

**I HEREBY CERTIFY that, on this 13th day of July, 2023, a true and correct copy of the foregoing Claimant's answers to Respondent First Set of Interrogatories was served via electronic mail upon the following:**

Lucas F. Webster

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**Counsel for Respondent**

**Chair, Board of Directors Leisure World Community Corp.**

(signed) *s.katzman*

**s.katzman**

Pro Se

Docket 39(g)  
OZAH Referral No: HR 23-01

**BEFORE THE MONTGOMERY COUNTY  
COMMISSION ON HUMAN RIGHTS  
Case Review Board**

**OFFICE OF ZONING AND ADMINISTRATIVE HEARINGS**  
Stella B. Werner Council Office Building  
100 Maryland Avenue, Suite 200  
Rockville, Maryland 20850

<b>SHERYL KATZMAN</b>	*	
Claimant	*	
v.	*	Human Rights Commission
		HRC No. REH-06711
<b>CHAIR, BOARD OF DIRECTORS LEISURE WORLD COMMUNITY CORP.</b>	*	OZAH Referral No. HR 21-02
Respondent.	*	Before: Kathleen E. Byrne, Hearing Examiner
	*	
* * * * *	*	* * * * *

**RESPONDENT'S FIRST SET OF INTERROGATORIES  
TO CLAIMANT SHERYL KATZMAN**

**To: Sheryl Katzman, Claimant**

**From: Chair, Board of Directors Leisure World Community Corp., Respondent**

## **INTERROGATORIES**

**INTERROGATORY NO. 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 each person identified. (Standard General Interrogatory No. 1.)

### **ANSWER TO INTERROGATORY NO. 1:**

Marc Erlich, Mont. Co. Executive, Brian Frosh, former State of Maryland Attorney General , Peter Drymalski-CCOC

Barbara Braswell (deceased LWCC BOD) Paul Bessel, David Frager, former LWCC BOD Chair

**INTERROGATORY NO. 2:** Identify yourself and all individuals with whom you reside. For each individual other than yourself, state that individual's age and whether they have the capability to understand, read and write English, and if not, state why that is the case.

### **ANSWER TO INTERROGATORY NO. 2:**

sheryl katzman

**INTERROGATORY NO. 3:** If you intend to rely upon any evidence, documents, electronically stored information, or 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, electronically stored information, and tangible things, and identify all persons having possession, custody, or control of them. (Standard General Interrogatory No. 3 (modified))

**ANSWER TO INTERROGATORY NO. 3:**

CCOC complaint #89-10 & 91-10 - resolution #11-3/11/11

CCOC staff email datd 4/27/16 Braswell 8/27/18 email to LW BOD Frager 5/8/17 notice to LW BOD

**INTERROGATORY NO. 4:** Identify all laws, statutory provisions, codes, rules, ordinances and/or regulations upon which you rely to support any element of your claims against Respondent in this Action.

**ANSWER TO INTERROGATORY NO. 4:**

Mont.Co. Code Chapter 27 ADA Act - Title VI

Office of Attorney General - letter

**INTERROGATORY NO. 5:** Identify each and every instance of what you contend to be the discriminatory conduct committed by Leisure World against you.

**ANSWER TO INTERROGATORY NO. 5:**

see #6 below

**INTERROGATORY NO. 6:** Identify each and every instance of what you contend to be retaliatory conduct committed by Leisure World against you.

**ANSWER TO INTERROGATORY NO. 6:** (starting 2015 —includes but not limited to:

7/29/22 10/09/20,9/18/19,7/8/19,9/17/18

retaliatory conduct includes failure to comply with multiple HOA Books and records requests as well as Md. AG complaints

**INTERROGATORY NO. 7:** Identify and describe all of the relief you seek in this Action, including but not limited to any reasonable accommodations, economic damages, non-economic damages, or other relief, and included in your answer the factual and/or legal basis for each element of relief sought, the identification of all persons having personal knowledge of each element of relief, and all documents relating to each element of relief.

**ANSWER TO INTERROGATORY NO. 7:**

provide requested ADA reasonable accommodation for use of recorder, \$20k damages - too many to list

**INTERROGATORY NO. 8:** Itemize and show how you calculate any economic damages claimed by you in this action, and describe any non-economic damages claimed. (Standard General Interrogatory No. 4)

**ANSWER TO INTERROGATORY NO. 8:**

Sec.27-8 Mont. Co. Code/ADA-Title III

**INTERROGATORY NO. 9:** Identify all individuals and/or governmental agencies or entities with whom you have had communications (written or oral) regarding the subject matter of this Action and describe in detail all communications with those individuals, agencies, or entities identified including the date of the communication, the persons included in the communication and the substance of the communication.

**ANSWER TO INTERROGATORY NO. 9:**

Mont.Co. HRC staff/Montgomery County Exec. & County Council, Leisure World BOD, Leisure World community residents, LWMC staff members, Mid-Atlantic ADA Center, US Dept. of Justice-Civil Rights Div. my physicians, Md.State elected representatives ACLU, multiple lawyers, Disability Rights Md.

**INTERROGATORY NO. 10:** Identify each person who drafted, participated in drafting, commented upon, or supplied information for use in any response to these interrogatories. For each such person, identify the interrogatory response(s) in which the person was involved and the extent and nature of the involvement.

**ANSWER TO INTERROGATORY NO. 10:**

s.katzman