

PUBLIC INFORMATION ACT REQUEST

March 4, 2022

Ashley Leonard
City of Annapolis
Office of Law
160 Duke of Gloucester
Annapolis, MD

By Electronic Mail: aeleonard@annapolis.gov

Re: Certain Correspondence

Dear Ms. Leonard:

On behalf of Energy Policy Advocates, and pursuant to the Maryland Public Information Act, G.P. §§ 4-101 - 4-601, I hereby request copies of:

1) All civil discovery requests (including but not limited to notices of deposition, interrogatories, and requests for production of documents) which the City has sent to any plaintiff in any action in which the City or any of its agencies or officers was a named defendant and in which the sole cause of action was stated by such plaintiff(s) as arising out of the Maryland Public Information Act.

2) All responses which the City received from the aforementioned plaintiff(s) to its discovery requests.

3) All motions to compel discovery, or memoranda in opposition to motions to compel discovery, which the City has filed in any action in which the Complaint cited or the sole cause of action arose from the Maryland Public Information Act.

We limit this request to items sent or received by the City in the past five years.

We look forward to your response. If you have any questions, do not hesitate to contact me by email at schilling@allhookedup.com.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'R' followed by a long horizontal line that ends in a small loop.

Rob Schilling