

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

PETITION OF
QUANTUM MARYLAND, LLC,

and
JOAN AQUILINO,

FOR JUDICIAL REVIEW OF
THE DECISION OF THE FREDERICK
COUNTY BOARD OF ELECTIONS,

Case No. C-10-CV-26-000309

and
BARBARA WAGNER

IN THE MATTER OF THE PETITION OF
THE FREDERICK COUNTY DATA
CENTER REFERENDUM COMMITTEE for
Referendum of Frederick County Council
Ordinance
26-01-001

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QUANTUM MARYLAND, LLC et al.

Plaintiffs,

v.

FREDERICK COUNTY BOARD OF
ELECTIONS, et al.

Defendants.

Case No. C-10-CV-26-000309

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PETITION OF WINDRIDGE
PROPERTIES, L.C. et al.,

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Petitioners,

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Case No. C-10-CV-26-000321

FOR JUDICIAL REVIEW OF
THE DECISION OF THE FREDERICK
COUNTY BOARD OF ELECTIONS,

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and

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BARBARA WAGNER

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IN THE MATTER OF THE PETITION OF
THE FREDERICK COUNTY DATA
CENTER REFERENDUM COMMITTEE
for Referendum of Frederick County
Council Ordinance
26-01-001

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WINDRIDGE PROPERTIES, L.C. et al.

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Plaintiffs,

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v.

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Case No. C-10-CV-26-000321

FREDERICK COUNTY BOARD OF
ELECTIONS, et al.

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Defendants.

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PETITION OF NDR PROPERTIES, LLC et al.,

Petitioners,

FOR JUDICIAL REVIEW OF
THE DECISION OF THE FREDERICK
COUNTY BOARD OF ELECTIONS,

and

BARBARA WAGNER

IN THE MATTER OF THE PETITION OF
THE FREDERICK COUNTY DATA
CENTER REFERENDUM COMMITTEE
for Referendum of Frederick County Council
Ordinance
26-01-001

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NDR PROPERTIES, LLC et al.

Plaintiffs,

v.

FREDERICK COUNTY BOARD OF
ELECTIONS, et al.

Defendants.

Case No. C-10-CV-26-000325

Case No. C-10-CV-26-000325

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PETITION OF ROWAN FREDERICK, LLC *
et al., *

Case No. C-10-CV-26-000326

Petitioners, *

FOR JUDICIAL REVIEW OF *
THE DECISION OF THE FREDERICK *
COUNTY BOARD OF ELECTIONS, *

and *

BARBARA WAGNER *

IN THE MATTER OF THE PETITION OF *
THE FREDERICK COUNTY DATA *
CENTER REFERENDUM COMMITTEE *
for Referendum of Frederick County Council *
Ordinance *
26-01-001 *

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ROWAN FREDERICK, LLC et al. *

Plaintiffs, *

v. * Case No. C-10-CV-26-000326

FREDERICK COUNTY BOARD OF *
ELECTIONS, et al. *

Defendants. *

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PETITION OF FREDERICK DATA
CENTER OWNER, LLC, et al.,

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Petitioners,

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FOR JUDICIAL REVIEW OF
THE DECISION OF THE FREDERICK
COUNTY BOARD OF ELECTIONS,

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Case No. C-10-CV-26-000327

and

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BARBARA WAGNER

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IN THE MATTER OF THE PETITION OF
THE FREDERICK COUNTY DATA
CENTER REFERENDUM COMMITTEE
for Referendum of Frederick County Council
Ordinance
26-01-001

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FREDERICK DATA CENTER OWNER, LLC
et al.

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Plaintiffs,

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Case No. C-10-CV-26-000327

v.

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FREDERICK COUNTY BOARD OF
ELECTIONS, et al.

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Defendants.

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PETITIONERS DAVID S. PLEASANTS AND NDR PROPERTIES, LLC'S
MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR JUDICIAL REVIEW

Petitioners, David S. Pleasants and NDR Properties, LLC (“Petitioners”), by and through their undersigned counsel, hereby submit this Memorandum of Law in Support of their Petition for Judicial Review and state as follows:

Petitioners hereby adopt and incorporate by reference the facts, arguments, and exhibits set forth in its April 13, 2026 Petition for Judicial Review. Petitioners further adopt and incorporate by reference the entirety of the Memorandum of Law filed by Petitioners Quantum Maryland, LLC and Joan Aquilino, which was filed on June 4, 2026.

WHEREFORE, Petitioners, David S. Pleasants and NDR Properties, LLC, respectfully request that this Court reverse the Board of Elections’ determination that the Referendum Petition is sufficient.

Respectfully submitted,

/s/ Derek P. Roussillon

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David S. Pleasants and NDR Properties, LLC

CERTIFICATE OF NON-RESTRICTED INFORMATION

Pursuant to Maryland Rule 20-201(h), I hereby certify that the attached filing does not contain any restricted information.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of June 2026, a copy of the foregoing was electronically served via MDEC on all counsel of record.

/s/ Derek P. Roussillon

Derek P. Roussillon, Esq.