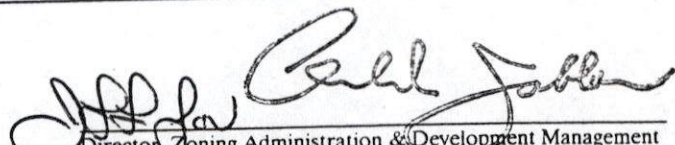


USE PERMIT



IT IS ORDERED by the Director of Zoning Administration & Development Management of Baltimore County, this 21ST day of FEBRUARY, 1996, that 7503 PARK HEIGHTS AVE (street address) should be and the same is hereby granted permission to operate a CLASS "A" ASSISTED LIVING (ALF) FACILITY FOR A MAXIMUM OF 12 (ALF) RESIDENTS.

Permit Number


Director, Zoning Administration & Development Management

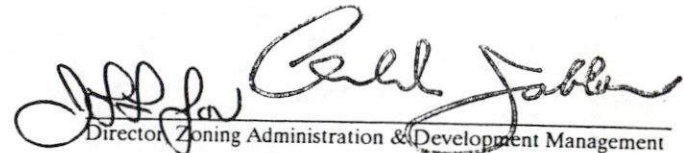
ORIGINAL MAILED TO APP. 2/21/96.
BLDG PERMIT RELEASED.
UNDER B258970 FOR ZONING + P.S.

USE PERMIT



IT IS ORDERED by the Director of Zoning Administration & Development Management of Baltimore County, this 21ST day of FEBRUARY, 1996, that 7503 PARK HEIGHTS AVE (street address) should be and the same is hereby granted permission to operate a CLASS "A" ASSISTED LIVING (ALF) FACILITY FOR A MAXIMUM OF 12 (ALF) RESIDENTS.

Permit Number



Director, Zoning Administration & Development Management

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

No.

011075

ck# 2829

20016150

DATE

1/26/96

ACCOUNT

AMOUNT

\$

40.00

RECEIVED
FROM:

LOPES

FOR:

USE PERMIT (ALF) APPLICATION
7503 PARK HTS AVE.

03A91#0171MICHRC

BA C002:26FMD1-26-96

\$40

DISTRIBUTION

WHITE - CASHIER

PINK - AGENCY

YELLOW - CUSTOMER

VALIDATION OR SIGNATURE OF CASHIER

INTER-OFFICE CORRESPONDENCE
RECOMMENDATION FORM

TO: Director, Office of Planning & Community Conservation
Attention: Ervin McDaniel
County Courts Building, Room 406
401 Bosley Avenue
Towson, MD 21204

PDM ALF # _____

Permit No. (if required) B 258970

FROM: Arnold Jablon, Director
Department of Permits & Development Management

RE: Assisted Living Facility (Class "A")

Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 1994, this office is requesting recommendations and comments from the Office of Planning and Community Conservation prior to this office's approval of a building/use permit.

MINIMUM APPLICANT SUPPLIED INFORMATION:

410-461-7722

SLADE MANSION LLC 9455 Balto National Pike Ellicott City
Print Name of Applicant Address Telephone Number

7503 Park Heights Ave Election District 3 Councilmanic District 2 Square Feet 44,000
Lot Address (street)

Lot Location: NES W side corner of Park Heights Ave, 400 feet from NB SW corner of Slade & Park Heights
(street) (street)

Land Owner: HANAN, Carol Sibel Tax Account Number 03-19-044700

Address: 7503 Park Heights Ave Telephone Number () _____

CHECKLIST OF MATERIALS- (to be submitted by applicant for required compatibility and/or appearance review by the Office of Planning and Community Conservation)

TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONLY

1. This Recommendation Form (3 copies)

PROVIDED?
YES ☒ NO ☐
Accepted for filing by [Signature]
Date: 2/26/96

2. Permit Application (if available)

☒ ☐

3. Site Plan

Property (3 copies): including lot size and square feet of buildings, parking and open space - minimum 500 square

☒ ☐

Topo Map (2 copies): available in Room 208, County Office Building - (please label site clearly)

☒ ☐

Statement as to whether or not building has been enlarged by 25% or more in the last five (5) years

☒ ☐

4. Building Elevation Drawings WAIVED

☐ WAIVED

5. Photographs (please label all photos clearly)

Adjoining Buildings

Surrounding Neighborhood

☒ ☐
☒ ☐

6. Current Zoning Classification: DR-2

TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONING ONLY

RECOMMENDATIONS / COMMENTS:

☒ Approval ☐ Disapproval ☐ Approval conditioned on required modifications of the application to conform with the following recommendations:

Signed by: Francis Morsey
for the Director, Office of Planning and Community Conservation

Date: 2/20/96

INTER-OFFICE CORRESPONDENCE
RECOMMENDATION FORM

TO: Director, Office of Planning & Community Conservation
Attention: Ervin McDaniel
County Courts Building, Room 406
401 Bosley Avenue
Towson, MD 21204

PDM ALF # _____

Permit No. (if required) B 258970

FROM: Arnold Jablon, Director
Department of Permits & Development Management

RE: Assisted Living Facility (Class "A")

MAIL TO

Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 1994, this office is requesting recommendations and comments from the Office of Planning and Community Conservation prior to this office's approval of a building/use permit.

MINIMUM APPLICANT SUPPLIED INFORMATION:

410-461-7722

Print Name of Applicant SLADE MANSION LLC Address 9455 Baltimore National Pike Telephone Number Ellicott City

Lot Address 7503 PARK HEIGHTS AVE Election District 3 Councilmanic District 2 Square Feet 44,000

Location: NES W side corner of PARK HEIGHTS AVE, 400 feet from NES W corner of Sonder Park Heights (street) (street)

Land Owner: HANAN, CAROL SIBEL Tax Account Number 03-19-044700

Address: 7503 PARK HEIGHTS AVE Telephone Number () _____

CHECKLIST OF MATERIALS- (to be submitted by applicant for required compatibility and/or appearance review by the Office of Planning and Community Conservation)

TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONLY

1. This Recommendation Form (3 copies)

PROVIDED?
YES ☒ NO ☐
Accepted for filing by [Signature]
Date: 1/26/96

2. Permit Application (If available)

☒ ☐

3. Site Plan

Property (3 copies): including lot size and square feet of buildings, parking and open space - minimum 500 square

☒ ☐

Topo Map (2 copies): available in Room 206, County Office Building - (please label site clearly)

☒ ☐

Statement as to whether or not building has been enlarged by 25% or more in the last five (5) years

☒ ☐

4. Building Elevation Drawings WAIVED

☐ WAIVED

5. Photographs (please label all photos clearly)

Adjoining Buildings
Surrounding Neighborhood

☒ ☐

6. Current Zoning Classification: DR-2

TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONING ONLY

RECOMMENDATIONS / COMMENTS:



Approval



Disapproval



Approval conditioned on required modifications of the application to conform with the following recommendations:

Signed by: Francis Morsey
for the Director, Office of Planning and Community Conservation

Date: 2/20/96

INTER-OFFICE CORRESPONDENCE
RECOMMENDATION FORM

TO: Director, Office of Planning & Community Conservation
Attention: Ervin McDaniel
County Courts Building, Room 406
401 Bosley Avenue
Towson, MD 21204

PDM ALF # _____

Permit No. (if required) B 258970

FROM: Arnold Jablon, Director
Department of Permits & Development Management

RE: Assisted Living Facility (Class "A")

Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 1994, this office is requesting recommendations and comments from the Office of Planning and Community Conservation prior to this office's approval of a building/use permit.

MINIMUM APPLICANT SUPPLIED INFORMATION:

410-461-7722

Print Name of Applicant SLADE MANSION LLC Address 9455 Baltimore National Pike Ellicott City Telephone Number _____

Lot Address 7503 Park Heights Ave Election District 3 Councilmanic District 2 Square Feet 44,000

Lot Location: NES W side corner of Park Heights Ave (street) 400 feet from NES W corner of Slade's Park Heights (street)

Land Owner: HANAM: CAROL SIBEL Tax Account Number 03-19-044700

Address: 7503 Park Heights Ave Telephone Number () _____

CHECKLIST OF MATERIALS- (to be submitted by applicant for required compatibility and/or appearance review by the Office of Planning and Community Conservation)

TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONLY!

