

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
*

* * * * *

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

To: Rosalynne R. Atterbeary Revocable Trust, Plaintiff

From: _____Marian L. Kratage_____, 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 am providing the attached copy of *The Property Owners Association of Arundel on the Bay, Inc. Constitution and Bylaws* (ratified on September 27, 1007) and *Rules and Regulations* (approved with revisions on September 27, 1997).

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 none of these 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: I have none of these documents.

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 none of these documents.

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 am providing the attached copy of *The Property Owners Association of Arundel on the Bay, Inc. Constitution and Bylaws* (ratified on September 27, 1007) and *Rules and Regulations* (approved with revisions on September 27, 1997).

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

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 am providing the attached copy of *The Property Owners Association of Arundel on the Bay, Inc. Constitution and Bylaws* (ratified on September 27, 1007) and *Rules and*

Regulations (approved with revisions on September 27, 1997).

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.

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 19, 2017_____

_____*Marian L. Kratage*_____
SIGN YOUR NAME HERE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of June, 2017, a copy of the foregoing document was served by hand delivery upon the following:

Eileen E. Powers, Esq.
Barbara J. Palmer, Esq.
Blumenthal, Delavan, Powers & Palmer, P.A.
888 Bestgate Rd, Ste 413
Annapolis, MD 21401
Email: epowers@bdpplaw.com

_____*Marian L. Kratage*_____
SIGN YOUR NAME HERE