USE PERMIT



IT IS ORDERED by the Di	rector of Zoning Admin	istration & Developm	nent
Management of Baltimore C	Sounty this 215Tday of	FEBRUARY	, 1996,
Management of Baltimore C	ounty, this <u>21</u> day of	1 11 he and t	he came is
that 7503 PARK HE	IGHTS AVE	should be allu t	ne same is
hereby granted permission to	operate a CLASS	"A" ASSISTEDL	IVING (ALF.)
FACILITY FOR A M	MAXIMUM OF 1	2 (ALF) RESID	DENTS.
	2000	Call S	all-
Permit Number	C/PA-Y	sing Administration & Developm	ent Management

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

USE PERMIT



Director Zoning Administration & Development Management

IT IS ORDEREI	by the	Director of Zoning Admir	nistration & Developn	nent
Management of B	altimor	e County, this 21 st day of	FEBRUAR Y	1996
that 7503 F	ARK H	EIGHTS AVE	should be and t	he same is
hereby granted pe	rmissio	n to operate a CLASS	"A" ASSISTEDL	IVING (ALF.)
FACILITY FO	RA	MAXIMUM OF I	2 (ALF) RESID	ENTS.
Permit Number		MOD	Bell	able

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

VALIDATION OR SIGNATURE OF CASHIER

BA CO02:26FM01-26-96

\$40

INTER-OFFICE CORRESPONDENC **RECOMMENDATION FORM**

TO:	Director, Office of Planning & Community Conservation		PDM	ALF #
	Attention: Ervin McDaniel County Courts Building, Room 406 401 Bosley Avenue Towson, MD 21204	Permit No	o. (if require	ed) B <u>25897</u> 0
FROM:	Arnold Jabion, Director Department of Permits & Development Management	•	•.	
RE:	Assisted Living Facility (Class "A")			
Pursuant from the	t to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 1994, this office Office of Planning and Community Conservation prior to this office's approval of a building/use per	is requesting r mit.		
MINIMU	IM APPLICANT SUPPLIED INFORMATION:		•	461-7722
	SIADE MONSION LIC 9455 Ba Ho Malion & Print Name of Applicant Lot Address 7503 PARK HEIGHTS AVE Election District 3 Councilman	ic District 2	C Ell' Te Square Fe	coff C(f g lephone Number 7
Lot Loca	ation: NES Wiside Corner of PARI LIBITUALIC, 400 feet from NE			. ^
Land Ov	wner: HANAN: CAROL SibeL Tax Account	Number <u>O</u>	3-19-1	044700
Address	s: 7503 Parek Llandh Ave Telephone 1	Number ()	
	.tST OF MATERIALS (to be submitted by applicant for required <i>compatibility</i> and/or appe hity Conservation)	earance revie	w by the O	ffice of Planning and
TO BE	E FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONL	YI PROVID		<u> </u>
1. This F	Recommendation Form (3 copies)	YES	NO A	cepted for filing by
2. Permi	it Application (If available)	\checkmark		'.
3. Site P Property	Plan y (3 coples): including lot size and square feet of buildings, parking and open space - minimum 500 square	1	•	·
Торо Ма	ap (2 copies): available in Room 208, County Office Building - (please label site clearly)	<u> </u>		
	ant as to whether or not building has been enlarged by 25% or more in the last five (5) years	1/	.	- >
4. Buildi	ing Elevation Drawings しいみいもり		WAIVE	ΞĎ
Adjoin	ographs (please label all photos clearly) ning Buildings unding Neighborhood	$\stackrel{\checkmark}{\checkmark}$		
6. Current	t Zoning Classification:			
	TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONIN	IG ONLYI		
	/			
RECOMM	LENDATIONS / COMMENTS:			
	Approval Disapproval Approval conditioned on required modifications of the application	on to conform wit	h the following	recommendations:
	v,			•

for the Director, Office of Planning and Community Conservation

TO:

