

Circuit Court for Howard County
Case No. 13-C-12-092827

UNREPORTED*

IN THE APPELLATE COURT

OF MARYLAND

No. 1366

September Term, 2024

LINDA C. BOLTON, ET AL.

v.

CROWLEY, HOGE & FEIN P.C.

Wells, C.J.,
Arthur,
Kenney, James A. III
(Senior Judge, Specially Assigned),

JJ.

Opinion by Arthur, J.

Filed: February 3, 2026

* This is an unreported opinion. It may not be cited as precedent within the rule of stare decisis. It may be cited as persuasive authority only if the citation conforms to Maryland Rule 1-104(a)(2)(B).

An out-of-state corporation renewed a judgment shortly before the judgment would have expired. When it filed its notice of renewal, however, the corporation had been “dissolved” because it had not filed various reports and had not paid certain fees in its place of incorporation.

The judgment-debtors moved to strike the judgment and to vacate the judgment. The corporation responded to the motion to strike by filing the required reports, paying the required fees, and reinstating its corporate status.

The circuit court denied the motions to strike and to vacate the judgment. The court also denied a motion to alter or amend, in which the judgment-debtors brought additional information before the court.

The judgment-debtors appealed. We affirm.

BACKGROUND

The law firm of Crowley, Hoge & Fein P.C. (“CHF”) is a District of Columbia corporation. On September 20, 2012, CHF obtained a money judgment in the Superior Court of the District of Columbia against Shirley A. Bolton, Linda C. Bolton, and Dr. Vickie E. Neal. On November 16, 2012, CHF recorded the District of Columbia judgment in the Circuit Court for Howard County, where two of the judgment-debtors resided.¹

¹ A state must give full faith and credit to the judgments of the courts of other states and of the District of Columbia. 28 U.S.C. § 1738. The Uniform Enforcement of Foreign Judgments Act, Maryland Code (1974, 2020 Repl. Vol.), §§ 11-801 to -807 of the Courts and Judicial Proceedings Article, facilitates the performance of that obligation by setting forth the mechanism by which a judgment-creditor can transform an out-of-

In Maryland a money judgment lasts for 12 years from the date of entry. Md. Rule 2-625; Maryland Code (1974, 2020 Repl. Vol.), § 5-102(a)(3) of the Courts and Judicial Proceedings Article. A judgment-creditor may, however, renew the judgment by filing a notice of renewal before the 12 years have run. Md. Rule 2-625.

On July 2, 2024, CHF filed a notice of renewal of its judgment in the Circuit Court for Howard County. On July 5, 2024, the clerk issued a notice of renewed judgment.

On July 15, 2024, the judgment-debtors moved to strike the foreign judgment and to stay the enforcement of the judgment. On July 19, 2024, the judgment-debtors moved to vacate the judgment.

In support of their motions, the judgment-debtors argued, principally, that CHF’s corporate status had been revoked and, thus, that it had no right to enforce the judgment. In addition, they argued that under Maryland law “[a] lawsuit filed by a forfeited corporation is a nullity because the corporation is a nonentity.” They attached a document showing that on September 2, 2021, the District of Columbia had revoked CHF’s certificate and registration because CHF had failed to file certain reports and failed to pay the fees that were due on April 1, 2021. They also attached a document showing that CHF was not in good standing with the Maryland State Department of Assessments and Taxation because it had not filed a required form in 2024.

state judgment into a Maryland judgment. Maryland Rule 2-623 specifies the manner in which a clerk of record must record and index an out-of-state judgment.

The motion to vacate the judgment included an affidavit from one of the judgment-debtors, Dr. Vickie E. Neal. In her affidavit, Dr. Neal asserted that she resides in Texas, that she does not reside in Howard County or in the State of Maryland, and that she has never resided at the Howard County address listed in CHF’s request to renew the judgment.²

In response to the judgment-debtor’s first two motions, CHF filed the required reports with the District of Columbia government on July 17, 2024, and paid all of the fees and penalties that it owed. As a consequence, CHF became an “[a]ctive” corporation in good standing in the District of Columbia.

On July 30, 2024, CHF opposed the motion to strike the foreign judgment. CHF attached the documents showing that it had filed the required reports, paid the required fees, and been “reinstated” in the District of Columbia. Quoting *RFB Properties, LLC v. Federal National Mortgage Association*, 284 A.3d 381, 386 (D.C. 2022), CHF argued that the reinstatement related back to the date of “administrative dissolution” and that it could, in general, carry on “its activities and affairs as if the administrative dissolution had never occurred[.]” In a footnote, CHF argued that, even though it was not in good standing in Maryland, it could do business in this State because its rights had not been “forfeited.”

