

PROPERTY OWNERS ASSOCIATION	*	IN THE
OF ARUNDEL ON THE BAY, INC. <i>et al.</i>	*	
	*	CIRCUIT COURT
Plaintiffs/Counter-Defendants	*	
	*	FOR
v.	*	
	*	ANNE ARUNDEL COUNTY
	*	
MAURICE B.TOSE', <i>et ux.</i>	*	MARYLAND
	*	
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.