MVLS Family Law Cohort Training Materials, Session 2

COURT FORMS:

Maryland Court family law forms. These forms are used by Pro Se litigants and can also be a super helpful template for family law attorneys, and/or are required by the Courts to be filed in family law cases. Here is a link to all the family law forms; it is worth reviewing the index and the content of the forms.

Commonly Required Court Forms:

-**Domestic Case Information Report** required for every family law case filed in Maryland

https://www.courts.state.md.us/sites/default/files/court-forms/courtforms/circuit/ccdcm001.pdf/ccdcm001.pdf

-**Short financial statement**, required from both parties when there are minor children in the case

https://www.courts.state.md.us/sites/default/files/court-forms/family/forms/ccdr030.pdf/ccdr030.pdf

-**Long financial form**, required from both parties when alimony is requested

https://www.courts.state.md.us/sites/default/files/court-forms/ccdr031.pdf

-**Notice of Restricted Information** – required when a financial statement is filed, a parenting plan, an MSA and many other documents. For more information about what it is and when it is needed: https://www.mdcourts.gov/courthelp/restrictedinfoform.

The form: https://www.mdcourts.gov/sites/default/files/court-forms/mdj008.pdf

-**Parenting plan** – required by both parties when there are minor children, can complete jointly or individually

https://www.mdcourts.gov/sites/default/files/court-forms/ccdr109.pdf

-Joint Statement Concerning Marital and Non-Marital Property, required when there is property in dispute, can complete jointly or individually

https://www.mdcourts.gov/sites/default/files/court-forms/family/forms/ccdr033.pdf/ccdr033.pdf

-General **Motion form**

https://www.mdcourts.gov/sites/default/files/court-forms/courtforms/joint/cc022.pdf/cc022.pdf

Motion to Shorten Time, overview in layperson terms: When you file something with the Court, you must make sure that a copy is delivered to your opposing party (if you are opening a new case or reopening a closed case, you will need to wait for the clerk to issue a summons; otherwise, you will be completing a certificate of service). Your opposing party has the opportunity to respond. By law, they have a set amount of time to respond (ranging from 15 days to 90 days, generally). In cases where there is a need for the court to address what you have filed more quickly, you may request that the Court shorten the amount of time your opposing party has to respond, so that the Court can more quickly address the merits of what you have filed. To do this, you must file a Motion to Shorten Time. Link to AA Co Instructions for Motion to Shorten Time

There is not a statewide form for Motion to Shorten Time. Check the county court DCM for specific instructions from the individual Courts about Motions to Shorten Time (and postponements). Here is Sample Motion to Shorten Time from AA Co:
http://aacpll.pbworks.com/w/file/52263086/NEWMotionShortenTime%20%283%29.doc
Here is Sample Motion to Shorten Time from Howard Co:
https://www.mdcourts.gov/sites/default/files/import/circuit/howard/pdfs/motiontoshortentime.pdf
**Motions to Shorten Time accompany other Court requests such as Request for Postponement, Request for Expedited Hearing, etc.

Request for Hearing or Proceeding form
https://www.mdcourts.gov/sites/default/files/court-forms/family/forms/ccdr059.pdf/ccdr059.pdf

-**Request for Order of Default** – to be filed once OP was served initial pleadings and the deadline to respond (in writing) passed

https://www.courts.state.md.us/sites/default/files/court-forms/family/forms/ccdr054.pdf/ccdr054.pdf

Helpful information from Maryland Courts about Default Orders and Judgments:
https://www.peoples-law.org/default-orders-judgments-maryland

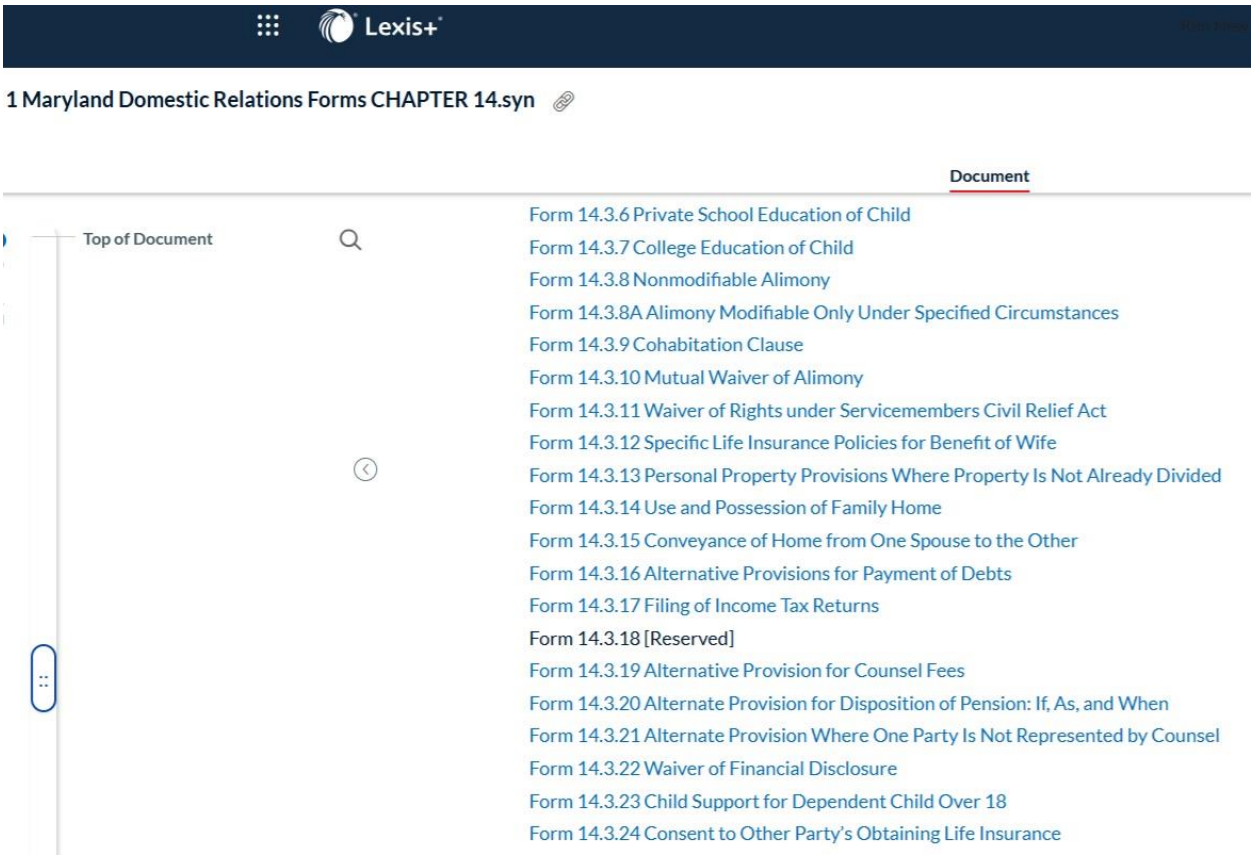
-**Motion for Alternate Service**, to be used when, after MANY efforts and attempts OP cannot be served and/or located. The more boxes you can check and efforts made, the more likely the Court is to grant it. Use it as a guide for efforts you should make to try to locate OP.

https://www.courts.state.md.us/sites/default/files/court-forms/ccdr070.pdf

SAMPLE PLEADINGS AND MSA

MSBA Marital Settlement Agreement Sample (1).pdf - this link will take you to a comprehensive template for a Settlement Agreement. I obtained it from a VERY helpful, thorough and prompt law librarian at the Montgomery County Law Library. Email address: MoCoLawLibrary@mdcourts.gov This is an excellent resource for ALL attorneys. You do not have to live or practice in Montgomery County. You can also request sample pleadings for a variety of types of family law cases.

Here is the information the law librarian included with the link to the above template: *Attached is the most comprehensive sample Marital Settlement Agreement form we have from the MSBA. I also would recommend that if attorneys need further guidance, another good resource is Maryland Domestic Relations Forms and Commentary (Lexis). It contains comprehensive sample property settlement agreements and sample clauses for visitation, custody, alimony, etc. It's a whole chapter—so we can't email all of it, but it's available in our collection and in our LexisNexis database. However, if you would like to see the table of contents and would like a section of this chapter, please let us know.*



There is a Maryland MSA form available here. It is a simple MSA and part of the Maryland Court family law forms.

DISCOVERY

General information about Discovery from the Maryland Courts: https://www.mdcourts.gov/courthelp/discoverycircuitcourt and People's Law Library of Maryland: https://www.peoples-law.org/maryland-circuit-court-discovery

Sample Interrogatories (domestic) from Maryland Rules and Sample Custody Interrogatories From Anne Arundel County and Sample Divorce Interrogatories from Anne Arundel County

Sample Custody Request for Production of Documents from Anne Arundel County and Sample Divorce Request for Production of Documents from Anne Arundel County

Sample Notice of Discovery from Anne Arundel County

Sample Discovery Deficiency Letter: see attached

Sample Good Faith Letter: see attached

Sample Motion to Compel: see attached

Sample Motion for Sanctions: see attached

Subpoenas

Overview

Maryland Rule

Where to get the Subpoena form

SCHEDULING ORDERS AND CONFERENCES

Sample Scheduling Orders: Combined Scheduling Orders.pdf

Information about Scheduling conferences

https://www.mdcourts.gov/sites/default/files/import/circuit/worcester/pdfs/schedulingconference.pdf

FAMILY SERVICES

What are family services?

ATTORNEYS FOR CHILDREN

Quick Reference, different types of attorneys for children

RECOMMENDED FAMILY LAW RESOURCES

Maryland Divorce and Separation Law, 11th Edition (Paperback with downloadable forms)

Fader's Maryland Family Law 7th Edition

People's Law Library of Maryland

Jon the MVLS Judicare Listserv, contact Jennifer Haber to be added

Join the DGSFamily Listserv, to be added, contact David Goldberg

Maryland Law Libraries

Specifically Anne Arundel, Montgomery County, and Carroll County

Recommended by a member of the Cohort: Rita Rosenkrantz Basic Family Law Training

MISC INFO (requested through Cohort Survey)

-UCCJEA this is a very complex area of law. Advice – KNOW YOUR LIMITATIONS. Reach out to an experienced lawyer.

-Local practices, including postponements and emergency custody procedures – see Maryland County Court's DCM and Family Division document included in materials and linked here.

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Maryland's Counties' DCMs
Family Law

Text of the Maryland Rule 16-302(b):

(b) Case Management Plan; Information Report.

(1) Development and Implementation.

(A) The County Administrative Judge shall develop and, upon approval by the Chief Justice of the Supreme Court, implement a case management plan for the prompt and efficient scheduling and disposition of actions in the circuit court. The plan shall include a system of differentiated case management in which actions are classified according to complexity and priority and are assigned to a scheduling category based on that classification and, to the extent practicable, follow any template established by the Chief Justice of the Supreme Court.

(B) The County Administrative Judge shall send a copy of the plan and all amendments to it to the State Court Administrator. The State Court Administrator shall review the plan or amendments and transmit the plan or amendments, together with any recommended changes, to the Chief Justice of the Supreme Court.

(C) The County Administrative Judge shall monitor the operation of the plan, develop any necessary amendments to it, and, upon approval by the Chief Justice of the Supreme Court, implement the amended plan.

(2) *Family Law Actions.*

(A) The plan shall include appropriate procedures for the granting of emergency relief and expedited case processing in family law actions when there is a credible risk of imminent abduction of a child or a credible prospect of imminent and substantial physical or emotional harm to a child or susceptible or older adult.

Committee note: The intent of this subsection is that the case management plan contain procedures for assuring that the court can and will deal immediately with a credible risk of imminent abduction of a child or a credible prospect of imminent and substantial physical or emotional harm to a child or susceptible or older adult, at least to stabilize the situation pending further expedited proceedings. Circumstances requiring expedited processing include threats to imminently terminate services necessary to the physical or mental health or sustenance of the child or susceptible or

older adult or the imminent removal of the child or susceptible or older adult from the jurisdiction of the court.

