

**Maryland Circuit Court for Anne Arundel County**

|  |   |                             |
|--|---|-----------------------------|
| CHRISTOPHER DAVID MCKEON,                  | ) |                             |
|  | ) |                             |
| Plaintiff,                                 | ) |                             |
| v.   | ) |                             |
| Charing Cross Townhouse Condominium, Inc., | ) | Case No. 02-C-08-132379 I J |
| Joseph R. DeSantis,                        | ) |                             |
| Carol Frankhouser,                         | ) |                             |
| Kathleen Marek,                            | ) |                             |
| Michael J. Helpa,                          | ) |                             |
| COMANCO, INC.,                             | ) |                             |
| Ruth Angell,                               | ) |                             |
| Defendants.                                | ) |                             |
|  | ) |                             |

**PLAINTIFF’S REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANTS DESANTIS, MAREK, FRANKHOUSER AND HELPA**

TO: DEFENDANTS JOSEPH R. DESANTIS, KATHLEEN MAREK,  
CAROL FRANKHOUSER AND MICHAEL J. HELPA to be answered  
individually and separately

FROM: PLAINTIFF CHRISTOPHER D. MCKEON

1. You are requested to file within thirty (30) days a written response to this request  
and to produce the documents below:

a. Your written response shall state with respect to each item or category,  
that inspection-related activities will be permitted as requested, unless request is  
refused, in which event the reasons for refusal shall be stated. If the refusal relates  
to part of an item or category, that part shall be specified.

b. In accordance, the documents shall be produced as they are covered in the  
usual course of business or you shall organize and label them to correspond with  
the categories in the request.

c. These requests shall encompass all items within your possession, custody  
or control.

- d. These requests are continuing in character so as to require you to promptly amend or supplement your response if and when you obtain, create, develop, receive or in any way generate further material information such as, but not limited to, the monthly management reports sent to directors (including, but not limited to, unit activity reports, minutes of meetings, proposals, correspondence and any other document placed into the management package), all correspondence and emails pertaining to Defendant Charing Cross Townhouse Association, Inc. (“Association”).
- e. If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous in the construction used, in responding.
- f. Unless otherwise specified in a specific request below, the time period for all documents requested herein shall be April 1, 2000 through the present day.

#### DEFINITION

- 2. As used in these requests, the following terms are to be interpreted in accordance with these definitions:
  - a. The term “person” includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, state, which agencies or political subdivisions, and court, or any other governmental entity.
  - b. The terms “you” or “your” include the persons to whom these requests are addressed, and all that person's agents, representatives or attorneys.

- c. In accordance, the terms, “document” or “documents” includes all writings, drawings, graphs, charts, photographs, recordings, and any other data computations from which information can be obtained, translated, if necessary by (you), through detection devices, into reasonably usable form.
- d. The term “governing body” has the same meaning as Maryland Condominium Act § 11-101(i).
- e. The term “quoted text” or “thread” means previous and prior emails that constitute a thread or chain of communication between the specified email and those that came before it or prompted the specified email, which are often and usually quoted beneath the specified email so as to provide reference for the communication contained in the specified email.
- f. The term “native” means the original or “as normally used or stored” format for electronically created and/or stored information or data.
- g. The term “metadata” means the identifying and other data that provides knowledge of or about electronically stored information.
- h. The term “email metadata” means all header information that identifies all aspects of email such as from/to, date/time sent/received/read, subject, cc, bcc, any other parties to the email, server information, path and physical location through which the email was sent by Defendant Comanco (server information may be provided once if in so doing all emails sent through said server are identified), original attachments and all other metadata stored with the email.
- i. The term “document” includes, besides its plain meaning, electronic, paper or other materials that may be rendered into electronic or paper form.

### DOCUMENTS TO BE PRODUCED

3. Copy of your proof of ownership of a unit in the Association's condominium project, current lease or affidavit by the homeowner of record proving your legal residence.
4. All architectural/landscaping change requests for your residence or any other unit in the condominium project.
5. All election records and any records or documents related to elections from 2000 through the present day.
6. Proof of bonding pertaining to the Association.

### COMMUNICATIONS

7. All emails from any email account at work, home, or any other location, written or received by you regarding, by or about any Association business, interests or any other discussion about, including or relevant to the Association, to include all quoted text or threads and all email metadata.
8. A list of all email addresses used by you at work, home, or any other location to include ownership and/or to whom assigned, and name and contact information of email service provider.
9. A list of all telephone numbers owned or used by you to include work, home (land-line or VOIP), cellular or other type, and to include ownership and/or to whom assigned (such as a work phone).

