

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

PETITION OF
QUANTUM MARYLAND, LLC, et al.,
Petitioners

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

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

IN THE CASE OF THE PETITION OF
THE FREDERICK COUNTY DATA
CENTER REFERENDUM COMMITTEE
FOR REFERENDUM OF FREDERICK
COUNTY COUNCIL ORDINANCE
26-01-001

* * * * *

CONSOLIDATED WITH:

Case No.: C-10-CV-26-000321
Case No.: C-10-CV-26-000325
Case No.: C-10-CV-26-000326
Case No.: C-10-CV-26-000327

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THIS FILING PERTAINS ONLY TO:

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

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**PETITIONERS WINDRIDGE PROPERTIES L.C. AND THEODORE H. BUTZ'S
MEMORANDUM IN SUPPORT OF THEIR PETITION FOR JUDICIAL REVIEW**

COMES NOW Petitioners-Plaintiffs, Windridge Properties L.C. and Theodore H. Butz
(the "Windridge Petitioners"), by and through their undersigned counsel, and for their

Memorandum in Support of their Petition for Judicial Review (“Memorandum”), and in support thereof, state as follows:

For their Memorandum, Windridge Petitioners hereby adopt and incorporate by reference the facts, arguments, and exhibits set forth in its Petition for Judicial Review as filed with this court on April 13, 2026. The Windridge Petitioners hereby further adopt and incorporate by reference those additional facts, arguments, and exhibits set forth in the Memorandum of Law filed by Petitioners-Plaintiffs Quantum Maryland, LLC and Joan Aquilino, as filed in this consolidated case under the lead Case No. C-10-CV-26-000309 to the same extent as if fully restated herein.

CONCLUSION

The Court should reverse the Board of Elections’ determination that the Referendum Petition is sufficient.

Date: June 4, 2026

Respectfully submitted,

/s/ William E. Erskine, Esq.
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CERTIFICATE OF SERVICE

I, William E. Erskine, HEREBY CERTIFY that on this 4th day of June, 2026, a copy of the foregoing document was filed electronically in the Maryland Electronic Court Filing Systems (MDEC) in the above-captioned matter and served on all counsel of record.

/s/ William E. Erskine, Esq.