Cross reference: See Code, Estates and Trust Article, § 13-601 for definitions of the terms "older adult" and "susceptible adult."

(B) In courts that have a family division, the plan shall provide for the implementation of Rule 16-307.

Cross reference: See Rule 9-204 for provisions that may be included in the case management plan concerning an educational seminar for parties in actions in which child support, custody, or visitation are involved.

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Maryland's Counties' DCMs
Family Law

1. **Allegany County**

Family DCM: https://www.mdcourts.gov/html/courtoperations/pdf/dcmfamilyallegany.pdf (Pursuant to Maryland Rule 16-302(b))

Family Division: https://www.mdcourts.gov/circuit/allegany/family

2. **Anne Arundel County**

Family DCM: https://www.circuitcourt.org/family-law-case-management-plan

Family Division: https://www.circuitcourt.org/clerk-circuit-court/civil-department-family-division

Note: It is not specified which Maryland Rule Anne Arundel County's Family DCM is pursuant to. However, I noticed that significant portions of this county's DCM are copy-pasted from parts of Charles County's Family DCM, which is pursuant to Maryland Rule 16-302(b). On the other hand, there are portions of this county's Family DCM that are non-existent in the Charles County's.

3. **Baltimore City**

Family DCM: https://www.mdcourts.gov/html/courtoperations/pdf/baltcityccctfamilydivisiondcmplan.pdf (Pursuant to Maryland Rule 16-302(b))

Family Division: https://www.baltimorecitycourt.org/court-divisions/family/, see also https://www.baltimorecitycourt.org/clerks-office/family-division/

4. **Baltimore County**

Family DCM: https://www.mdcourts.gov/html/courtoperations/pdf/dcmfamilybaltimorecounty.pdf (Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.baltimorecountymd.gov/departments/circuit/family

Note: They have a separate website for the division of Marriage & Divorce. https://www.baltimorecountymd.gov/departments/circuit/clerk/marriage-divorce

5. **Calvert County**

Family DCM: https://www.mdcourts.gov/html/courtoperations/pdf/calvertdcmfamily.pdf (Pursuant to Maryland Rule 16-302(b))

Family Division: https://www.calvertcountymd.gov/3166/Family-Law

6. **Caroline County**

DCM could not be located online

Family Services: https://www.courts.state.md.us/circuit/caroline/family

7. **Carroll County**

Family DCM: https://circuitcourt.carrollcountymd.gov/docs/DCM%20Carroll%20County%20Circuit%20Court.pdf (Pursuant to Maryland Rule 16-302(b))

Family Division: https://www.courts.state.md.us/clerks/carroll/family

8. **Cecil County**

Family DCM: https://www.mdcourts.gov/html/courtoperations/pdf/dcmfamilycecil.pdf (Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.mdcourts.gov/clerks/cecil/family

9. **Charles County**

Family DCM: https://www.mdcourts.gov/html/courtoperations/pdf/charlescountyfamilydcmcmh.pdf (Pursuant to Maryland Rule 16-302(b))

Family Division: https://www.mdcourts.gov/clerks/charles/family, see also https://www.charlescountymd.gov/government/circuit-court/family-law

10. Dorchester County

Family DCM: https://www.mdcourts.gov/sites/default/files/import/circuit/dorchester/pdfs/dcmfamilyplan.pdf (Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.mdcourts.gov/circuit/dorchester/family

11. Frederick County

Family DCM: https://www.mdcourts.gov/html/courtoperations/pdf/dcmfamilyfrederick.pdf (Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.frederickcountymd.gov/5708/Family-Services-Program; see also https://www.frederickcountymd.gov/16/Family-Services; https://www.courts.state.md.us/sites/default/files/import/coronavirus/frederickcountyshcinformationcc.pdf

12. Garrett County

DCM could not be identified online

Family Services: https://www.courts.state.md.us/clerks/garrett/family

13. Harford County

Family DCM: https://www.courts.state.md.us/sites/default/files/import/circuit/harford/pdf/familydcmplan.pdf (Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.mdcourts.gov/circuit/harford/familyservices

14. Howard County

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Family Law

Family DCM:
https://www.mdcourts.gov/sites/default/files/import/circuit/howard/pdfs/dcmfamilyhoward2022.pdf (Pursuant to Maryland Rule 16-302(b))

Family Division: https://www.mdcourts.gov/circuit/howard/family

15. Kent County

DCM could not be identified online

Family Services: https://www.mdcourts.gov/circuit/kent/family

16. Montgomery County

DCM (no family specific DCM was found):
https://www.mdcourts.gov/html/courtoperations/pdf/dcmmontgomerycountycc.pdf
(Pursuant to Maryland Rule 16-302(b))

*Family Law DCM section starts on Section III (Page 12 of the pdf file).

**Footnote n. 11 of the above file hyperlinks Montgomery County's Family Law DCM, but the link is nonfunctional.

*** Only other Family DCM for Montgomery County I could find from Montgomery County's website is one from 2007:
https://www.montgomerycountymd.gov/cct/Resources/Files/Family_DCM_Manual.pdf
Following administrative order of amendment is attached:
https://www.montgomerycountymd.gov/cct/Resources/Files/Administrative-Orders/Amending_Family_DCM_Plan_Administrative_Order.pdf

Family Services: https://www.montgomerycountymd.gov/cct/departments/family-division-services.html

17. Prince George's County

Family DCM: https://princegeorgescourts.org/DocumentCenter/View/876/DCM-Family
(Pursuant to Maryland Rule 16-302(b))

Family Division: https://princegeorgescourts.org/390/Family-Division

18. Queen Anne's County

Family DCM:
https://www.mdcourts.gov/html/courtoperations/pdf/dcmfamilyqueenannes.pdf
(Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.mdcourts.gov/circuit/queenannes/familyservices

19. St. Mary's County

Family DCM:
https://www.mdcourts.gov/html/courtoperations/pdf/dcmfamilylawstmarys.pdf
(Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.mdcourts.gov/clerks/stmarys/familyservices

20. Somerset County

DCM could not be located online
Family Services: https://www.mdcourts.gov/circuit/somerset/familyservices

21. Talbot County

DCM could not be located online
Family Services: https://www.mdcourts.gov/clerks/talbot/family

22. Washington County

DCM (no family specific DCM was found):
https://www.mdcourts.gov/html/courtoperations/pdf/dcmwashingtoncountycircuitcourt.pdf (Pursuant to Maryland Rule 16-302(b))

Family Services: https://www.mdcourts.gov/circuit/washington/family

23. Wicomico County

DCM could not be located online
Family Services: https://www.courts.state.md.us/circuit/wicomico/familyservices

24. Worcester County

Family DCM:
https://www.courts.state.md.us/sites/default/files/import/circuit/worcester/pdfs/dcmplan.pdf (Pursuant to Maryland Rule 16-202, 16-204, 2-504.1, and 17-100-108)

Family Services: https://www.courts.state.md.us/circuit/worcester/family

Sample

_____	*	IN THE
Plaintiff	*	CIRCUIT COURT FOR
v.	*	ANNE ARUNDEL COUNTY
_____	*	MARYLAND
Defendant	*	Case No.: C-02-FM-21-000

* * * * * * * * * * * * *

SCHEDULING ORDER

PURSUANT TO Maryland Rule 2-504, after a Scheduling Conference, it is hereby Ordered

Case Time Standard Deadline: This case must be concluded including post trial motions by 8-2-22.

☒ All parties and counsel were present, EXCEPT Via Zoom. ☐ All parties failed to appear.

Amendment Deadlines:

☒ Any amendments to a pleading shall be filed by _____ (if no date is selected, then within fifteen (15) days before the discovery deadline). Any amendments filed after this date either may not be permitted by this Court or may be subject to a separate scheduling order.

Discovery/ Motion Deadlines:

☒ 1. ORDERED that all discovery (*See* Md. Rules Title 2, Chapter 400) shall be completed and answered by 8/20/21. (Note: This deadline does not apply to ***de bene esse* depositions**.) This discovery deadline will NOT be extended solely because discovery has not been completed. Discovery, including motions to compel and/or for sanctions, must be initiated sufficiently in advance of the discovery deadline to provide the opposing party time to comply in accordance with Md. Rules Title 2, Chapter 400. **All motions to compel and/or for sanctions shall be filed no later than eighteen (18) days prior to the discovery deadline or may not be considered by the Court.**

☐ By agreement, although a limited divorce is plead, discovery shall include all issues related to an absolute divorce.

☒ 2. ORDERED that the Court finds good cause to allow the parties _____ days from the date of the Scheduling Conference (maximum 30 days) to propound Interrogatories and Request for Production of Documents.

☒ 3. ORDERED that each party shall identify each person whom the party expects to call as an expert witness at trial, including all information specified in Rule 2-402(g)(1), by _____ (if no date is selected, then forty-five (45) days before the discovery deadline).

☒ 4. ORDERED each party shall file the notice required by Rule 2-504.3(b) concerning computer-generated evidence forty-five (45) days before the discovery deadline.

05/19/2021 ETD

☒ 5. ORDERED that the parties shall exchange copies by _____, and bring to each subsequent hearing and/or mediation the following items:

- ☒ a. past three (3) years tax returns, with all supporting documents including W2s, K-1s , and 1099s
- ☒ b. current year's year-to-date pay stubs
- ☐ c. all pension information
- ☐ d. copies of all account statements
- ☒ e. documents supporting all claimed expenses included in the child support guidelines worksheet
- ☐ f. other _____.

☒ 6. ORDERED all dispositive motions shall be filed no later than fifteen (15) days after the discovery deadline.

Online Parenting Education Program: ☐ ***NO MINOR CHILDREN, SERVICE NOT ORDERED***

☒ 7. ORDERED that the parties shall attend the Online Parenting Education Program **(see attached order).**

- ☐ The parties are not Ordered to attend the Online Parenting Education Program for the following reason(s):_____.
- ☒ The parties have previously been Ordered to attend the Online Parenting Education Program.
- ☒ Plaintiff ☒ Defendant shall file proof of completion of the online class by 5/24/24

Alternative Dispute Resolution: ☐ ***NO MINOR CHILDREN, SERVICE NOT ORDERED***

☒ The Court provided each party a paper copy of the Maryland Parenting Plan Instructions and Maryland Parenting Plan Tool. The parties were advised that they may work separately, together or with a mediator to develop a parenting plan that they believe is in the best interest of the child. The electronic versions of these documents can be found at www.mdcourts.gov

☒ 8. ORDERED that the parties shall attend Custody and Visitation Mediation **(see attached order).** Remote

Mediator: Cecilia Alizs Deadline: 7/2/24

- ☒ By agreement of the parties/counsel. ☐ Safety concern expressed by a party.
- ☐ The parties are not referred for Custody and Visitation Mediation for the following reason(s):

_____.

- ☐ The parties have previously been Ordered to Custody and Visitation Mediation.

☐ 9. ORDERED that the parties shall participate in the **Property/ Financial ADR Program** by meeting with a court-appointed mediator to discuss property-related issues in their case for possible settlement **(see attached order).**

Mediator:_____ Deadline: _____

- ☐ By agreement of the parties/counsel.