INTER-OFFICE CORRESPONDENC⁻⁻ RECOMMENDATION FORM

O:	Director, Office of Planning & Community Conservation		P	DM ALF #
	Attention: Ervin McDaniel County Courts Building, Room 406 401 Bosley Avenue		Permit No. (if red	quired) B <u>25897</u> 0
	Towson, MD 21204			,
ROM:	Amold Jablon, Director Department of Permits & Development Management	1 000		
RE:	Assisted Living Facility (Class "A")	LTO		
'ursuant	to Section 432.5.B (Baltimore County Zoning Regulations) effective Feb Office of Planning and Community Conservation prior to this office's app	ruary 25, 1994, this office is re	equesting recommo	endations and comments
	M APPLICANT SUPPLIED INFORMATION:	* , 1	41	0-461-7722
	SIADE MANSION LLC 9455 B Print Name of Applicant Address	a Ho National	Pike E	111 COHCIA
	Lot Address 7503 PARK HEICHTS AVE Election			
_ot Loca	ation: NES Wiside/corner of PARV Lb (Alle, ,	400 feet from NBS	N corner of 50n	de & Air's Ibil
and Ov	10-101	Tax Account Nu	mber <u>03-19</u>	(6.334)
Address	: 7503 Parek Hender Ave	Telephone Num	ber ()	
CHECKL	IST OF MATERIALS (to be submitted by applicant for required control ity Conservation)	ompatibility and/or appeara	nce review by the	e Office of Planning and
TO BE	FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPME	NT MANAGEMENT ONLY		
			PROVIDED?	Sol
. This R	Recommendation Form (3 copies)		YES NO	Accepted for filing by Date: 126 90
. Permit	t Application (If available)		<u> </u>	1
3. Site Pl Property	lan / (3 coples): including lot size and square feet of buildings, parking and open space	- minimum 500 square	<u></u>	
Торо Ма	p (2 copies): avallable in Room 206, County Office Building - (please label site cle	arly)	<u> </u>	
Statemen	nt as to whether or not building has been enlarged by 25% or more in the last five (5)	years	<u> </u>	
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Adjoin	graphs (please label all photos clearly) ing Buildings unding Neighborhood		_ wa _ =	
. Current	Zoning Classification: DK-Z			
	TO BE FILLED IN BY THE OFFICE OF	PLANNING AND ZONING C	DNLYI	
ECOMM	ENDATIONS / COMMENTS:			
		modifications of the application to	conform with the follo	wing recommendations:
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igned by: Julianuc Mousey
for the Director, Office of Planning and Community Conservation

Date: 2/20/96

INTER-OFFICE CORRESPONDENCE ARECOMMENDATION FORM

ro:

Director, Office of Planning & Community Conservation

for the Director, Office of Planning and Community Conservation

Attention: Ervin McDaniel

PDM ALF #_

County Courts Building, Room 406 401 Bosley Avenue Towson, MD 21204	Permit No. (if required) B <u> </u>
FROM: Amold Jablon, Director Department of Permits & Development Management	
RE: Assisted Living Facility (Class "A")	
Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective from the Office of Planning and Community Conservation prior to this office's	February 25, 1994, this office is requesting recommendations and comments approval of a building/use permit.
MINIMUM APPLICANT SUPPLIED INFORMATION:	410-461-7722
SIADE MONSION LIC 9455 Print Name of Applicant Address	Ba Ho Notina C Pike Ellicot City Telephone Number
Lot Address 7503 PARK HEIGHTS AVE Ele	ction District 3 Councilmanic District 2 Square Feet 44,000
Lot Location: NES Wiside Corner of PARV Lb 11 W Alle, (street)	. 400 feet from NBS W corner of Sonde & Prick Ib. Has
Land Owner: HANAM: CAROL SibeL	Tax Account Number 03-19-044700
Address: 7503 Parek Hender Ave	Telephone Number ()
CHECKLIST OF MATERIALS (to be submitted by applicant for require Community Conservation)	ed compatibility and/or appearance review by the Office of Planning and
TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELO	PMENT MANAGEMENT ONLY! PROVIDED?
1. This Recommendation Form (3 copies)	YES NO Accepted for filing by Date: 1/26 96
2. Permit Application (if available)	<u> </u>
 Site Plan Property (3 copies): including lot size and square feet of buildings, parking and open s 	pace - minimum 500 square
Topo Map (2 copies): available in Room 206, County Office Building - (please label sh	
Statement as to whether or not building has been enlarged by 25% or more in the last fit. Building Elevation Drawings いかいをり	···
•	— WAIVED
5. Photographs (please label all photos clearly) Adjoining Buildings Surrounding Neighborhood	-
5. Current Zoning Classification: DR-Z	
TO BE FILLED IN BY THE OFFICE	OF PLANNING AND ZONING ONLY!
SECOMMAND A TIONE (COMMENTS.	
RECOMMENDATIONS / COMMENTS: Approval Disapproval Approval conditioned on rec	uired modifications of the application to conform with the following recommendations:
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Revised 9/6/95

