

PRO. EXHIBIT# 1
CASE: 2024-0203-V
DATE: 1/21/25

JOHN DOUGLAS WALLOP ET AL

Applicant,

v.

**ANNE ARUNDEL OFFICE OF
ADMISTRATIVE HEARINGS**

Administrative Agency.

* **IN**
* **ANNE ARUNDEL COUNTY**
* **OFFICE OF**
* **ADMINSTRATICE HEARINGS**
* **CASE NO.: 2024-0203-V**

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MOTION TO POSTPONE

Respondent, Janice Gruehn, by and through their undersigned counsel, hereby move this Office to postpone the hearing currently set for January 21, 2025, in the above-captioned matter and state as follows:

1. The above-captioned case is currently scheduled for one hearing before the Anne Arundel County Administrative Hearing Officer on Tuesday, January 21, 2025, at 10:00 a.m.
2. Respondent was notified of the variance application hearing on December 22nd, 2024.
3. Respondent owns the property at 215 Winchester Beach Drive, Annapolis, MD, 21409, which is adjacent to the property which is the subject of the application.
4. Respondent was initially unfamiliar with the process for obtaining or opposing a variance from the Administrative Hearing Officer but attempted to obtain counsel immediately upon understanding that Respondent could be represented at the variance hearing.
5. Having contacted multiple land use attorneys who were unable to represent Respondent in the matter or to attend the hearing on January 21, 2025, Respondent engaged Dales Associates as counsel on January 16, 2025.

6. As of the date of this Motion, January 17, 2025, Mr. Philip Dales, Principal of DA and attorney for the Respondent, will be traveling out of the state for business and unable to join virtually.

7. This request is made to allow the Respondent to be represented by counsel at the hearing.

8. Respondent agrees to pay any additional expenses incurred if the postponement is granted, including readvertising, costs of the official stenographer, and other reasonable administrative costs as assessed by the Office.

9. This case has not been continued before and this request has not been made for the purpose of delay.

WHEREFORE, Respondent in the above-captioned matter, Jeffrey Gruehn, respectfully request that the Anne Arundel County Office of Administrative Hearings postpone the hearing currently scheduled for January 21, 2025, and for such further relief as the Office determines to be proper.

Date: January 17, 2025

Respectfully submitted,

/s/ Philip C. Dales

Philip C. Dales, AIS No. 13121780192

DALES ASSOCIATES

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Counsel for Respondent

Mrs. Janice Gruehn