Other Optional Orders:

☐ 10. ORDERED that an attorney is appointed to represent the minor child(ren) **(see attached order)** – or – the request is:

- ☐ a. Child(ren)'s Privilege Attorney
- ☐ b. Child(ren)'s Best Interest Attorney
- ☐ By agreement of the parties/counsel.
- ☐ _____
- ☐ c. Child(ren)'s Advocate Attorney
- ☐ d. Denied

☐ 11. ORDERED that an investigation and/or home study by the Custody Evaluation Unit of the Family Law Division is to be conducted **(see attached order)** – or – the request is:

- ☐ a. By agreement of the parties/counsel.
- ☐ b. _____
- ☐ c. Denied

☒ 12. ORDERED that a Psychological Evaluation of _____ is to be performed by a court-designated psychiatrist/psychologist **(see attached order)** – or – the request is:

- ☐ a. By agreement of the parties/counsel.
- ☒ b. counsel for def. reserves the right to file a written motion for psych. eval. of Plaintiff. Counsel for Plaintiff notes an objection to such an evaluation and will file a written answer.
- ☐ c. Denied

☐ 13. ORDERED that a Substance Abuse Screen/Assessment of _____ shall be performed in the manner **(see attached order)** – or – the request is:

- ☐ a. Urinalysis Screening
- ☐ b. Substance Abuse Assessment
- ☐ By agreement of the parties/counsel.
- ☐ _____
- ☐ c. Hair Follicle Testing
- ☐ d. Denied

☐ 14. ORDERED that there shall be a new Scheduling Confcrence in this matter on _____, at _____ am./pm.

- ☐ And Show Cause Hearing for Failure to Appear **(see attached order)**
- ☐ Uncontested/ Default Instructions given to Plaintiff/ Defendant.

***Pendente Lite*/ Motion/ Merits Hearing:**

☐ 15. ORDERED that a ☐ ***pendente lite***/ ☐ ***motions***/ ☐ ***merits*** hearing shall be heard on _____, at _____ am/pm on the issues of:

- ☐ a. Child Support
- ☐ b. Alimony
- ☐ c. Use and Possession of Family Home
- ☐ d. Initial Counsel Fees/ Cost/ Expenses
- ☐ e. Other: _____
- ☐ f. Custody
- ☐ g. Visitation
- ☐ h. Contempt

The ☐ ***pendente lite*** / ☐ ***motions*** hearing shall be limited in time to _____ hour(s) (two (2) hours maximum).

The **Merits** hearing shall be limited in time to _____ hour(s) or _____ day(s).

ORDERED that the Request for ☐ ***pendente lite*** / ☐ ***motions*** hearing is hereby **DENIED**.

Pretrial Settlement Conference:

☒ 16. ORDERED that there shall be a Pretrial Settlement Conference per Rule 2-504.2 on 9/27/21, at 10:00 a.m./p.m.

**** If a monetary award is being sought by either party, a Rule 9-207 Joint Statement of Property shall be completed, filed, and fully executed prior to the Pretrial Settlement Conference. If a party fails to comply with this requirement, the Court may enter any order in regard to the noncompliance that is just.***

**** If child support is at issue, the parties/counsel shall provide proposed Child Support Guidelines Worksheet(s).***

**** If the parties do not reach a comprehensive parenting plan, they shall complete a Joint Statement of the Parties Concerning Decision-Making Authority and Parenting Time pursuant to Md. Rule 9-204.2. The Joint Statement shall be filed at least ten days before any scheduled settlement conference or if none, 20 days before the scheduled trial date or as the court otherwise directs.***

**** Prior to the Pretrial Settlement Conference, parties/counsel shall exchange lists of all exhibits intended to be introduced at the trial and of witnesses to be called at trial.***

**** Failure to attend the Pretrial Settlement Conference by a party may result in dismissal of the party's action, the entry of a default against the absent party, and/or the imposition of monetary sanctions.***

The Pretrial Settlement Conference shall be held before a judge or other designated officer of the Court. The attorneys who will litigate the case and parties shall be present at the Pretrial Settlement Conference and shall be prepared to discuss ALL aspects of the case in anticipation of settlement. Failure to prepare the case for Settlement Conference or failure to comply with the deadlines/requirements delineated above could result in an order limiting evidence or testimony in the case, or imposing counsel fees, cost and expenses as set forth in Md. Rule 2-508 (e), or other monetary sanctions. A trial date on the Merits in the case will be scheduled, if necessary, only if all discovery has been concluded and only after a meaningful Pretrial Settlement Conference has been held on all contested issues.

Other Orders:

☒ 17. ☐ Plaintiff ☒ Defendant shall file a
☒ Child Support Financial Statement (Short Form) by: 5/25/21.
☐ General Financial Statement (Long Form) by: _____.

☐ 18. Agreement reached. _____ to prepare ☐ complete/ ☐ partial Order within _____ days.

☐ 19. ORDERED that:

_____

_____

_____.

☐ 20. ORDERED that this case shall be closed: ☐ at this time. ☐ upon the entry of an appropriate Order.

Request for Accommodation/Interpreter:

If language interpretation or accommodation due to disability is needed, please immediately visit www.circuitcourt.org and click the "How do I?" tab for information on how to file a request. Any other questions regarding this Order should be addressed to the Office of Family Law Case Management (410) 222-1153.

Counsel and parties understand the deadlines set forth herein and are informed that this case must be concluded prior to the Case Time Standard Deadline set forth herein. They are also advised to review a copy of the Court's Family Law Differentiated Case Management Plan, which is available on the Court's website at www.circuitcourt.org.

05/18/2021 3:18:40 PM
Date

JUDGE
Judge Donna M. Schaeffer
Circuit Court for Anne Arundel County, Maryland

Recommended by:

Magistrate

Date

Prepared by:

Scheduling Conference Administrator

5/18/21
Date

The Maryland Court Help Center provides free limited legal services for people who are not represented by a lawyer. Free legal assistance is available by contacting the Maryland Court Help Center at (410) 260-1392. You can also chat with the Center or get more information by visiting www.mdcourts.gov/helpcenter

	*	**IN THE**
Plaintiff/Counter Defendant,	*	**CIRCUIT COURT**
v.	*	**FOR**
	*	**BALTIMORE CITY**
Defendant/Counter-Plaintiff.	*	**CASE NO:**

* * * * * * * * * * * * *

SCHEDULING ORDER

On November 5, 2021 the Parties and their counsel in the above-captioned matter appeared before the Circuit Court for Baltimore City. Part 13, for purposes of conducting a hearing on Defendant/Counter-Plaintiff's Motion for New Hearing and Motion for Reconsideration. *Docket Entries #91 and 92.* A the conclusion of the hearing, the Court orally granted the motions and vacated its August 6, 2021 order modifying custody. The Court set the matter for a new trial to be conducted on January 13, 2022 and conducted a Scheduling Conference pursuant to Maryland Rule 2-504.1.

Among the matters at issue in the case whether the Court should modify its custody order of April 11, 2016 which granted the Parties joint legal custody of their children and provided Ms. Hearn with primary physical custody. Pursuant to Maryland Rule 9-204.1(b), the Court directed the Parties to Maryland Parenting Plan Instructions and Maryland Parenting Plan Tool, the purpose of which is to assist them in developing a Comprehensive Parenting Plan for their children.

Pursuant to the information provided by the Parties and counsel at the Scheduling Conference, it is this 8th day of November 2021, by the Circuit Court for Baltimore City, hereby

ORDERED that all discovery, except updates, shall be concluded no later than December 31, 2021; and it is further

ORDERED that all motions (excluding Motions in Limine) shall be filed by 7 days after the date by which all discovery must be completed; and it is further

ORDERED that by November 24, 2021 amendments to the pleadings are allowed as of right; and it is further

ORDERED that the issues of modification of Child Support, Legal and Physical Custody and Parenting Time shall be heard before this Court on **Thursday January 13, 2022 at 9:00am, in Courtroom 339, Elijah Cummings Courthouse, 111 North Calvert Street Baltimore, Maryland 21202 before Magistrate Tate and shall be limited in time to 6 hours;** and it is further

ORDERED that in lieu of a Pre-trial Conference otherwise authorized by Rule 2-504.2, the Parties shall provide each other with the information noted in Rule 2-504.2(b)(8) through (b)(11) no later than **January 4, 2022**. All Motions in Limine shall be filed by the same date; and it is further

ORDERED that the Parties shall comply with the following document requirements:

a. The Parties shall complete a Financial Statement pursuant to Maryland Rule 9-203(b);

b. The Parties/counsel shall prepare a Child Support Guidelines Worksheet; and

c. The Parties shall each bring to the hearing documentation of current income from all sources, including the last four (4) paycheck stubs, and most recent federal and state income tax returns; and it is further

ORDERED that if the parties have reached a Comprehensive Parenting Plan under Rule 9-204.1, they shall file it with the Clerk of the Court within five working days of reaching agreement on same; and it is further

ORDERED that if the parties are unable to reach a Comprehensive Parenting Plan, they shall file with the Clerk of the Court a Joint Statement Concerning Decision Making Authority and Parenting Time ("Joint Parenting Statement") as required by Maryland Rule 9-204.2. The Joint Parenting Statement shall be filed at least 10 days prior to the date of the settlement conference noted above. If no settlement conference has been scheduled pursuant to this Order, the Joint Parenting Statement shall be filed with Clerk of the Court at least 20 days before the trial date noted above. The Joint Parenting Statement shall be submitted in a format consistent with Court form DR-110. The parties are directed to Rule 9-204.2(c) with respect to their obligations to serve a proposed Joint Parenting Statement on the opposing party, and finalize the Joint Parenting Statement for submission to the Court.

NOTICE: IF YOU WOULD LIKE THE COURT TO REVIEW ANY EMAILS, TEXT MESSAGES, PHOTOGRAPHS, SOCIAL MEDIA POSTS OR OTHER EVIDENCE STORED ELECTRONICALLY, YOU *MUST* PRINT OUT COPIES. THE COURT WILL NOT READ DOCUMENTS STORED ON Y R CELL PHONE, TABLET, OR LAPTOP COMPUTER.

TRUE COPY
TEST

JUDGE

The Clerk shall mail copies of this order to:

and

Counsel for Plaintiff/Counter Defendant Counsel for Defendant/Counter-Plaintiff.

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

[redacted]
Plaintiff :

v. : CASE NO. [redacted]

Defendant :

SCHEDULING ORDER
(831)

A scheduling hearing having been held and it having been determined that certain issues are contested, it is this 22nd day of November, 2013, by the Circuit Court for Montgomery County, Maryland, pursuant to Maryland Rule 2-504,

ORDERED that this is your official notice of dates and required Court Appearances. ANY MODIFICATIONS OF THIS SCHEDULING ORDER MUST BE REQUESTED BY WRITTEN MOTION FILED BEFORE THE COMPLIANCE DATE(S). The motion must provide good cause to justify the requested modification. Stipulations between counsel shall not change any deadlines in the Order absent Court approval. Failure to comply with all terms may result in dismissal, default judgment, refusal to let witnesses testify, refusal to admit exhibits, the assessment of cost and expenses, including attorney fees, or other sanctions.

If financial statements have not been filed as required by Maryland Rule 9-202, they shall be filed within five days of this order.

This case is assigned to Track 3 of the Family Division. Please consult the monitors on the lobby level for location of hearing or trial.

child issues

PENDENTE LITE HEARING	04/30/2014	9:30am 1 day	CH SUP, ALI, ACCESS, ATTY FEES, SUIT MON

STAGE 1 (CUSTODY)		
PLT EXPERTS IDENTIFIED/FILED BY	01/17/2014	
DEF EXPERTS IDENTIFIED/FILED BY	01/31/2014	
DISCOVERY COMPLETED	02/14/2014	
SETTLEMENT/STATUS HRG.	05/29/2014	1:30pm 1 hour
CUSTODY-MERITS	06/17/2014	9:30am 3 days

STAGE 2 (REMAINING ISSUES)		
PLT EXPERTS IDENTIFIED/FILED BY	07/18/2014	
DEF EXPERTS IDENTIFIED/FILED BY	08/01/2014	
DISCOVERY COMPLETED	08/15/2014	
JNT PROP/PRETRIAL STMT(IF APPRO)	09/05/2014	
SETTLEMENT/PRETRIAL HRG.	09/12/2014	9:30am

property issues

THIS IS A PROPER ORDER TO BE SIGNED:

CLARK E WISOR
Family Division Master

John W. Debelius III,
County Administrative Judge

NOTE: SUPPLEMENTAL/AMENDED COMPLAINT AND ANSWER (IF NECESSARY) MUST BE TIMELY FILED PRIOR TO THE MERITS/TRIAL DATE.