1. This Recommendation Form (3 copies)

PROVIDED?
YES ☒ NO ☐
Accepted for filing by [Signature]
Date: 1/26/96

2. Permit Application (If available)

☒ YES ☐ NO

3. Site Plan

Property (3 copies): including lot size and square feet of buildings, parking and open space - minimum 500 square

☒ YES ☐ NO

Topo Map (2 copies): available in Room 206, County Office Building - (please label site clearly)

☒ YES ☐ NO

Statement as to whether or not building has been enlarged by 25% or more in the last five (5) years

☒ YES ☐ NO

4. Building Elevation Drawings WAIVED

☐ YES ☒ NO WAIVED

5. Photographs (please label all photos clearly)

Adjoining Buildings
Surrounding Neighborhood

☒ YES ☐ NO

6. Current Zoning Classification: DR-2

TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONING ONLY!

RECOMMENDATIONS / COMMENTS:

☒ Approval ☐ Disapproval ☐ Approval conditioned on required modifications of the application to conform with the following recommendations:

Signed by: Francis Morsey
for the Director, Office of Planning and Community Conservation

Date: 2/20/96

**INTER-OFFICE CORRESPONDENCE
RECOMMENDATION FORM**

TO: Director, Office of Planning & Community Conservation
Attention: Ervin McDaniel
County Courts Building, Room 406
401 Bosley Avenue
Towson, MD 21204

PDM ALF # _____

Permit No. (if required) B 258970

FROM: Arnold Jablon, Director
Department of Permits & Development Management

RE: Assisted Living Facility (Class "A")

Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 1994, this office is requesting recommendations and comments from the Office of Planning and Community Conservation prior to this office's approval of a building/use permit.

MINIMUM APPLICANT SUPPLIED INFORMATION:

410-461-7722

SLADE MANSION LLC 9455 Ba Ho National Pike Ellicott City
Print Name of Applicant Address Telephone Number

Lot Address 7503 PARK HEIGHTS AVE Election District 3 Councilmanic District 2 Square Feet 44,000

Lot Location: NES W side corner of Park Heights Ave, 400 feet from NB S W corner of Slade & Park Heights
(street) (street)

Land Owner: HANAN, Carol Sibel Tax Account Number 03-19-044700

Address: 7503 PARK HEIGHTS AVE Telephone Number () _____

CHECKLIST OF MATERIALS- (to be submitted by applicant for required *compatibility* and/or *appearance* review by the Office of Planning and Community Conservation)

TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONLY!

1. This Recommendation Form (3 copies)

PROVIDED?		Accepted for filing by <u>[Signature]</u> Date: <u>2/26/96</u>
YES	NO	
☒	☐	

2. Permit Application (if available)

☒	☐
-------------------------------------	--------------------------

3. Site Plan

Property (3 copies): including lot size and square feet of buildings, parking and open space - minimum 500 square

☒	☐
-------------------------------------	--------------------------

Topo Map (2 copies): available in Room 208, County Office Building - (please label site clearly)

☒	☐
-------------------------------------	--------------------------

Statement as to whether or not building has been enlarged by 25% or more in the last five (5) years

☒	☐
-------------------------------------	--------------------------

4. Building Elevation Drawings WAIVED

☐	<u>WAIVED</u>
--------------------------	---------------

5. Photographs (please label all photos clearly)

Adjoining Buildings
Surrounding Neighborhood

☒	☐
-------------------------------------	--------------------------

6. Current Zoning Classification: DR-2

TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONING ONLY!

RECOMMENDATIONS / COMMENTS:

☒ Approval ☐ Disapproval ☐ Approval conditioned on required modifications of the application to conform with the following recommendations:

Signed by: Francis Mowsey
for the Director, Office of Planning and Community Conservation

Date: 2/20/96

INTER-OFFICE CORRESPONDENCE
RECOMMENDATION FORM

TO: Director, Office of Planning & Community Conservation
Attention: Ervin McDaniel
County Courts Building, Room 406
401 Bosley Avenue
Towson, MD 21204

PDM ALF # _____

Permit No. (if required) B 258970

FROM: Arnold Jablon, Director
Department of Permits & Development Management

RE: Assisted Living Facility (Class "A")

ORIGINAL
FILE ETC TO
OPDC 1/26/96 JAP

Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 1994, this office is requesting recommendations and comments from the Office of Planning and Community Conservation prior to this office's approval of a building/use permit.

MINIMUM APPLICANT SUPPLIED INFORMATION:

410-461-7722

Print Name of Applicant SLADE MANSION LLC Address 9455 Balto National Pike Ellicott City Telephone Number _____

Lot Address 7503 Park Heights Ave Election District 3 Councilmanic District 2 Square Feet 44,000

Lot Location: NES W side/corner of Park Heights Ave 400 feet from NES W corner of Slade & Park Heights
(street) (street)

Land Owner: HANAN, Carol Sibel Tax Account Number 03-19-044700

Address: 7503 Park Heights Ave Telephone Number () _____

CHECKLIST OF MATERIALS- (to be submitted by applicant for required compatibility and/or appearance review by the Office of Planning and Community Conservation)

TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONLY!

	PROVIDED?		Accepted for filing by Date: <u>1/26/96</u> JAP
	YES	NO	
1. This Recommendation Form (3 copies)	☒	☐	
2. Permit Application (If available)	☒	☐	
3. Site Plan			
Property (3 copies): including lot size and square feet of buildings, parking and open space - minimum 500 square	☒	☐	
Topo Map (2 copies): <u>available</u> in Room 206, County Office Building - (please label site clearly)	☒	☐	
Statement as to whether or not building has been enlarged by 25% or more in the last five (5) years	☒	☐	
4. Building Elevation Drawings	☐	☒ <u>WAIVED</u>	
5. Photographs (please label all photos clearly)			
Adjoining Buildings	☒	☐	
Surrounding Neighborhood	☒	☐	
6. Current Zoning Classification: <u>DR-2</u>			

TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONING ONLY!

RECOMMENDATIONS / COMMENTS:

☐ Approval ☐ Disapproval ☐ Approval conditioned on required modifications of the application to conform with the following recommendations:

Signed by: _____
for the Director, Office of Planning and Community Conservation

Date: _____

INTER-OFFICE CORRESPONDENCE
RECOMMENDATION FORM

TO: Director, Office of Planning & Community Conservation
Attention: Ervin McDaniel
County Courts Building, Room 406
401 Bosley Avenue
Towson, MD 21204

PDM ALF # _____

Permit No. (if required) B 258970

FROM: Arnold Jablon, Director
Department of Permits & Development Management

RE: Assisted Living Facility (Class "A")

Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 1994, this office is requesting recommendations and comments from the Office of Planning and Community Conservation prior to this office's approval of a building/use permit.

MINIMUM APPLICANT SUPPLIED INFORMATION:

410-461-7722

SHADE Mansion LLC 9455 BalHo National Pike Ellicott City
Print Name of Applicant Address Telephone Number

Lot Address 7503 Park Heights Ave Election District 3 Councilmanic District 2 Square Feet 44,000

Lot Location: NES W side/corner of Park Heights Ave, 400 feet from NES W corner of Shade & Park Heights
(street) (street)

Land Owner: HANAN: CAROL SIBEL Tax Account Number 03-19-044700

Address: 7503 Park Heights Ave Telephone Number () _____

CHECKLIST OF MATERIALS- (to be submitted by applicant for required *compatibility* and/or *appearance* review by the Office of Planning and Community Conservation)

TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONLY

1. This Recommendation Form (3 copies)

PROVIDED?
YES ☒ NO ☐
Accepted for filing by [Signature]
Date: 1/26/96

2. Permit Application (If available)

☒ ☐

3. Site Plan

Property (3 copies): including lot size and square feet of buildings, parking and open space - minimum 500 square

☒ ☐

Topo Map (2 copies): *available* in Room 206, County Office Building - (please label site clearly)

☒ ☐

Statement as to whether or not building has been enlarged by 25% or more in the last five (5) years

☒ ☐

4. Building Elevation Drawings WAIVED

☐ WAIVED

5. Photographs (please label all photos clearly)

Adjoining Buildings

Surrounding Neighborhood

☒ ☐

6. Current Zoning Classification: DR-2

TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONING ONLY

RECOMMENDATIONS / COMMENTS:

☐ Approval ☐ Disapproval ☐ Approval conditioned on required modifications of the application to conform with the following recommendations:

Signed by: _____
for the Director, Office of Planning and Community Conservation

Date: _____



Baltimore County
Department of Permits and
Development Management

Development Processing
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204
pdmlandacq@co.ba.md.us

September 11, 2002

Roger N. Powell, Esq.
107 Old Court Road
Pikesville, MD 21208

Re: KLF Assisted Living, LLC, Et. Al. vs. Slade Mansion, LLC

Dear Mr. Powell:

Your recent letter to this department was forwarded to me for reply. In response to your request and your phone conversations with Carl Richards, Zoning Review Supervisor, and after extensive review of the available records, the following has been determined:

- 1.) No applications for variance and/or special exception have been made by Charles Nemphos, individually or in the name of Slade Mansion, LLC from January 1, 1999 through the present date.
- 2.) No applications for building permits have been made by Charles Nemphos, individually or in the name of Slade Mansion, LLC from January 1, 1999 through the present date.

