

APPENDIX

APPENDIX A: Court of Appeals of Maryland's Petition Docket No. 129, September Term 2022, October 25, 2022, ORDER denying Petitioner's Motion for Reconsideration.

APPENDIX B: Court of Appeals of Maryland's Petition Docket No. 129, September Term 2022, August 30, 2022, ORDER denying writ of certiorari.

APPENDIX C: Court of Special Appeals of Maryland, No. 1112, September Term, 2021. ORDER dated May 26, 2022: Denying Motion for Reconsideration.

APPENDIX D: Court of Special Appeals of Maryland, CSA-REG-1112-2021. MANDATE, dated May 4, 2022, entered May 26, 2022: Affirming Circuit Court for Baltimore County Judgment.

APPENDIX D1: Court of Special Appeals of Maryland Correction Notice, dated May 26, 2022. Notification of Corrected Opinion.

APPENDIX D2: Court of Special Appeals of Maryland, No. 1112, September Term, 2021, dated May 4, 2022, Corrected Unreported Opinion.

APPENDIX D3: Court of Special Appeals of Maryland, No. 1112, September Term, 2021, NOT DATED or FILED in the Court, Original Unreported Opinion.

APPENDIX E: Court of Special Appeals of Maryland, No. 1112, September Term 2021, ORDER, to proceed without a Prehearing Conference or Alternative Dispute Resolution, dated October 8, 2021.

APPENDIX E1: Court of Special Appeals of Maryland, No. 1112, September Term 2021, ORDER, Waiver of Cost, dated October 12, 2021.

APPENDIX F: Court of Special Appeals of Maryland, No. 1112, September Term 2021, ORDER, granting Appellate Request for Waiver of Cost, dated October 12, 2021.

APPENDIX G: Circuit Court for Baltimore County, Maryland, No.: C-03-CV-20-004108, September 21, 2021, Transcript of Proceedings: *Carter v. Gardaworld*.

APPENDIX H: Circuit Court for Baltimore County, Maryland, No.: C-03-CV-20-004108, Defendants' Motion for Protective Order to Stay Discovery Pending Defendants' Motion to Dismiss, dated June 22, 2021.

APPENDIX H1: Circuit Court for Baltimore County, Maryland, No.: C-03-CV-20-004108, Plaintiff's Motion in Opposition of Defendants' Motion for Protective Order

to Stay Discovery Pending Defendants' Motion to Dismiss, dated June 23, 2021, and 10:36 am.

APPENDIX H2: Circuit Court for Baltimore County, Maryland, No.: C-03-CV-20-004108, ORDER, Granting Defendants Motion for Protective Order and Brief in Support. Furthered ORDERED: Discovery stayed until further order of this court to be reconsidered following ruling on pending motion to dismiss filed by defendant and motion for summary judgment filed by plaintiff, dated July 29, 2021.

APPENDIX I: Gardaworld's Termination Notice for this Petitioner, dated September 25, 2020.

APPENDIX J: United States District Court District of Maryland's notification of removal from State court to Federal Court, dated December 21, 2020.

APPENDIX J1: In the United States District Court for The District of Maryland's Memorandum of Law in Support of Defendants' Motion to Dismiss, dated December 28, 2020, and filed solely by Glasser. Deliberate misrepresentation of material facts. (Listed as District Court # 1-20-cv-03700-JKB. Document 10-1 Filed 12/28/20 Page 29 of 29). Partial document, page 5 through Certificate of Service page.

APPENDIX K: First interaction with Glasser: Nathaniel M. Glasser's notification to Carter advising to direct all future correspondence and service documents to him; that he is attaching a copy of the motion to dismiss filed in federal court; and he makes mention of Carter's previously filed Order for Default, dated January 4, 2021.

APPENDIX L: Nathaniel M. Glasser's notification to Carter advising that he and his clients will not be responding to discovery request because we are now in federal court and under a different set of rules, dated January 5, 2021.

APPENDIX L1: Nathaniel M. Glasser's notification to Carter advising that it has come to his attention that in late December 2020, Carter mailed removal papers and discovery request to defendants. Since he is their attorney please send all future correspondences to him, dated January 22, 2021.

APPENDIX M: United States District Court for the District of Maryland's five pages Notice of Removal, prepared and filed by Nathaniel M. Glasser, dated December 21, 2020. (Copies of States documents not included).