Possession and use of cell phones, computers, other electronic devices, and cameras may be limited or prohibited in designated areas of the court facility. The use of any camera, cell phone, or any electronic device for taking, recording, or transmitting photographs, videos, or other visual images is prohibited in the court facility at all times, unless the court expressly grants permission in a specific instance.

SHANNON KOWITZ, ESQ
SUITE B215
10015 OLD COLUMBIA RD
COLUMBIA MD 21046

FORCHED 11/ 2/2013 09:27:50

E-FILED; Howard Circuit Court
Docket: 5/27/2020 1:10 PM; Submission: 5/27/2020 1:10 PM

CIRCUIT COURT FOR HOWARD COUNTY, MARYLAND
8360 COURT AVENUE
ELLICOTT CITY, MARYLAND 21043
Main: 410-313-2111 Civil: 410-313-3844 Criminal: 410-313-3822 Juvenile: 410-313-3827 Land Records: 410-313-5850 Calendar Office: 410-313-3575 Family Law: 410-313-2225

Case Number: **C-13-FM-20-00**
Other Reference Numbers:

vs. F

FILE COPY

SCHEDULING ORDER – TRACK 4

PURSUANT TO MD Rule 2-504, it is 5/27/2020, by the CIRCUIT COURT FOR HOWARD COUNTY, ordered as follows:

1. ORDERED that expert reports, expert witnesses and MD. Rule 2-402(g) disclosures shall be served on all other parties and a notice shall be filed pursuant to MD.Rule 2-401(d)(2) no later than 10/11/2020.
2. ORDERED that any rebuttal expert witnesses shall be designated no later than 10/26/2020.
3. ORDERED that a party who intends to use computer-generated evidence shall file the notice required by MD Rule 2-504.3(b) no later than 10/11/2020.
4. ORDERED that all discovery shall be concluded by 10/27/2020, except for depositions and supplementation of responses as required by MD Rule 2-401(e).

   Any modifications of this Scheduling Order must be requested by written motion filed before the compliance date(s). The motion must provide good cause to justify the requested modification. Stipulations between the parties and/or their counsel shall not change any deadline in this Scheduling Order absent Court approval. ALL DISCOVERY DISPUTES MUST BE RESOLVED BY THE DISCOVERY DEADLINE. Failure to have counsel enter his/her appearance after the scheduling conference shall not be grounds for postponement.

5. ORDERED that Motions to Compel Discovery must be filed by 10/31/2020.
6. ORDERED that the parties shall exchange draft copies of a pre-trial statement by 10/20/2020. The parties shall file one (1) joint pre-trial statement with the Court no later than 10/27/2020. This statement shall include the following (i) a list of all issues that will need to be tried by the Court (e.g. grounds for divorce, alimony, custody); (ii) a list of issues that have been settled; (iii) the names of witnesses (other than impeachment witnesses) for each side; and (iv) an estimate as to the length of trial.
7. ORDERED that each party shall complete a current Financial Statement that complies with Md. Rule 9-203 no later than 10/27/2020.

PENDENTE LITE

ORDERED that there shall be a **Pendente Lite Hearing, on September 14, 2020 at 8:30 a.m.** Unless otherwise ordered by the court for good cause shown, the hearing shall be limited to 3 hours.

ORDERED before the hearing:

(a) If child support is in dispute, fully completed child support guideline worksheets, pursuant to MD. Rule 9-206, must be filed.
(b) Current financial statements, W-2's, last year's tax returns, current pay stubs, documentation of current expenses (i.e. daycare) shall be exchanged between the parties no later than ten (10) days prior to the hearing. Documents not exchanged may not be considered by the Magistrate unless they were not available in exercise of due diligence.
(c) The parties shall prepare a listing of the documents and records to be offered in evidence by each party at the trial, other than those expected to be used solely for impeachment, indicating which documents the parties agree may be offered in evidence without the usual authentication.

(d) Parties shall exchange lists of anticipated witnesses (other than impeachment witnesses) and copies of anticipated trial exhibits no later than one (1) week prior to hearing.

SETTLEMENT CONFERENCE:

ORDERED that there shall be a **SETTLEMENT CONFERENCE** before this court on **November 10, 2020 at 9:00 a.m**. Counsel completely conversant with the matters and facts involved in this case, and their clients, **must attend the conference in person**. Failure of attendance may result in sanctions being imposed. Prior to the conference:

(a) If child support is in dispute, fully completed child support guideline worksheets, pursuant to MD. Rule 9-206, must be filed.
(b) If the parties are not able to reach a comprehensive parenting plan the parties shall file a Joint Statement of the Parties concerning Decision Making Authority and Parenting Time pursuant to MD Rule 9-204. In accordance with MD Rule 9-201, the Maryland Parenting Plan Instructions and Maryland parenting Plan Tool is available online https://mdcourts.gov/ and will be distributed to parties by the court. Parents may work separately, together, with counsel, at the parent seminar or with a mediator, to develop a parenting plan they believe is in the best interest of their child.
(c) If there is a request for a monetary award or other relief pursuant to MD. Code, Family Law, §8-205, the parties shall file one (1) joint statement, in substantially the form prescribed by MD Rule 9-207, with the joint pre-trial statement.

TRIAL: scheduled at the conclusion of the Settlement Conf.

ORDERED that if there are any outstanding issues at the conclusion of the settlement conference, parties may request a trial date. The trial date must be scheduled within case time standards. Before the final trial:

(a) If there is any objection by any party as to any portion of the testimony on videotape for which that party seeks a ruling by the Court for purposes of trial, the party seeking such a ruling shall submit no later than thirty (30) days prior to trial a transcript with the disputed testimony clearly designated by marker or otherwise, along with a short statement as to the reason for the objection. Any opposing party should submit a reply thereto within ten (10) days thereafter. Failure to timely follow these requirements may result in any such objection being considered waived.
(b) The parties shall prepare a listing of the documents and records to be offered in evidence by each party at the trial, other than those expected to be used solely for impeachment, indicating which documents the parties agree may be offered in evidence without the usual authentication.
(c) Parties shall exchange lists of anticipated witnesses (other than impeachment witnesses) and copies of anticipated trial exhibits no later than ten (10) days prior to trial.

Failure to abide by this Order will subject the non-complying counsel, party or both, to appropriate sanctions. **FAILURE TO APPEAR TO ANY SCHEDULED COURT EVENT MAY RESULT IN CASE DISMISSAL.**

If you, a party represented by you, or a witness to be called on behalf of the party, need an accommodation under the Americans with Disabilities Act, please contact the Court. If you have questions please contact us at (410) 313-2028.

5/27/2020
Date

William V. Tucker

William V. Tucker
County Administrative Judge

ZADJURA
FAMILY LAW

[redacted]

February 5, 2026

SENT VIA EMAIL & FIRST CLASS US MAIL
[redacted]

RE: [redacted] VS. [redacted]
CIRCUIT COURT/BALTIMORE COUNTY
CASE NO.: [redacted]

Dear [redacted]:

It has been more than thirty (30) days since your client was served with Interrogatories and Request for Production, Inspection, and Copying of Documents.

Please respond by forwarding your client's answers, responses, and/or the appropriate documents. If you do not believe your client is obligated to respond for some reason, please contact me so we may discuss the matter. If you would like an additional four (4) calendar days from the date of this letter to respond, please confirm in writing that I will receive your client's discovery responses in that time period. If I do not hear from you or receive the requested discovery within the next seven (7) calendar days, I will be forced to file a "Motion to Compel and for Sanctions." As the receipt of discovery is necessary for the preparation and evaluation of my client's case, and Rule 2-432(d) requires that this matter be addressed with reasonable promptness, I have no choice but to act with promptness. I hope further efforts to gain your client's compliance will not be necessary.

Very truly yours,

[redacted]

cc: [redacted], via email

[redacted]

February 5, 2026

SENT VIA EMAIL & FIRST CLASS U.S. MAIL
[redacted]

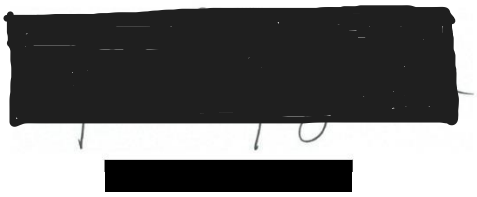
RE: [redacted] **v.** [redacted]
CIRCUIT COURT/HOWARD COUNTY
CASE NO.: [redacted]

Dear [redacted]:

It has been more than thirty (30) days since your client was served with Interrogatories and Request for Production, Inspection, and Copying of Documents.

Please respond by forwarding your client's answers, responses, and/or the appropriate documents. If you do not believe your client is obligated to respond for some reason, please contact me so we may discuss the matter. If you would like an additional seven (7) calendar days from the date of this letter to respond, please confirm in writing that I will receive your client's discovery responses in that time period. If I do not hear from you or receive the requested discovery within the next seven (7) calendar days, I will be forced to file a "Motion to Compel and for Sanctions." As the receipt of discovery is necessary for the preparation and evaluation of my client's case, and Rule 2-432(d) requires that this matter be addressed with reasonable promptness, I have no choice but to act with promptness. I hope further efforts to gain your client's compliance will not be necessary.

Sincerely,



[redacted]

cc: [redacted] (via email)

[redacted]

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY MARYLAND

[redacted] *

Plaintiff, *

v. * Case No. [redacted]

[redacted] *

Defendant. *

* * * * * * * * * * * * *

CERTIFICATION PURSUANT TO RULE 2-431

[redacted], attorney for Defendant, hereby certifies to the Court that she consulted with the Plaintiff about the discovery dispute in this matter as follows:

1. Defendant's counsel sent Plaintiff's counsel a letter dated December 8, 2025 via email and First-Class US Mail postage prepaid, in an attempt to resolve the dispute herein; and
2. Defendant's counsel made one telephone call to Plaintiff's that went unanswered on December 10, 2025 and left a voicemail as a result.
3. Plaintiff sent a subsequent email requesting an extension through December 24, 2025 which was agreed to by Defendant; however, Plaintiff did not comply with the extended deadline she requested

After said good faith efforts to resolve our differences concerning this discovery dispute, counsel have been unable to reach agreement.

_____

[redacted]

CPF #: [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Attorney for Plaintiff

ZADJURA
FAMILY LAW

[redacted]

April 13, 2023

Sent via Email

[redacted]

CASE: [redacted] v. [redacted]
Case No.: [redacted]
Court: Circuit Court for Montgomery County

Dear Tracy:

I am in receipt of discovery responses from your client. Your client's production is not satisfactory, and I itemize the deficiencies for you below.

INTERROGATORIES

1. Identify each person, other than a person intended to be called as an expert witness at trial, having discoverable information that tends to support a position that you have taken or intend to take in this action, including any claim for damages, and state the subject matter of the information possessed by that person. (Standard General Interrogatory No. 1.)

ANSWER[redacted]

DEFICIENCY: Discovery in this matter was propounded upon Plaintiff on November 21, 2022. It took Plaintiff almost 4 months to provide her initial discovery responses,

[redacted]

which is well beyond the time permitted by the Maryland Rules of Court. The time for Plaintiff to note her witnesses, anticipated witnesses, or persons having discoverable information in this matter was when she answered this interrogatory as she had been in receipt of Defendant's initial discovery production for almost 60 days. Plaintiff's counsel is a well-versed family law attorney who is more than capable of counseling her client as to the persons who are responsive to this interrogatory in the approximate 120 days from the time discovery was propounded upon Plaintiff to the time Plaintiff initially responded. Without this information, Defendant himself will be prejudiced in his ability to determine what rebuttal witnesses he may need in this matter for the remaining issues of the grounds for divorce, alimony, marital property disposition, and attorney's fees.