Since no written records are available regarding the above for the period of January 1, 1999 to the present date, unless we hear from you otherwise, no person from this office will appear for the scheduled deposition.

I trust that the information set forth herein is sufficiently detailed and responsive to your request. If you need further information or have any questions, please do not hesitate to contact me at 410-887-3391.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey N. Perlow".

Jeffrey N. Perlow, Planner II
Zoning Review Office

JNP

Come visit the County's Website at www.co.ba.md.us



Printed with Soybean Ink
on Recycled Paper

Law Offices
ROGER N. POWELL
107 Old Court Road
Pikesville, Maryland 21208

9/9/02
WCR
see me
y

Telephone (410) 653-0262

Facsimile (410) 653-5057

September 4, 2002

Custodian of Records (Director of Zoning, P.D.M.)
Baltimore County Dept. Of Zoning
111 W. Chesapeake Avenue, Room 111
Towson, MD 21204

Re: KLF Assisted Living, LLC vs. Slade Mansion LLC

Dear Custodian:

Enclosed please find Subpoena Duces Tecum and Notice to Take Document Deposition Duces Tecum relative to the above captioned matter. Please be advised that if you supply to this office by return mail the requested records together with a certification that the records supplied are a true copy of the records made and maintained by you, then, it will not be necessary for you to personally appear for the deposition.

Please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,

Roger N. Powell

RNP/ejl



CIRCUIT COURT FOR BALTIMORE COUNTY

SUZANNE MENSH, CLERK
COUNTY COURTS BUILDING
401 BOSLEY AVENUE
P.O. BOX 8754
TOWSON, MARYLAND 21285-8754

KLF ASSISTED LIVING, LLC, ET AL

Case Number 03-C-01-011764

(X) Civil

() Criminal

Vs.

SLADE MANSION, LLC

SUBPOENA DUCES TECUM

STATE OF MARYLAND, BALTIMORE COUNTY TO WIT:

TO: (Name, Address, County)

Custodian of Records (Director of Zoning, P.D.M.)
Baltimore County Department of Zoning
111 W. Chesapeake Avenue, Room 111
Towson, MD 21204

YOU ARE HEREBY COMMANDED TO: () Personally appear () Produce documents and or objects only
(X) Personally appear and produce documents or objects:

at Law Office of Roger N. Powell, 107 Old Court Rd. Baltimore, MD 21208
Place where attendance is required:

on Monday the 30th day of September XX 2002 at 10:00 a.m. XXX

YOU ARE COMMANDED TO produce the following documents or objects:

See attached Notice to Take Document Deposition Duces Tecum

Subpoena requested by (X) Plaintiff: () Defendant: and any questions should be referred to:

(410) 653-0262

Roger N. Powell, Esq. 107 Old Court Rd., Balto MD 21208
(Name of Party or Attorney, Address and Phone Number)

Date issued 9/4/02

CLERK



NOTICE:

- (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE FOR FAILURE TO OBEY THIS SUBPOENA.
- (2) This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.
- (3) If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate a person to testify pursuant to Rule 2-412(d).

SHERIFF'S RETURN

() Served and copy delivered on date indicated below.

() Inserved. by reason of _____

Date: _____ Fee: \$ _____

SHERIFF

Original and one copy needed for each witness

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

KLF ASSISTED LIVING, LLC

Plaintiff

VS.

SLADE MANSION, LLC

Defendant

Case no: 03-C-01-011764

NOTICE TO TAKE DOCUMENT DEPOSITION DUCES TECUM

The Plaintiff will take the deposition of the below named deponent on the following date, time and location, before a Notary Public or a person qualified to record the deposition testimony, said deposition to continue from day to day until complete.

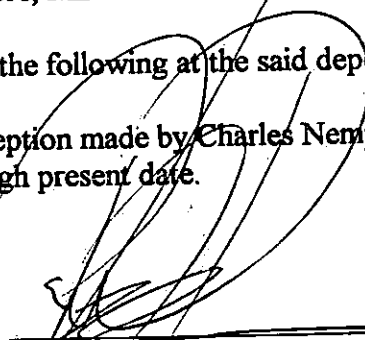
DEPONENT: Custodian of Records (Director of Zoning, P.D.M.)
Baltimore County Department of Zoning
111 W. Chesapeake Avenue
Towson, MD 21204

DATE & TIME: Monday, September 30, 2002 - 10:00 AM

LOCATION: Law Offices of Roger N. Powell
107 Old Court Road, Baltimore, MD 21208

The deponent is commanded to appear and produce the following at the said deposition:

For all applications for variance or special exception made by Charles Nemphos, individually or in the name of Slade Mansion, LLC, 1/1/99 through present date.



ROGER N. POWELL
107 Old Court Road
Baltimore, MD 21208
(410) 653-0262
Attorney for Plaintiff

PLEASE NOTE THAT THIS IS A DOCUMENT DEPOSITION ONLY. PERSONAL ATTENDANCE WILL NOT BE REQUIRED SCHEDULED IF THE DOCUMENTS ARE PRODUCED TO THIS OFFICE PRIOR TO THE DATE AND TIME SCHEDULED.

Law Offices
ROGER N. POWELL
107 Old Court Road
Pikesville, Maryland 21208

Telephone (410) 653-0262

Facsimile (410) 653-5057

September 4, 2002

Custodian of Records
Baltimore County Dept. Of Permits & Licenses, Room 100
111 W. Chesapeake Avenue
Towson, MD 21204

7503
Park Heights Ave

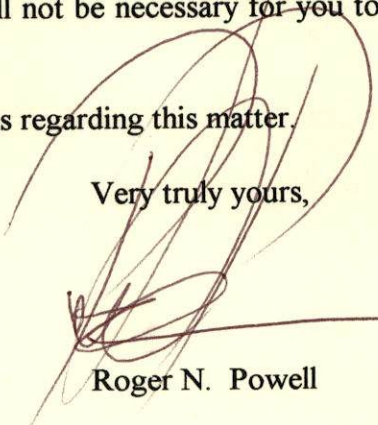
Re: KLF Assisted Living, LLC vs. Slade Mansion LLC

Dear Custodian:

Enclosed please find Subpoena Duces Tecum and Notice to Take Document Deposition Duces Tecum relative to the above captioned matter. Please be advised that if you supply to this office by return mail the requested records together with a certification that the records supplied are a true copy of the records made and maintained by you, then, it will not be necessary for you to personally appear for the deposition.

Please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,


Roger N. Powell

RNP/ejl



CIRCUIT COURT FOR BALTIMORE COUNTY

SUZANNE MENSCH, CLERK
COUNTY COURTS BUILDING
401 BOSLEY AVENUE
P.O. BOX 8754
TOWSON, MARYLAND 21285-8754

KLF ASSISTED LIVING, LLC, ET AL

Case Number 03-C-01-011764

(X) Civil

() Criminal

Vs.

