

HOWARD COUNTY BOARD OF APPEALS

HOWARD COUNTY, MARYLAND

BA-829D / CE-26-17

DONNA GORJÓN

Appellant, Pro Se

**APPELLANT'S MOTION TO ESTABLISH A DATE CERTAIN  
FOR CONTINUATION OF HEARING, PROVIDE ADEQUATE  
ADVANCE NOTICE, CLARIFY STATUS OF WITNESS  
SUBPOENAS, AND PROVIDE ATTENDANCE RECORDS**

Appellant Donna Gorjón, appearing pro se, respectfully requests that the Howard County Board of Appeals promptly establish a date certain for continuation of the hearing in BA-829D / CE-26-17, provide sufficient advance notice to permit meaningful preparation and witness arrangements, provide direction concerning the subpoena procedure applicable to the continuation hearing, and provide or identify the September 17 electronic attendance/sign-in record maintained by the Board, if any.

This Motion does not seek delay. Appellant seeks the earliest reasonable continuation date that allows her to present her case, address witness and subpoena procedures as directed by the Board, coordinate material witnesses, and prepare the remainder of her presentation and rebuttal.

## **I. PROCEDURAL BACKGROUND**

1. BA-829D / CE-26-17 is Appellant's appeal from the Hearing Examiner's Decision and Order dated June 15, 2026.
2. On July 17, 2026, the Board issued a Scheduling Order requiring the parties to appear on September 17, 2026 at 9:00 a.m. and identifying October 8, 2026 at 6:30 p.m. as a reserved hearing continuation date, "if needed." The Scheduling Order is attached as Exhibit A.
3. The Board convened on September 17, 2026. The proceeding ended before the merits of Appellant's appeal were heard and before Appellant presented her witnesses.
4. To Appellant's recollection, immediately before the September 17 proceeding ended, the Board did not announce October 8, 2026 or any other date as the date upon which BA-829D / CE-26-17 would continue.
5. Following September 17, Appellant repeatedly requested written clarification concerning the procedural status of the case, whether the hearing would be rescheduled, when and how notice would be provided, and the status of the continuation date. Those requests are reflected in Exhibits D, E, and F.
6. As checked by Appellant on October 5, 2026, Howard County's public Board of Appeals page for this appeal identified

its status as "CONTINUATION DATE TBD." The County's individual case page identified the matter as "Continued" and listed September 17, 2026 as the hearing date.

7. As checked by Appellant on October 5, 2026, the County's public Upcoming Hearings page did not list an October 8, 2026 continuation hearing for this appeal.

8. Accordingly, the County public records reviewed by Appellant on October 5, 2026 did not identify October 8, 2026 as the scheduled continuation date. The July 17 Scheduling Order nevertheless remains accurately described as having reserved October 8, 2026 as a continuation date "if needed." Appellant therefore requests a definite written continuation date and adequate advance notice.

## **II. NINE SUBPOENAS WERE ISSUED FOR THE SEPTEMBER 17 HEARING**

9. Appellant caused nine witness subpoenas to be issued in preparation for the September 17, 2026 hearing.

10. Exhibit B is the subpoena issued to Brian R. Dietz and is submitted solely as a representative example of the form and hearing-date requirements contained in the subpoenas issued for that proceeding. Exhibit B is not intended to suggest that Mr. Dietz was the only subpoenaed witness.

11. The representative subpoena directs appearance specifically on September 17, 2026. It does not identify a later continuation date.

12. Exhibit C is Appellant's September 10, 2026 Updated Witness and Subpoena Status filing concerning the nine subpoenaed witnesses.

### **III. STATUS OF SUBPOENAED WITNESSES AND ATTENDANCE RECORD**

13. Because the September 17 proceeding ended before Appellant presented her case, the subpoenaed witnesses were not called and their attendance was not established through testimony on the evidentiary record.

14. Persons attending the proceeding were directed to sign in electronically, either remotely or using the computer located outside the hearing gallery.

15. Appellant personally observed Rosa Gil and Geoffrey Goins complete the electronic sign-in process and observed Inspector Blanding in the hearing gallery.

