordingly had written notice of the existence and substance of this evidence since July 30, 2026.
2. Prior to the August 18, 2026 supplemental filing deadline, Appellant requested guidance from the Board regarding the proper method for submitting video evidence (e.g., digital media, cloud-storage link, or other format). Appellant did not receive a response to that request prior to the deadline.
3. As a result, Appellant's August 18, 2026 supplemental filing included Exhibits 17, 24, and 32 through 37, but did not include the Exhibit 21 video file, pending clarification of the proper submission method.
4. Section 2.210 of the Board's Rules of Procedure provides that, for good cause shown, the Board may receive additional evidence. Good cause exists here because: (a) Appellant's inquiry regarding submission format was timely made and went unanswered; (b) the substance of Exhibit 21 was already disclosed in writing to Appellee via the July 30, 2026 Table of Exhibits and Memorandum, such that the video file itself introduces no new factual allegation and merely corroborates evidence already before the Board and known to Appellee; and (c) Appellee therefore suffers no prejudice from receiving the video file itself after August 18, 2026, having already had over three weeks' written notice of its content in advance of the September 17, 2026 hearing.
5. Appellant respectfully requests that the Board (a) advise Appellant of the appropriate method and format for submitting the Exhibit 21 video file, and (b) grant leave for Appellant to submit that file upon receipt of such guidance, and in any event no later than a reasonable period before the September 17, 2026 hearing.

WHEREFORE, Appellant respectfully requests that this Motion be granted.

Respectfully submitted,

Donna Gorjón
Appellant, pro se
gorjondo@att.net

Dated: August 19, 2026

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of August, 2026, a copy of the foregoing Motion was served by email upon:

David R. Moore, Esq. (dmoore@howardcountymd.gov)
Gary W. Kuc, Esq. (GKuc@howardcountymd.gov)
Lawrence Schoen (larryschoen@gmail.com)
Marcie Karen Weil (hikingboots6@aol.com)

Donna Gorjón