² The address is the address of the two other judgment-debtors. It is also the address listed for Dr. Neal in CHF’s initial request to record the District of Columbia document in 2012. Other information in the record indicates, however, that Dr. Neal resides in Texas.

On July 30, 2024, CHF also opposed the motion to stay the enforcement of the judgment and the motion to vacate the judgment. In the opposition to the motion to vacate the judgment, CHF largely restated the arguments in the opposition to the motion to strike the foreign judgment.

On August 9, 2024, the circuit court denied the motion to strike and the motion to stay. On August 12, 2024, the circuit court denied the motion to vacate the judgment.

On August 16, 2024, Dr. Neal moved the court to reconsider the denial of the motion to strike the judgment. Among other things, she argued that she resides in Texas, that she did not reside at the Howard County address listed in the request to renew the judgment, and that a Maryland could not assert personal jurisdiction over her.

On August 22, 2024, all three of the judgment-debtors moved the court to reconsider the denial of the motion to vacate the judgment. In support of the motion, the judgment-debtors argued, among other things, that CHF’s right to do business in Maryland had not been forfeited only because CHF had failed to inform the Maryland authorities that it had been administratively dissolved in the District of Columbia; that CHF’s right to do business in Maryland should be forfeited because CHF had made false statements, including a statement about the location of its principal office; that section 7-301 of the Corporations and Associations (“CA”) Article of the Maryland Code (1975, 2025 Repl. Vol.) prohibited CHF from maintaining a suit in the State of Maryland;³ and

³ CA section 7-301 provides as follows:

that CHF had “fraudulently reobtained” its certification in the District of Columbia because it had provided a “false address” for the location of its business.

On September 6, 2024, the circuit court denied the motions to alter or amend.

On September 9, 2024, the judgment-debtors noted a timely appeal.

QUESTIONS PRESENTED

The judgment-debtors raise two questions, which we have restated:

1. Did the circuit court err in denying the motion to strike the foreign judgment and the motion for reconsideration of the denial of the motion to strike the foreign judgment?

If a foreign corporation is doing or has done any intrastate, interstate, or foreign business in this State without complying with the requirements of Subtitle 2 of this title, neither the corporation nor any person claiming under it may maintain a suit in any court of this State unless it shows to the satisfaction of the court that:

- (1) The foreign corporation or the person claiming under it has paid the penalty specified in § 7-302 of this subtitle; and
- (2) Either:
 - (i) The foreign corporation or a foreign corporation successor to it has complied with the requirements of Subtitle 2 of this title; or
 - (ii) The foreign corporation and any foreign corporation successor to it are no longer doing intrastate, interstate, or foreign business in this State.

Subtitle 2 of Title 7 of the Corporations and Associations Article concerns the registration and qualification of foreign corporations that do business (foreign, interstate, or intrastate) in Maryland.

For an extensive discussion of section 7-301, see *Yangming Marine Transport Corp. v. Revon Products U.S.A., Inc.*, 311 Md. 496 (1988).

2. Did the circuit court err in denying the motion to vacate the renewal of the foreign judgment and the motion for reconsideration of the denial of the motion to vacate the renewal of the foreign judgment?⁴

Because we see no error or abuse of discretion, we shall affirm the judgment.

STANDARD OF REVIEW

The judgment-debtors liken the denial of the motions to strike and to vacate the judgment to the denial of a motion to revise an enrolled judgment, which we review for clear abuse of discretion. *See, e.g., Stuples v. Baltimore City Police Dep’t*, 119 Md. App. 221, 232 (1998). We also review the denial of the motion to alter or amend the judgment for abuse of discretion. *See, e.g., RRC Northeast, LLC v. BAA Maryland, Inc.*, 413 Md. 638, 673 (2010).

DISCUSSION

The circuit court did not abuse its discretion in declining to strike or vacate the judgment or in declining to reconsider its decisions. Although the District of Columbia had revoked CHF’s certificate and registration when CHF attempted to renew the judgment in Maryland, CHF promptly addressed the cause of the revocation and thus

⁴ The judgment-debtors formulated the questions as follows:

1. Did the Circuit Court error [sic] in denying Appellant’s Motion for Reconsideration and Defendant’s Motion to Strike Foreign Judgment?
2. Did the Circuit Court error [sic] in denying Appellants’ Motion for Reconsideration and Defendant’s Motion to Vacate Renewal of Foreign Judgment?

became an “active” corporation. Under District of Columbia law, which governs CHF’s corporate status,⁵ CHF’s reinstatement relates back to the effective date of CHF’s “administrative dissolution” in 2017. D.C. Code § 29-106.03(d). Moreover, as a result of its “reinstatement,” CHF was entitled to “resume carrying on its activities and affairs as if the administrative dissolution had never occurred[.]” *Id.* The temporary loss of corporate status had no effect on CHF’s ability to renew its judgment.

