

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: Lori Strum
3515 Newport Avenue
Annapolis, MD 21403-4741

DATE/TIME: Tuesday, April 6, 2021 at 11:30 a.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
kosmerl@councilbaradel.com
meneely@councilbaradel.com
Attorneys for Plaintiffs and Counter-Defendants

/s/
Barbara J. Palmer CPF# 8501010468

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| Defendants/Counter-Plaintiffs | * | Case No. C-02-CV-19-003640 |

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DOCUMENT SCHEDULE FOR LORI STRUM

The deponent, Lori Strum is to provide the following documents to counsel for the Defendants and Counter-Plaintiffs *two business days in advance of the scheduled deposition*:

A. All written and electronic correspondence in your possession with the Defendants and Counter-Plaintiffs, Maurice Tose' and Teresa Layden from January, 2018 until the present.

B. All written and electronic correspondence, notes, memoranda or other communication in your possession that you have shared with members of the community of Arundel on the Bay which relate to the subject matter of this action from the period of January, 2018 to the present.

C. All documents in your possession related to any and all maintenance or erosion control measures that Arundel-on-the-Bay, Inc., its officers or directors have directed or undertaken on the Disputed Street or property, the Tose' Layden properties or other property in proximity to the property which is the subject of this action.

D. All documents that are not subject to attorney-client privilege, that reflect your assessment of the rights of use by the Plaintiffs and the members of the community of Arundel-on-the-Bay to the Disputed Street which is the subject of this action. Include in your response all email communications and posts on the community website.

E. Any and all records of activity which has occurred on the Disputed Street which is the subject of this action for the last twenty years. 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.

F. All documents in your possession which related to the subject matter of this litigation that were not otherwise produced in response to the Defendants and Counter-Plaintiffs; Request for Production of Documents.