10. All telephone records that show calls from/to, duration, date/time between any telephone number owned or used by you, listed or unlisted, and any telephone numbers now or previously owned or used by any and all directors of the Association within the specified time period of this request.

11. All correspondence individually sent to Defendant Comanco or any of its or the Association's directors, members, employees, consultants or contractors, renters, non-renters or any other person or organization residing or having an interest in the Association's condominium project.

12. All correspondence between you and the Association attorneys Michael S. Neall, Earl Schaeffer, and any others not heretofore known to Plaintiff (excluding lawfully privileged correspondence related to the above-captioned Complaint).

13. The petition calling for an audit of the Association's records (submitted to Defendant Comanco by Plaintiff May 28, 2008) provided to you by Defendant Comanco; all documents relevant and related to or regarding said petition, including documents showing its receipt by the Association secretary and you, the validation and qualification of the signatures against the member roll, the removal of signatures from said petition (to include name, address, reason removed, date removed, manner or method by which removal was determined), notification to directors and members of the Association, and all communications between Defendant Comanco, other Defendants, Plaintiff and any other person, group or organization, and the dates in which each step above was taken.

14. The petition calling for an August 21, 2008 special meeting to remove Plaintiff as a director of the Association provided to you by Defendant Comanco; all documents relevant and related to or regarding said petition, including documents showing its receipt

by the Association secretary, notification to directors and members of the Association, the removal of signatures from said petition (to include name, address, reason removed, date removed, manner or method by which removal was determined), the validation and qualification of the signatures against the member roll, and all communications between Defendant Comanco, other Defendants, Plaintiff and any other person, group or organization, and the dates in which each step above was taken.

#### QUALIFICATION AND TRAINING

15. All information regarding your employment history, qualifications, training, certificates, professional memberships for the past ten years.

#### FINANCIALS

16. All income and expense statements and records for you which show the expenditure or receipt of any monies on behalf of, or by or through, the Association and/or Defendant Comanco, showing each dollar or cent of income and expense, including the person it was received from or paid to with itemized bills or statements and the dates thereof for each, organized by year and by month within each year, and then alphabetically by name including account number and all other identifying information.

#### INSURANCE

17. List of all insurance claims by you or the homeowner(s) of record of your residence showing adjudication of the claim, amount paid by insurance and/or by the Association, a description of the casualty, whether it was covered, not covered, self-

insured by the Association, if self-insured an explanation why the casualty was paid or not paid.

#### INFORMATION TECHNOLOGY

18. A list of all computer equipment owned or operated by you, at work or at home, to include a full description of the equipment by make and model, the Internet and email provider and software used on said equipment to compose, transmit or receive any email regarding Association business.

19. All architectural/landscaping requests, along with all relevant data, dispositions, adjudications, appeals and any other such data pertinent to each such request, stored within your computer equipment or in non-electronic form in your residence. This information shall be organized per condominium unit.

#### MISCELLANEOUS

20. All notes and diaries of property walk-throughs and inspections.

21. All notes and diaries of any and all conversations by or between you or any other director or officer of the Association, Defendant Comanco and/or its employees, agents, contractors or other such person or entity, and the Association attorneys Earl Schaffer, Michael S. Neall or any other person or entity to heretofore known by Plaintiff.

Respectfully Submitted,

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Christopher McKeon, Plaintiff, *Pro Se*  
1120 Soho Court, Crofton, MD 21114  
410-271-7907

CERTIFICATE OF SERVICE

I, Christopher McKeon, Plaintiff, *Pro Se*, do hereby certify that a copy of the foregoing Request for Production of Documents has been served by First Class U.S. Mail, postage paid, this \_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, upon the following:

Comanco, Inc., and  
Ruth Angell  
c/o Thomas R. Callahan  
Callahan & Callahan, P.C.  
2133 Defense Hwy  
Crofton, MD 21114

Charing Cross Townhouse Association,  
Inc.  
c/o Owen J. Curley  
Niles, Barton & Wilmer, LLP  
111 S. Calvert Street, Suite 1400  
Baltimore, MD 21202

Joseph R. DeSantis  
1001 Shire Court  
Crofton, MD 21114

Kathleen Marek  
1008 Broderick Court  
Crofton, MD 21114

Carol Frankhouser  
1005 Shire Court  
Crofton, MD 21114

Michael J. Helpa  
1007 Broderick Court  
Crofton, MD 21114

Respectfully Submitted,

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Christopher McKeon  
Plaintiff, *Pro Se*  
410-271-7907