

# Commencing an Action: Maryland

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A Q&A guide to commencing an action in Maryland. This Q&A addresses the requirements for drafting and filing initiating papers, serving process, and amending the complaint. Answers to questions can be compared across a number of jurisdictions (see [Commencing an Action: State Q&A Tool](#)).

## OVERVIEW OF COMMENCING AN ACTION

### 1. What are the applicable rules for commencing an action?

Generally, the Maryland Rules of Civil Procedure and the Courts & Judicial Proceedings Article of the Maryland Code Annotated govern the commencement of a civil action.

The following rules and statutes apply to commencing a civil action in Maryland circuit courts:

- Md. Rule 2-101 (commencement of action).
- Md. Rule 2-111 - 2-126 (process).
- Md. Rule 2-302 (pleadings allowed).
- Md. Rule 2-303 (form of pleadings).
- Md. Rule 2-304 (pleading certain matters).
- Md. Rule 2-305 (claims for relief).
- Md. Rule 2-341 (amendment of pleadings).
- Md. Code Ann., Cts. & Jud. Proc. § 1-501 (circuit court jurisdiction and powers).
- Md. Code Ann., Cts. & Jud. Proc. §§ 6-101 - 6-103 (personal jurisdiction).
- Md. Code Ann., Cts. & Jud. Proc. §§ 6-201, 6-202, and 6-203 (venue).
- Md. Code Ann., Cts. & Jud. Proc. §§ 6-301 - 6-313 (service of process).

- Md. Code Ann., Cts. & Jud. Proc. §§ 7-201 - 7-208 (circuit court costs and fees).

The following rules and statutes apply to commencing a civil action in Maryland district courts:

- Md. Rule 3-101 (commencement of action).
- Md. Rule 3-111 - 3-126 (process).
- Md. Rule 3-302 (pleadings allowed).
- Md. Rule 3-303 (form of pleadings).
- Md. Rule 3-304 (pleading time and place).
- Md. Rule 3-305 (claims for relief).
- Md. Rule 3-341 (amendment of pleadings).
- Md. Code Ann., Cts. & Jud. Proc. §§ 4-401 - 4-405 (district court jurisdiction).
- Md. Code Ann., Cts. & Jud. Proc. §§ 7-301 - 7-302 (district court costs and fees).

Counsel should also check local court rules, local efilings rules, and judges' standing orders for guidance.

### 2. Generally, in which trial level court must an action be commenced? Please address:

- Monetary thresholds for trial level courts.
- Territorial limits for trial level courts.

If an action satisfies the jurisdictional requirements, a party may commence an action in:

- Circuit court.
- District court.

#### MONETARY THRESHOLDS

The circuit courts have exclusive jurisdiction over civil actions in which the amount of controversy exceeds \$30,000 (Md. Code Ann., Cts. & Jud. Proc. §§ 1-501 and 4-401).

Circuit courts and district courts have concurrent jurisdiction over civil actions in which the amount of controversy is between \$5,000 and \$30,000 except in:

- Replevin actions.
- Landlord-tenant, distraint, and wrongful detainer actions.
- Grantee suits brought in ejectment proceedings.
- Petitions for injunction relating to the use, disposition, encumbrances, or preservation of property that is either:
  - claimed in a replevin action, until seizure under the writ; or
  - sought to be levied on in an action of distress, until levy and any removal.

(Md. Code Ann., Cts. & Jud. Proc. § 4-402). The above-listed actions are exclusively within the jurisdiction of the district courts (Md. Code Ann., Cts. & Jud. Proc. § 4-401). Furthermore, the district courts do not have equity jurisdiction, jurisdiction to decide the ownership of real property, or jurisdiction to render a declaratory judgment (Md. Code Ann., Cts. & Jud. Proc. § 4-402).

District courts have exclusive jurisdiction over civil actions in which the amount of controversy is \$5,000 or less (Md. Code Ann., Cts. & Jud. Proc. § 4-401).

Generally, a claimant has the right to a jury trial in actions in which the amount in controversy is \$15,000 and above. Because the district courts do not hold jury trials, parties must bring claims with a jury demand in a circuit court. (Md. Code Ann., Cts. & Jud. Proc. § 4-402.)

