E-FILED; Anne Arundel Circuit Court Docket: 4/22/2021 4:36 PM; Submission: 4/22/2021 4:36 PM

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

Plaintiffs/Counter-Defendants

**CIRCUIT COURT** 

**FOR** 

v.

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 27, 2021 at 12:00 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 22<sup>nd</sup> day of April, 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

Barbara J. Palmer CPF# 8501010468