Date: 2/20/96

INTER-OFFICE CORRESPONDS RECOMMENDATION FORM.

TO: Director, Office of Planning & Community Conservation	PDM ALF #
Attention: Ervin McDaniël	Permit No. (if required) B <u>25897</u> 6
County Courts Building, Room 406 401 Bosley Avenue	Femilia No. (il required) B 20077
Towson, MD 21204	
FROM: Amold Jablon, Director	
Department of Permits & Development Management	•
RE: Assisted Living Facility (Class *A*)	
Assisted Living Facility (Class A)	
Pursuant to Section 432.5.B (Baltimore County Zoning Regulations) effective February 25, 19	
from the Office of Planning and Community Conservation prior to this office's approval of a bu	
MINIMUM APPLICANT SUPPLIED INFORMATION:	410-461-7722
SIADE MANSION LIC 9455 Ballo	Natural Pite Ellicoficity
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Lot Address 7503 PARK HEIGHTS AVE Election District 3	Councilmanic District 2 Square Feet 44,000
Lot Location: NES W/side/comer of PARY Lb 11 MAILE, 400	Sando & Arel In 1
Lot Location: NES Wiside/comer of PARV FAIL (Street)	teet from N B's W corner of
	(
	Tax Account Number <u>03-19-044700</u>
Address: 7503 Parek Hender Alle	Telephone Number ()
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Community Conservation)	y androi appearance review by the Onice of Flanning and
TO BE FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAG	PROVIDED?
	YES NO Accepted for filing by
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2. Permit Application (If available)	✓
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	ov square
Topo Map (2 copies); available in Room 208, County Office Building - (please label site clearly)	<u>v</u> , <u>-</u>
Statement as to whether or not building has been enlarged by 25% or more in the last five (5) years	· <u> </u>
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a Duilding Cideadon Diawnigs	WAINED
5. Photographs (please label all photos clearly)	\checkmark .
Adjoining Buildings Surrounding Neighborhood	$\dot{\mathbf{Z}}$
DP-7	
3. Current Zoning Classification:	
TO BE FILLED IN BY THE OFFICE OF PLANNING	3 AND ZONING ONLY!
10 BE FILLED IN BY THE OFFICE OF PLANNING	S AND LUMMO UNCH
PECOMIENTS.	
RECOMMENDATIONS / COMMENTS:	
Approval Disapproval Approval conditioned on required modifications	s of the application to conform with the following recommendations:
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for the Director, Office of Planning and Community Conservation