#### TERRITORIAL LIMITS

There are no territorial limits on the jurisdiction of either circuit courts or district courts. In most cases, the appropriate county in which to commence an action is governed by the laws of venue, and is generally the county where the defendant either:

- Resides.
- Carries on a regular business.
- Is employed.
- Habitually engages in a vocation.
- Maintains its principal offices, if the defendant is a corporation.

(Md. Code Ann., Cts. & Jud. Proc. § 6-201.)

### 3. What documents must be prepared to commence an action? Are there official forms for the initiating papers?

#### DOCUMENTS

A party commences an action by filing a complaint (Md. Rule 2-101 and 3-101).

In circuit court, the plaintiff must also file an information report, with limited exceptions (Md. Rule 2-111).

#### OFFICIAL FORMS

The information report must be in the form made available by the court clerk (Md. Rule 2-111; see Maryland Courts: Court Forms).

### 4. Is an action commenced by serving or filing the initiating papers? If an action is commenced by service, by when must the complaint or other pleadings be filed?

A party commences an action by filing a complaint (Md. Rule 2-101 and 3-101).

### 5. How are the initiating papers filed? Please address:

- Whether the papers are filed electronically or by hard copy.
- Any fees for filing the initiating papers, and in what form those fees must be paid.

#### FILING INITIATING PAPERS

A party must file the initiating papers by hard copy in counties that have not yet adopted e-filing (Md. Rule 1-322). Otherwise, parties must file complaints electronically (Md. Rule 20-106(a)). As of October 2017, the following counties have adopted mandatory e-filing:

- Allegany.
- Anne Arundel.
- Calvert.
- Caroline.
- Cecil.
- Charles.
- Dorchester.
- Frederick.
- Garrett.
- Kent.
- Queen Anne's
- Somerset.
- St. Mary's.
- Talbot.
- Washington.
- Wicomico.
- Worcester.

(See Maryland Courts: MDEC).

#### FILING FEES

In circuit courts, the filing fee is generally \$165 (Md. Code Ann., Cts. & Jud. Proc. § 7-202; Maryland Courts: Circuit Court Fee Schedule).

In district courts, the filing fee is:

- \$34 for filing a "small claim" (under \$5,000).
- \$46 for filing a "large claim" (in excess of \$5,000).

(Maryland Courts: District Court Fee Schedule.)

#### INITIATING PAPERS

### 6. What are the contents that must be included in the summons?

The clerk of the court prepares the summons (Md. Rule 2-112 and 3-112).

In circuit court, the summons must contain:

- The name of the court.
- The assigned docket reference.
- The name and address of the plaintiff.
- The name and address of the defendant.
- The date of issue.

- The time within which the summons must be served.
- The time within which the defendant must file a response to the complaint by pleading or motion.
- A notification to the defendant that failure to file the response within the time allowed may result in a judgment by default or the granting of the relief sought.
- The time within which the return of service must be made. (Md. Rule 2-114.)

In district court, the summons must contain:

- The name of the court.
- The assigned docket reference.
- The name and address of the plaintiff.
- The name and address of the defendant.
- The date of issue.
- The time within which the summons must be served.
- The assigned trial date.
- The time within which the defendant must file a notice of intention to defend.
- A notification to the defendant that failure to file the notice of intention to defend within the time allowed may result in a judgment by default or the granting of the relief sought.
- The time within which the return of service must be made. (Md. Rule 3-114.)

#### 7. What are the contents that must be included in the complaint?

The complaint must contain:

- A caption that identifies:
    - the names of the parties;
    - the addresses of the parties (including zip codes), if known;
    - the name of the court; and
    - the document title (Complaint).
- (Md. Rule 1-301(a).)
- A clear statement of the facts necessary to constitute a cause of action (Md. Rule 2-305 and 3-305).
  - A demand for judgment for the relief sought (Md. Rule 2-305 and 3-305).
  - A signature by the party's attorney or the party, if unrepresented (Md. Rule 1-311).
  - The signatory's address, telephone number, facsimile number (if any), and email (if any) (Md. Rule 1-311).
  - If electronically filed by an attorney, the attorney's Client Protection Fund ID number (Md. Rule 1-311; Md. Rule 20-107).