2. Identify each person whom you expect to call as an expert witness at trial, state the subject matter on which the expert is expected to testify, state the substance of the findings and opinions to which the expert is expected to testify and a summary of the grounds for each opinion, and attach to your answers any written report made by the expert concerning those findings and opinions. (Standard General Interrogatory No. 2.)

ANSWER[redacted]

DEFICIENCY: Discovery in this matter was propounded upon Plaintiff on November 21, 2022. It took Plaintiff almost 4 months to provide her initial discovery responses, which is well beyond the time permitted by the Maryland Rules of Court. The time for Plaintiff to note her experts, or anticipated experts, in this matter was when she answered this interrogatory as she had been in receipt of Defendant's initial discovery production for almost 60 days. Plaintiff's counsel is a well-versed family law attorney who is more than capable of counseling her client as to the experts she may need in the approximate 120 days from the time discovery was propounded upon Plaintiff to the time Plaintiff initially responded. Without this information, Defendant himself will be prejudiced in his ability to determine what rebuttal experts he may need in this matter

[redacted]

for the remaining issues of the grounds for divorce, alimony, marital property disposition, and attorney's fees.

3. If you intend to rely upon any documents or other tangible things to support a position that you have taken or intend to take in the action, including any claim for damages, provide a brief description, by category and location, of all such documents and other tangible things, and identify all persons having possession, custody, or control of them. (Standard General Interrogatory No. 3.)

ANSWER: [redacted]

DEFICIENCY: Plaintiff failed to answer this interrogatory in its entirety. Maryland Rule 2-421(b) requires that Plaintiff answer the interrogatory "separately and fully" and "shall include all information available" to Plaintiff directly or her counsel. Plaintiff's general answer prejudices Defendant in that he cannot properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

4. Identify yourself and all individuals with whom you reside. For each individual other than yourself, state that individual's age, relationship to you, and marital status. State your own birth date and social security number. (Standard Domestic Relations Interrogatory No. 1.)

ANSWER: [redacted]

[redacted]

DEFECIENCY: Plaintiff fails to state [redacted]'s relationship to her or his marital status. Please remedy this deficiency in a supplemental Answer to this Interrogatory.

5. Describe your educational background. Include in your answer the highest grade you completed; the name and date of any degree, diploma, or certificate you received, and the name of the institution conferring the degree, diploma, or certificate; and any specialized training you have received. (Standard Domestic Relations Interrogatory No. 2.)

ANSWER [redacted]

DEFICIENCY: Plaintiff failed to give the dates of her respective degrees. Please remedy this deficiency in a supplemental Answer to this Interrogatory.

10. Identify the sources and amounts of any other moneys and credit(s) you received during the past five years with an aggregate value in excess of $250 in any one year, including gifts, loans from others, loans repaid to you by others, sales of assets, and untaxed distributions. (Standard Domestic Relations Interrogatory No. 9.)

ANSWER [redacted]

DEFICIENCY: Plaintiff failed to provide the specific sources and amounts of the gifts she received from family members and friends over the past 5 years. Maryland Rule 2-421(b) requires that Plaintiff answer the interrogatory "separately and fully" and "shall include all information available" to Plaintiff directly or her counsel. Plaintiff's general answer prejudices Defendant in that he cannot properly evaluate Plaintiff's case or

[redacted]

prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

11. List each item of property in which you have any interest. For each item listed, state how it is titled, its value, the amount of any present lien or mortgage on the property, the date of acquisition of the property, and the identity of any other person with an interest in the property. If you claim that any property listed is not marital property, state the facts upon which you base your claim, including all sources of funds used for the acquisition of the property and identify all persons with personal knowledge of those facts. (Standard Domestic Relations Interrogatory No. 10.)

ANSWER[redacted]

DEFICIENCY: Plaintiff failed to answer this item with any specificity and just generally itemized various marital and non-marital assets Plaintiff also failed to itemize the value of each asset, any lien against an asset, the date of acquisition, of the property, any other

person with interest in the property, the source of funds used to acquire alleged non-marital assets, the facts Plaintiff bases her claim that an asset is non-marital, and any persons having knowledge of those facts. Maryland Rule 2-421(b) requires that Plaintiff answer the interrogatory "separately and fully" and "shall include all information available" to Plaintiff directly or her counsel. Plaintiff's general answer prejudices Defendant in that he cannot properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court. Further, Plaintiff's claim that this interrogatory is premature is not a valid objection. It took Plaintiff almost 4 months to provide her initial discovery responses, which is well beyond the time permitted by the Maryland Rules of Court. Plaintiff has been in receipt of Defendant's initial discovery production for almost 60 days and is fully aware of her own assets. Plaintiff's counsel is a well-versed family law attorney who is more than capable of counseling her client as to what is a marital asset versus what is not, as well as what items Plaintiff has an interest in generally, in the approximate 120 days from the time discovery was propounded upon Plaintiff to the time Plaintiff initially responded.

13. If you contend that your spouse's conduct was excessively vicious or that your spouse acted with extreme cruelty or constructively deserted you, describe your spouse's conduct and state the date and nature of any injuries sustained by you and the date, nature, and provider of health care services rendered to you. Identify all persons with personal knowledge of your spouse's conduct and all persons with knowledge of any injuries you sustained as a result of that conduct. (Standard Domestic Relations Interrogatory No. 15.)

ANSWER: [redacted]

[redacted]

DEFICIENCY: Plaintiff provides no dates (approximate or specific as to any of her allegations during the parties' marriage. Plaintiff makes reference to physical assaults by Defendant during their marriage; however, she does not indicate when these alleged

[redacted]

assaults occurred or the provider of any healthcare services to her. Further, Plaintiff references alleged behaviors by Defendant, specifically, harassment and humiliation, teasing, bullying, and spreading rumors about her, that occurred in front of or to third parties; however, she fails to identify persons with personal knowledge of these alleged facts. Without the aforementioned information from Plaintiff, Defendant will be prejudiced in his ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

15. If you have sought or received treatment or therapy at any time during the past 10 years for any physical, mental, or emotional condition, including drug addiction or alcoholism, describe the condition and the treatment or therapy provided, state the date or dates of treatment or therapy, and identify all persons providing treatment or therapy. (Standard Domestic Relations Interrogatory No. 20.)

ANSWER: [redacted]

DEFICIENCY: Plaintiff's objection to this interrogatory is simply invalid. Plaintiff, by requesting alimony, has placed her physical and mental condition at issue before the Court, and as such, the substantive answer to this interrogatory is necessary and relevant and must be provided in a supplemental Answer to this Interrogatory.

16. State whether you presently own or have an interest in (or during the last three (3) have owned or had an interest in) any life insurance or annuity policy and, if so, for each policy state the name and address of each insurance company and annuity policy; the number of the policy; the type of policy; the date the policy was issued; the face amount of the policy; the amount of the annual premium; the total amount of premiums paid on the policy; the name and address of each beneficiary named in the policy; the date of any change of beneficiary and the name of each beneficiary added or deleted during the last three (3) years; the date of assignment of the policy and the name of each assignee, if the policy has

[redacted]

been assigned, the name and address of the insurance agent or broker for the policy; the amount, dates and present balances of each loan made on the policy, if any; and the present cash surrender value of the policy.

ANSWER: [redacted]

DEFICIENCY: As Plaintiff is the insured party for the Primerica insurance policy, the documentation and information regarding same is within Plaintiff's possession, custody, and/or control. Plaintiff has an obligation to obtain the information requested in this Interrogatory. Further, this life insurance policy is a potential marital asset, the responsive information to this Interrogatory is necessary and relevant for Plaintiff to provide. Please have her supplement this Answer accordingly.

17. If you have any interest in any type of retirement, profit sharing, deferred compensation, or pension plan or fund, including an Individual Retirement Account or Keogh Plan, state: the name of the plan or fund; the name and address of the custodian or administrator of the plan or fund; the percent of your present vesting in the plan or fund; the name of any employer contributing to the plan or fund, if any; the total amount of your contributions to the plan or fund; the total amount of your employer's contributions in your behalf of the plan or fund, if determinable; the present balance of your interest in the plan or fund, if determinable; the earliest date upon which you are entitled to receive actual benefits from the plan or fund; the amount of benefits and the method of payment to you on retirement of any funds from said plan or fund; the amount of any funds now available to you and the method of obtaining them; whether you have in your possession the plan or fund document and any amendments thereto or, if not, a written summary of the plan or fund and, if not, the name and address of the person from whom they may be obtained, the date to which your last annual plan or fund benefit statement runs; the usual date upon which the annual plan or fund benefit statement is issued; your beginning date of employment with the originator of the plan or fund; the date upon which you

began participation in the plan or fund; your last date of employment with the originator of the plan or fund if said employment has been terminated; the last date upon which you were a participant in the plan or fund, if your participation has been terminated; the present value of your interest in the plan or fund; itemize your last five years compensation on a year-by-year basis for plan or fund purposes, if relevant to plan participation; your date of birth; and the condition of your health.

ANSWER:

DEFICIENCY: Plaintiff failed to provide any information regarding the retirement/pension subsidy from her employer that she references in Answer to Interrogatory #7. Please have Plaintiff supplement this Answer accordingly, as the information requested is relevant to the issues of alimony, marital property, and attorney's fees pending before the Court.

18. If you are claiming that your spouse received or is receiving income in an amount greater than reported on federal and/or state income tax returns, state each year in which you claim that your spouse had such additional income; the amount of additional income for each year that you claim your spouse had such additional income; the source of the additional income for each year in which you claim that your spouse had such additional income; the names and addresses of all persons having Knowledge of the allegation that your spouse had additional income for each such year that you allege that your spouse had such additional income; the facts upon which you rely in support of the

[redacted]

contention that your spouse had additional income for each year that you allege such additional income; and for each particular year in which you allege your spouse received additional income, state the disposition made of such additional income.

ANSWER: [redacted]

DEFICIENCY: The time for Plaintiff to Answer this Interrogatory is now. She has been in possession of Defendant's discovery and financial statement in this matter for approximately 60 days. Please have Plaintiff supplement this Answer accordingly.

21. If you contend that you are entitled to an award of alimony, whether indefinite or rehabilitative, state all facts upon which you base your contention, and give the name, address, and telephone number of all persons having personal knowledge of these facts.

ANSWER: [redacted]

DEFICIENCY: Plaintiff failed to indicate the facts upon which she bases her contention and failed to identify persons having knowledge of these facts. Without the requested information being provided by Plaintiff, Defendant will be prejudiced in his ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding alimony and attorney's fees pending before the Court.

ZADJURA
FAMILY LAW

[redacted]

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All documents (including photographs) identified in your answers to this party's interrogatories.

ANSWER: [redacted]

DEFICIENCY: Plaintiff failed to provide, at minimum, paystubs, bank statements, and retirement account statements that were referenced in her Answers to Interrogatories. Without all documents identified in Plaintiff's Answers, Defendant will be prejudiced in his ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

2. All documents (including photographs) upon which a claim or defense is based and any document relevant to a claim or defense in the case herein.

ANSWER [redacted]

DEFICIENCY: Plaintiff failed to provide, at minimum, paystubs, bank statements, and retirement account statements that were referenced in her Answers to Interrogatories. Without all documents identified in Plaintiff's Answers, Defendant will be prejudiced in his ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

3. A copy of your most recent annual "Your Social Security Statement" (all citizens are provided with this statement each year by the Social Security Administration. If you do not have a copy, you can obtain one directly from the Social Security Administration).

ANSWER

DEFICIENCY: Plaintiff had approximately 120 days from the time discovery was propounded upon her until she provided her responses to gather documents. Plaintiff's social security statement is easily obtained in a matter of minutes from the Social Security Administration's website. This particular document is necessary and relevant to Defendant's ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

4. All written or recorded reports or documents received from, or prepared by, an expert who will testify in these proceedings.