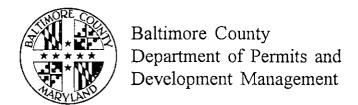
Date: 2/20/96

INTER-OFFICE CORRESPONDENCL RECOMMENDATION FORM

TO:	Director, Office of Planning & Community Conservation			PDM /	ALF#
	Attention: Ervin McDaniel County Courts Building, Room 406		Permit No	. (if require	d) B 258970
	401 Bosley Avenue				
	Towson, MD 21204	ORIGINAL			
FROM:			-		
	Department of Permits & Development Management	FILE ETC TO		000	
RE:	Assisted Living Facility (Class "A")	OPEC 1/2	6/96	944)
Pursuan from the	t to Section 432.5.B (Baltimore County Zoning Regulations) effective Office of Planning and Community Conservation prior to this office	ve February 25, 1994, this office is	requesting re	commendat	ions and comments
	JM APPLICANT SUPPLIED INFORMATION:	s approval of a building/use perm	it.	410-	461-7722
		7 11 11	-	1 1 1 1 1	
	SIADE Monsion LLC 9455 Print Name of Applicant Addr	ess Da Ho Nation	C Pike	ELL!	phone Number 7
	Lot Address 7503 PORK HCIGHTS AUCE	lection DistrictCouncilmanic	District Z	Square Fee	44,000
Lot Loc	ation: NES Wiside/corner of Park Abi Male,	. 400 feet from NBS	S W corner of	50 pde	& ARELLOUDE
Land O	wner: HANAM: CAROL Sibel	Tax Account N	lumber 03	-19-0	144700
Address	= 7503 Parek Hender Ave	Telephone Nu	ımber ()	
CHECKI	LIST OF MATERIALS (to be submitted by applicant for requinity Conservation)	red compatibility and/or appea	rance review	by the Off	ice of Planning and
TO B	FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELO	OPMENT MANAGEMENT ONLY			
			PROVID		DA
1. This F	Recommendation Form (3 copies)		YES		epted for filing by
2. Permi	t Application (If available)		V		7 1/-
3. Site P	lan			-	
	y (3 copies): including lot size and square feet of buildings, parking and open	space - minimum 500 square	~		
Торо Ма	ap (2 copies): available in Room 206, County Office Building - (please label s	site clearly)	V		
Stateme	ent as to whether or not building has been enlarged by 25% or more in the last	five (5) years	V		
4. Buildi	ing Elevation Drawings			WAIVED	
5. Photo	graphs (please label all photos clearly)				
Adjoir	ning Buildings unding Neighborhood		V		
	t Zoning Classification: DR - 2		~	_	
	TO BE FILLED IN BY THE OFFIC	CE OF PLANNING AND ZONING	ONLYI		
DECOM	ENDATIONS / COMMENTS:				
NECOMM.					
Ш	Approval Disapproval Approval conditioned on re	equired modifications of the application	to conform with	the following re	ecommendations:
		Λ.			
Signed by	for the Director Office of Planning and Community Consequents			Date:	

INTER-OFFICE CORRESPONDENC_ RECOMMENDATION FORM

TO:	Director, Office of Planning & Community Conservation Attention: Ervin McDaniel		PDM ALF #
	County Courts Building, Room 406	Permit N	o. (if required) B 258970
	401 Bosley Avenue	. 0.1111(14	o. (ii required) b oco o p
	Towson, MD 21204		
FROM:	Amold Jablon, Director Department of Permits & Development Management	- ** ¬ ;=	
RE:	Assisted Living Facility (Class "A")		
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MINIMU	JM APPLICANT SUPPLIED INFORMATION:		410-461-7722
	SIADE MANSION LLC 9455 Ba Ho Notion	C Pik	Telephone Number
	Lot Address 7503 PORK HCIGHTS AVE Election District 3 Councilman	nic District_Z	_ Square Feet 44,000
Lot Loca	ation: NES Wiside Corner of PARY 161 Auc. 400 feet from NE		
Land O	wner: HANAM: CAROL SibeL Tax Account	t Number _O.	3-19-044700
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TOBE	E FILLED IN BY THE DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONL		
	THE DETAIL OF PERMITS AND DEVELOPMENT MANAGEMENT ONL	PROVID	DED?
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	y (3 copies): including lot size and square feet of buildings, parking and open space - minimum 500 square	V	
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	ning Buildings unding Neighborhood	Y	_
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	TO BE FILLED IN BY THE OFFICE OF PLANNING AND ZONIN	IG ONLY!	
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П	Approval Disapproval Approval conditioned on required modifications of the application	on to conform with	h the following recommendations:
Signed by	for the Director, Office of Planning and Community Consequation		Date:



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:

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

Jeffrey N. Perlow, Planner II.

