

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

MAYOR AND CITY COUNCIL OF
BALTIMORE,

Plaintiff,

v.

BP P.L.C. et al.,

Defendants.

Case No. 1:18-cv-02357-ELH

REQUEST FOR HEARING

Pursuant to Local Rule 105.6, Defendants Chevron Corp., Chevron U.S.A., Inc., B.P. Products North America Inc., BP p.l.c., BP America Inc., Exxon Mobil Corp., ExxonMobil Oil Corp., Shell Oil Co., Royal Dutch Shell plc, CITGO Petroleum Corp., Phillips 66, ConocoPhillips, ConocoPhillips Co., Marathon Petroleum Corp., Speedway LLC, Hess Corp., Crown Central LLC, Crown Central New Holdings, LLC, CNX Resources Corp., CONSOL Energy, Inc., and CONSOL Marine Terminals LLC (collectively, "Defendants") respectfully request a hearing on Plaintiff's Motion to Remand ("Remand Motion") (ECF No. 111), and in support thereof, state the following:

1. This action was removed on July 31, 2018 (ECF No. 1).
2. On September 11, 2018, Plaintiff Mayor and City Council of Baltimore ("Plaintiff") filed its Remand Motion, seeking remand of this matter to the Circuit Court for Baltimore City. *See* ECF No. 111. In that filing, Plaintiff requested that a hearing be held on the Remand Motion. *See id.* at p. 1 ("Plaintiff requests a hearing on its Motion [to Remand] pursuant to Local Rule 105.6.").

3. Defendants filed their Opposition to the Remand Motion (“Opposition”) on October 11, 2018 (ECF No. 124).

4. Oral argument was recently heard on a motion to remand in a substantially similar case brought by the State of Rhode Island, which is represented by the same outside law firm as the City of Baltimore in this case.

5. Under this Court’s Local Rule 105.6, “[c]ounsel may (but need not) file a request for a hearing.”

6. Accordingly, Defendants file this Request for Hearing and ask the Court to set a hearing on Plaintiff’s Motion to Remand.¹

Respectfully submitted,

Dated: February 20, 2019

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¹ Several Defendants contend that they are not subject to personal jurisdiction in Maryland. Defendants submit this request subject to, and without waiver of, these jurisdictional objections.

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CERTIFICATE OF SERVICE

I hereby certify that, on the 20th day of February 2019, the foregoing document was filed through the ECF system and was therefore served on all registered participants identified on the Notice of Electronic Filing.

/s/ Ty Kelly Cronin