SLADE MANSION, LLC

SUBPOENA DUCES TECUM

STATE OF MARYLAND, BALTIMORE COUNTY TO WIT:

TO: (Name, Address, County)

Custodian of Records
Baltimore County Dept. of Permits & Licenses, Room 100
111 W. Chesapeake Avenue
Towson, MD 21204

YOU ARE HEREBY COMMANDED TO: () Personally appear () Produce documents and or objects only
(X) Personally appear and produce documents or objects:

at Law Office of Roger N. Powell, 107 Old Court Rd. Baltimore, MD 21208
Place where attendance is required:

on Monday the 30th day of September 2002 at 10:00 a.m. XXX

YOU ARE COMMANDED TO produce the following documents or objects:

See attached Notice to Take Document Deposition Duces Tecum

Subpoena requested by (X) Plaintiff: () Defendant: and any questions should be referred to:

(410) 653-0262

Roger N. Powell, Esq. 107 Old Court Rd., Balto MD 21208

(Name of Party or Attorney, Address and Phone Number)

Date issued 9/4/02

CLERK



NOTICE:

- (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE FOR FAILURE TO OBEY THIS SUBPOENA.
- (2) This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.
- (3) If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate a person to testify pursuant to Rule 2-412(d).

SHERIFF'S RETURN

() Served and copy delivered on date indicated below.

() Inserved. by reason of _____

Date: _____ Fee: \$ _____

SHERIFF

Original and one copy needed for each witness

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

KLF ASSISTED LIVING, LLC

Plaintiff

VS.

SLADE MANSION, LLC

Defendant

Case no: 03-C-01-011764

NOTICE TO TAKE DOCUMENT DEPOSITION DUCES TECUM

The Plaintiff will take the deposition of the below named deponent on the following date, time and location, before a Notary Public or a person qualified to record the deposition testimony, said deposition to continue from day to day until complete.

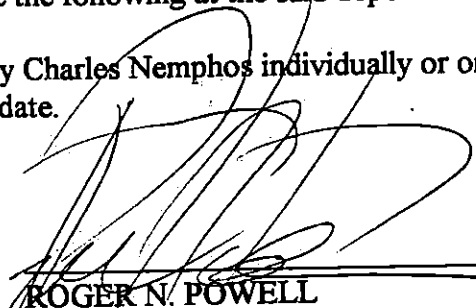
DEPONENT: Custodian of Records
Baltimore County Department of Permits & Licenses
111 West Chesapeake Avenue
Towson, MD 21204

DATE & TIME: Monday, September 30, 2002 - 10:00 AM

LOCATION: Law Offices of Roger N. Powell
107 Old Court Road, Baltimore, MD 21208

The deponent is commanded to appear and produce the following at the said deposition:

All applications for building permits made by Charles Nemphos individually or on behalf of Slade Mansion, LLC, from 1/1/99 through present date.


ROGER N. POWELL
107 Old Court Road
Baltimore, MD 21208
(410) 653-0262
Attorney for Plaintiff

PLEASE NOTE THAT THIS IS A DOCUMENT DEPOSITION ONLY. PERSONAL ATTENDANCE WILL NOT BE REQUIRED SCHEDULED IF THE DOCUMENTS ARE PRODUCED TO THIS OFFICE PRIOR TO THE DATE AND TIME SCHEDULED.

DATE: 09/11/2002 AUTOMATED PERMIT TRACKING SYSTEM BP1072M
TIME: 13:00:05 FULL SCREEN INQUIRY

SEL	STREET ADDRESS	PERMIT NO	CONTROL NO
12205	PARK HEIGHTS AVE	E468534	468534
12213	PARK HEIGHTS AVE	E434278	434278
12215	PARK HEIGHTS AVE	E391336	391336
12328	PARK HEIGHTS AVE	P458850	458850
12328	PARK HEIGHTS AVE	E438907	438907
12328	PARK HEIGHTS AVE	B437552	MR
12428	PARK HEIGHTS AVE	B451543	MR
12428	PARK HEIGHTS AVE	B087200	MR
7401	PARK HEIGHTS AVE	P384446	384446
7401	PARK HEIGHTS AVE	E425129	425129
7401	PARK HEIGHTS AVE	E384934	
7401	PARK HEIGHTS AVE	B425855	GRC-
7401	PARK HEIGHTS AVE	B422455	C-
7401	PARK HEIGHTS AVE	B381079	C-
7600	PARK HEIGHTS AVE	B498507	TT
7600	PARK HEIGHTS AVE	E386278	386278
7600	PARK HEIGHTS AVE	B463569	TT
7600	PARK HEIGHTS AVE	B429324	TT

PAGE SCROLL (F/B) F CLEAR TO RETURN TO THE MENU
ENTER THE LETTER -X- NEXT TO THE ADDRESS TO RECEIVE PERMIT DETAIL

NO RECENT
PERMITS

APPLICATION FOR PERMIT
BALTIMORE COUNTY MARYLAND
DEPARTMENT OF PERMITS & DEVELOPMENT MANAGEMENT
TOWSON, MARYLAND 21204

DATE:

OEA 810

HISTORIC DISTRICT/BLDG.

YES ☐ NO ☐

DO NOT KNOW ☐

DISTRICT/PRECINCT

3 6

DOES THIS BLDG.
HAVE SPRINKLERS

YES ☐ NO ☐

PERMIT #: 3258970
RECEIPT #: 287110
CONTROL #: 1000
KREF #:

FEE: \$35.00

PAID:

PAID BY: APPL

INSPECTOR:

I HAVE CAREFULLY READ THIS APPLICATION
AND KNOW THE SAME IS CORRECT AND TRUE,
AND THAT IN DOING THIS WORK ALL PROVI-
SIONS OF THE BALTIMORE COUNTY CODE AND
APPROPRIATE STATE REGULATIONS WILL BE
COMPLIED WITH WHETHER HEREIN SPECIFIED
OR NOT AND WILL REQUEST ALL REQUIRED
INSPECTIONS.

BUILDING 1 or 2 FAM.

CODE CODE

BOCA CODE ☒

TYPE OF IMPROVEMENT

1. ☐ NEW BLDG CONST

2. ☐ ADDITION

3. ☐ ALTERATION

4. ☐ REPAIR

5. ☐ WRECKING

6. ☐ MOVING

7. ☒ OTHER chg of occ

TYPE OF USE

RESIDENTIAL

1. ☐ ONE FAMILY
2. ☐ TWO FAMILY
3. ☐ THREE AND FOUR FAMILY
4. ☐ FIVE OR MORE FAMILY
(ENTER NO UNITS) _____
5. ☐ SWIMMING POOL
6. ☐ GARAGE
7. ☒ OTHER associated living facility

TYPE FOUNDATION

- BASEMENT
1. ☐ SLAB
2. ☐ BLOCK
3. ☐ CONCRETE

TYPE OF CONSTRUCTION

1. ☐ MASONRY
2. ☐ WOOD FRAME
3. ☐ STRUCTURE STEEL
4. ☐ REINF. CONCRETE

ENTRANCE AIR: 1. 12A
ESTIMATED COST: \$ NA
F MATERIALS AND LABOR

OWNERSHIP

1. ☒ PRIVATELY OWNED 2. ☐ PUBLICLY OWNED 3. ☐ SALE 4. ☐ RENTAL

RESIDENTIAL CATEGORY: 1. ☐ DETACHED 2. ☐ SEMI-DET. 3. ☐ GROUP 4. ☐ TOWNHSE 5. ☐ MIDRISE
EFF: #1BED: 1 #2BED: 1 #3BED: 1 TOT BED: 3 TOT APTS/CONDOS: 1 6. ☐ HIRISE

WASTE DISPOSAL 1. ☐ Y 2. ☐ N BATHROOMS 4 CLASS 4
POWDER ROOMS 1 KITCHENS 1 LIBER 1 FOLIO 1

BUILDING SIZE LOT SIZE AND SETBACKS

FLOOR 0 SIZE 210 X

WIDTH 10 FRONT STREET 10

DEPTH 10 SIDE STREET 10

HEIGHT 10 FRONT SETBK 10

STORIES 1 SIDE SETBK 10

LOT #'S 1 SIDE STR SETBK 10

CORNER LOT 1 REAR SETBK 10

1. ☐ Y 2. ☐ N ZONING 10

PROPERTY ADDRESS 7503 Park Heights Ave
SUITE/SPACE/FLOOR _____
SUBDIV: _____
TAX ACCOUNT #: 03-19-044700
OWNER'S INFORMATION (LAST, FIRST)
NAME: SIBEL HANAN + Carol
ADDR: 7503 Park Heights Ave