APPENDIX M1: United States District Court for the District of Maryland's Defendants' Joint Response to the District Court's Standing Order Concerning Removal prepared and solely signed by Nathaniel M. Glasser, dated December 23, 2020.

APPENDIX M2: United States District Court for the District of Maryland's Defendant Gardaworld Securities Services – US's Disclosure of Corporate Interest prepared and solely signed by Nathaniel M. Glasser, dated December 23, 2020.

APPENDIX N: In the Circuit Court for Baltimore County, Maryland's Notice of Filing of Notice of Removal, electronically submitted with John S. Linehan affixed, dated December 21, 2020.

APPENDIX O: United States District Court for the District of Maryland's Civil Cover Sheet, prepared and signed by Nathaniel M. Glasser, dated December 21, 2020.

APPENDIX P: United States District Court for the District of Maryland (Baltimore) Civil Docket for Case #: 1:20-cv-03700-JKB, initiated December 21, 2020.

APPENDIX P1: United States District Court for the District of Maryland (Baltimore) Standing Order Concerning Removal for Case #: 1:20-cv-03700-JKB, December 21, 2020.

APPENDIX Q: Page 14 and 15 of Chief Judge James K. Bredar's Memorandum for *Carter v. Gardaworld*, No.: 1:20-cv-03700-JKB, concluding case, dated May 20, 2021.

APPENDIX Q1: Chief Judge James K. Bredar's ORDER for *Carter v. Gardaworld*, No.: 1:20-cv-03700-JKB, dated May 20, 2021.

APPENDIX R: In the United States District Court, Defendants' Motion to Dismiss Plaintiff's Complaint and AMENDED Complaint, dated December 28, 2020.

APPENDIX S: Circuit Court for Baltimore County, Maryland's Motion for Special Admission of Out-Of-State Attorney Nathaniel M. Glasser, dated June 7, 2021.

APPENDIX T: Order Granting Motion for Special Admissions of Nathaniel M. Glasser, dated June 8, 2021.

APPENDIX U: Circuit Court for Baltimore County, Maryland's ORDER: Striking Plaintiff's Motion for Summary Judgment, dated June 25, 2021.

APPENDIX V: Circuit Court for Baltimore County, Maryland's ORDER: Granting Plaintiff's Motion for Reconsideration, dated July 26, 2021.

APPENDIX W: Circuit Court for Baltimore County, Maryland's Defendants' Reply Memorandum of Law in Further Support of Their Motion to Dismiss Plaintiff's Complaint and Amended Complaint and Opposition to Plaintiff's Motion for Summary Judgment, dated June 22, 2021.

APPENDIX X: Circuit Court for Baltimore County, Maryland's Order: Motion to Continue or Postpone, dated August 20, 2021.

APPENDIX Y: Circuit Court for Baltimore County, Maryland's Assignment of Trial, or Hearing, dated August 24, 2021.

APPENDIX Z: Circuit Court for Baltimore County, Maryland's Civil Non-Jury Hearing Sheet, dated September 21, 2021.

APPENDIX AA: Attorney Grievance Commission of Maryland, Office of Bar Counsel investigative conclusion against Respondent: Nathaniel M. Glasser, File No.: 2022-1632, dated October 13, 2022.

APPENDIX BB: State of Maryland Commission of Judicial Disabilities investigation conclusion against Judge Jan Alexander: CJD 2022-122 Alexander/Carter, dated November 22, 2022.

CHARLES H. CARTER

v.

**GARDAWORLD SECURITY
SERVICES - US, et al.**

* **IN THE**
* **COURT OF APPEALS**
* **OF MARYLAND**
* **Petition Docket No. 129**
* **September Term, 2022**
* **(No. 1112, Sept. Term, 2021**
* **Court of Special Appeals)**
* **(No. C-03-CV-20-004108, Circuit**
* **Court for Baltimore County)**

O R D E R

Upon consideration of the motion for reconsideration and the supplements filed thereto, in the above-captioned case, it is this 25th day of October, 2022

ORDERED, by the Court of Appeals of Maryland, that the motion and the supplements are DENIED.

/s/ Shirley M. Watts
Senior Judge

APPENDIX A

*Chief Judge Fader did not participate in the consideration of this matter.

CHARLES H. CARTER

v.

