

**AGREEMENT RESOLVING THE PENDING
TEMPORARY RESTRAINING ORDER HEARING**

This Agreement (the "Agreement") is entered into by and among Concert Woodmore, LLC ("Club"), for itself, successors, agents, insurers, personal representatives and assignees, and Pleasant Prospect Homeowners Association, Inc. ("HOA") (*collectively* the "Parties").

RECITALS

R1. The Club and the HOA are adjacent landowners, each owning land situated in Prince George's County, Maryland.

R2. The Parties entered into a Settlement Agreement dated April 19, 2017 to address certain disputes between the Parties, which was amended in 2022.

R3. On 14 September 2023 the Club filed a lawsuit in Prince George's County Circuit Court seeking injunctive relief, including a temporary restraining order ("TRO"), to prohibit the HOA from deactivating gate access cards possessed by the Club if the Club did not pay the HOA's newly-requested fees. Case No. C-16-CV-23-004228.

R4. The Club's counsel gave notice of the pleadings to counsel and resident agent for the HOA, Ms. Arthur, stating that the Motion for a TRO would be heard tomorrow at 10:00 a.m. in the Circuit Court for Prince George's County.

R5. The parties hereby endeavor to avoid the need for a TRO hearing tomorrow.

NOW THEREFORE, in consideration of the above recitals, each of which is made a part of this Agreement, the Club and the HOA agree as follows:

1. The HOA agrees that it shall not deactivate any gate access cards possessed by the Club until, at the earliest, 15 October 2023 (if this matter is not resolved);
2. The Club and the HOA agree that they will be bound by the dispute resolution mechanism in the Parties' 2017 settlement agreement as renewed;
3. The Parties jointly agree that a preliminary injunction hearing be set on or before 15 October 2023 for a determination on the merits should the Parties fail to resolve this matter before such hearing; and
4. The Parties agree to use reasonable efforts to advance the mediation and arbitration proceedings required by the dispute settlement mechanism, and the Parties agree to a deadline to complete these proceedings by 31 January 2024 unless the Parties agree otherwise.

This document is not a settlement agreement. The purpose of it is to clearly define the rights of the Parties as they seek to implement the dispute resolution process required by the 2017

Settlement Agreement. The further purpose of this Agreement is to resolve the pending hearing at which the Club intends to seek a TRO as set forth in the pleadings.

Concert Woodmore, LLC

By: Sundria R. Ridgley

Sundria R. Ridgley

Printed Name

Authorized Person

Title

9/13/2023

Date

**Pleasant Prospect Homeowners
Association, Inc.**

By: _____

Printed Name

Title

Date

Settlement Agreement. The further purpose of this Agreement is to resolve the pending hearing at which the Club intends to seek a TRO as set forth in the pleadings.

Concert Woodmore, LLC

By: _____

Printed Name

Title

Date

**Pleasant Prospect Homeowners
Association, Inc.**

By: *James Davis* _____

James Davis

Printed Name

President

Title

September 13, 2023

Date