APPLICANT INFORMATION

NAME: John A. Lopes Jr.
COMPANY: Monick Construction
STREET P.O. Box 932
CITY, ST, ZIP Hamover MD 21076
PHONE #: 410-551-8511 MHIC LICENSE #: 44915

APPLICANT SIGNATURE: John A. Lopes Jr. TRACT: _____

PLANS: CONST 1 PLOT 1 PLAT 1 DATA 1

TENANT _____

CONTR: Monick

ENGNR: _____

SELLR: _____

DESCRIBE PROPOSED WORK: Change of occupancy from
Apt to 12 person assisted living facility
2 Floor Plans to scale 1/8"

OK TO FILE ONLY. APPLICANT NA TO FILE FOR ALF 2011
NON-RESIDENTIAL USE PERMIT WHICH MUST BE APPROV

08. ☐ AMUSEMENT, RECREATION, PLACE OF ASSEMBLY
09. ☐ CHURCH, OTHER RELIGIOUS BUILDING
10. ☐ FENCE (LENGTH _____ HEIGHT _____)
11. ☐ INDUSTRIAL, STORAGE BUILDING
12. ☐ PARKING GARAGE
13. ☐ SERVICE STATION, REPAIR GARAGE
14. ☐ HOSPITAL, INSTITUTIONAL, NURSING HOME
15. ☐ OFFICE, BANK, PROFESSIONAL
16. ☐ PUBLIC UTILITY
17. ☐ SCHOOL, COLLEGE, OTHER EDUCATIONAL
18. ☐ SIGN
19. ☐ STORE _____ MERCANTILE _____ RESTAURANT
SPECIFY TYPE _____
20. ☐ SWIMMING POOL _____
SPECIFY TYPE _____

21. ☐ TANK, TOWER
22. ☐ TRANSIENT HOTEL, MOTEL (NO. UNITS _____)
23. ☐ OTHER _____

TYPE OF HEATING FUEL

1. ☐ GAS 3. ☐ ELECTRICITY
2. ☐ OIL 4. ☐ COAL

TYPE OF WATER SUPPLY

1. ☒ PUBLIC SYSTEM ☐ EXISTS ☐ PROPOSED
2. ☐ PRIVATE SYSTEM ☐ EXISTS ☐ PROPOSED

TYPE OF SEWAGE DISPOSAL

1. ☐ PUBLIC SEWER ☒ EXISTS ☐ PROPOSED
2. ☐ PRIVATE SYSTEM ☐ EXISTS ☐ PROPOSED
SEPTIC ☐ EXISTS ☐ PROPOSED
PRIVY ☐ EXISTS ☐ PROPOSED

PROPOSED USE:

EXISTING USE: associated living facility

APPROVAL SIGNATURES

DATE

BLD INSP 100 John A. Lopes Jr. FINAL 1/25/96

BLD PLAN 100 John A. Lopes Jr. 1/25/96

FIRE OK TO FILE 1-25-96

SEDI CTL 1 1/25/96

ZONING 111 OK TO FILE 1/25/96

PUB SERV 111 OK TO FILE 1/25/96

ENVRMNT 111 OK TO FILE 1-25-96

PERMITS 1 1/25/96

MAKE CHECKS PAYABLE TO BALTIMORE COUNTY MARYLAND -- NO PERMIT FEES REFUNDED

Released for Zoning + P. & S. 2/21/96
3258970

PERMIT #: 3258970
RECEIPT #: 1287410
CONTROL #: 1287410
XREF #:

FEE: \$35.00
PAID:
PAID BY: APPR
INSPECTOR:

I HAVE CAREFULLY READ THIS APPLICATION AND KNOW THE SAME IS CORRECT AND TRUE, AND THAT IN DOING THIS WORK ALL PROVISIONS OF THE BALTIMORE COUNTY CODE AND APPROPRIATE STATE REGULATIONS WILL BE COMPLIED WITH WHETHER HEREIN SPECIFIED OR NOT AND WILL REQUEST ALL REQUIRED INSPECTIONS.

BUILDING 1 or 2 FAM.
CODE CODE
BOCA CODE ☒

TYPE OF IMPROVEMENT
1. ☐ NEW BLDG CONST
2. ☐ ADDITION
3. ☐ ALTERATION
4. ☐ REPAIR
5. ☐ WRECKING
6. ☐ MOVING
7. ☒ OTHER Chg of occ

TYPE OF USE

RESIDENTIAL

01. ☐ ONE FAMILY
02. ☐ TWO FAMILY
03. ☐ THREE AND FOUR FAMILY
04. ☐ FIVE OR MORE FAMILY
(ENTER NO UNITS)
05. ☐ SWIMMING POOL
06. ☐ GARAGE
07. ☒ OTHER associated Chg of occ

TYPE FOUNDATION BASEMENT
1. ☐ SLAB 1. ☐ FULL
2. ☐ BLOCK 2. ☐ PARTIAL
3. ☐ CONCRETE 3. ☐ NONE

TYPE OF CONSTRUCTION

1. ☐ MASONRY
2. ☐ WOOD FRAME
3. ☐ STRUCTURE STEEL
4. ☐ REINF. CONCRETE

CENTRAL AIR: 1. ☒ YES
ESTIMATED COST: \$ 13.1

OF MATERIALS AND LABOR
PROPOSED USE:
EXISTING USE:

OWNERSHIP

1. ☒ PRIVATELY OWNED 2. ☐ PUBLICLY OWNED 3. ☐ SALE 4. ☐ RENTAL

RESIDENTIAL CATEGORY:

#EFF: #1BED: #2BED: #3BED: TOT BED: TOT APTS/CONDOS: 5. MIDRISE 6. HIRISE

1 FAMILY BEDROOMS

GARBAGE DISPOSAL 1. ☐ Y 2. ☐ N

POWDER ROOMS

BATHROOMS KITCHENS

CLASS 4 LIBER 4 FOLIO

BUILDING SIZE LOT SIZE AND SETBACKS
FLOOR 0 SIZE 210 X
WIDTH FRONT STREET
DEPTH SIDE STREET
HEIGHT FRONT SETBK
STORIES SIDE SETBK 100
LOT #'S SIDE STR SETBK
CORNER LOT REAR SETBK
1. ☐ Y 2. ☐ N ZONING

APPLICATION FOR PERMIT
BALTIMORE COUNTY MARYLAND
DEPARTMENT OF PERMITS & DEVELOPMENT MANAGEMENT
TOWSON, MARYLAND 21204

DATE:

OEASMD

HISTORIC DISTRICT/BLDG.

PROPERTY ADDRESS 7503 Park Heights Ave ☐ YES ☐ NO
SUITE/SPACE/FLOOR
SUBDIV: ☐ DO NOT KNOW
TAX ACCOUNT #: 03-19-044700 DISTRICT/PRECINCT
OWNER'S INFORMATION (LAST, FIRST)
NAME: SIBEL HANAN J Carol
ADDR: 7503 Park Heights Ave

DOES THIS BLDG.
HAVE SPRINKLERS
YES ☐ NO ☐

APPLICANT INFORMATION

NAME: John A. Lopes JR.
COMPANY: Monick Construction
STREET P.O. Box 932
CITY, ST, ZIP Hamover MD 21076
PHONE #: 410-551-8511 MHIC LICENSE #: 44915
APPLICANT
SIGNATURE: John A. Lopes JR. TRACT: BLOCK:
PLANS: CONST ☐ PLOT ☐ PLAT ☐ DATA ☐ EL ☐ PL ☐
TENANT
CONTR: Monick
ENGNR:
SELLR:

DESCRIBE PROPOSED WORK:

Change of occupancy from
Apt to 12 person assisted living facility
2 Floor Plans to scale Y3

