

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

Plaintiffs

v.

MAURICE TOSE, et al.

Defendants

* IN THE
* CIRCUIT COURT
* FOR
* ANNE ARUNDEL COUNTY
* Case No.: C-02-CV-19-3640

PLAINTIFFS' EXPERT DESIGNATION

Plaintiffs/Counter-Complaint Defendants, Property Owners Association of Arundel on the Bay, Inc., David Delia and Lori Strum, by and through their attorneys, Wayne T. Kosmerl, N. Tucker Meneely and Council, Baradel, Kosmerl and Nolan, P.A., hereby designate the following expert witness expected to testify in the above captioned matter:

1. Anne C. Ogletree, Esq. (See attached Resume – Exhibit A)

Ms. Ogletree is a Maryland attorney practicing with offices in Denton, Maryland. Ms. Ogletree will testify as an expert on real estate issues pertaining to real property, including, but not limited to, titles, easements and equitable principles applicable thereto in Maryland. She will testify that the Court may presume a deed to the streets in Arundel on the Bay to Town Commissioners and that the deed to the streets is valid. A grant may be presumed from the original lot owners and developer of Arundel on the Bay to the Town at the time of the creation of the Town of Arundel on the Bay. A grant may also be presumed preceding the time the Town Commissioners conveyed out title to the streets to Anne Arundel County and/or the Town Trustees. The basis for this opinion are the facts and circumstances surrounding the development and dissolution of the Town of Arundel on the Bay and formation of the Property Owners Association of Arundel on the Bay, Inc. including the specific language in the deeds and other historic documents indicating the intent of the property owners in Arundel on the Bay and accompanying principles of State and federal caselaw including

but not limited to the equitable principles, presumption of a deed or lost grant, waiver and estoppel. She will further testify that all property owners in Arundel on the Bay have at least an implied easement to the platted streets in Arundel on the Bay and that the right to maintain and improve the property subject to the easement flows with the easement.

ADDITIONAL EXPERT WITNESSES

Plaintiffs reserve the right to identify additional expert witnesses to rebut the testimony of Defendants' expert witnesses. Further, as discovery is ongoing, Plaintiffs reserve the right to supplement this expert designation as necessary. Plaintiffs also reserve the right to call any of the Defendants' experts at the trial of this matter.

Respectfully submitted,

COUNCIL, BARADEL,
KOSMERL & NOLAN, P.A.

By: /s/ N. Tucker Meneely
Wayne T. Kosmerl (CPF# 7302010002)
N. Tucker Meneely (CPF# 1012150249)
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Attorneys for Plaintiffs

Resume

Anne C. Ogletree
118 Market Street
Denton, MD 21629

Personal Information:

Name: Anne C. Ogletree
Work Address: 118 Market Street
Denton, MD 21629

Occupation: Attorney

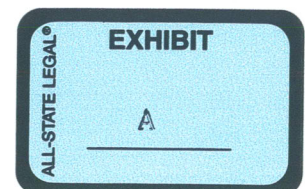
Education:

High School Kent Place School
Summit, NJ
Graduated 1962
Awards: Honor Roll, Recipient of History Prize

College Manhattanville College
Purchase, NY
Graduated 1966,
Degree awarded: Bachelor of Arts
Rank in Class : top 10 percent,
Awards: Honors Program German Language, Brownson Honor Society

Law School University of Maryland
500 W. Baltimore Street
Baltimore , MD
Graduated 1974
Degree awarded: Juris Doctor, with Honor
Rank in Class: 6th of 203
Awards: Order of the Coif; Law Review 1972-1973

Additional Classes Columbia University, German, 1965
University of Maryland, Education Classes, 1968-1970
Salisbury University, Geography, 1970



Employment:

St. Joseph's Elementary
Yonkers, NY
Position: Teacher, 1966-1967

Talbot County Board of Education
Easton, MD
Position: Teacher, 1967-1971

Robert C. Thompson, Esq.
Easton, MD 21601
Position: Law Clerk, 1972-1974, General civil practice, estate tax
Associate 1974-1976

Roland C. Kent, Esq.
Denton, MD 21629
Position: Associate 1976-1977, General practice

Kent, Ogletree and Thornton Law Firm
Denton, MD
Position: Partner 1977-1985, General practice

Anne C. Ogletree, Esq.
118 Market Street
Denton, MD
Sole Practitioner: 1985-1988; General civil practice

Hairston, Gorman, Ogletree, & Greenleaf Law Firm
Denton, MD
Position: Partner 1988-1992; General practice

Anne C. Ogletree, Esq.
118 Market Street
Denton, MD
Sole Practitioner, 1992- current, General civil practice concentrating
In property and land use issues; real estate settlements

Appointed Positions:

Standing Committee on the Rules of Practice and Procedure
Of the Court of Appeals of Maryland 1979-2013
Chairperson, Property Subcommittee, 1984-2013

Caroline County Governmental Study Commission 1995
Attorney, Caroline County Board of Zoning Appeals, 2011-2015

Alternate Attorney, Talbot County Board of Appeals, 2010-current

State Board of Law Examiners, Character Committee Co-Chairperson
1st Appellate Circuit, 2013-current

Examiner in Chancery, Caroline County Circuit Court, 1998-current

Court Auditor, Caroline County Circuit Court, 2008-current

Corporate Boards:

Plantation Field Equestrian Events, 1988-current (non-profit
organization promoting Equestrian Sport)

Mid Shore Pro Bono, Inc. 2011-current (non-profit providing free
or reduced cost legal services to low income individuals in the mid-
shore area)

Professional References: Carolyn D. Spicher, vice -president
Cnb Bank, Denton Branch
850 Fifth Ave.
Denton, MD 21629
Tel. 410-820-4007

Hon. Jo Ann D. Asparagus
Domestic Relations Master
Circuit Court for Caroline County
Courthouse
109 Market Street
Denton, MD 21629
Tel. 410-479-2303

Hon. Karen A. Murphy-Jensen
Judge
Circuit Court for Caroline County
109 Market Street, Ste. 200
Denton, MD 21629
410-479-2303

Personal References:

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A. Curtis Andrew Auction
American Corner Road
Federalsburg, MD 21632
Tel. 410-754-8826

Mary Sue Hurst
6413 Suicide Bridge Road
Hurlock, MD 21643
Tel. 410-200-6424

Sean T. Stafford
6436 Statum Road
Preston, MD 21655
Tel. 410-829-4104

Professional Publications:

Micpel, Curing Defective Titles
Micpel, Midshore Chapter, Residential Real Estate Transactions

Professional Assignments:

Expert witness on real property issues in the following Circuit Courts:

Circuit Court for Dorchester County	Re: County road, creation and location Re: Title to real property
Circuit Court for Kent County	Re: value of small acreage on river in Caroline County; merchantability
Circuit Court for Caroline County	Re: Priority of liens; Location of original county courthouse and whether served by public or private road