

FILED
U.S. DISTRICT COURT
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)
2008 OCT 10 P 3:22

ANGELA SWAGLER, et al.

CLERK'S OFFICE
AT BALTIMORE

Plaintiffs

BY _____ * DEPUTY

v.

* Case No. RDB-08-2289

HARFORD COUNTY, MARYLAND,
et al.

*

*

Defendants

*

* * * * *

CONSENT AGREEMENT IN LIEU OF INJUNCTION

Defendants, Harford County, Maryland; Town of Bel Air, Maryland; Colonel Terence Sheridan; State Trooper Neighoff; State Trooper Bradley; State Trooper Rasinski; Bel Air Police Officer Donald Ravadge; Bel Air Police Officer Mark Zulauf; and Bel Air Police Officer Armand Dupre, by and through undersigned counsel, hereby responds to Plaintiffs' Motion for Preliminary Injunction, acquiescing thereto in lieu of further ruling of the Court, as described below:

1. Defendants are aware that Plaintiffs filed with their initial Complaint in this matter a Motion for Preliminary Injunction. Although defendants have been served with the underlying lawsuit, they have not yet been served with the Motion.
2. Plaintiff's Motion asks the Court to enjoin the defendants from enforcing Harford County Code, section 219-4, which they contend is unconstitutional.
3. Counsel for the parties have conferred about the Motion and reached an agreement, memorialized herein.

GRANTED this 10th day of OCTOBER 2008

Richard D. Bennett
Richard D. Bennett
United States District Judge

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2. Plaintiff's Motion asks the Court to enjoin the defendants from enforcing Harford County Code, section 219-4, which they contend is unconstitutional.

3. Counsel for the parties have conferred about the Motion and reached an agreement, memorialized herein.

4. Defendants will waive service of the Motion.

5. Defendants agree not to enforce Harford County Code § 219 against the Plaintiffs and others similarly situated to them in a manner that prohibits them and others from displaying hand-held signs in a traditional public forum without a permit.

6. Plaintiffs will withdraw the Motion for Preliminary Injunction within 30 days of the filing of this consent agreement, retaining the right to re-file it should Defendants begin enforcing the Ordinance in the future.

Respectfully submitted,

ROBERT S. MCCORD,
County Attorney

/s/

Karen J. Kruger
Senior Assistant County Attorney
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/s/

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and Rasinski

/s/

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Mark Zulauf and Armand Dupre

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of October, 2008, a copy of the foregoing Consent Agreement in Lieu of Injunction was filed electronically in the United States District Court for the District of Maryland and was served on all persons entitled to service via said electronic filing.

/s/

Karen J. Kruger