OK TO FILE ONLY. APPLICANT ~~TO~~ TO FILE FOR ALF Zoning

NON-RESIDENTIAL USE PERMIT WHICH MUST BE APPROVED

08. ☐ AMUSEMENT, RECREATION, PLACE OF ASSEMBLY
09. ☐ CHURCH, OTHER RELIGIOUS BUILDING
10. ☐ FENCE (LENGTH HEIGHT) APPR. FILING AT OWN RISK DUE TO POSSIBLE REVISIONS BEING REQD
11. ☐ INDUSTRIAL, STORAGE BUILDING
12. ☐ PARKING GARAGE
13. ☐ SERVICE STATION, REPAIR GARAGE
14. ☐ HOSPITAL, INSTITUTIONAL, NURSING HOME
15. ☐ OFFICE, BANK, PROFESSIONAL
16. ☐ PUBLIC UTILITY
17. ☐ SCHOOL, COLLEGE, OTHER EDUCATIONAL
18. ☐ SIGN
19. ☐ STORE ☐ MERCANTILE ☐ RESTAURANT
20. ☐ SWIMMING POOL
SPECIFY TYPE
21. ☐ TANK, TOWER
22. ☐ TRANSIENT HOTEL, MOTEL (NO. UNITS)
23. ☐ OTHER

TYPE OF HEATING FUEL

1. ☐ GAS 3. ☐ ELECTRICITY
2. ☐ OIL 4. ☐ COAL

TYPE OF WATER SUPPLY

1. ☒ PUBLIC SYSTEM ☐ EXISTS ☐ PROPOSED
2. ☐ PRIVATE SYSTEM ☐ EXISTS ☐ PROPOSED

TYPE OF SEWAGE DISPOSAL

1. ☐ PUBLIC SEWER ☒ EXISTS ☐ PROPOSED
2. ☐ PRIVATE SYSTEM ☐ EXISTS ☐ PROPOSED
SEPTIC ☐ EXISTS ☐ PROPOSED
PRIVY ☐ EXISTS ☐ PROPOSED

PROPOSED USE: associated living facility

EXISTING USE: apt

1. DETACHED 2. SEMI-DET. 3. GROUP 4. TOWNHSE 5. MIDRISE 6. HIRISE

1 FAMILY BEDROOMS

GARBAGE DISPOSAL 1. ☐ Y 2. ☐ N

POWDER ROOMS

BATHROOMS KITCHENS

CLASS 4 LIBER 4 FOLIO

APPROVAL SIGNATURES

DATE

BLD INSP/100 OK TO FILE FINAL : 1/25/96
BLD PLAN 120 :
FIRE : OK TO FILE : 1-25-96
SEDI CTL :
ZONING 111: OK TO FILE : 1/25/96
PUB SERV/111: OK TO FILE : 1/25/96
ENVRMNT 911/111: OK TO FILE : 1-25-96
PERMITS :
DATE

MAKE CHECKS PAYABLE TO BALTIMORE COUNTY MARYLAND -- NO PERMIT FEES REFUNDED



Front 7501 Park Heights Ave.

11516216859-2W 1620 9563

COPIES & ENLARGEMENTS CALL 800-421-1030



Western Side Park Height Ave

11516216859-2W 1620 9568

COPIES & ENLARGEMENTS CALL 800-421-1030



7505 PARK HEIGHTS. AVE

11516216859-2W 1620 9565

COPIES & ENLARGEMENTS CALL 800-421-1030



7505 Park Heights Ave

11516216859-2W 1620 9566

COPIES & ENLARGEMENTS CALL 800-421-1030



Western Side PARK Heights Ave

11516216859-2W 1620 9567
COPIES & ENLARGEMENTS CALL 800-421-1030



REAR 7503 PARK HEIGHTS AVE

11516216859-2W 1620 9561

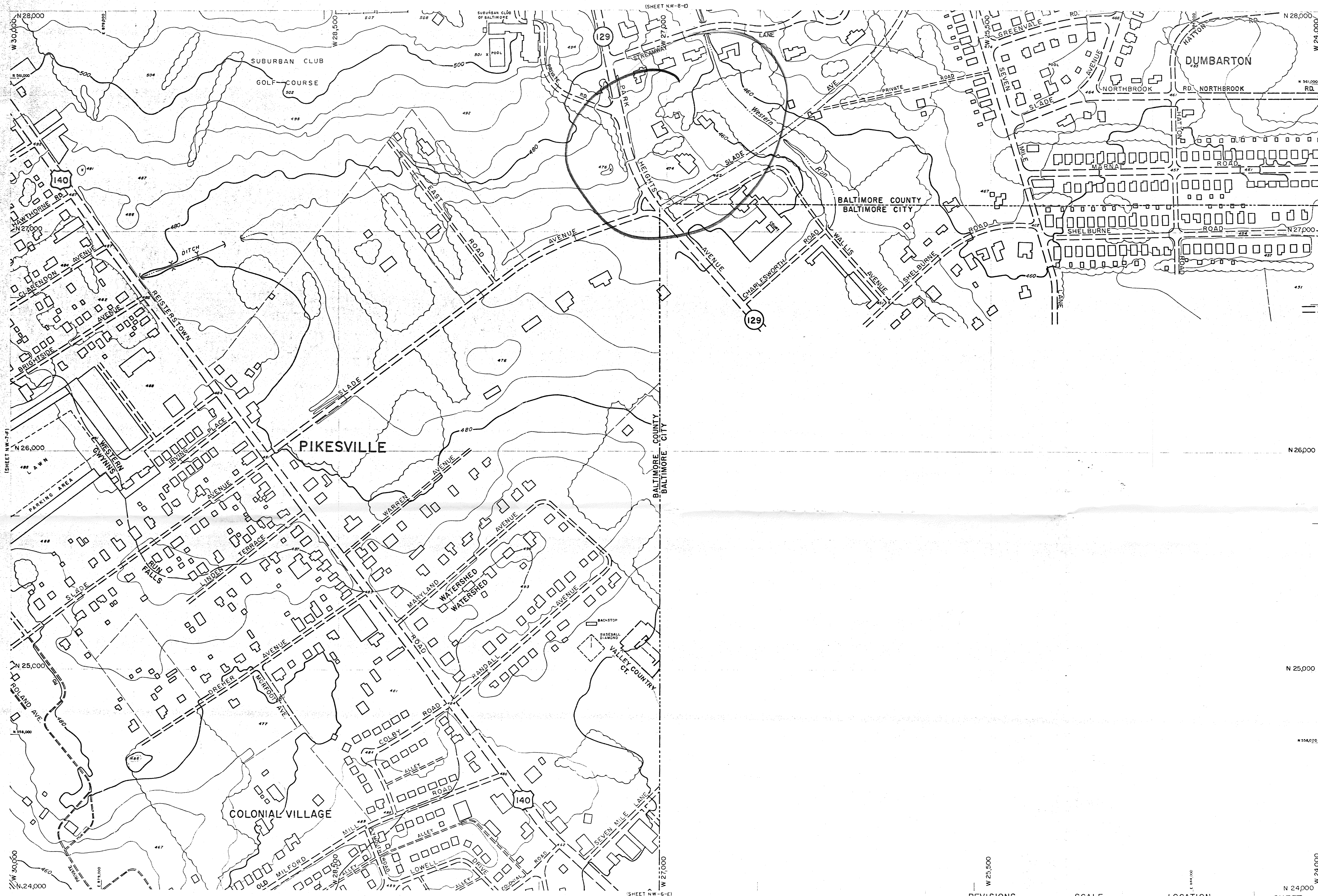
COPIES & ENLARGEMENTS CALL 800-421-1030



Front 7503 PARK Heights AVE.

11516216859-2W 1620 9569

COPIES & ENLARGEMENTS CALL 800-421-1030



PHOTOGRAMMETRIC MAP OF
BALTIMORE COUNTY METROPOLITAN AREA

REVISIONS

BY DATE

SCALE

1" = 200'

LOCATION

PIKESVILLE

SHEET

N.W.

7-E

DATE OF
PHOTOGRAPHY
APRIL 1953

Topography Compiled By Photogrammetric Methods
AERO SERVICE CORPORATION-PHILADELPHIA, PA

ZONING USE PERMIT
PLAN FOR CLASS "A"
ASSISTED LIVING FACILITY

LOCATED AT

7503 PARK HEIGHTS AVE
BALTIMORE MD 21208

PROPERTY OWNER:
SLADE MANSION L.L.C.
9455 BALTIMORE NATIONAL PIKE
ELLCOTH CITY 21042
410-461-7722

3rd Election Dist.