16. Geoffrey Goins was personally served with the Board-issued subpoena on September 9, 2026 at 9:30 a.m., as documented by the Affidavit / Certification of Personal Service attached as Exhibit G. The certification was transmitted afterward; the later

transmission of the certification should not be confused with the September 9 date of personal service.

17. Appellant does not represent that these were the only subpoenaed witnesses who appeared. Other subpoenaed witnesses may have signed in electronically or otherwise participated without Appellant's personal observation.

18. Appellant requested attendance and Board-participation records concerning the September 17 proceeding. Appellant has not received or located a posted official roster identifying all persons who signed in or participated.

19. Without that record, Appellant cannot reliably determine which of the nine subpoenaed witnesses appeared on September 17 or what additional arrangements may be necessary for the continued hearing.

20. Appellant therefore requests that the Board provide or identify the September 17 electronic attendance/sign-in record, or other record identifying persons who registered for or participated in the proceeding, to the extent such a record is maintained.

#### **IV. LAWRENCE SCHOEN - USPS DELIVERY AND SUBPOENA PROCEDURE**

21. One of the subpoenaed witnesses was Lawrence Schoen. Appellant attempted delivery of the September 17 subpoena through the United States Postal Service.

22. USPS did not complete delivery of the subpoena to Mr. Schoen before the September 17, 2026 hearing.

23. Appellant requests that the Board provide direction regarding the procedure for the subpoena issued to Mr. Schoen in connection with the continuation hearing, including whether a new or reissued subpoena is required once a continuation date is established.

24. Appellant's September 10, 2026 filing, reproduced as Exhibit C, reported Mr. Schoen as "subpoenaed and served" based on the information available to Appellant at that time. Subsequent USPS information indicated that delivery of the subpoena was not completed. Exhibit C is submitted as a historical record of the September 10 filing and is not offered as proof that service of Mr. Schoen's subpoena was completed.

25. The absence of a presently established continuation date prevents Appellant from obtaining the Board's direction and making the resulting witness arrangements for a specific

continuation date.

## **V. NEED FOR MEANINGFUL ADVANCE NOTICE**

26. Appellant recognizes that the July 17 Scheduling Order reserved October 8, 2026 at 6:30 p.m. as a continuation date, if needed.

27. However, the September 17 proceeding ended before the merits were heard; no continuation date was announced to Appellant immediately before the proceeding ended; the County public records reviewed by Appellant on October 5 identified the continuation date as TBD or the matter as Continued without listing October 8 as a hearing date; and Appellant repeatedly sought clarification.

28. Appellant has awaited a definite continuation date while attempting to preserve the record, determine witness status, and obtain procedural guidance.

29. A response shortly before October 8 stating that October 8 is the continuation date would not resolve the practical difficulty created by the intervening uncertainty. Appellant would still need to determine witness status, obtain the Board's direction concerning subpoena procedure, and coordinate attendance.

30. Appellant therefore respectfully requests that, if the Board considers October 8 to remain operative, the Board first address

whether sufficient time remains for Appellant to complete the witness and subpoena procedures directed by the Board and secure her material witnesses.

31. If sufficient time does not remain, Appellant requests that the Board establish the earliest reasonable replacement date that permits those steps to be completed.

## **VI. SUBPOENA PROCEDURE FOR THE CONTINUATION**

32. Howard County Board of Appeals Rules of Procedure § 2.208(h) addresses subpoenas. Appellant requests that the Board provide direction concerning the appropriate subpoena procedure applicable to the continuation hearing once a date is established.

33. Appellant specifically requests direction as to whether subpoenas issued for September 17 remain effective for the continued proceeding and, if not, whether new, amended, or reissued subpoenas should be requested.

34. A known continuation date and clear procedural direction will permit Appellant to coordinate witness attendance and take the subpoena-related steps directed by the Board.

## **VII. NEED FOR A DEFINITE CONTINUATION DATE**

35. Appellant does not contend in this Motion that the July 17 Scheduling Order was ineffective when issued. Rather, Appellant seeks relief because subsequent events and the County public records reviewed on October 5 leave the operative continuation date uncertain.