The complaint must be drafted in numbered paragraphs, and each cause of action must be set forth in a separately numbered count (Md. Rule 2-303(a)).

When a plaintiff seeks a monetary award that is less than \$75,000, the demand for relief must specify the amount sought. If the plaintiff seeks more than \$75,000, the complaint must include a general statement that the amount sought exceeds \$75,000. (Md. Rule 2-305.)

#### 8. Must the plaintiff certify or swear to the complaint?

Generally, a plaintiff does not need to verify or swear to a complaint (Md. Rule 1-301(f)). There are exceptions in certain circumstances, which include:

- A demand for a temporary restraining order (Md. Rule 15-504(a)).
- A demand for a mechanics lien (Md. Code Ann., Real Prop. § 9-105(a)(2)).

#### 9. What is the applicable pleading standard? Please address any:

- Key distinctions from Federal Rules of Civil Procedure 8.
- Different pleadings requirements for particular claims (for example, fraud).

#### STATE PLEADING STANDARD

Under Maryland law, a complaint must contain:

- A clear statement of the facts necessary to constitute a cause of action.
- A demand for judgment for the relief sought.

(Md. Rule 2-305(a) and 3-305.) The complaint's averments must be simple, concise, and direct. The complaint must contain only the statements of fact that are necessary to show the plaintiff's entitlement to relief. (Md. Rule 2-303(b) and 3-303(b).)

The plaintiff must plead the facts with sufficient specificity. General assertions and broad conclusions are not sufficient. If the complaint is doubtful and ambiguous, the court will construe the complaint most strongly against the plaintiff in determining whether the complaint is sufficient. (See *Bobo v. State*, 697 A.2d 1371, 1372-73 (Md. 1997).)

When time and place are material to the cause of action, the plaintiff must include the time and place in the averments (Md. Rule 2-304(c) and 3-304).

#### KEY FEDERAL DISTINCTIONS

Although the language of the pleading rules is similar to the federal pleading standard as articulated in *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007) and *Ashcroft v. Iqbal*, 556 U.S. 662 (2009), Maryland courts have not yet addressed how the state standard may differ from the federal standard (see *Baltimore County v. Baltimore County Deputy Sheriffs*, 2016 WL 687503, at \*5 n.3 (Md. Ct. Spec. App. Feb. 18, 2016) (unpublished)).

#### PLEADING REQUIREMENTS FOR PARTICULAR CLAIMS

##### Fraud

A plaintiff must plead fraud claims with particularity (*McCormick v. Medtronic, Inc.*, 101 A.3d 467, 492 (Md. Ct. Spec. App. 2014)).

##### Capacity

In circuit court, a plaintiff does not need to aver the capacity of a party to sue or be sued (Md. Rule 2-304(a)).

### Conditions Precedent

In circuit court, when a party pleads the performance or occurrence of conditions precedent, it is sufficient to aver generally that all conditions precedent have been performed or have occurred (Md. Rule 2-304(b)).

**10. Please address the circumstances, if any, where a complaint is not part of the initiating papers, including what papers are filed instead of a complaint.**

A complaint is always part of the initiating papers in Maryland.

**11. Please discuss any prerequisites for filing certain claims (for example, filing a complaint against a government entity).**

### HEALTH CARE MALPRACTICE

Subject to certain exceptions, claims against health care providers for medical injuries are subject to the Health Care Malpractice Claims Act (Md. Code Ann., Cts. & Jud. Proc. §§ 3-2A-01 – 3-2A-10). Under that statute, claimants must first file such claims with the Director of the Health Care Alternative Dispute Resolution Office for arbitration (Md. Code Ann., Cts. & Jud. Proc. § 3-2A-04). Within 90 days of filing the complaint with the Director, the claimant must file a certificate of a qualified expert attesting that:

- The defendant departed from standards of care.
- The departure proximately caused the claimant's injury.

(Md. Code Ann., Cts. & Jud. Proc. § 3-2A-04.)

### PROFESSIONAL MALPRACTICE

Within 90 days after filing a professional malpractice claim, the plaintiff must file a certificate in which a qualified expert attests that the defendant failed to meet an applicable standard of professional care (Md. Code Ann., Cts. & Jud. Proc. § 3-2C-02). This statute applies to claims against:

- Licensed architects.
- Certified interior designers.
- Licensed landscape architects.
- Licensed professional engineers.
- Licensed surveyors.