ZONING MAP

ZONE D.R. 2

AREA REQUIRED FOR

12 BEDS = 44,000 SQ. FT.

DENSITY CALCULATIONS.

12 BEDS D.R. 2

25000 SQFT. FOR 7 BEDS

3,800 sq ft FOR EACH ADDED BED

25,000

19,000

44,000

LOT SIZE 44,000 SQ. FT OR 1.00 AC⁺

PARKING SPACES

1 SPACE FOR EACH 3 BEDS

4 SPACES REQUIRED

ALL PARKING USES SHOWN

EXISTED PRIOR TO THE DATE

OF THIS PLAN ALL
PARKING WILL BE

PACKING WITH DE
PERMANENTLY STR

PERMANENTLY STRIPPED

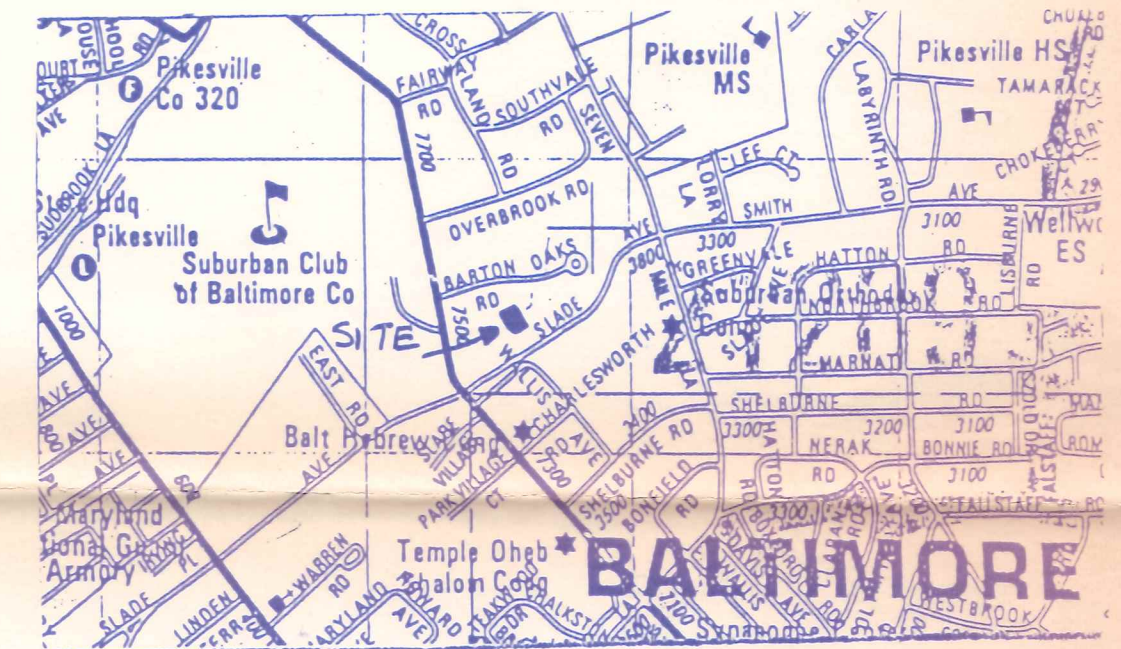
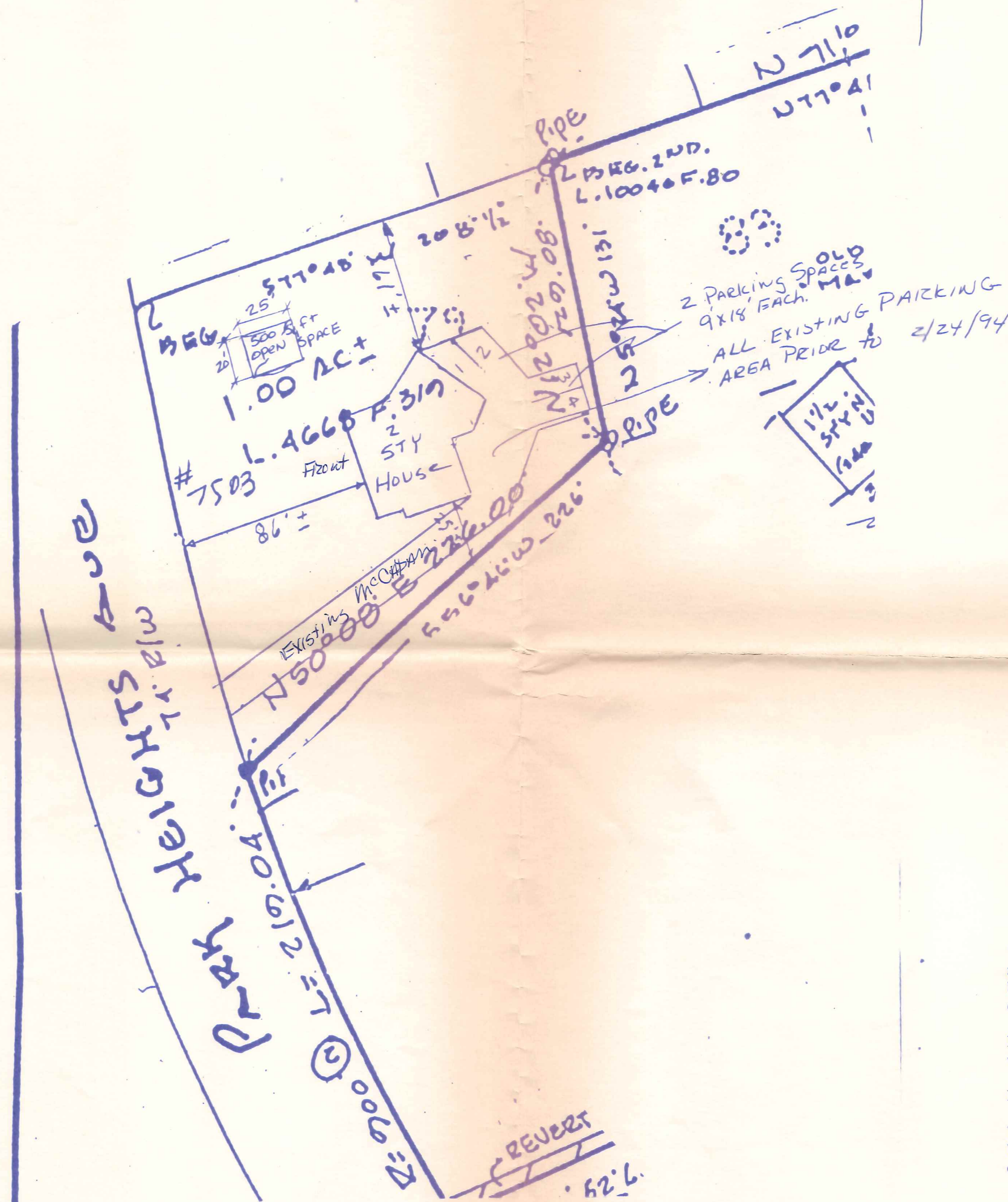
EXISTING FLOOR AREA

1st FLOOR 2,000 SQ. FT.

2ND FLOOR 1,800 SQ FT

BASEMENT FOR STORAGE

AND MECHANICAL EQUIP.



VICINITY MAP

*This building has not been originally constructed to accommodate elderly housing or an assisted living facility. No reconstruction, relocation, (exterior) changes or additions of (25% or more in ground floor area) to the exterior of the building (beyond the enclosure of a porch or the addition of an exterior stairway) have occurred within five years of the date of this permit application"

No signs are proposed, any future signs will comply with Section 413.1 (BCZR) and all zoning sign policies or a zoning variance is required (per Section 432.5.B.1.a, BCZR)

NOTE AND CHECK ONE

There have been

There have not been

exterior enlargements to this building in the past 5 years.