ANSWER:

DEFICIENCY: Discovery in this matter was propounded upon Plaintiff on November 21, 2022. It took Plaintiff almost 4 months to provide her initial discovery responses, which is well beyond the time permitted by the Maryland Rules of Court. The time for Plaintiff to note, retain, and work with her experts, or anticipated experts, in this matter was when she answered this interrogatory as she had been in receipt of Defendant's initial discovery production for almost 60 days. Plaintiff's counsel is a well-versed family law attorney who is more than capable of counseling her client as to the experts she may need in the approximate 120 days from the time discovery was propounded upon Plaintiff to the time Plaintiff initially responded. Without this information, Defendant himself will be prejudiced in his ability to determine what rebuttal experts he may need in this matter for the remaining issues of the grounds for divorce, alimony, marital property disposition, and attorney's fees.

[redacted]

5. All written or recorded reports or documents received from, or prepared by, an expert who was retained or employed by you to assist, formally or informally, in the above-referenced matter.

ANSWER: [redacted]

DEFICIENCY: Discovery in this matter was propounded upon Plaintiff on November 21, 2022. It took Plaintiff almost 4 months to provide her initial discovery responses, which is well beyond the time permitted by the Maryland Rules of Court. The time for Plaintiff to note, retain, and work with her experts, or anticipated experts, in this matter was when she answered this interrogatory as she had been in receipt of Defendant's initial discovery production for almost 60 days. Plaintiff's counsel is a well-versed family law attorney who is more than capable of counseling her client as to the experts she may need in the approximate 120 days from the time discovery was propounded upon Plaintiff to the time Plaintiff initially responded. Without this information, Defendant himself will be prejudiced in his ability to determine what rebuttal experts he may need in this matter for the remaining issues of the grounds for divorce, alimony, marital property disposition, and attorney's fees.

6. All of your pay stubs for this calendar year and the prior two (2) calendar years from all employers (civilian, governmental, military etc.,), individuals, or entities that you worked for, or with, as an employee, independent contractor, and partner or otherwise.

ANSWER [redacted]

DEFICIENCY: Plaintiff had approximately 120 days from the time discovery was propounded upon her until she provided her responses to gather documents. Plaintiff's paystubs are easily obtained from her employer, and she has had ample opportunity to obtain these items in the last 4 months, either by downloading her paystubs from her

[redacted]

payroll/worksite website, or requesting them directly from her employer. The documents requested are necessary and relevant to Defendant's ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

9. All financial statements and loan applications prepared by you, or for you, for any purpose whatsoever during the last 5 years.

ANSWER[redacted]

DEFICIENCY: Plaintiff purchased a vehicle in 2019 and presumably had to apply for a loan to do so. Further, Plaintiff applied for a Care Credit account in 2022 and likely had to submit a loan application in order to obtain this account. The documents requested are necessary and relevant to Defendant's ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

10. Documents evidencing each monthly expense itemized in your financial statement pursuant to Maryland Rule 9-202.

ANSWER: [redacted]

DEFICIENCY: Plaintiff failed to produce any bank statements in this matter and only produced credit card statements for 1 account (SECU) for a period of approximately 6 months. Additionally, Plaintiff produced rent receipts and storage unit printouts (partial), but no other documentation regarding the expenses itemized on her financial statement. What has been provided is wholly insufficient as a response to this document request and will prejudice Defendant in his ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the

grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

12. Copies of all documents and statements, for the past 3 years, relating to any brokerage accounts, stocks, bonds, mutual funds, annuities, pension plans, 401K plans, 401B plans, 403B plans, SEPS, SARSEPS, SIMPLEs, Keoughs, retirement plans, insurance policies, profit sharing plans, stock option plans, or any other investments of any type in which you currently have an interest or had an interest during the last 3 years.

ANSWER[redacted]

DEFICIENCY: Plaintiff provided the following sporadic statements for her [redacted] - [redacted]. Further, Plaintiff provided no documentation whatsoever for her retirement/pension account through her current employer. Please have Plaintiff supplement her document production with complete records for all retirement accounts in her name.

14. All detective and/or investigation reports made and prepared in the ordinary course of business by any investigators relating and/or pertaining to the Plaintiff or Defendant.

ANSWER: [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

[redacted]

15. All documents you have obtained via subpoena in this matter.

ANSWER: [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

16. Any transcript you receive in this matter or any related matter.

ANSWER [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

19. Copies of all Wills and Trust documents pursuant to which you are a Trustee or a beneficiary.

ANSWER: [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

20. Copies of all documents, pleadings, findings, orders, and decisions, in any action in which you have been a party during the last 5 years (including, but not limited to, civil matters, criminal matters, administrative matters of all types, worker's compensation claims, veterans' claims, disability claims, social security claims, mediation matters, arbitrated matters, small claims matters, etc.).

ANSWER[redacted]

DEFICIENCY: Plaintiff's objection to this document request is without merit. As Plaintiff has alleged fault-based grounds for divorce in this matter, all pleadings regarding the protective order filed by Plaintiff against Defendant are relevant to this matter. Please have Plaintiff supplement her discovery accordingly.

21. All documents and records relating to your physical and/or mental health created during the last 2 years.

ANSWER: [redacted]

DEFICIENCY: Plaintiff's objection to this document request is simply baseless. Plaintiff, by requesting alimony, has placed her physical and mental condition at issue before the Court, and as such, the documents responsive to this request are necessary and relevant and must be provided in a supplemental response. It is impossible to believe that Plaintiff has received no medical treatment of any kind related to her physical and/or mental health in the last two years, especially given Plaintiff is believed to have undergone cosmetic surgery during that time.

24. A copy of all credit cards that you are authorized to charge on or on which you have or have had signing privileges for the past 2 years.

[redacted]

ANSWER: [redacted]

DEFICIENCY: Plaintiff provided no documentation responsive to this request whatsoever. Plaintiff produced limited credit card statements for 2 credit cards, so it is presumed she is more than capable of providing copies of the credit cards themselves. Please have Plaintiff supplement accordingly.

25. A copy of all credit card statements for all credit cards that you are authorized to charge on or on which you have or have had signing privileges for the past 2 years.

ANSWER: [redacted]

DEFICIENCY: Plaintiff produced 6 months of statements for her SECU credit card and no statements for her Care Credit/Synchrony credit card. Please have Plaintiff supplement with 2 years of statements for all credit cards in her name.

26. A copy of all debit cards that you are authorized to use or that you have used for the past 2 years.

ANSWER: [redacted]

DEFICIENCY: Plaintiff referenced numerous bank accounts in her Answers to Interrogatories in this matter but failed to produce any documentation of the debit cards linked to those accounts. Please have Plaintiff supplement accordingly.

[redacted]

27. A copy of all debit card statements for all debit cards that you are authorized to charge on or on which you have or have had signing privileges for the past 2 years.

ANSWER[redacted]

DEFICIENCY: No documents whatsoever were produced in response to this request. Plaintiff, by her own admission, has several bank accounts within her name in the last 2 years. It seems impossible to believe that she has no documentation (or timely access to the documentation) responsive to this request. For Plaintiff to behave in a fashion that implies Defendant can appropriately prepare to defend against Plaintiff's claims for alimony, marital property disposition, and attorney's fees without the requested documentation or that the requested documentation is not relevant to the matters pending before the Court is ludicrous.

28. A copy of your health insurance identification card, a copy of your spouse's health insurance identification card, and a copy of the minor children's health insurance identification cards.

ANSWER[redacted]

DEFICIENCY: Plaintiff's objection to this document request is improper. Plaintiff herself has a claim for alimony and as such, both parties' health insurance coverage is relevant. Please have Plaintiff supplement her document production accordingly.

32. As to your interest in any business, corporation, partnership, sole proprietorship, syndication, joint venture, limited liability company, limited liability partnership or other business in which you now have or had at least a 1% interest therein during the last 3 years, produce all corporate (Forms 1120 and 1120S) and partnership (Form 1065) income tax returns and the other applicable/associated

[redacted]

business tax returns, forms, K-1's, and accompanying schedules prepared during the last 3 years. And, produce all of the books, record, receipts, invoices, statements, checks, and financial statements that show, in whole or part, the income and deductions of said business for the last 3 years.

ANSWER[redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

33. All documents not heretofore called for indicating any interest you have, and the present value of your interest, in any sole proprietorship, partnership, syndication, joint venture, limited liability company, limited liability partnership, or closely held corporation or other business entity.

ANSWER: [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

34. All documents indicating the date upon which you secured any interest in any asset in which you have an interest presently.

ANSWER[redacted]

[redacted]

DEFICIENCY: Except for the title to 2 vehicles, Plaintiff produced no documents responsive to this request. Plaintiff is claiming that she has an interest in both marital and non-marital assets according to her Answers to Interrogatories but has failed to produce any documentation supporting these claims. It is unclear to Defendant how he will not be prejudiced by Plaintiff's failure to provide these documents, as she is seeking a division of the marital property and attorney's fees in this matter.

35. All documents relating to any fringe benefits that you or your spouse receive as a result of employment, military service, self employment, or for any other reason.

ANSWER[redacted]

DEFICIENCY: Plaintiff provided documentation regarding her health insurance plans provided through her employer; however, she failed to provide any documentation to the retirement accounts she is eligible for and/or contributing to through her employment. Alimony, marital property, and attorney's fees are all at issue in this case. As such, the documents being requested by Defendant are necessary and relevant and must be produced by Plaintiff.

37. All documents indicating any interest you have and the present value of the interest in any type of retirement, pension or profit-sharing plan or fund, or deferred compensation plan including, but not limited to, (a) a complete copy of the plan, and any amendment thereto; (b) a complete copy of the plan summary description, and any amendments thereto; and (c) the most recent annual participants statement pertaining to it.

ANSWER[redacted]

[redacted]

DEFICIENCY: Plaintiff provided no documentation whatsoever for her retirement/pension account through her current employer. Please supplement Plaintiff's document production accordingly.

38. As to any Keogh (HR-10) Plan in which you are a participant, copies of the plan's trust instruments or documents, including any amendments thereto, and the most recent statement issued by each bank or custodian.

ANSWER[redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

39. All statements issued by a bank or other custodian covering any Individual Retirement Account in which you have an interest or had an interest during the last 2 years.

ANSWER: [redacted]

DEFICIENCY: Plaintiff provided the following sporadic statements for he[redacted] Please have Plaintiff supplement her document production with complete records for he[redacted] for the past 2 years.

41. All documents relating or referring to monies or property owed by Defendant to Plaintiff, or Plaintiff to Defendant.

[redacted]

ANSWER[redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

42. For any credit charge account in your sole name or in combination with any other person or entity, all charge account slips signed by or on your behalf during the last 2 years and all statements rendered by the creditor involved during the same period.

ANSWER: [redacted]

DEFICIENCY: Plaintiff produced 6 months of statements for her SECU credit card and no statements for her Care Credit/Synchrony credit card. Plaintiff produced no charge slips for either account. Please have Plaintiff supplement with 2 years of statements and charge slips for all credit cards in her name.

43. All tangible evidence of indebtedness of any monies or Credits due by you to any person or entity of any nature whatsoever.

ANSWER[redacted]

DEFICIENCY: Plaintiff produced 6 months of statements for her SECU credit card and no statements for her Care Credit/Synchrony credit card. Plaintiff produced no lease,

car loan statements, etc. for any other accounts or to demonstrate any other monies she owes to a 3rd party of any kind. Please have Plaintiff supplement her document production accordingly.

44. All documentary evidence indicating any support or other obligation owed or due to your former spouse or children of said former marriage.

ANSWER:

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

45. All documents evidencing the cost, charges, and expenses of your maintenance, support and upkeep during the last 2 years.