(Md. Code Ann., Cts. & Jud. Proc. § 3-2C-01.)

### TORT CLAIMS AGAINST THE STATE

Subject to certain exceptions, a claimant may not file a tort action against the state of Maryland unless both:

- The claimant first files a claim for relief directly with the state Treasurer within one year of the injury.
- The Treasurer denies the claim.

(Md. Code Ann., State Gov't § 12-106.)

### SERVICE OF PROCESS

**12. When must the defendant be served with process? Can the time to serve the defendant be lengthened?**

#### SERVING THE DEFENDANT WITH PROCESS

In circuit court, the plaintiff must serve the defendant with process within 60 days after the clerk issues the summons (Md. Rule 2-113).

In district court, the plaintiff must serve process within 30 days (Md. Rule 3-113).

#### ADDITIONAL TIME FOR SERVICE

Once the time period to serve process has expired, the plaintiff may make a written request to renew the summons (Md. Rule 2-113 and 3-113).

#### 13. What documents must be served?

The plaintiff must serve:

- The summons.
- The complaint.
- All other papers filed with the complaint.

(Md. Rule 2-121 and 3-121.)

#### 14. Who may serve process? Is a license or other certification required?

The following persons may serve process:

- A sheriff.
- Any non-party to the action, including an attorney of record, who is both:
  - competent; and
  - 18 years of age or older.

(Md. Rule 2-123(a) and 3-123(a).)

#### 15. What are the methods for service within the state?

##### SERVICE ON AN INDIVIDUAL

A party may serve an individual by either:

- Delivering to the person a copy of the summons, complaint, and all other papers filed with it.
- Leaving a copy at the individual's dwelling house or usual place of abode with a resident of suitable age and discretion.
- Mailing a copy to the person by certified mail, restricted delivery requested.

(Md. Rule 2-121 and 3-121.)

A party may serve an individual by serving either:

- The individual.
- An agent authorized by appointment or by law to receive service of process for the individual.

(Md. Rule 2-124(b) and 3-124(b).)

If the plaintiff proves by affidavit that the defendant has evaded service, the court may order that the plaintiff serve the defendant by both:

- Mailing a copy of the summons, complaint, and all other papers filed with it to the defendant at the defendant's last known residence.
- Delivering a copy of each to a person of suitable age and discretion at the defendant's place of business.

(Md. Rule 2-121(b) and 3-121(b).) The court may order any other means of service it deems appropriate and reasonably calculated to give actual notice if the plaintiff proves by affidavit that both:

- Good faith efforts to serve the defendant through typical methods have been unsuccessful.
- Service by mailing to the defendant's last known residence and delivering a copy to the defendant's place of business is inapplicable or impracticable.

(Md. Rule 2-121(c) and 3-121(c).)

#### **Service on an Individual Under Disability**

A party may serve an individual under disability by both:

- Serving the individual.
- Serving the parent, guardian, or other person having care or custody of the person or estate of the individual under disability.

(Md. Rule 2-124(c) and 3-124(c).)

#### **SERVICE ON AN ENTITY**

A party may serve an entity by either:

- Delivering to the person to be served a copy of the summons, complaint, and all other papers filed with it.
- If the person to be served is an individual, leaving a copy at the individual's dwelling house or usual place of abode with a resident of suitable age and discretion.
- Mailing a copy to the person to be served by certified mail, restricted delivery requested.

(Md. Rule 2-121 and 3-121.)

The person to be served depends on the type of entity involved, although the person is typically a resident agent authorized by the entity to receive service of process.

Service may be made on any entity required to have a resident agent by serving two copies of the summons, complaint, and all other papers filed with it, together with the required fee, on the State Department of Assessments and Taxation if either:

- The entity has no resident agent.
- The resident agent is dead or no longer at the registered address for service of process.
- Two good faith attempts on separate days to serve the resident agent have failed.

(Md. Rule 2-124(o) and 3-124(o).)

#### **Service on a Corporation**

A party may serve a corporation, incorporated association, or joint stock company by serving any of the following:

- Resident agent.
- President.
- Secretary.
- Treasurer.