frey M. Ferlow

Zoning Review Office

JNP

Law Offices

ROGER N. POWELL

107 Old Court Road

Pikesville, Maryland 21208

Telephone (410) 653-0262

Facsimile (410) 653-5057

September 4, 2002

9/9/br cock

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
RIF ADDIGINE DITERIOR	(X) Civil	() Criminal
	W. / icioni	÷
Vs.	•	
SLADE MANSION, LLC	•	
·	•	
SUBPOENA	DUCES TECUM	
TATE OF MARYLAND, BALTIMORE COUNTY TO WIT:		•
C: (Name, Accress, County)		
Custodian of Records (Director OI Zoning	, P.D.M.)	
Raltimore County Department of Zoning		
111 W. Chesapeake Avenue, Room 111 Towson, MD 21204	_	
YOU ARE HEREBY COMMANDED TO: () Personally act	ear: () Produce document	s and or object only
Law Office of Roger N. Powell, 107 Old	Court Rd Raltimore,	<u>-MD 4+200-</u>
and heart		
Place where standance is required:		
Place where steriothes is received.		
		: 10 - 00 - 3 m - XX
Monday the 30th day of Septemb	er <u>X9 2002</u> a	<u> 10 100</u> 3m
n Monday ne 30th cay of Septemb		<u>110:00</u> - 2m. X X
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YCU ARE COMMANDED TO produce the following document	or objects:	
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succeens requested by (X) Plaintiff: () Defendant: and any que	or objects: ocument Deposition I suons snould be referred to:	ouces Tecum
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succoena requested by (X) Plaintiff; () Defendant; and any que	or objects: ocument Deposition I suons snould be referred to:	ouces Tecum
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succoena requested by (X) Plaintiff; () Defendant; and any que	ocument Deposition I suchs should be referred to:	Ouces Tecum (410)653-0262
YCU ARE COMMANDED TO produce the following document See attached Notice to Take D Succeens requested by (x) Plaintiff: () Defendant: and any que Roger N. Powell. Esq. 107 Old Court Rd. (Name of Party of Attorney, Address and Phone Number)	ocument Deposition I such should be referred to: Ralto MD 21208	Ouces Tecum (410)653-0262
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succeens requested by (X) Plaintiff: () Defendant: and any que Roger N. Powell. Esq. 107 Old Court Rd. (Name of Party of Attorney, Address and Phone Number)	ocument Deposition I suchs should be referred to:	ouces Tecum (410)653-0262
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succoena requested by (X) Plaintiff; () Defendant; and any que Roger N. Powell Esq 107 Old Court Rd (Name of Party of Attorney, Address and Phone Number) Date issued 9/4/02	ocument Deposition I such should be referred to: Balto MD 21208 CLERK	Ouces Tecum (4101653-0262
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succoena requested by (X) Plaintiff; () Defendant; and any que Roger N. Powell Esq 107 Old Court Rd (Name of Party of Attorney, Address and Phone Number) Date issued 9/4/02	ocument Deposition I such should be referred to: Balto MD 21208 CLERK	Ouces Tecum (410)653-0262
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succeens requested by (x) Plaintiff; () Defendant; and any que Roder N. Powell. Esq. 107 Old Court Rd. (Name of Party of Attorney, Address and Phone Number) Oate issued. 9/4/02 NOTICE: (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE	cument Deposition I such short	(410)653-0262
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succeens requested by (x) Plaintiff: () Defendant: and any que Roger N. Powell, Esq. 107 Old Court Rd. (Name of Party or Atterney, Address and Phone Number) Date issued	cor objects: ocument Deposition I such short should be referred to: Ralto MD 21208 CLERK FOR FAILURE TO OBE! This we to depart by the Counter by any served is an organization.	(410)653-0262
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succeens requested by (x) Plaintiff: () Defendant: and any que Roger N. Powell, Esq. 107 Old Court Rd. (Name of Party or Atterney, Address and Phone Number) Date issued	cor objects: ocument Deposition I such short should be referred to: Ralto MD 21208 CLERK FOR FAILURE TO OBE! This we to depart by the Counter by any served is an organization.	(410)653-0262
See attached Notice to Take D Succoena requested by (x) Plaintiff; () Defendant: and any que Roger N. Powell Esq 107 Old Court Rd. (Name of Party of Attemey, Address and Phone Number) Oate issued 9/4/02 NOTICE: (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE (2) This succoena shall remain in effect until you are granted le of the Court. (3) If this succeena is for attendance at a deposition and the p the organization must designate a person to testify pursu	coment Deposition I such should be referred to: Balto MD 21208 CLERK FOR FAILURE TO OBE! This we to depart by the Count or by any served is an organization. and to Rule 2-412(d).	(410)653-0262
See attached Notice to Take D Succeena requested by (x) Plaintiff: () Defendant: and any que Roger N. Powell. Esq. 107 Old Court Rd. (Name of Party of Atterney, Address and Phone Number) Date issued. (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE (2) This succeena shall remain in effect until you are granted to of the Court. (3) If this succeena is for attendance at a deposition and the p the organization must designate a person to testify pursu	coment Deposition I such should be referred to: Balto MD 21208 CLERK FOR FAILURE TO OBE! The eve to depart by the Count or by any served is an organization. and to Rule 2-412(d). REIURN	(410)653-0262
YOU ARE COMMANDED TO produce the following document See attached Notice to Take D Succoena requested by (x) Plaintiff: () Defendant: and any que Roger N. Powell Fsq. 107 Old Court Rd. (Name of Party of Attemey, Address and Phone Number) Oate issued 9/4/02 NOTICE: (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE (2) This succeena shall remain in effect until you are granted te of the Court. (3) If this succeena is for attendance at a deposition and the p the organization must designate a person to testify pursu SHEFIFF S	coment Deposition I such should be referred to: Balto MD 21208 CLERK FOR FAILURE TO OBE! The eve to depart by the Count or by any served is an organization. and to Rule 2-412(d). REIURN	(410)653-0262
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IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

