

PROPERTY OWNERS ASSOCIATION * IN THE
OF ARUNDEL ON THE BAY, INC. *et al.* *
Plaintiffs/Counter-Defendants * CIRCUIT COURT
v. * FOR
* ANNE ARUNDEL COUNTY
MAURICE B.TOSE', *et ux.* * MARYLAND
Defendants/Counter-Plaintiffs * Case No. C-02-CV-19-003640

* * * * *

DEFENDANT'S NOTICE TO TAKE DEPOSITION DUCES TECUM

Notice is hereby given pursuant to the Maryland Rules of Procedure that the deposition for the purpose of discovery will be taken of:

NAME: Anne Ogletree
118 Market Street
Denton, MD 21629

DATE/TIME: Tuesday, April 6, 2021 at 2:00 p.m.

PLACE: Remote Deposition via Zoom
(Veritext Legal Solutions to schedule)

at the time indicated above before an officer duly authorized by law to administer the oath on the above-referenced date, the deponent is directed to produce any and all documents for the purposes of inspection and photocopying, including by way of example, but not limited to the documents itemized on the attached Document Schedule.

/s/
Barbara J. Palmer (CPF 8501010468)
HYATT & WEBER, P.A.
200 Westgate Circle, Suite 500
Annapolis, Maryland 21401
410-266-0626; 410-841-5065 (fax)
bpalmer@hwlaw.com

Counsel for Defendants and Counter-Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of March, 2021, a copy of the foregoing Defendant's Notice to Take Deposition Duces Tecum was filed in accordance with the MDEC system and a copy will be electronically served upon:

Wayne T. Kosmerl, Esq.
N. Tucker Meneely, Esq.
125 West Street, 4th Floor
Annapolis, Maryland 21401
410-268-6600
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Attorneys for Plaintiffs and Counter-Defendants

/s/
Barbara J. Palmer CPF# 8501010468

PROPERTY OWNERS ASSOCIATION OF ARUNDEL ON THE BAY, INC. <i>et al.</i>	*	IN THE
	*	CIRCUIT COURT
Plaintiffs/Counter-Defendants	*	FOR
v.	*	ANNE ARUNDEL COUNTY
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Defendants/Counter-Plaintiffs	*	Case No. C-02-CV-19-003640

* * * * *

DOCUMENT SCHEDULE FOR ANNE OGLETREE

The deponent, Anne Ogletree is to provide the following documents to Defendant's counsel *two business days in advance of the scheduled deposition*:

A. All written and electronic correspondence in your possession from any community member, officer or director of the Property Owners Association of Arundel on the Bay, Inc., or their counsel, Wayne Kosmerl or Tucker Meneely that reference the community of Arundel-on-the-Bay, and your role as an expert witness in litigation, from 2005 until the present;

B. All written or electronic documentation that you have been provided by any individual associated with Arundel-on-the-Bay, Inc. include all notes, plats, memoranda or opinions expressed by other experts, or any other records related to the subject matter of this action;

C. All documents in your possession related to your assessment of the issues and any opinions you intend to express concerning the rights of the parties in the property which is the subject of this action. Include in your production all reports, notes, drafts of reports, interview notes or calendar notations, records from site visits, raw data, appraisals, invoices, bills, engagement letters and letters of opinion.

D. Any and all deeds, plats, surveys, documents you have obtained from Maryland Land Records, or any other documentation you have obtained in the course of preparing your opinion,

E. All documents reflecting any and all opinions you have rendered regarding property rights to any property located in the community of Arundel on the Bay from 2005 until the present.

f. Any and all documents or references upon which you relied upon or referred to in rendering your opinions in this action.