**GARDAWORLD SECURITY
SERVICES - US, et al.**

* **IN THE**
* **COURT OF APPEALS**
* **OF MARYLAND**

* **Petition Docket No. 129**
September Term, 2022

* **(No. 1112, Sept. Term, 2021**
Court of Special Appeals)

* **(No. C-03-CV-20-004108, Circuit**
Court for Baltimore County)

ORDER

Upon consideration of the petition for a writ of certiorari to the Court of Special Appeals, the Request for Waiver of Prepaid Appellate Costs, and the answer filed thereto, in the above-captioned case, it is this 30th day of August, 2022

ORDERED, by the Court of Appeals of Maryland, that the filing fee in this Court is WAIVED; and it is further

ORDERED, that the petition is DENIED as there has been no showing that review by certiorari is desirable and in the public interest.

Exhibit 1 /s/ Shirley M. Watts

Senior Judge

APPENDIX B

*Chief Judge Fader did not participate in the consideration of this matter.

CHARLES H. CARTER,

Appellant,

v.

GARDAWORLD SECURITY
SERVICES – US, ET AL.,

Appellees.

*
IN THE
*
COURT OF SPECIAL APPEALS
*
OF MARYLAND
*
No. 1112, September Term, 2021
*
(Cir. Ct. No. C-03-CV-20-004108)
*

* * * * * * * * * * * * * * *
ORDER

Upon consideration of the appellant's motion for reconsideration of the Court's
May 4, 2022, opinion, it is this 26th day of May 2022, by the Court of Special Appeals,
ORDERED that the motion for reconsideration is denied.

FOR A PANEL OF THE COURT
(consisting of Arthur, Shaw, Woodward,
Patrick L., Senior Judge, Specially Assigned, JJ.)

Judge's signature
appears on original order.

Kevin F. Arthur, Judge

APPENDIX C

IN THE COURT OF SPECIAL APPEALS OF MARYLAND

Charles H. Carter,
Appellant

v.

Gardaworld Security Services - Us.,
Appellee

*
* No. 1112, September Term 2021
* CSA-REG-1112-2021
* Circuit Court No. C-03-CV-20-004108

MANDATE

On the 4th day of May, 2022, it was ordered and adjudged by the Court of Special Appeals:

Judgment of the Circuit Court for Baltimore County affirmed. Costs to be paid by appellant.

STATE OF MARYLAND, Sct.:

I do hereby certify that the foregoing is truly taken from the records and proceedings of the said Court of Special Appeals. In testimony whereof, I have hereunto set my hand as Clerk and affixed the seal of the Court of Special Appeals, this 26th day of May, 2022.



Gregory Hilton

Gregory Hilton, Clerk
Court of Special Appeals

**COURT OF SPECIAL APPEALS OF MARYLAND
CORRECTION NOTICE**

May 26, 2022

**Case No. 1112, Sept. Term, 2021
Charles H. Carter v. GardaWorld Security Services - US**

**Unreported opinion filed: May 4, 2022
Authoring judge: Per Curiam**

COVER PAGE NOW READS

File: (no file date)

SHOULD READ

Filed: May 4, 2022

A corrected opinion has been posted on the Court's webpage: www.mdcourts.gov/cosappeals.

/S/

**Gregory Hilton
Clerk of the Court of Special Appeals**

Exhibit 18A

APPENDIX D.1

Circuit Court for Baltimore County
Case No. C-03-CV-20-004108

UNREPORTED

IN THE COURT OF SPECIAL APPEALS
OF MARYLAND

No. 1112

September Term, 2021

CHARLES H. CARTER

v.

GARDAWORLD SECURITY SERVICES-US,
et al.

Arthur,
Shaw,
Woodward, Patrick L.
(Senior Judge, Specially Assigned),

JJ.

PER CURIAM

Filed: May 4, 2022

*This is an unreported opinion, and it may not be cited in any paper, brief, motion, or other document filed in this Court or any other Maryland Court as either precedent within the rule of stare decisis or as persuasive authority. Md. Rule 1-104.

Charles H. Carter, appellant, worked as a security officer for GardaWorld Security Services, appellee. After Mr. Carter was terminated from his employment, he filed a complaint in the Circuit Court for Baltimore County raising a number of state and federal claims against GardaWorld and his former supervisors. GardaWorld filed a notice of removal in the United States District Court for the District of Maryland. The United States District Court subsequently entered an order granting GardaWorld's motion to dismiss Mr. Carter's federal claims and remanding the state law claims back to the circuit court.