KLF ASSISTED LIVING, LLC

Plaintiff

VS.

Case no: 03-C-01-011764

SLADE MANSION, LLC

Defendant

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 Avnue

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

7503 Park Heidets Are

Custodian of Records
Baltimore County Dept. Of Permits & Licenses, Room 100
111 W. Chesapeake Avenue
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. BCX 8754 TOWSON, MARYLAND 21285-6754

Vs. SLADE MANSION, LIC SUBPOENA DUCES TECUM STATE OF MARYLAND, BALTIMORE COUNTY TO WIT: TO: (Name, Accress, County) Custodian of Records Baltimore County Dept. of Permits & Licenses, Room 100 111 W. Chesapeake Avenue Toward, MD 2/20 AMANOED TO: () Personally sincern () Produce comments and or intention of () Personally storage and croduce scounders or intention Law Office of Roger N. Powell, 107 Old Court Rd. Baltimore, MD 2/108 Flact where instructors is recurred: Monday the 30th may of September Xg 2002 at 10109 1m. XXX YOU ARE COMMANDED TO produce the following documents or objects: See attached Notice to Take Document Deposition Duces Tecum Succeens recursed ty (x) Planniff () Defendant and any questions should be referred to: (Name of Pany or Atterney, Accress and Phone Number) (Name of Pany or Atterney, Accress and Phone Number) (I YOU ARE LIABLE TO BODY ATTACHMENT AND FINE FOR FAILLIRE TO OBEY THIS SUBPOENA. (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE FOR FAILLIRE TO OBEY THIS SUBPOENA. (1) If this succeens is for attendances at a deposition and the carry served is an organization, notice is hereby given the inequalization must designate a person to testify jurisuant to Rule 2-12(d). SHETHEF S RETURN ()—Served and comy delivered on date indicated below. ()—Jussived, by reason of	TCWSCN. MARTICAND 11122 110	Casa Number	03_C-01-011764
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NCTICE: (1) YOU ARE LIABLE TO BODY ATTACHMENT AND FINE FOR FAILURE TO OBE? THIS SUBPOENA. (2) This succeens shall remain in effect until you are granted leave to depart by the Court or by an officer acting on bena of the Court. (3) If this succeens is for attendance at a deposition and the carry served is an organization, notice is hereby given the organization must designate a person to testify pursuant to Rule 2-412(d). SHEFIFF S RETURN ()—Served and copy delivered on date indicated below. ()—Inserved, by reason of SHEFIFF	(Name of Party of Attorney, Address and Pitche	سعدبر ليست	
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Date: SHERIFF	()—Jnserved, by reason of		
	549: S	RIFF	
	Original and one copy needed for each witness		

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

KLF ASSISTED LIVING, LLC

Plaintiff

VS.