(Md. Rule 2-124(d) and 3-124(d).) If service to the above persons fails, service may be made by serving either:

- The manager.
- Any person expressly or impliedly authorized to receive service of process, including a:
  - director;
  - vice president;

- assistant secretary;
- assistant treasurer; or
- other authorized person.

(Md. Rule 2-124(d) and 3-124(d).)

#### **Service on a General Partnership**

A party may serve a general partnership by serving any general partner (Md. Rule 2-124(e) and 3-124(e)).

#### **Service on an LP, LLP, or LLC**

A party may serve a limited partnership, limited liability partnership, or limited liability company by serving its resident agent. If there is no resident agent or if a good faith attempt to serve the resident agent has failed, service may be made on any general partner, member, or other person expressly or impliedly authorized to receive service of process. (Md. Rule 2-124(f), (g), (h) and 3-124(f), (g), (h).)

#### **Service on an Unincorporated Association**

A party may serve an unincorporated association by serving any officer or member of its governing board. If there are no officers or if the association has no governing board, service may be made on any member of the association. (Md. Rule 2-124(i) and 3-124(i).)

#### **Service on the State**

A party may serve the State of Maryland by either:

- Serving the Attorney General.
- Serving an individual designated by the Attorney General in a writing filed with the clerk of the Court of Appeals.

(Md. Rule 2-124(j) and 3-124(j).)

#### **Service on a State Officer or Agency**

A party may serve an officer or agency of the State of Maryland by either:

- Serving the resident agent designated by the officer or agency.
- Serving the Attorney General or an individual designated by the Attorney General in a writing filed with the clerk of the Court of Appeals.

(Md. Rule 2-124(k) and 3-124(k).) If service is made on the Attorney General or a designee of the Attorney General, and the officer or agency is not ordinarily represented by the Attorney General, the Attorney General or designee must promptly forward the process and papers to the appropriate officer or agency (Md. Rule 2-124(k) and 3-124(k)).

#### **Service on a Local Subdivision of the State**

A party may serve a local subdivision of the state by serving the resident agent designated by the local entity. If the local entity has no resident agent or if a good faith effort to serve the resident agent has failed, a party may serve either:

- The chief executive or presiding officer.
- Any member of the governing body, if there is no chief executive or presiding officer.

(Md. Rule 2-124(l) and 3-124(l).)

## SERVICE IN IN REM ACTIONS

In *in rem* and *quasi in rem* circuit court actions, when the whereabouts of the defendant are unknown and reasonable efforts have been made in good faith to locate the defendant, the court may order service by both:

- Mailing a notice to the defendant's last known address.
- Either:
  - posting the notice at the courthouse door or on a bulletin board immediately nearby;
  - publishing the notice at least once a week in each of three successive weeks in one or more newspapers of general circulation published in the county in which the action is pending; or
  - posting a notice in a conspicuous place on the land, for actions relating to interest in that land, including leasehold interests.

(Md. Rule 2-122.)

### 16. What are the methods for service outside the state?

A party may serve outside of Maryland using the same methods of service available for service within Maryland (Md. Rule 2-121(a) and 3-121(a); see Question 15). In addition, a party may serve outside of the state using a method prescribed by either the:

- Court.
- Foreign jurisdiction, if the method is reasonably calculated to give actual notice.

(Md. Rule 2-121(a) and 3-121(a).)

### 17. Are there any days on which service of process is restricted (for examples, Sundays or holidays)?

A party may serve process on a Sunday or holiday. However, writs of dstraint or for eviction or possession may not be served on Sunday. (Md. Rule 2-125 and 3-125.)

### 18. What are the consequences for ineffective service of process?

Defective service of process is a jurisdictional defect, and the defendant's actual knowledge of the suit does not cure that defect (see *Lohman v. Lohman*, 626 A.2d 384, 392 (Md. 1993)). In circuit court, the defendant may move the court to dismiss an action for insufficient service of process. However, the defendant waives this issue by failing to raise it by motion before filing an answer. (Md. Rule 2-322.) In district court, a defendant may challenge the sufficiency of service of process in a notice of intention to defend (*Pickett v. Sears, Roebuck & Co.*, 775 A.2d 1218, 1233 (Md. 2001)).