GardaWorld then filed a motion to dismiss the remaining state law counts on the grounds that the complaint failed to state a claim upon which relief could be granted. In response, Mr. Carter filed a "Motion in Opposition of Dismissal and Request for Summary Judgment" (motion for summary judgment). He also filed a "complaint" alleging that Nathaniel M. Glasser, Esq., one of GardaWorld's attorneys, had engaged in the unauthorized practice of law by filing pleadings and motions without being licensed to practice law in Maryland. Following a hearing, the court granted the motion to dismiss.

On appeal, Mr. Carter raises six issues, which reduce to three: (1) whether the court erred in granting the motion to dismiss because GardaWorld failed to file a timely answer to his complaint; (2) whether the pleadings filed by GardaWorld, including the motion to dismiss, should have been stricken because, he claims, they were filed by an attorney who was not licensed to practice law in Maryland; and (3) whether the court erred in denying

his motion for summary judgment and “complaint” against Mr. Glasser without holding a hearing.¹ For the reasons that follow we shall affirm the judgment of the circuit court.

Mr. Carter first contends that the court erred in granting the motion to dismiss because GardaWorld failed to file a timely answer to his complaint. We disagree. Generally, a defendant is required to file an answer, a preliminary motion to dismiss, or a notice of removal to federal court within 30 days after being served with a copy of the complaint. *See Maryland Rules 2-321 and 2-322; see also 28 U.S.C. § 1446.* Mr. Carter effected service of the complaint on November 19, 2020. Therefore, GardaWorld was required to file a responsive pleading no later than December 21, 2020.²

GardaWorld’s notice of removal was filed on December 21, 2020. Thus, it was timely. And having filed a timely notice of removal, GardaWorld was not required to file any other response to the complaint in the circuit court until the proceedings in federal court were terminated. Those proceedings concluded on May 20, 2021 after the federal court entered its final judgment dismissing Mr. Carter’s federal claims and remanding the remaining state law claims back to the circuit court. Thereafter, GardaWorld’s time for filing an answer or preliminary motion in the circuit court was extended “to 15 days after

¹ We note that none of the questions presented in Mr. Carter’s brief address the merits of the motion to dismiss. Nor does Mr. Carter specifically contend that the court erred in finding that his complaint failed to state a claim upon which relief could be granted. Consequently, we do not address that issue on appeal. *See Diallo v. State*, 413 Md. 678, 692-93 (2010) (noting that arguments that are “not presented with particularity will not be considered on appeal” (quotation marks and citation omitted)).

² The thirtieth day after November 19th fell on a Saturday. Therefore, GardaWorld had until Monday December 21, 2020 to file a responsive pleading.

entry of the court’s order on the . . . remand[.]” *See* Maryland Rule 2-321(c). Because GardaWorld filed its preliminary motion to dismiss on June 4, 2021, exactly fifteen days after the remand order was issued, that motion was timely filed. And having filed that motion, GardaWorld was not required to file an answer until the motion was decided by the circuit court. Consequently, we hold that GardaWorld filed a timely response to Mr. Carter’s complaint.

Mr. Carter next asserts that the motion to dismiss and other pleadings filed by GardaWorld should have been stricken because they were signed by Mr. Glasser, who he claims was not licensed to practice law in Maryland. Again, we disagree. Pursuant to Maryland Rule 1-311(a) every pleading of a party presented by an attorney must “be signed by at least one attorney who had been admitted to practice law in this State[.]” Having reviewed the record, we are persuaded that all pleadings filed by GardaWorld in this case complied with that Rule. On June 8, 2021, the court granted a motion for special admission allowing Mr. Glasser to represent GardaWorld in the case without the presence of Maryland counsel. Prior to that date, GardaWorld had only filed two pleadings in the circuit court, a Notice of Filing of Notice of Removal filed on December 21, 2020, and a Motion to Dismiss filed on June 4, 2021. And both of those pleadings were signed by a licensed Maryland attorney.³

³ The Notice of Filing of Notice of Removal was not signed by Mr. Glasser. The motion to dismiss contained Mr. Glasser’s name but it noted that his special admission was forthcoming.

Mr. Carter appears to take issue with the fact that Mr. Glasser signed and filed the Notice of Removal in federal court and then represented GardaWorld in the federal court proceedings. However, to practice law in federal court Mr. Glasser was not required to be a member of the Maryland Bar. Rather, he only had to be a member of the bar of the U.S. District Court for the District of Maryland, which he was at all relevant times during the removal proceedings. Consequently, he was allowed to sign and file pleadings in federal court on GardaWorld's behalf.