Case no: 03-C-01-011764

SLADE MANSION, LLC

Defendant

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:	09/11/2 13:00:0		AUTO			RACKING INQUIRY	SYSTEM	BP1072		72M
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	
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ENTER THE LETTER -X- NEXT TO THE ADDRESS TO RECEIVE PERMIT DETAIL

NO RECENT PERMITS

BALTIMORE COUNTY MARYLAND DATE:
TOWSON, MARYLAND 21204 OEA SUN
PERMIT #: PROPERTY ADDRESS 7503 PARK LE VISTORIC DISTRICT/BLDG.
SUITE/SPACE/FLOOR SUBDIV: RECEIPT #: P
REF #: D3-19-044700 DISTRICT/PRECINCT
OWNER'S INFORMATION (LAST, FIRST) NAME: 51Bel HANAN I CANAL
PAID: 1503 PAIK HELDE AUR
PAID BY: DOES THIS BLDG. INSPECTOR: APPLICANT INFORMATION HAVE SPRINKLERS
HAVE CAREFULLY READ THIS APPLICATION NAME: JOHN A. (ODES TO
AND THAT IN DOING THIS LODGE AND TRUE; COMPANY: MONICE CANSTRUCTION
SIONS OF THE BALTIMORE COUNTY CODE AND APPROPRIATE STATE REGULATIONS WILL BE CITY, ST, ZIP HANGUER MD Z/676
COMPLIED WITH WHETHER HEREIN SPECIFIED PHONE #: 410-551-8511 MHIC LICENSE #: 44915
OR NOT AND WILL REQUEST ALL REQUIRED APPLICANT SIGNATURE: ALL REQUIRED BLOCK:
BUILDING 1 or 2 FAM. PLANS: CONST PLOT PLAT DATA EL PL
CODE CODE TENANT CONTR: AND WARE
YPE OF IMPROVEMENT ENGNR:
NEW BLDG CONST SELLR:
AT TERRATION
REPAIR WRECKING WOVING OTHER (La of old)
MOVING de de la person assisted levers la della
STOOK Plans 72 SCALE YS
OK TO FILE ONLY. APPLICANT TO FILE FOR ALF ZONE
ESIDENTIAL USE PERMIT WHICH MUST BE APPLO
1. ONE FAMILY 2. TWO FAMILY 09. AMUSEMENT, RECREATION, PLACE OF ASSEMBLY PERMIT APPLY 09. CHURCH, OTHER RELIGIOUS BUILDING
3. THREE AND FOUR FAMILY 10. FENCE (LENGTH HEIGHT)
(ENTER NO UNITS) 12. PARKING GARAGE
5. SWIMMING POOL 6. GARAGE 7. OTHER (A CONTROL) 13. SERVICE STATION, REPAIR GARAGE FOSSIBLE REVISIONS 14. HOSPITAL, INSTITUTIONAL, NURSING HOME BEING ROD 15. OFFICE BANK PROFESSIONAL
16. PUBLIC UTILITY
YPE FOUNDATION BASEMENT 18. SIGN
- BLOCK 2. PARTIAL 19. STORE MERCANTILE — RESTAURANT
SPECIFY TYPE
21. TANK, TOWER 22. TRANSIENT HOTEL, MOTEL (NO. UNITS
23. OTHER
YPE OF CONSTRUCTION TYPE OF HEATING FUEL TYPE OF SEWAGE DISPOSAL
MASONRY WOOD FRAME 2. OIL 4. COAL 2. PRIVATE SYSTEM EXISTS PROPOSED
STRUCTURE STEEL REINF. CONCRETE TYPE OF WATER SUPPLY SEPTIC EXISTS PROPOSED PRIVY EXISTS PROPOSED
ENTRAL AIR: 1. 12. 1. PUBLIC SYSTEM - EXISTS PROPOSED
F MATERIALS AND LABOR
PROPOSED USE: ADDIOHA VIVE facility
NNERSHIP 1. PRIVATELY OWNED 2. PUBLICLY OWNED 3. SALE 4. RENTAL
ESIDENTIAL CATEGORY: 1. DETACHED 2. SEMI-DET. 3. GROUP 4. TOWNHSE 5. MIDRISE
FAMILY BEDROOMS #2BED: #3BED: TOT BED: TOT APTS/CONDOS: 6. HIRISE
ARBAGE DISPOSAL I. Y 2. N BATHROOMS CLASS 4 DWDER ROOMS LIBER FOLIO
APPROVAL ŞIGNATURES DATE
BUILDING SIZE LOT SIZE AND SETBACKS BLD INSP/DOGETIME FINAL:1/25/96:
FLOOR SIZE 1/0 X BLD PLAN 25"
DEPTH SIDE STREET SEDI CTL:
STORIES SIDE SETBK ZONING / 1: QUARTER STORIES SIDE SETBK PUB SERV / PUB SERV
LOT #'S SIDE STR SETBK ENVRMNT 4/10/10/10/10/10/10/10/10/10/10/10/10/10/
CORNER LOT REAR SETBK : :

