

ROSALYNNE R. ATTERBEARY REVOCABLE TRUST, et al.

* IN THE

* CIRCUIT COURT

* FOR

* ANNE ARUNDEL COUNTY

Plaintiffs/Counter- Defendants,

v.

PROPERTY OWNERS ASSOCIATION * OF ARUNDEL ON THE BAY, INC., et

al.

* Case No: C-02-CV-15-003736 Defendants. *

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

To: Rosalynne R. Atterbeary Revocable Trust, Plaintiff

From: John K. Brock, Defendant(s)

Defendant(s) hereby respond to the Request for Production of Documents filed by Plaintiffs Rosalynne R. Atterbeary Revocable Trust, et. al., and state(s) as follows:

Request No. 1: All documents identified in your Answers to Interrogatories. Response:

I have no such documents.

Request No. 2: All documents, including any survey, plat, plan, photograph, aerial photograph, or other written or electronic graphic representation of the Atterbeary Property, the Coble Property, or the Disputed Roads.

Response: **I have no such documents.**

Request No. 3: All correspondence, memoranda, or documents that contain information about, describe, refer, or otherwise relate to the Atterbeary Property, the Coble Property, or the Disputed Roads, including those documents which are to or from the Atterbearys or the Cobles.

Response:

Request No. 4: Any written statements by any person(s) concerning or relating to the ownership, use, maintenance, or occupation of the Atterbeary Property, the Coble Property, or the Disputed Roads.

Response: **I have no such documents.**

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Request No. 5: All documents that support any claim or defense you have raised or intend to raise in this action regarding title to and use of Parcel 2 and Parcel 3 as shown on Exhibit 1 attached to Plaintiffs' Interrogatories.

Response: **I have no such documents.**

Request No. 6: All statements, memoranda, or other written or electronic document given by you to any person concerning the subject matter of this action.

Response: **I have no such documents.**

Request No. 7: All documents, including correspondence, notes, memoranda or other communications, between you and the plaintiffs related to or concerning the subject matter of this action.

Response: **I have no such documents.**

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Request No. 8: All documents, including correspondence, notes, memoranda, or other communications, between you and the Association relating to or concerning the subject matter of this action.

Response: **I have no such documents.**

Request No. 9: All documents, including correspondence, notes, memoranda, or other communications, between you and any other lot owner in Arundel on the Bay relating to or concerning the subject matter of this action.

Response: **I have no such documents.**

Request No. 10: All documents relating to and/or supporting any claim or defense you have raised or intend to raise in this action regarding ownership, use, maintenance, or occupation of the Disputed Roads.

Response: **I have no such documents.**

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Request No. 11: All documents that support your claim that you use or have used the Disputed Roads for any purpose.

Response: **I have no such documents.**

Request No. 12: All documents that support your claim that any other person uses or has used the Disputed Roads for any purpose.

Response: **I have no such documents.**

Request No. 13: All documents associated with your involvement on social media related to or concerning the subject matter of this action.

Response: **I have no such documents.**

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Request No. 14: All documents, including statements, correspondence, memoranda, or other written or electronic communications between you and the Association's counsel in this action that relate to or concern the subject matter of this action.

Response: **I have no such documents.**

I SOLEMNLY AFFIRM under penalty of perjury that the foregoing responses to Plaintiffs' Request for Production of Documents are true to the best of my knowledge, information and belief.

Date: June 20, 2017 John K. Brock  NAME

RULE 20-201(F)(1) CERTIFICATE

I HEREBY CERTIFY that the foregoing submission does not contain any restricted information.

John K. Brock NAME

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