

## Answers to Interrogatories

1. Rhoda Rebecca Morris  
3430 Newport Ave., Annapolis, MD 21403.  
(H) 410-626-1437; (M) 443-837-8196  
Retired
2. No one
3. Lot "C"; Block 44; no co-owners, titled in my name; July 1992; July 1992l; no lien or mortgage
4. Personal residential purposes; live alone; primary personal residence.
5. Owned for over 20 years.
6. None known
7. Unknown
8. None
9. Served as Treasurer of the POA-AOTB from 2006 – 2013; kept the books, participated in the annual audit, bid contracts, signed checks, made deposits.
10. In 2006, at the request of the BOD, I sent RFP's to several local landscape companies requesting bids for our grass cutting. As part of the RFP, I offered to meet with representatives of the companies to walk through the community and show them what areas were covered in the contract. When we reached the grassed street end of Magnolia Ave. adjacent to Mrs. Coble's house, Mrs. Coble came out to talk to us. On confirming that we were discussing the grass cutting contract, Mrs. Coble said that she would rather cut the grass on the subject area herself so that it was level with the grass on her own property. She assured me that she had no intention to claim the subject property but was only concerned with the appearance of the landscape. Representatives from two landscaping companies were present, Bay Ridge and Stewart. Names unknown.
11. No knowledge of problems.
12. Knowledge obtained through mailing from the Community Association and website.
13. I have no opinion on who owns fee simple title to the property in question.
14. As a member of this community, I have used the subject property for the purposes listed in answer #15. I have used the property on numerous occasions within the last 20 years.

15. Have used the disputed property to walk my dog, watch the cruise ships, sailboat races and other water traffic within the last 20 years. Watched the America's Cup race from the property in (I believe) 2006. Other specific dates unknown.
16. Neighbor, Roberta Bleinberger (since deceased) accompanied me to watch the American's Cup race and on other occasions, specific dates unknown.
17. No changes.
18. The disputed properties have been grass space for at least the last 25 years and open to the residents of this community for their legal use.
19. Documents in my personal files; copies in Association files – RFP, Letters to landscaping companies, etc.
20. Prior to the occasion in Answer #10, the grassy area was cut by the firm holding the landscaping contract. The name of this company can be obtained by reviewing the checks written prior to 2006.
21. The street ends in Arundel on the Bay are open to access by any community resident.
22. The street ends in Arundel on the Bay are not open to access by anyone not a community resident.
23. During my term as Treasurer, I handled contracts associated with street end maintenance, i.e., grass cutting, erosion control, etc. Through the end of my last term in 2013, all maintenance of these areas was the responsibility of the Association with the exception stated in Answer #10. Documents would be invoices paid and contracts let.
24. I was Treasurer during that litigation so I am aware of the information in this question.
25. I am aware that the property in question is shown on maps made to show erosion control areas for a proposed project to mediate the loss of shoreline. I am aware that David Delia was the primary contact for this project. I do not have possession of these maps and do not know the date these maps were made.
26. See attached documents concerning the 2006 RFP for grass cutting in the community.