“On forfeiture of its right to do intrastate business in [Maryland], [a] foreign corporation is subject to the same rules, legal provisions, and sanctions as if it had never qualified or been licensed to do business in this State[.]” (CA § 7-304(d)), which includes a prohibition on “maintain[ing] a suit in any court of this State[.]” CA § 7-301. Thus, upon the forfeiture of its right to do business in Maryland, a foreign corporation may lose the right to maintain a lawsuit in Maryland courts. *See A Guy Named Moe, LLC v. Chipotle Mexican Grill of Colorado, LLC*, 447 Md. 425, 439 (2016). But although CHF was not in good standing in Maryland when it renewed the judgment, CHF never forfeited its right to do business in Maryland. Therefore, even if we assume that renewing a judgment entails maintaining a suit, CHF did not lose the right to renew its judgment in Maryland.⁶

⁵*See Tomran, Inc. v. Passano*, 391 Md. 1, 17 (2006).

⁶ As of January 12, 2026, the date of oral argument in this appeal, CHF was in good standing in Maryland.

The judgment-creditors contend that CHF “fraudulently” renewed its judgment. They argue, for example, that when it applied for reinstatement CHF was no longer in the business of practicing law; that two of its three named partners were practicing law elsewhere and that the third had died; and that the firm did not have an office at the District of Columbia address listed in its application for reinstatement. They also argue that when it closed its law practice CHF did not file the reports required by the District of Columbia.

These arguments have no effect on our conclusion that the circuit court did not abuse its discretion in declining to strike or vacate the judgment or in declining to reconsider its decisions. CHF may no longer be in the business of practicing law, and its partners may not be practicing law at CHF, but CHF is clearly in some kind of business—the business of enforcing a judgment and collecting a debt. The death of a named partner has no impact on CHF’s ability to enforce a judgment, because CHF is a corporation with an existence separate and apart from that of its owners. And if CHF used a “false” or incorrect address in successfully applying for reinstatement, that matter is best addressed to the relevant authorities in the District of Columbia. A Maryland court has no authority to look behind a facially valid document establishing that a foreign corporation has reinstated its corporate status in the jurisdiction in which it was incorporated.

One of the appellants, Dr. Neal, argues that the circuit court abused its discretion in declining to alter or amend its orders because, she says, Maryland lacks personal

jurisdiction over her. Dr. Neal’s argument misapprehends the nature of the rights that CHF has attempted to enforce.

When a judgment-creditor attempts to record an out-of-state judgment in Maryland, a Maryland court may inquire as to whether *the court that rendered the judgment* had personal jurisdiction over the defendant. *See, e.g., Oxendine v. SLM Capital Corp.*, 172 Md. App. 478, 483-90 (2007). Thus, in 2012, when CHF first recorded the judgment in Maryland, Dr. Neal (and her co-defendants) could have questioned whether the Superior Court of the District of Columbia had personal jurisdiction over them. A Maryland court’s ability to exercise personal jurisdiction over Dr. Neal is, however, irrelevant to CHF’s right to record its District of Columbia judgment in Maryland, or to renew the judgment before 12 years had run. A Maryland court must give full and faith credit to a valid judgment of a court in the District of Columbia.⁷

Dr. Neal also argues that because she resides in Texas, the judgment against her should last for only 10 years, as provided by Texas law, and for not the 12 years provided by Maryland. Her argument has no merit. Once CHF recorded the judgment in Maryland, it became a Maryland judgment. The duration of a Maryland judgment is governed by Maryland law. *See Stevenson v. Edgefield Holdings, LLC*, 244 Md. App.

⁷ In general, “a money judgment that is recorded and indexed in the county of entry constitutes a lien from the date of entry in the amount of the judgment and post-judgment interest on the defendant’s interest in land located in that county.” Md. Rule 2-621(a). If Dr. Neal has no interest in land located in Howard County, the Maryland judgment has little effect on her.

604, 623 (2020). Were the law otherwise, the same judgment might have a different duration for different judgment-debtors—for example, CHF’s judgment would last for 12 years against Dr. Neal’s co-appellants (who reside in Maryland) even though, according to Dr. Neal, it would last only 10 years against her. Because Dr. Neal’s argument leads to this absurd conclusion, it cannot be correct.

In summary, the circuit court did not abuse its discretion in declining to strike or to vacate the renewed judgment and in declining to alter or amend its judgments.

**JUDGMENT OF THE CIRCUIT COURT
FOR HOWARD COUNTY AFFIRMED.
APPELLANTS TO PAY COSTS.**