Finally, Mr. Carter asserts that the court erred in not holding a hearing on his motion for summary judgment and his complaint against Mr. Glasser. However, the court held a hearing on the motion to dismiss. And during that hearing it heard arguments from Mr. Carter as to why the motion should not be granted, including his claim that Mr. Glasser was engaging in the unauthorized practice of law. Moreover, having determined during that hearing that Mr. Carter's complaint failed to state a claim upon which relief could be granted, a separate evidentiary hearing on his motion for summary judgment was unnecessary.⁴

**JUDGMENT OF THE CIRCUIT
COURT FOR BALTIMORE COUNTY
AFFIRMED. COSTS TO BE PAID BY
APPELLANT.**

⁴ Moreover, we note that no hearing was required because Mr. Carter did not request a hearing in either of his motions. *See Maryland Rule 2-311(f).*

—Unreported Opinion—

Circuit Court for Baltimore County
Case No. C-03-CV-20-004108

UNREPORTED

IN THE COURT OF SPECIAL APPEALS

OF MARYLAND

No. 1112

September Term, 2021

CHARLES H. CARTER

v.

GARDAWORLD SECURITY SERVICES-US,
et al.

Arthur,
Shaw,
Woodward, Patrick L.
(Senior Judge, Specially Assigned),

JJ.

PER CURIAM

Exhibit 18 Filed:

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APPENDIX D3

Charles H. Carter, appellant, worked as a security officer for GardaWorld Security Services, appellee. After Mr. Carter was terminated from his employment, he filed a complaint in the Circuit Court for Baltimore County raising a number of state and federal claims against GardaWorld and his former supervisors. GardaWorld filed a notice of removal in the United States District Court for the District of Maryland. The United States District Court subsequently entered an order granting GardaWorld's motion to dismiss Mr. Carter's federal claims and remanding the state law claims back to the circuit court. GardaWorld then filed a motion to dismiss the remaining state law counts on the grounds that the complainant failed to state a claim upon which relief could be granted. In response, Mr. Carter filed a "Motion in Opposition of Dismissal and Request for Summary Judgment" (motion for summary judgment). He also filed a "complaint" alleging that Nathaniel M. Glaser, Esq., one of GardaWorld's attorneys, had engaged in the practice law in Maryland. Following a hearing, the court granted the motion to dismiss.

On appeal, Mr. Carter raises six issues, which reduce to three: (1) whether the court erred in granting the motion to dismiss because GardaWorld failed to file a timely answer to his complaint; (2) whether the pleadings filed by GardaWorld, including the motion to dismiss, should have been stricken because, he claims, they were filed by an attorney who was not licensed to practice law in Maryland; and (3) whether the court erred in denying

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Carter's complaint.

GardaWorld filed its preliminary motion to dismiss on June 4, 2021, exactly fifteen days after the remand order was issued, that motion was timely filed. And having filed that motion, GardaWorld was not required to file an answer until the motion was decided by the circuit court. Consequently, we hold that GardaWorld filed a timely response to Mr. Carter's complaint.

Mr. Carter appears to take issue with the fact that Mr. Glasser signed and filed the Notice of Removal in federal court and then represented GardaWorld in the federal court proceedings. However, to practice law in federal court Mr. Glasser was not required to be a member of the Maryland Bar. Rather, he only had to be a member of the bar of the U.S. District Court for the District of Maryland, which he was at all relevant times during the removal proceedings. Consequently, he was allowed to sign and file pleadings in federal court on GardaWorld's behalf.

Finally, Mr. Carter asserts that the court erred in not holding a hearing on his motion for summary judgment and his complaint against Mr. Glasser. However, the court held a hearing on the motion to dismiss. And during that hearing it heard arguments from Mr. Carter as to why the motion should not be granted, including his claim that Mr. Glasser was engaging in the unauthorized practice of law. Moreover, having determined during that hearing that Mr. Carter's complaint failed to state a claim upon which relief could be granted, a separate evidentiary hearing on his motion for summary judgment was unnecessary.⁴

**JUDGMENT OF THE CIRCUIT
COURT FOR BALTIMORE COUNTY
AFFIRMED. COSTS TO BE PAID BY
APPELLANT.**

⁴ Moreover, we note that no hearing was required because Mr. Carter did not request a hearing in either of his motions. *See* Maryland Rule 2-311(f).