36. The present uncertainty materially affects Appellant's ability to coordinate material witnesses and prepare to present her appeal.

37. A definite hearing date and sufficient advance notice will permit an orderly continuation and allow Appellant to follow whatever subpoena procedure the Board directs.

## **REQUEST FOR RELIEF**

- A. Promptly establish a date certain for continuation of BA-829D / CE-26-17;
- B. Provide Appellant with clear written notice of that continuation date;
- C. Establish the continuation date with sufficient advance notice to permit Appellant to determine witness status, obtain the Board's direction concerning subpoena procedure, take the steps directed by the Board, and coordinate witness

- attendance;
- D. If the Board considers October 8, 2026 at 6:30 p.m. to remain operative, determine whether sufficient time remains for Appellant to complete those witness and subpoena-related steps before requiring Appellant to proceed on that date;
  - E. If sufficient time does not remain, establish the earliest reasonable replacement continuation date;
  - F. Provide direction as to whether subpoenas issued for September 17 remain effective for the continued hearing and, if not, the procedure for requesting new, amended, or reissued subpoenas;
  - G. Provide or identify the September 17, 2026 electronic attendance/sign-in record, or other record identifying persons who registered for or participated in the proceeding, to the extent maintained by the Board;
  - H. Provide direction regarding the subpoena procedure applicable to Lawrence Schoen in light of USPS's non-delivery of the September 17 subpoena;
  - I. Direct that the continuation date be reflected on the public docket and applicable Board hearing calendar; and
  - J. Grant such other and further relief as the Board determines appropriate to provide an orderly continuation.

Respectfully submitted,

Donna Gorjón

Appellant, Pro Se

Date: October 5, 2026

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **CERTIFICATE OF SERVICE**

I certify that on October 5, 2026, I served a copy of the foregoing Motion and attached exhibits by electronic mail upon:

David R. Moore — ~~dmoores@howardcountymd.gov~~  
Counsel for Howard County Department of Planning and Zoning

Kristen Bowen Perry — ~~kbperry@howardcountymd.gov~~  
Deputy County Solicitor

Filed with:

Kel Berg, Board Administrator — ~~kberg@howardcountymd.gov~~  
Howard County Board of Appeals — councilboard@howardcountymd.gov

Courtesy copies — not represented as formal service:

Aron Weiss — ~~aweiss@howardcountymd.gov~~

Gary W. Kuc — ~~gwkuc@howardcountymd.gov~~

Method of Service: Electronic mail

Donna Gorjón  
Appellant, Pro Se

**EXHIBIT A**

July 17, 2026 Scheduling Order

Official Howard County Board of Appeals docket document

**HOWARD COUNTY BOARD OF APPEALS**

**DONNA GORJON**

Appellant,

vs.

**HOWARD COUNTY DEPARTMENT OF PLANNING  
AND ZONING (DPZ)**

Respondent.

**BEFORE THE  
HOWARD COUNTY BOARD OF APPEALS**

**BA Case No: BA-829D**

**SCHEDULING ORDER**

UPON CONSIDERATION of the Petition of Appeal of Hearing Examiner Decision filed by the Appellant on July 15, 2026, and pursuant to Howard County Charter §501, it is this 17th day of July 2026;

ORDERED, that parties shall appear for the initial hearing date scheduled for September 17, 2026, at 9:00 a.m. and with reserved hearing continuation dates, if needed, scheduled for October 8, 2026, at 6:30 p.m.

It is so ORDERED.

**HOWARD COUNTY BOARD OF APPEALS  
CHAIRPERSON**

Gene T. Ryan

*Reproduced from the official Howard County Board of Appeals PDF for inclusion in this assembled package. For filing, the original County PDF is preferable if available.*

## EXHIBIT B

IN THE MATTER OF:  
Donna Gorjón  
v.  
Howard County Department of Planning and  
Zoning

BEFORE THE  
HOWARD COUNTY  
BOARD OF APPEALS  
CASE NO. BA-829D

### SUBPOENA

TO: (Name and Address)

Brian R. Dietz, Professional Land Surveyor

Dietz Surveying Inc.

