

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: Martha (Fisher) McDowell, Defendant

Martha McDowell, Pro Se Defendant, responding to the Request for Production of Documents filed in these proceedings by the Plaintiff, Rosalynne R. Atterbeary Revocable Trust, state(s) as follows:

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

Response:

It is unduly burdensome to produce all the documents identified in my interrogatory requests. All the documents are available to the Plaintiffs through their lawyers or the AOTB website with one exception. I am producing the April 21, 2017 Atterbeary e-mail referenced in interrogatory answer number 12.

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 documents responsive to this request.

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 no documents to produce other than the document referred to in response 1.

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 documents to produce other than the document referred to in response 1.

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 documents responsive to this request.

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 documents responsive to this request.

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 documents to produce other than the document referred to in response 1.

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 received an invitation to a meeting of long-time AOTB residents from the Vice President of the Association, and indicated that I would attend; however, I missed the meeting. The e-mail exchange is being produced (MFM 004).

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 documents responsive to this request.

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:

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 documents responsive to this request.

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 documents responsive to this request.

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

Response: This request is vague and ambiguous. I have no documents responsive to this request.

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 documents responsive to this request.

Respectfully submitted,

Martha (Fisher) McDowell

By: /s/ Martha (Fisher) McDowell
Martha (Fisher) McDowell
3446 Newport Avenue
Annapolis, MD 21403
Pro Se Defendant