

IN THE SUPREME COURT OF MARYLAND

MARYLAND STATE BOARD
OF ELECTIONS, *et al.*,

Appellants,

v.

ANTHONY AMBRIDGE, *et al.*,

Appellees.

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September Term

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No. 26

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MOTION TO EXCEED WORD LIMIT

COME NOW, Appellees, by and through counsel, Thiru Vignarajah, Esq., pursuant to Md. R. Rev. Ct. App. & Spec. App. 8-431, 8-503, and Md. Gen. Provi. 1-351, to respectfully ask this Honorable Court to issue a nunc pro tunc, ex parte Order permitting Appellees' Brief to exceed the 13,000-word limit and in support thereof states as follows:

1. This matter arises from an appeal of a final order from the Circuit Court for Anne Arundel County in *Anthony Ambridge, et al v. Maryland State Board of Elections, et al.*
2. That following the issuance of the order, Appellants MCB HP Baltimore LLC ("MCB") and the Mayor and City Council of Baltimore ("MCC") filed successful motions to intervene which established them as Appellants in this appeal.
3. Because of the implications of this matter for the upcoming election, and similar to the expedited briefing schedule before the Circuit Court for Anne Arundel County, this matter has been set on an expedited schedule before the Supreme Court of Maryland as well.
4. Appellees have now been confronted with three robust Appellant briefs from each of the now-three Appellants that were filed less than a week ago; the prevailing Order does not provide Appellees with any flexibility or allowance in light of the multiple substantial briefs filed by Appellants in this important matter.
5. As it currently stands, Appellants have submitted briefs with a total statutory word count of 34,776 words, whereas Appellees are ostensibly limited to nearly a third of that if restrained to the 13,000 word limit prescribed by Md Rule 8-503(d).

6. Although this Rule applies equally to Appellants and Appellees, an equal application in these circumstances produces a measure of inequity and limits Appellees' ability to ensure that this Honorable Court fully appreciates the case at bar.
7. Obtaining a full understanding of the case in order to effect a just ruling on the merits of the case remains the lodestar of our judicial system. *See Deborah Rollins v. Capital Plaza Associates, L.P.*, 181 Md. App. 188, 202 (Md. Ct. Spec. App. 2008) (citing *Michael Singer Joseph v. Bozzuto Mgmt. Co., et al*, 173 Md.App. 305, 348 (2007)).
8. Should Appellees' instant Motion to Exceed Word Limit be denied, Appellees are prepared, in accordance to Md Rule 8-503(g), to bear the full expense for the swift reproduction of a brief that is in conformity with the original word limit.
9. This Motion is ripe and proper for an ex parte ruling in consideration of the facts that this case is already on an expedited track and, pursuant to Md Rule 1-351, Appellees have notified Appellants of their intent to put forth this motion for ex parte ruling on October 3, 2024.

WHEREFORE, for the foregoing reasons and any which may appear to the Court, the Appellee respectfully requests that this Motion be granted, and this Court issue an order permitting Brief of Appellees to exceed the 13,000-word limit and to implement this order nunc pro tunc to the Order of September 20, 2024.

Respectfully submitted,

/s/Thiruvendran Vignarajah

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of October 2024 the foregoing ***Motion to Exceed Word Limit***, was filed via MDEC with the Clerk of the Supreme Court of Maryland, and served via MDEC to the following:

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