8119 Oakleigh Road Baltimore, MD 21234

In accordance with the Howard County Board of Appeals Rules of Procedure § 2.208(h), you are hereby compelled to ☐ Personally appear, ☐ Produce documents and/or objects only; ☒ Personally appear and produce documents or objects; at the **George Howard Building-Banneker Hearing Room** located at **3430 Court House Drive, Ellicott City, 21043** on (date) **9/17/26** at (time) **09:00 a.m.**

You must produce the following documents pursuant to this subpoena:

- Complete, unredacted copies of all boundary surveys of 10450 Waterfowl Terrace prepared by Mr. Dietz or Dietz Surveying Inc., including all versions dated April 28, 2023 and September 28, 2023.
- Any records reflecting Mr. Dietz's Professional Land Surveyor license number(s) held during 2023, including any renewal, reissuance, or correction of that license number.
- Any correspondence with the property owner, DPZ, or the Wilde Lake Community Association regarding the preparation or transmittal of these surveys.

### SUBPOENA REQUESTED BY:

Requestor's Name Donna Gorjón

Requestor's Address 10473 State Rt 108, Columbia, MD 21044

Requestor's Email & Phone gorjond@att.net 240-417-1046

### Instructions to Party Requesting Subpoena:

The Rules of Procedure of the Board of Appeals § 2.208(h)(2) requires that the person requesting the subpoena "shall be responsible for arranging service of the subpoena at least seven days prior to the date of the hearing. The person serving the subpoena shall certify in writing that the subpoena was personally served or by certified mail."

ISSUED by the Chairperson of the Howard County Board of Appeals on 8/24/26

Howard County Board of Appeals  
Chairperson

Gene Ryan  
Digitally signed by Gene  
Ryan  
Date: 2025.08.22  
09:05:51 -04'00'

**EXHIBIT C**

Appellant's Updated Witness and Subpoena Status Filing

Status date: September 10, 2026

**BEFORE THE BOARD OF APPEALS OF HOWARD COUNTY, MARYLAND**

**IN THE MATTER OF DONNA GORJÓN, Appellant**

**BA-829D / CE-26-17**

**Docket Identifier: B-26-11**

**APPELLANT'S UPDATED WITNESS AND SUBPOENA STATUS  
FILING**

Appellant respectfully submits this updated list of all subpoenaed witnesses and their current response status for the September 17, 2026, de novo hearing. Appellant continued service and compliance efforts through September 10, 2026.

**I. SUBPOENAED WITNESSES**

**1. Inspector Blanding**

His inspection in CE-26-17; locations and methods of measurements; field notes, photographs, observed conditions; and role of his measurements in DPZ's March 10, 2026 closure determination.

*Status:* Subpoenaed; response received.

**2. Everett James**

The March 10, 2026 closure letter; DPZ's statement that an appeal from "this notice" could be filed within 30 days; and the letter's status as DPZ's closing determination.

*Status:* Subpoenaed; response received.

**3. Justin Tyler**

His 2023 email, its purpose and context, related communications, and its relationship to Larry Schoen's November 28, 2023 interpretation.

*Status:* Subpoenaed; response received.

**4. Brian Dietz**

Identification and authentication of the survey; its reference points and depicted conditions; and factual discrepancies between the survey and DPZ's measurements.

*Status:* Subpoenaed; response received.

**5. Rosa Gil**

Personal observations concerning the property's physical layout, structures, access areas, surrounding features, and differences between former and completed conditions.

*Status:* Subpoenaed; response received.

**6. Rodolpho Angel**

Permit E25006682; electrical work covered by that permit; relocation of the electrical panel; BGE's involvement through its subcontractor; and related records.

*Status:* Subpoenaed; response received.

**7. Larry Schoen**

The property's former and completed conditions; communications concerning the November 28, 2023 interpretation; communications with DPZ; and facts relevant to the March 2026 complaint, inspection, and closure.