ANSWER:

DEFICIENCY: At minimum, Plaintiff has failed to produce paystubs, bank statements, monthly bills, and comprehensive credit card statements. Further, while Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to provide comprehensive documents responsive to this request immediately.

[redacted]

46. All documents relating to any loan incurred by you or on your behalf during the past 2 years.

ANSWER: [redacted]

DEFICIENCY: Plaintiff purchased a vehicle in 2019 and presumably had to apply for a loan to do so. Further, Plaintiff applied for a Care Credit account in 2022 and likely had to submit a loan application to obtain this account. The documents requested are necessary and relevant to Defendant's ability to properly evaluate Plaintiff's case or prepare to defend himself against Plaintiff's claims regarding the grounds for divorce, alimony, marital property disposition, and attorney's fees pending before the Court.

47. All documentary evidence indicating any support or other obligation owed or due a former lover, or former spouse, or children of said former lover or former spouse.

ANSWER: [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

49. All documents evidencing your search for employment in the last three years including but limited to applications, letters of inquiring, and emails to prospective employers or employment agencies.

ANSWER: [redacted]

[redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

50. Copies of all securities in which you have an interest of any nature whatsoever.

ANSWER: [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

51. All documents evidencing source and amounts of all monies or credits of any nature whatsoever not reflected in your federal and state income tax returns received by you during the last 3 years, and presently, including, but not limited to, gifts received by the you, loans made to you, repayment of loans to you, sale of assets, disability benefits, not-taxable distributions, etc.

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has

[redacted]

failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

52. All documents concerning any claims for damage or injury (either personal or property) on file or contemplated, of yours, including copies of any reports or appraisals relevant thereto.

ANSWER[redacted].

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

53. All documents indicating any interest of yours in and the value of that interest of any estate or trust, whether vested or non-vested.

ANSWER: [redacted]

DEFICIENCY: Plaintiff has provided no responsive documents to this request whatsoever. Defendant will be prejudiced in his ability to properly evaluate Plaintiff's claims and defend against same in this matter if Plaintiff does not supplement her document production accordingly.

[redacted]

54. All tangible evidence of indebtedness of any monies or credits due to you from any person or entity of any nature whatsoever.

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

55. All documents relating to or referring to income or dividends from stock owned by you during the last 5 years and presently.

ANSWER: [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

56. Complete copies of all homeowners' or casualty insurance policies, including all schedules, in which you are a named beneficiary.

ANSWER [redacted]

[redacted]

DEFICIENCY: Plaintiff received the discovery propounded upon her approximately 120 days prior to her producing her discovery in this matter. That is more than enough time for Plaintiff to contact the homeowner's insurance company and/or casualty insurance company to obtain the documents. Please immediately supplement this response.

57. All documents relating or referring to policies of insurance upon your life and all documents indicating the cash surrender value, if any, of said polices, and the amount of encumbrances against said policies, if any. Provide evidence of premium payments during the last 2 years.

ANSWER: [redacted]

DEFICIENCY: Plaintiff received the discovery propounded upon her approximately 120 days prior to her producing her discovery in this matter. That is more than enough time for Plaintiff to contact the life insurance company to obtain the documents. Please immediately supplement this response.

58. All agreements with your attorney or attorneys relating to the rendering of legal services in the instant proceeding to you, along with all bills and billing records pertaining to any monies due from you to him/her or them.

ANSWER: [redacted]

DEFICIENCY: Plaintiff failed to produce her fee/retainer agreement with her counsel. Please supplement her document production accordingly.

59. All documents regarding payments made to your attorney or attorneys relating to the rendering of legal services in the instant proceeding, including but not

limited to payments made by you directly to said attorney(s) or payments made by third parties on your behalf to said attorney(s).

ANSWER: [redacted]

DEFICIENCY: As Plaintiff failed to produce comprehensive credit card statements or any bank statements whatsoever, it is impossible to ascertain with what funds Plaintiff is compensating her attorney. Please supplement her document production accordingly.

60. All documents and records relating to any safe deposit box and the contents thereof in which you have or had an interest during the last 3 years, and presently, including an itemization of the contents of said box from during the last 3 years and presently.

ANSWER [redacted]

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

61. All bank books of any kind and/or other records of banking and financial institutions showing the extent of your deposits and any other transactions relating to savings, checking and any other type of account with a banking or other financial institution for the last 2 years, including but not limited to bank statements, checks, checkstubs, deposit and withdrawal slips on these accounts.

[redacted]

ANSWER[redacted]

DEFICIENCY: Plaintiff produced no responsive documents to this request. Please supplement immediately.

62. All checks, check stubs or registers, deposit slips, and statements issued during the last 2 years by, from or to you or any financial institution in connection with any account in any financial institution in which you individually or in conjunction with any other person or entity of any nature whatsoever maintained a checking account during the last 2 years

ANSWER[redacted]

DEFICIENCY: Plaintiff produced no responsive documents to this request. Please supplement immediately.

63. Your most recent books and most recent statements of any savings account, certificate of deposit, money market, checking account, or other deposit of funds of any nature whatsoever in any financial institution in which you have an interest, (or had an interest during the last 2 years) either directly or indirectly, in trust or otherwise, either individually or in conjunction with any other person or entity of any nature whatsoever.

ANSWER[redacted]

[redacted]

DEFICIENCY: Plaintiff produced no responsive documents to this request. Please supplement immediately.

64. An itemization of, or, if none, all documents evidencing, the item and value thereof of all assets of yours owned individually or concurrently with others, directly or indirectly, in trust or otherwise.

ANSWER: [redacted]

DEFICIENCY: Plaintiff produced no responsive documents to this request. Please supplement immediately.

65. All documents or other tangible evidence, whether or not the same will be produced at the trial of this cause, indicating that any property now in the possession of the Defendant is the property of the Plaintiff.

ANSWER [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

66. All documents or tangible evidence, whether or not the same will be produced at the trial of this cause, indicating that any property of any nature whatsoever in

which you have an interest is "marital property," within the purview of Md. Code, Family Law, § 8-201(e) and § 8-203(a).

ANSWER:

DEFICIENCY: Plaintiff produced no responsive documents to this request. Please supplement immediately.

67. Copies of all appraisals made on any property of any nature whatsoever owned in whole or in part by the Defendant (whether directly or indirectly, solely or concurrently with others, in trust or otherwise) or the Plaintiff (whether directly or indirectly, solely or concurrently with others, in trust or otherwise).

ANSWER

DEFICIENCY: Plaintiff either does or does not have such documents in her possession, custody, and/or control – specifically, either such documents exist, or they do not. Plaintiff's non-specific response does not comply with the Maryland Rules and must be clarified as Defendant has a right to know without question as to whether such documents exist. Please have Plaintiff supplement her response immediately.

68. All deeds, contracts of sale, trust agreements, or like instruments pertaining to any real estate in which the Defendant or Plaintiff has or had a beneficial interest during the period from 1980 to present, and date of production along with a copy of any settlement sheets or other documentation in connection with the acquisition or sale thereof and all documents indicating the balance of any encumbrance thereon.

ANSWER

[redacted]

DEFICIENCY: Plaintiff produced no responsive documents to this request. It is unreasonable to believe that she needs time to gather documents responsive to this request as the parties signed a listing agreement and contract for sale of the marital home within the few weeks directly prior to Plaintiff's producing her discovery in this matter. Please supplement immediately.

69. Copies of all leases for any property in which you have or have had a leasehold interest in the last 3 years.

ANSWER: [redacted]

DEFICIENCY: Plaintiff produced no responsive documents to this request. While she did produce receipts for rental payments, she did not produce the lease itself. Please supplement immediately.

70. When the term "marital debt" is utilized in the paper, it shall mean "a debt which is directly traceable to the acquisition of marital property, whether or not the same constitutes an encumbrance upon said property, or said debt's economic effect is to reduce the value of marital property;" and when the term "nonmarital debt" is utilized in this paper, it shall mean "a debt which is not directly traceable to the acquisition of marital property."
    a. All documents indicating the nature, amount, and the name and address of the creditor of any outstanding marital debt.
    b. All documents indicating the nature, amount and name and address of the creditor of any nonmarital debt presently in existence.
    c. All documents indicating that any payment which was made by either the Plaintiff or Defendant subsequent to the marriage of the parties in satisfaction of any marital debt referable to the acquisition of any marital property was made with nonmarital funds or property or with funds or

property directly traceable thereto (See Schweizer v. Schweizer, 301 Md. 626, 484 A.2d 267).

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

71. Copies of all social media pages which you have ever created on Facebook, LinkedIn, Myspace, Twitter, blogs, text messages and all other forms of computer social media and all messages which you have ever sent and/or received on Facebook, LinkedIn, Myspace, Twitter, blogs, text messages and all other forms of computer social media and provide the passwords for each of said accounts that you have ever maintained.

ANSWER [redacted]

DEFICIENCY: Plaintiff's objection to this document request is without merit. Plaintiff has made claims for alimony, property distribution, and attorney's fees, and the grounds for divorce in this matter is in dispute.

72. All computer-generated magnetic media and data compilations including, but not limited to, disks, tapes, memory files and any and all back-up disks or files

[redacted]

that are in a retrievable, machine-readable form relating to any of the items set forth in this request for production of documents, including all financial accounting transactions, receipts, disbursements, or general ledger detail entries, and all e-mail sent or received from the date of your marriage, to the present. If you contend that any of the information does not currently exist, provide the information that does exist and provide all documentation as to when any information was erased or deleted from the computer system.

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

73. Print a copy of your entire Facebook history by following these steps:
    a. Go to www.facebook.com and log into your Facebook account.
    b. On the right side of the top of the page, there is an arrow down. Click on it and then scroll to settings.
    c. You will now be on the general account settings page.
    d. From this page, click on the "download a copy of your Facebook data."
    e. When the new page appears, click on "Start my Archive."

ANSWER: [redacted]

[redacted]

DEFICIENCY: Plaintiff's objection to this document request is without merit. Plaintiff has made claims for alimony, property distribution, and attorney's fees, and the grounds for divorce in this matter is in dispute.

74. Produce a copy of your entire Instagram history by following these steps:
   i. Go to your profile and hit the pinwheel icon (the settings function).
   ii. Click "Privacy and Security."
   iii. Scroll down to "Data Download" and click "Request Download."
   iv. Enter the email address where you'd like to receive a link to your data and then enter your Instagram account password.
   v. You'll soon receive an email titled "Your Instagram Data" with a link to your data.
   vi. Click "Download Data" and follow the instructions to finish downloading your information.

ANSWER: [redacted]

DEFICIENCY: Plaintiff's objection to this document request is without merit. Plaintiff has made claims for alimony, property distribution, and attorney's fees, and the grounds for divorce in this matter is in dispute.

75. Produce a copy of your entire Snapchat history by following these steps:
   i. Log into your account on accounts.snapchat.com.
   ii. Click on "My Data."
   iii. Click "Submit Request" at the bottom of the page.
   iv. Verify your email with Snapchat.
   v. Snapchat will send you a link to your verified email when the data is ready to download.
   vi. Follow and click the link in your email to download your data.

[redacted]

ANSWER[redacted]

DEFICIENCY: Plaintiff's objection to this document request is without merit. Plaintiff has made claims for alimony, property distribution, and attorney's fees, and the grounds for divorce in this matter is in dispute.

77. All documents pertaining to any Venmo, Cash App, and PayPal and any other forms of electronic payments and/or documents in your name alone or jointly with any other person or persons or as trustee, custodian, guardian, or where someone holds funds on your behalf, or in which you have had an interest in the last five years.

ANSWER[redacted]

DEFICIENCY: Plaintiff's objection to this document request is without merit. Plaintiff has made claims for alimony, property distribution, and attorney's fees, and the grounds for divorce in this matter is in dispute.

78. Any and all written communication between you and Defendant, including but not limited to email and text message communication, from the past twelve (12) months through the present date.

