

BRYAN CANARY

Plaintiff

v.

GORDON BROWN

Defendant

IN THE

DISTRICT COURT

OF MARYLAND FOR

BALTIMORE CITY

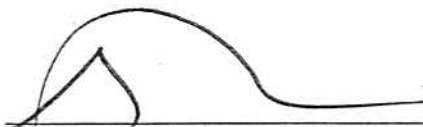
CASE NO.: 010100044122017

Trial Date: May 23, 2017

NOTICE OF INTENT TO DEFEND

Please enter the appearance of Stavros A. Papaminas as attorney for the Defendant, Gordon Brown, and for Answer to the Plaintiff's Complaint says:

1. That the Defendant generally denies the allegations set forth in all counts.
2. That the Plaintiff's claim for relief is barred by contributory negligence.
3. That the Plaintiff's claim for relief is barred by assumption of risk.
4. That the Complaint fails to state a claim upon which relief can be granted.



STAVROS A. PAPAMINAS-Staff Counsel
District Court ID No. (6696)
Allstate Insurance Company
300 East Lombard Street, Suite 1201
Baltimore, MD 21202
Telephone: (410) 361-8744
Attorney for Defendant
Gordon Brown

kmp

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed first class, postage prepaid, this 11 day of April, 2017, to:

David W. Clayton, Esquire
11 E. Lexington Street, 3rd Floor
Baltimore, MD 21202
Attorney for Plaintiff


STAVROS A. PAPAMINAS

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**CERTIFICATE REGARDING DISCOVERY
AND NOTICE OF SERVICE**

I HEREBY CERTIFY that on this 11 day of April, 2017, I served on all counsel and pro se parties hereto by mail, postage prepaid, a copy of Defendant's Interrogatories propounded to the Plaintiff together with a copy of this Notice and that I will retain the original of these documents in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted, to:

David W. Clayton, Esquire
11 E. Lexington Street, 3rd Floor
Baltimore, MD 21202
Attorney for Plaintiff


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INTERROGATORIES

PROPOUNDED PURSUANT TO THE MARYLAND RULES

TO: Bryan Canary, Plaintiff

BY: Gordon Brown, Defendant

You are requested to answer the following Interrogatories:

(a) These Interrogatories are continuing in character, so as to require you to file supplementary Answers if you obtain further or different information before trial.

(b) Where the name or identity of a person is requested, please state full name, home address, and also business address, if known.

(c) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the pleadings.

(d) Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives and, unless privileged, his attorneys. When answer is made by a corporation, state the name, address and title of the person supplying the information, and making the affidavit, and the source of his information.

(e) The pronoun "you" refers to the party to whom these Interrogatories are addressed, and the persons mentioned in clause (d).

1. Identify with specificity all of the false or malicious or defamatory statements claimed to have been made by the defendant, of or concerning you, in the subject complaint, and, state: a. the words that you claim were defamatory; b. the date when and the place where the words were spoken or published; and c. the name and address of each person to whom these words were uttered or published.

2. State the name and address of each person who ridiculed you or held you in contempt as a result of any statements claimed to have been made by the defendant.

3. State the name and address of each person who has knowledge of your reputation in the community.

4. State how and in what manner your reputation has been injured, including the name and address of each person in whose opinion your reputation has been damaged, as a result of the acts listed in the complaint.

5. State whether you have engaged in any conversation with any other person since the date when the alleged defamatory statements were supposedly made regarding the allegedly slanderous statements that you claim were made, and, if so, state: a. the time and place of each conversation; b. the name and address of each person present at such conversation; and c. the comments of each person in regard to the allegedly slanderous statements that you claim were made.

6. Identify all personnel of the plaintiff business entity employed by the business entity at the time when the alleged defamatory statements were allegedly made by the defendants, setting forth for each: a. the person's name, title or position, and current address; b. the time period for which the individual was or has been employed by the plaintiff business entity.

7. State with particularity the factual basis for the plaintiff's allegation that each of the defamatory statements were entirely false, including the manner in which the plaintiff business entity knows that each statement is not true in any respect.

8. State with particularity the factual basis for the plaintiff's allegation that each of the defamatory statements made by the defendant were false and: a. known by the defendant to be false; and/or b. made with reckless disregard for the truth or falsity of the matters asserted.

9. Describe with particularity the loss of business damages that the plaintiff claims to have incurred as a result of the alleged defamation described in the complaint, setting forth: a. each item of lost business; b. the name and address of each person or entity with whom the business would have been; c. the amount claimed to have been lost by the

plaintiff business entity in connection with each item; and d. a detailed description of the manner in which the plaintiff business entity has determined that the loss of each item of business was a result of the alleged defamation.

10. State whether the plaintiff business entity, its agents, or its attorneys obtained any statements from any person who has knowledge or information of the matters and incidents described in the complaint, and, if so, set forth for each: a. the name and address of each person; b. the date of the statement; c. whether the statement was written or oral; d. if oral, the substance of the statement; and e. if written, identify and attach a copy of each written statement.


11. State the names and addresses of all persons having knowledge or information of the matters and incidents described in the complaint filed in this case.

12. Provide the name and address of every person, government agency, corporation, or other entity that has withdrawn business from the plaintiff business entity, or declined to do business with the plaintiff business entity, as a result of the defamation alleged in this action.

13. With respect to the plaintiff's business entity's revenue, set forth: a. the plaintiff's business entity's revenue for the year before the alleged defamatory statements were allegedly made by the defendants; b. the plaintiff business entity's revenue for the year in which the alleged defamatory statements were allegedly made by the defendants; and c. the prior year's projected revenue or estimated revenue for the year in which the alleged defamatory statements were allegedly made by the defendants.

14. Prior to entering into the short-term rental agreement with the Defendant referenced in the Complaint, were you aware of any potential utility or heating issues with the subject property. If your answer is yes, did you warn the Defendant of a potential heating issue before execution of the rental agreement.

15. State whether prior to September 23, 2016 any part of the heating system on the subject property underwent any repair or maintenance. If the answer is yes, state the name and address of the person who performed the repair, the dates of such work, and a brief description of the work performed.



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MOTION FOR PRIORITY TRIAL

NOW COMES, Gordon Brown, Defendant, by her attorney, Stavros A.

Papaminas and in support of his Motion for Priority Trial, states as follows:

1. Counsel for the Defendant requests that this case be given a priority trial given the fact that the Defendant, Gordon Brown resides in New York.
2. It would be patently unfair for him to incur the expense of traveling from out of State and not get reached at trial.



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STAVROS A. PAPAMINAS