*Status:* Subpoenaed and served; no response received as of September 10, 2026.

**8. Geoff Goins**

His personal knowledge concerning the November 28, 2023 interpretation, related communications, and factual information or records concerning that interpretation.

*Status:* Subpoenaed and served; no response received as of September 10, 2026.

**9. Antonio Forte**

Facts within his personal knowledge concerning the property, relevant communications, documents, or other matters identified in his subpoena.

*Status:* Subpoena delivered September 9, 2026, at 12:03 PM to Front Desk/Reception/Mail Room, Sterling, Virginia 20166; no response received as of September 10, 2026.

**II. RELATED DOCUMENTS AND EXHIBITS**

1. The March 10, 2026 DPZ closure letter and appeal-rights language;
2. DPZ inspection records, photographs, field notes, and measurements in CE-26-17;
3. The survey identified through Brian Dietz;
4. Permit E25006682 and related electrical and BGE records;
5. Justin Tyler's 2023 email and related communications;
6. Larry Schoen's November 28, 2023 interpretation and related communications;
7. Relevant building-permit, inspection, and as-built materials; and
8. Photographs or diagrams authenticated by a witness with personal knowledge.

The anticipated testimony is limited to personal knowledge, factual observations, agency actions, measurements, authentication, records, and communications. Appellant does not offer any witness as an expert or seek legal conclusions through witness testimony.

**III. NONRESPONDING WITNESSES**

Larry Schoen and Geoff Goins were subpoenaed and served but had not responded as of September 10, 2026. Antonio Forte was also subpoenaed; the filing reported delivery on September 9, 2026 at 12:03 PM to the Front Desk/Reception/Mail Room at his place of employment in Sterling, Virginia 20166, with no response received as of September 10.

The filing requested that the Board accept the filing and attached subpoena/service materials; permit subpoenaed witnesses who appear to testify subject to Board rulings; accept supplemental proof of service or witness responses; provide direction concerning any additional service required for Forte; and reserve enforcement determinations until review of the applicable subpoena, proof of service, objections, and circumstances of noncompliance.

Respectfully submitted,  
Donna Gorjón, Appellant, Pro Se

**CERTIFICATE OF SERVICE (from September 10 filing)**

The September 10 filing certified electronic-mail service upon David R. Moore, Esq.; G. Kuc; K. Berg; Larry Schoen; and Marcie Weil.

Subject: Preservation and Procedural Status  
Date: Sep 17, 2026 at 4:36:28 PM

To: Kel Berg  
Cc: Aaron Weiss

[REDACTED]

September 17, 2026

Via Electronic Mail

Kel Berg

Howard County Department of Planning and Zoning

Re: BA-829D / CJ-26-17 Immediate Request for Preservation and Procedural Status

Dear Ms. Berg:

I respectfully request the immediate preservation of the complete record concerning the September 17, 2026 hearing in BA-829D / CJ-26-17, including:

1. The hearing video and audio recordings;
2. Attendance records and Board-member participation records;
3. Minutes, notes, docket entries, and any hearing log;
4. All exhibits, testimony, objections, and proffers presented or identified;
5. All written communications concerning the hearing; and
6. Any order, ruling, continuance notice, or other disposition.

Based on my present recollection, the hearing ended after the Board stated that a quorum was no longer present. I am requesting clarification as to whether the matter was recessed, continued, adjourned, terminated, dismissed, or otherwise decided, and whether any written order or ruling has been entered.

Please also confirm:

- Whether the hearing will be rescheduled;
- How and when notice of any further hearing will be provided;
- Whether the complete hearing record will remain available for review; and

- Which Board members, if any, will participate in any continued or rescheduled proceeding.

I am sending this request before reviewing the hearing recording and reserve the right to supplement it after reviewing the video. I preserve all objections concerning quorum, notice, Board-member participation, the completeness of the record, and my opportunity to be heard. I do not consent to any particular future procedure or disposition by sending this request.

Please confirm receipt and advise when the hearing recording will be available.