ANSWER: [redacted]

DEFICIENCY: Plaintiff produced limited written communications between the parties back to around the time she filed for a protective order against Defendant. It is

impossible to believe that the parties did not communicate in writing prior to that time and it is Defendant's belief that the parties have had more written communication that has been provided by Plaintiff since the denial of her protective order.

79. Any and all written communication between you and one or both minor children, including but not limited to email and text message communication, from the past twelve (12) months through the present date.

ANSWER: [redacted]

DEFICIENCY: Plaintiff has put communications involving third parties at issue in this case with her allegations about Defendant's behaviors, specifically, harassment and humiliation, teasing, bullying, and spreading rumors about her, that occurred in front of or to third parties. Further, it is anticipated that Plaintiff has spoken to friends and family (including the parties' children) about subject matters relevant to this case and it is not for Plaintiff to decide what in those communications is relevant.

80. Any and all written communication between you and any third party regarding any subject matter relevant to this case (including but not limited to custody, child support, alimony, marital property, attorney's fees, etc.), including but not limited to email and text message communication, from the past twelve (12) months through the present date.

ANSWER [redacted]

DEFICIENCY: Plaintiff has put communications involving third parties at issue in this case with her allegations about Defendant's behaviors, specifically, harassment and humiliation, teasing, bullying, and spreading rumors about her, that occurred in front of or to third parties. Further, it is anticipated that Plaintiff has spoken to friends and

family (including the parties' children) about subject matters relevant to this case and it is not for Plaintiff to decide what in those communications is relevant.

82. Any and all documents regarding the allegations contained in paragraph 12 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER

DEFICIENCY: Plaintiff's objection is without merit as the grounds for divorce plead by Plaintiff involve the alleged incident referenced in this paragraph of Plaintiff's Complaint.

83. Any and all documents regarding the allegations contained in paragraph 13 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER:

DEFICIENCY: Plaintiff's objection is without merit as Plaintiff is making claims for a monetary award, property division, and alimony. One of the factors the Court may consider when considering Plaintiff's request is the monetary and non-monetary contributions to the marriage/family.

84. Any and all documents regarding the allegations contained in paragraph 14 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER:

[redacted]

DEFICIENCY: Plaintiff's objection is without merit as the grounds for divorce plead by Plaintiff involve the alleged incident referenced in this paragraph of Plaintiff's Complaint.

85. Any and all documents regarding the allegations contained in paragraph 16 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER: [redacted]

DEFICIENCY: Plaintiff's objection is without merit as Plaintiff is making claims for a monetary award, property division, and alimony.

87. Any and all documents regarding the allegations contained in paragraph 18 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER: [redacted]

DEFICIENCY: Plaintiff's objection is without merit as Plaintiff is making claims for a monetary award, property division, and alimony. One of the factors the Court may consider when considering Plaintiff's request is the monetary and non-monetary contributions to the marriage/family.

88. Any and all documents regarding the allegations contained in paragraph 19 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

[redacted]

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

89. Any and all documents regarding the allegations contained in paragraph 20 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

90. Any and all documents regarding the allegations contained in paragraph 21 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

[redacted]

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

91. Any and all documents regarding the allegations contained in paragraph 22 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

92. Any and all documents regarding the allegations contained in paragraph 26 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ZADJURA
FAMILY LAW

[redacted]

ANSWER[redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

93. Any and all documents regarding the allegations contained in paragraph 29 of your Complaint for Absolute Divorce, or in the Alternative, Limited Divorce and Other Relief.

ANSWER: [redacted]

DEFICIENCY: While Plaintiff may have produced documents responsive to this request, it is impossible for Defendant to decipher which documents Plaintiff intends for those to be. Maryland Rule 2-422(d) requires a responding party to "produce the documents or information as they are kept in the usual course of business or organize and label them to correspond with the categories in the request", which Plaintiff has failed to do. Please have Plaintiff supplement her discovery to comply with Maryland Rule 2-422.

In a good faith attempt to resolve this discovery dispute, I request that your client remedy her discovery deficiencies within 14 days of the date of this letter. If not, I will have no choice but to file a Motion to Compel and for Sanctions with the Court. Your prompt and immediate attention to this matter is appreciated. Thank you.

ZADJURA
FAMILY LAW

[redacted]

Sincerely,

[redacted]

cc[redacted] (via email)

IN THE CIRCUIT COURT FOR CHARLES COUNTY MARYLAND

[redacted] *

Plaintiff/Counter-Defendant, *

v. * Case No.: [redacted]

[redacted] *

Defendant/Counter-Plaintiff. *

* * * * * * * * * * * * *

ORDER

UPON CONSIDERATION of Plaintiff's Motion for Sanctions and any response thereto, it is by the Circuit Court for Charles County, Maryland:

ORDERED, that said Motion be, and the same hereby is **GRANTED;** and it is further

ORDERED, that Defendant be **PRECLUDED** from introducing any evidence or having any witnesses testify because of her failure to comply with discovery; and it is further

ORDERED, that a rebuttable presumption that Plaintiff shall have sole physical and sole legal custody of the minor children of the parties is **IMPOSED**; and it is further

ORDERED, that Defendant shall contribute to the sum of $682.77 directly to Plaintiff's counsel within ten (10) days of this Order for her discovery failure, and if Defendant fails to comply, that same may be reduced to a Judgment in Plaintiff's favor upon written request of Plaintiff.

_____

Judge

IN THE CIRCUIT COURT FOR CHARLES COUNTY MARYLAND

[redacted] *

Plaintiff/Counter-Defendant, *

v. * Case No. [redacted]

[redacted] *

Defendant/Counter-Plaintiff. *

* * * * * * * * * * * * *

MOTION FOR SANCTIONS

Plaintiff, through counsel, says:

1. This case is a custody and child support establishment that has been pending since September 2023.

2. Plaintiff[redacted] (hereinafter referred to as "Plaintiff"), served Defendant, [redacted]n (hereinafter referred to as "Defendant") with Interrogatories and Request for Production, Inspection and Copying of Documents on March 21, 2024.

3. On May 30, 2024, Plaintiff filed a Motion to Compel Discovery and For Sanctions regarding Defendant's discovery failures. Plaintiff incorporates the allegations contained in his Motion to Compel Discovery and For Sanctions herein.

4. Plaintiff obtained an Order to Compel Discovery against Defendant on July 24, 2024, which granted Defendant ten (10) days to produce her complete answers and responses to the Interrogatories and Request for Production, Inspection and Copying of Documents previously propounded upon her.

5. As of this filing of the instant Motion, Defendant has not filed any answers to Interrogatories nor any responses to the Request for Production of Documents, which substantially causes prejudice, delay and expense to Plaintiff, who cannot adequately

prepare his case for trial.

6. In compliance with Maryland Rule 2-431, Plaintiff's counsel has corresponded with Defendant's counsel regarding Defendant's discovery failures via email on August 2, 2024 and on August 5, 2024, and via Zoom during the parties' pre-trial conference before the Court on August 7, 2024.

7. There is no just reason or excuse for the failure of Defendant to answer/respond to the Discovery propounded upon her.

8. Plaintiff seeks an Order for Sanctions against Defendant.

9. Plaintiff incurred attorney's fees in connection with the previously filed Motion to Compel and good faith attempts to resolve the discovery dispute in the amount of $332.77. Plaintiff incurred additional attorney's fees in connection with this Motion for Sanctions and good faith attempts to resolve the discovery dispute in the amount of $350.00.

10. Plaintiff seeks an Order requiring Defendant to pay him the sum of $682.77 within 10 days for her discovery failures as part of the sanctions against her.

RELIEF REQUESTED:

A. That this Court **GRANT** Plaintiff's Motion for Sanctions;

B. That this Court **PRECLUDE** Defendant from introducing any evidence or having any witnesses testify because of her failure to comply with discovery;

C. That this Court **IMPOSE** a rebuttable presumption that Plaintiff shall have sole physical and sole legal custody of the minor children of the parties;

D. That this Court **ORDER** Defendant to pay Plaintiff's Attorney's Fees and all costs associated with Plaintiff's attempt to gain Defendant's cooperation in this matter in the amount of $682.77 within 10 days of the

date of the Order; and

E. That this Court **GRANT** such other and further relief as the nature of this cause may require.

_____
[redacted]
CPF #[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing document was sent via first class U.S. mail, postage paid this _____ day of _____, 2024, to:

[redacted]
Attorney for Defendant

[redacted]
Best Interest Attorney

_____
[redacted]

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY MARYLAND

[redacted] *

Plaintiff, *

[redacted] * Case No.: [redacted]

[redacted] *

Defendant. *

* * * * * * * * * * * * *

ORDER

UPON CONSIDERATION of the aforegoing Motion for Order to Compel Discovery and for Sanctions (Interrogatories & Request for Production, Inspection, and Copying of Documents) and any response thereto, it is by the Circuit Court for Baltimore County, Maryland:

ORDERED, that said Motion for Order to Compel Discovery and for Sanctions (Interrogatories & Request for Production, Inspection, and Copying of Documents) be, and the same hereby is **GRANTED;** and it is further

ORDERED, that Plaintiff serve upon Defendant complete answer and responses to Defendant's interrogatories and document requests within ten (10) days of the date of this Order; and it is further

ORDERED, that Plaintiff shall contribute $_____ as and for Defendant's attorney's fees in connection with Defendant's Motion for Order to Compel Discovery and for Sanctions (Interrogatories & Request for Production, Inspection, and Copying of Documents), to be paid directly to Defendant's counsel within ten (10) days of the date of this Order.

_____
Judge, Circuit Court for
Baltimore County, Maryland

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY, MARYLAND

[redacted] *

Plaintiff, *

v. * Case No. [redacted]

[redacted] *

Defendant. *

* * * * * * * * * * * * *

MOTION FOR ORDER TO COMPEL DISCOVERY AND FOR SANCTIONS

(Interrogatories & Request for Production, Inspection, and Copying of Documents)

Defendant, through counsel, says:

1. Defendant [redacted] (hereinafter referred to as "Defendant"), files this Motion pursuant to Rule 2-431, Rule 2-432(b), and Rule 2-432(a).

2. Defendant served Plaintiff, [redacted] (hereinafter referred to as "Plaintiff") with Interrogatories and Request for Production, Inspection and Copying of Documents on November 5, 2025.

3. Plaintiff has not filed any answers to Interrogatories nor any responses to the Request for Production of Documents, which substantially causes prejudice, delay and expense to Defendant, who cannot adequately prepare his case for trial.

4. There is no just reason or excuse for the failure of Plaintiff to respond to the Discovery propounded upon her.

5. Defendant's counsel sent a written letter to Plaintiff's counsel on December 8, 2025 via email and First-Class US Mail postage prepaid, and left Plaintiff's counsel a voicemail on December 10, 2025, pursuant to Maryland Rule 2-431, in a good faith attempt to acquire Plaintiff's compliance with the Maryland Rules of Court. Attached

is the certification required by Rule 2-431.

6. Plaintiff replied and requested an extension through December 24, 2025, to which Defendant agreed. However, Plaintiff did not comply with extended deadline that she requested.

7. Defendant seeks an Order to Compel Discovery and for Sanctions.

RELIEF REQUESTED:

A. That this Court order Plaintiff to produce executed "Answers to Interrogatories" and "Responses to Request for Production, Inspection, and Copying of Documents" within ten (10) days of its Order;

B. That this Court pass an Order imposing such sanctions as are just;

C. That this Court order Plaintiff to pay the reasonable expenses, including attorney's fees, resulting from this discovery failure; and

D. That Defendant be awarded such other and further relief as the nature this cause may require.

_____

[redacted]
CPF #: [redacted]
[redacted]
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing document was served via MDEC and/or first-class U.S. mail, postage prepaid, on February 5, 2026, to:

[redacted]
Attorney for Plaintiff

_____
[redacted]