If there have been, explain what they were:

11/11

If more than an existing porch enclosure or addition of exterior stair show calculations for the % of increase here:

The undersigned are responsible for the accuracy of the information on this plan. (Owners)


 (Signature)
 CHARLES J. MEMPHIS
 (Print or Type Name)

(Signature)

(Print or Type Name)

SCALE 1" = 50'

ZONING USE PERMIT PLAN FOR CLASS "A" ASSISTED LIVING FACILITY

LOCATED AT

7503 PARK HEIGHTS AVE
BALTIMORE MD 21208

PROPERTY OWNER:

SLADE MANSION L.L.C.
9455 BALTIMORE NATIONAL PIKE
ELLICOTT CITY 21042
410-461-7722

3RD ELECTION DIST.

ZONING MAP

ZONE D.R.2

AREA REQUIRED FOR

12 BEDS = 44,000 SQ.FT.

DENSITY CALCULATIONS.

12 BEDS D.R.2

25,000 SQ.FT. FOR 7 BEDS

3,800 SQ.FT. FOR EACH ADDED BED

25,000

19,000

44,000

LOT SIZE 44,000 SQ.FT OR 1.00 AC⁺

PARKING SPACES

1 SPACE FOR EACH 3 BEDS

4 SPACES REQUIRED

ALL PARKING USES SHOWN

EXISTED PRIOR TO THE DATE

OF THIS PLAN ALL

PARKING WILL BE

PERMANENTLY STRIPED

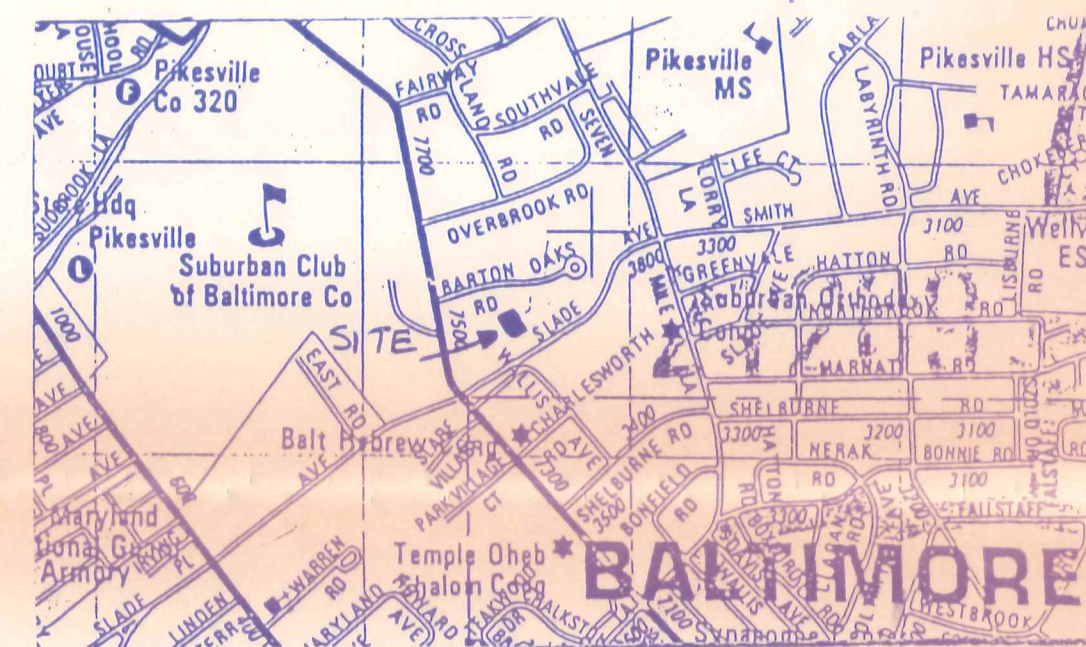
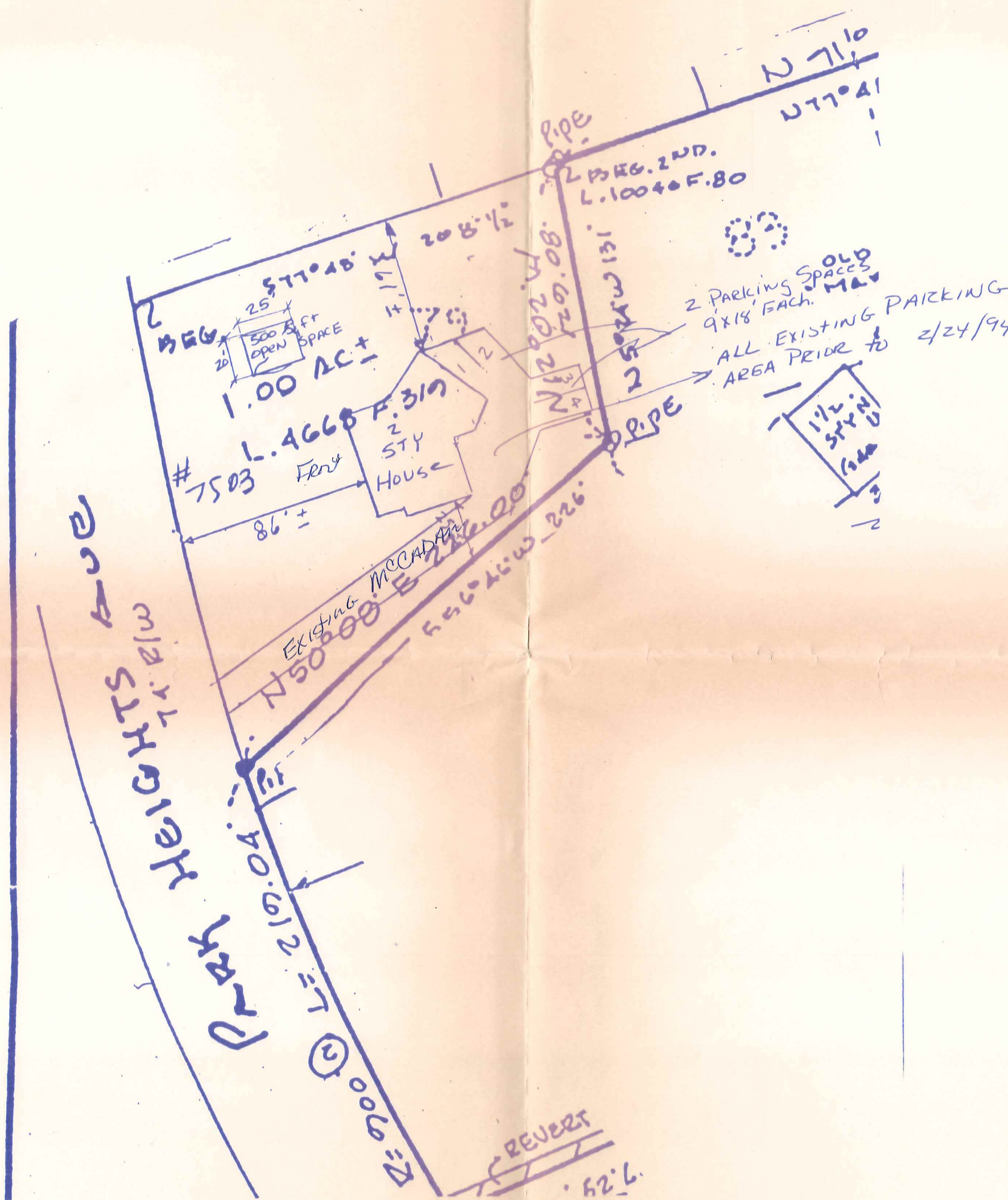
EXISTING FLOOR AREA

1ST FLOOR 2,000 SQ.FT.

2ND FLOOR 1,800 SQ.FT.

BASEMENT FOR STORAGE

AND MECHANICAL EQUIP.



VICINITY MAP

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NOTE AND CHECK ONE

There have been

There have not been ☒

exterior enlargements to this building in the past 5 years.

If there have been, explain what they were:

N/A

If more than an existing porch enclosure or addition of exterior stair show calculations for the % of increase

here:

N/A

The undersigned are responsible for the accuracy of the information on this plan (Owners)

Charles T. Nemphos
(Signature)
Charles T. Nemphos
(Print or Type Name)

(Signature)

(Print or Type Name)

SCALE 1" = 50'