Respectfully submitted,

Donna Gorjón

Appellant, Pro Se

From: Mario Gorjon [REDACTED]  
Subject: BA-829D  
Date: Sep 25, 2026 at 9:46:58 AM  
To: Kel Berg [REDACTED]  
Cc: Aaron Weiss [REDACTED]  
[REDACTED]  
[REDACTED]

BA-829-  
D\_Final\_Procedural\_Let...  
34 KB

A Certificate of Service is included confirming electronic service upon counsel and the other parties/recipients identified therein.

I certify that a copy of this communication and the attached filing was sent simultaneously to all parties of record, including David R. Moore, Esq. [REDACTED] and Gary W. Kuc, Esq. [REDACTED], counsel for DPZ, and property owners Lawrence Schoen [REDACTED] and Marcie Karen Weil [REDACTED].

**Via Electronic Mail**

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

**Re: BA-829-D — Donna Gorjon**  
**Notice of Continuing Procedural Status, Unanswered Procedural Requests, and Request for Prompt Continuation**

Dear Ms. Berg and Members of the Board:

I write regarding the continuing procedural status of BA-829-D following the September 17, 2026 proceeding. I respectfully request that this correspondence be maintained with the record of BA-829-D.

**September 17 Proceeding**

I appeared for the September 17 hearing fully prepared to proceed with my appeal.

I had prepared six complete exhibit packets in advance and brought three additional complete packets for use at the hearing. The proceeding ended before I had the opportunity to present my case and offer my evidence. Accordingly, I do not represent that the contents of those physical exhibit packets were admitted into evidence. I retrieved the physical packets following the proceeding and have maintained them for presentation when the hearing resumes.

The County's BA-829-D case page currently identifies the matter as "Continued," and the Board of Appeals' active-case listing identifies BA-829-D as "CONTINUATION DATE TBD."

The County's case page also reflects materials I filed before September 17, including my Memorandum of Points and Authorities, Certificate of Appellant Exhibits, Motion for Leave to Submit Exhibit 21 Video File, Witness Subpoena Status, and Consolidated Response to the Motion to Dismiss and Reply Memorandum.

I respectfully request confirmation that these previously filed materials remain part of the BA-829-D record and will remain before the Board when the hearing continues.

**Prior Procedural Requests**

Before the September 17 hearing, I repeatedly sought clarification regarding procedures necessary for me to prepare for and participate in this appeal as a self-represented appellant.

With the exception of a response from Director Lynda Eisenberg indicating that the information I required was available online, I have not received substantive responses to a number of my case-specific procedural questions.

I have reviewed the publicly available information. While that information provides general guidance, it does not answer several questions arising specifically from the interruption and continuation of BA-829-D. Most significantly, the County's website itself presently states that the continuation date is "TBD."

I therefore respectfully request written clarification of the following:

- 1 **Continuation date and procedural status.** What is the present procedural status of BA-829-D, and what process and anticipated timeframe will be used to establish its continuation date?
- 2 **Previously filed materials.** Will all pleadings, motions, responses, certificates and other materials previously filed in BA-829-D remain part of the record without requiring resubmission?
- 3 **Exhibits.** When the hearing resumes, will I have the opportunity to present and offer the exhibits that I was prepared to present on September 17 but did not have the opportunity to offer before the proceeding ended?
- 4 **Physical exhibit packets.** How many physical exhibit packets should I bring to the continued hearing, and when are those packets required to be provided?
- 5 **Previously issued subpoenas.** What is the status of subpoenas issued for the September 17 hearing? Must witnesses who were properly served for September 17 be served again for the continuation, and will new subpoenas need to be requested and issued?
- 6 **Witnesses who did not appear.** What procedure, if any, applies to witnesses who were properly served for September 17 but did not appear?
- 7 **Additional evidence.** What procedure will govern relevant evidence that became available after preparation for the September 17 hearing but before the continuation, including responsive public records received after the original exhibit preparation period?
- 8 **Board participation.** What existing law or rule will govern participation by Board members in the continued hearing, including participation by any member who was not present for all or part of the September 17 proceeding?
- 9 **Notice.** How and when will the parties receive formal notice of the continuation date?