An action against any defendant who has not been served is subject to dismissal:

- After 120 days from the issuance of original process, in circuit court.
- After one year from the issuance of original process, in district court.

(Md. Rule 2-507(b) and 3-507(a).)

### 19. How are any defects in serving process cured?

The Maryland Rules do not provide a particular method for curing defects in serving process. A plaintiff who has defectively served process should cure that defect by re-serving process in accordance with the Maryland Rules.

### 20. Must proof of service of process be filed? Please address:

- Any required form of proof of service (for example, affidavit, affirmation, or declaration).
- Any information required in the proof of service.
- When the proof of service must be filed.

In Maryland, proof of service must be filed (Md. Rule 2-126(a) and 3-126(a)). However, failure to make proof of service does not affect the validity of the service (Md. Rule 2-126(g) and 3-126(g)).

If the process server is unable to make service, the server must file a return of service along with the unserved original process (Md. Rule 2-126(d), (e) and 3-126(d), (e)).

#### REQUIRED FORM

The form of proof required depends on the manner in which the party makes service (see Required Information).

#### REQUIRED INFORMATION

Proof of service must include a copy of the process (Md. Rule 2-126(e) and 3-126(e)).

If service is by delivery, the proof must include:

- The name of the person served.
- The date of service.
- The particular place and manner of service.

(Md. Rule 2-126(a)(1) and 3-126(a)(1).)

If service is made by leaving a copy of process at the individual's usual place of residence with a resident of suitable age and discretion, the proof must also include:

- A description of the individual served.
- The facts which led the individual making service to conclude that the individual served is of suitable age and discretion.

(Md. Rule 2-126(a)(1) and 3-126(a)(1).)

If service is made by an individual other than a sheriff or a clerk, the process server must also file an affidavit that includes:

- The name, address, and telephone number of the affiant.
- A statement that the affiant is of the age of 18 or over.

(Md. Rule 2-126(a)(2) and 3-126(a)(2).)

If service is by certified mail, the proof must include the original return receipt (Md. Rule 2-126(a)(3) and 3-126(a)(2)). If a district court clerk makes service by certified mail, the clerk promptly files the return receipt as proof of service (Md. Rule 3-126(a)(3)).



If service is made by posting or publication, proof of service must include:

- The name, address, and telephone number of the individual making service.
  - Proof of compliance with the Rule 2-122 of the Maryland Rules.
  - A copy of the posted notice or publication.
- (Md. Rule 2-126(b) and 3-126(b).)

#### WHEN PROOF MUST BE FILED

Proof of service of process must be filed promptly and in any event within the time during which the person served must respond to the process (Md. Rule 2-126(a) and 3-126(a)).

If the process server is unable to make service, the server must file a return of service as soon as practicable, and in no event later than ten days after the validity of the process expires (Md. Rule 2-126(d) and 3-126(d)).

### AMENDING THE COMPLAINT

#### 21. Can the complaint be amended after it has been filed, but before it has been served?

A party may amend the complaint after it has been filed, but before it has been served (see Md. Rule 2-341 and 3-341). For more information, see Question 22.

#### 22. Can the complaint be amended after it has been filed and served? If so:

- When can this be done as of right?
- When must a plaintiff seek a court order to amend the complaint?

#### AMENDMENT AS OF RIGHT

In circuit court, pleadings may be amended without leave of court at any time prior to:

- The date set forth in the court's scheduling order.
- 30 days before a scheduled trial, if no scheduling order is issued. (Md. Rule 2-341(a).)

In district court, pleadings may be amended without leave of court at any time prior to 15 days before a scheduled trial (Md. Rule 3-341(a)).

#### COURT ORDER FOR AMENDING THE COMPLAINT

In circuit court, the plaintiff must seek a court order to amend its complaint:

- After the date set forth in the court's scheduling order.
- Within 30 days prior to trial, if no scheduling order is issued. (Md. Rule 2-341(b).)

In district court, the plaintiff must obtain the adverse party's written consent or leave of court to amend the complaint:

- Within 15 days of a scheduled trial date.
- After trial has started.

(Md. Rule 3-341(b).)

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