

ROSALYNNE R. ATTERBEARY
REVOCABLE TRUST, *et al.*

Plaintiffs/Counter-
Defendants,

v.

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

Defendants.

* IN THE
* CIRCUIT COURT
* FOR
* ANNE ARUNDEL COUNTY
*
* Case No: C-02-CV-15-003736
*

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RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

To: Rosalynne R. Atterbeary Revocable Trust, Plaintiff

From: Lee Earl Dickey and Netta Ann Dickey, 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:

The only document we referenced was the USE AGREEMENT. It is on the AOTB website.

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:

We only used the AOTB USE AGREEMENT document copy which did not have any Exhibit 1 attached.

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:

WE only referenced the USE AGREEMENT document on the AOTB website. we did not read anything about the Atterbeary property, the Coble Property, or the Disputed Roads, except the letters from the Plaintiffs lawyers telling us we were being sued by the plaintiffs.

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:

The USE AGREEMENT covers the right of the Association to manage the the use and maintenance of the Disputed Roads, and the Chesapeake Walk. We do not know who uses, maintains, or occupies the Atterbeary, or Coble properties.

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:

We only used the USE AGREEMENT which did not have any Exhibit 1 attached. We have no other documents in our custody.

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:

We used only the USE AGREEMENT and have no other 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:

WE have no documents, correspondence, notes, memoranda, or communications with the plaintiffs except the notices sent from the plaintiff's lawyers saying we were defendants being sued.

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:

WE only used the USE AGREEMENT document. We have no other 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:

We have no documents. We communicated with Susan Cook and attorney about formatting the Interrogatories and this RESPONSE TO REQUEST FOR PRODUCTION OF 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:

We only used the USE AGREEMENT for AOTB which explains the ownership, use, maintenance, and occupation of the DISPUTED ROADS. We have no other documents.

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

Response:

We have not used the DISPUTED ROADS for any purpose. We have no documents. We explained in the Interrogatories that we used the Chesapeake Walk twice in the 1990s to see the Whit Bread boats arriving and departing. We did not create documents to show that we used the Chesapeake Walk.

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

Response:

We have no documents to support or deny that other people have used the Disputed Roads for any purpose.

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

Response:

We have no documents on social media concerning the subject matter of this action.

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:

We have no documents, statements, correspondence, memoranda, other written or electronic communications with the Association's counsel that relate to or concern the subject matter of this action.

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: 06/28/2017

Lee Earl Dickey
NAME
Netta Ann Dickey

RULE 20-201(F)(1) CERTIFICATE

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

Lee Earl Dickey
NAME
Netta Ann Dickey