These questions are not requests for legal advice, nor am I asking the Board Administrator to advocate for any party. They concern the procedures that will govern my pending administrative appeal so that I can prepare for and participate meaningfully in the continued hearing.

#### **Request for a Reasonable and Prompt Continuation**

Maryland Land Use Article § 4-306(e)(1) provides that a board of appeals shall establish a **reasonable time for the hearing of an appeal**, provide the required notice, and **decide the appeal within a reasonable time**.

I recognize that § 4-306 does not establish a specific numerical deadline for the continuation of a hearing. Accordingly, I am not asserting that a particular statutory deadline has already expired.

I am, however, respectfully requesting that BA-829-D be assigned a continuation date within a reasonable and prompt period and that the parties be informed of that date as soon as practicable.

The September 17 proceeding did not end because I requested a continuance, failed to appear, or was unprepared to proceed. I appeared prepared to present my case. The proceeding ended before I had the opportunity to begin presenting the merits of my appeal.

The continuing absence of a hearing date has practical consequences for my preparation, including witness availability, subpoenas and service, organization and preservation of evidence, preparation of exhibit packets, and the additional time and expense associated with preparing for another hearing date.

I respectfully request that these circumstances be considered in establishing the continuation date.

#### **Preservation of the September 17 Record**

On September 17, I submitted a written request for preservation of the complete record concerning that proceeding.

I respectfully renew that request and ask that the complete September 17 record relating to BA-829-D continue to be preserved, including, to the extent such records exist:

- the original video and audio recording and associated electronic records;
- attendance and Board-member participation records;
- the agenda, hearing log, minutes and notes;
- materials submitted or identified in connection with the proceeding;
- docket entries, notices, orders or other records reflecting the status or continuation of BA-829-D; and
- communications specifically concerning the scheduling, interruption, continuation or procedural status of BA-829-D.

This preservation request is intended to protect the completeness of the administrative record. It should not be construed as an allegation that any record has been destroyed, altered, withheld or otherwise improperly handled.

#### **Preservation of Rights**

I have made substantial efforts to prepare and present this appeal and have attempted throughout this process to obtain the procedural information necessary to proceed appropriately as a self-represented appellant.

My purpose in submitting this letter is not to speculate regarding events outside this appeal, attribute motives to any individual, or ask the Board to determine matters that are not before it.

My immediate concern is ensuring that circumstances surrounding the interruption of the September 17 proceeding and the continuing absence of a continuation date do not impair my opportunity to receive a complete, fair, and orderly hearing on the merits of my pending



IN THE MATTER OF:  
 Donna Gorjon v. Howard County Department of Planning and Zoning  
 HOWARD COUNTY BOARD OF APPEALS  
 CASE NO. BA-829D

AFFIDAVIT / CERTIFICATION OF PERSONAL SERVICE

I, GORDON NEAL, certify that I personally served  
 Geoffrey Goins with the subpoena issued by the Chairperson of the Howard County Board of Appeals  
 in Case No. BA-829D.

Date of personal service: 9/9/2026

Time of personal service: 9:30 AM

Place of personal service: HOWARD COUNTY DEPARTMENT OF PLANNING & ZONING  
711 PENNINGTON AVENUE, ANNAPOLIS, MD 21078

The subpoena served requires Geoffrey Goins to personally appear before the Howard County Board of  
 Appeals on **September 17, 2026 at 9:00 a.m.** at the George Howard Building, Banneker Hearing  
 Room, 3430 Court House Drive, Ellicott City, Maryland 21043, and to produce the documents  
 identified in the subpoena.

I certify that the foregoing statement is true and correct to the best of my knowledge and that the  
 subpoena was personally delivered as stated above.

Signature of person serving subpoena:

Gordon Neal

Printed name: GORDON NEAL, PROCESS SERVER

Address: 916 ORFORD AVENUE

ANNAPOLIS, MD 21001

Telephone: 443-417-6389

Date signed: 9/9/2026

**Attachment:** Copy of subpoena served on Geoffrey Goins.