

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: J. David Lashar and Margaret C. Lashar, 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:

See Real Property records, Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document "DEFENDANT/COUNTER-PLAINTIFF'S OPPOSITION TO PLAINTIFFS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING" and associated "AOTB EXHIBIT EXTRACT", which may also be found on <http://arundelonthebay.org/documents.html>.

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:

See Real Property records, Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document “DEFENDANT/COUNTER-PLAINTIFF’S OPPOSITION TO PLAINTIFFS’ MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING” and associated “AOTB EXHIBIT EXTRACT”, which may also be found on <http://arundelonthebay.org/documents.html>.

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:

See Real Property records, Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document “DEFENDANT/COUNTER-PLAINTIFF’S OPPOSITION TO PLAINTIFFS’ MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING” and associated “AOTB EXHIBIT EXTRACT”, which may also be found on <http://arundelonthebay.org/documents.html>.

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:

See Real Property records, Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document “DEFENDANT/COUNTER-PLAINTIFF’S OPPOSITION TO PLAINTIFFS’ MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING” and associated “AOTB EXHIBIT EXTRACT”, which may also be found on <http://arundelonthebay.org/documents.html>.

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:

See Real Property records, Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document "DEFENDANT/COUNTER-PLAINTIFF'S OPPOSITION TO PLAINTIFFS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING" and associated "AOTB EXHIBIT EXTRACT", which may also be found on <http://arundelonthebay.org/documents.html>.

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:

See Real Property records, Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document "DEFENDANT/COUNTER-PLAINTIFF'S OPPOSITION TO PLAINTIFFS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING" and associated "AOTB EXHIBIT EXTRACT", which may also be found on <http://arundelonthebay.org/documents.html>.

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:

N/A

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:

See Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document “DEFENDANT/COUNTER-PLAINTIFF’S OPPOSITION TO PLAINTIFFS’ MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING” and associated “AOTB EXHIBIT EXTRACT”, which may also be found on <http://arundelonthebay.org/documents.html>.

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:

N/A

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:

See Real Property records, Arundel on the Bay Newsletters, copies may be found on <http://arundelonthebay.org/documents.html>, and Arundel on the Bay responses to this lawsuit, in particular, the information contained in the document “DEFENDANT/COUNTER-PLAINTIFF’S OPPOSITION TO PLAINTIFFS’ MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, AND REQUEST FOR HEARING” and associated “AOTB EXHIBIT EXTRACT”, which may also be found on <http://arundelonthebay.org/documents.html>.

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

Response:

Photos taken on 2/1/2014 while on family walk to enjoy wintery weather and sights along Disputed Roads:



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

Response:

N/A

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

Response:

N/A

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:

See Arundel on the Bay website for all correspondences related to this lawsuit
<http://arundelonthebay.org/documents.html>.

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: _____

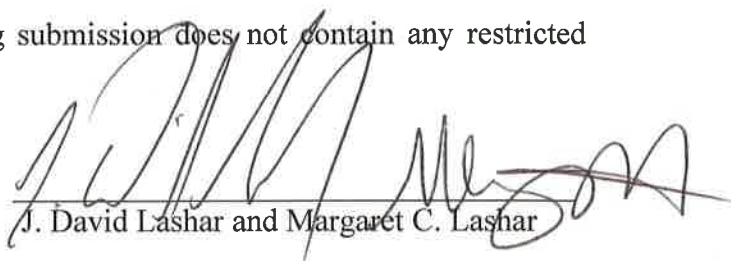
5.23.17



J. David Lashar and Margaret C. Lashar

RULE 20-201(F)(1) CERTIFICATE

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

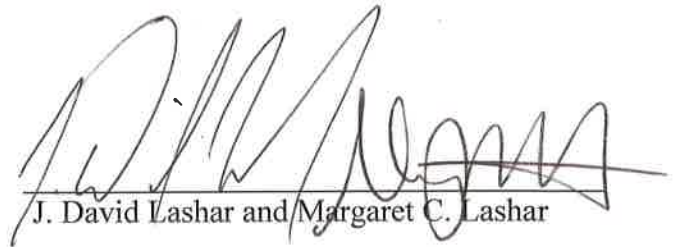


J. David Lashar and Margaret C. Lashar

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd day of May, 2017, a copy of the foregoing paper was served by first class mail, postage prepaid, upon the following:

Eileen E. Powers, Esq.
Barbara J. Palmer, Esq.
Blumenthal, Delavan & Williams, P.A.
888 Bestgate Rd, Ste 413
Annapolis, MD 21401


J. David Lashar and Margaret C. Lashar