

Notice of Non-Compliance with Limited Settlement Agreement

TO: Office of Zoning and Administrative Hearings (OZAH)
ATTN: Khandikile Mvunga Sokoni, Hearing Examiner
CC: Brian R. Fellner, Esq. (Respondent's Counsel)

RE: CCOC Case No. 2025-076 / OZAH Referral No. CCOC 26-01

DATE: January 6, 2026

Notice of Breach of Limited Settlement Agreement and Procedural Decision

I am writing to formally notify the Office of Zoning and Administrative Hearings (OZAH) that the Respondent, Kenwood Place Condominium, has failed to comply with the terms of the Limited Settlement Agreement and Limited Mutual Release executed on October 14, 2025.

Specifically, the Respondent has failed to meet the following obligations:

1. Failure to Inspect (Negligent Maintenance): The agreement required a certified plumber for the Respondent to inspect the plumbing/pipes associated with Unit #137 within 30 days of October 10, 2025. To date, no such inspection has occurred.
2. Failure to Provide Guidance (Proxies/Ballots): Counsel for the Respondent was required to notify the CCOC via email regarding the status of the proxies and furnish a copy of the CCOC's guidance by October 24, 2025, including me as a "cc". I have received no such communication.

Under the terms of the Agreement, failure to adhere to any provision is a Class A violation. Furthermore, because the agreement contains a "No Severability" clause, the failure to perform these specific duties renders the remaining portions of the agreement—including the limited release of claims—invalid.

I intend to discuss these failures as a "preliminary matter" during the scheduled pre-hearing conference on January 13, 2026. I request that the "Negligent Maintenance" and "Election/Proxy" issues remain active for the public hearing on May 12, 2026.

Respectfully,



Mary Dolbashian, Complainant

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2026, a copy of the foregoing Notice of Non-Compliance was sent via email and first-class mail, postage prepaid, to:

Brian R. Fellner, Esq.
Fellner Legal Services, LLC
485 Ritchie Highway, #203-D
Severna Park, MD 21146
bfellner@flslawyer.co

Mary Dolbashian

A handwritten signature in black ink that reads "Mary Dolbashian". The signature is fluid and cursive, with "Mary" on the top line and "Dolbashian" on the bottom line.