APPLICATION FOR PERMIT

APPLICATION FOR PERMIT BALTIMORE COUNTY MARYLAND DATE: DEPARTMENT OF PERMITS & DEVELOPMENT MANAGEMENT TOWSON, MARYLAND 21204 PERMIT #: PROPERTY ADDRESS 2503 Pack lbs whits Ale Toward Property Pack Research Property Address 2503 Pack lbs whits Ale Toward Pack Research Pack
APPLICATION FOR PERMIT
BALTIMORE COUNTY MARYLAND DATE:
TOWSON, MARYLAND 21204 OEA SW
HISTORIC DISTRICT/BLDG.
PERMIT #: D PROPERTY ADDRESS 7503 Pack Lky July Ave YES NO SUITE/SPACE/FLOOR
CONTROL #: O SUBDIV: DO NOT KNOW
TAX ACCOUNT #: 03-/9-044700 DISTRICT/PRECINCT OWNER'S INFORMATION (LAST, FIRST)
OWNER'S INFORMATION (LAST, FIRST) NAME: 5/Bel HANAN CANAL ADDR: 7503 POAK HANAN STANDER
PAID: NAME: 51BEL HANAN J CANOL
PAID BY: WOOK. DOES THIS BLDG.
INSPECTOR: APPLICANT INFORMATION HAVE SPRINKLERS
NAME: JOHN A. CORES TO YES NO
AND THAT IN DOTAG THE HODE ALL PROPERTY
STREET STATE RECTIATIONS WILL BE STREET CITY, ST, ZIP LANGUER MT Z/076
PHONE #: 4/10-551-851 MHIC LICENSE #: 4/49/5
OR NOT AND WILL REQUEST ALL REQUIRED APPLICANT
INSPECTIONS. SIGNATURE: TRACT: BLOCK:
BUILDING 1 or 2 FAM. PLANS: CONST PLOT PLAT DATA EL PL
CODE CODE TENANT CONTR: AND WAR.
TYPE OF IMPROVEMENT ENGNR:
NEW BLDG CONST SELLR:
ADDITION
ALTERATION C. L. A. C
REPAIR WRECKING MÓVING OTHER (LG OLO) (C) DESCRIBE PROPOSED WORK: Clarge of accepting from Add to 12 person assisted levery facility
MOVING , Hat to 12 person assisted levere backles
OTHER CLOSOCCO
THER CAMPOCCO STORES TO SCALE YS
OK TO FILE ONLY. APPLICANT TO FILE FOR ALF ZOWI
1 4 4 A
1. ONE FAMILY 08. AMUSEMENT, RECREATION, PLACE OF ASSEMBLY PERMIT APPLY. 12. TWO FAMILY 09. CHURCH, OTHER RELIGIOUS BUILDING
3. THREE AND FOUR FAMILY 10. FENCE (LENGTH HEIGHT) APP 511 1015 AT 511 1015
4. FIVE OR MORE FAMILY (ENTER NO UNITS) 11. INDUSTRIAL, STORAGE BUILDING (ENTER NO UNITS) 12. PARKING GARAGE 13. SERVICE STATION REPAIR GARAGE FASCIALE REVISION
DIRECTOR DIRECTOR, KEINING ORRANDE (VS) 1900 1/2 VISIONS
6. GARAGE HOSPITAL, INSTITUTIONAL, NURSING HOME BEING-RAD TOTHER OFFICE, BANK, PROFESSIONAL
PUBLIC UTILITY
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SLAB 1. FULL 19. STORE MERCANTILE RESTAURANT
- BLOCK 2. PARTIAL SPECIFY TYPE CONCRETE 3. NONE 20. SWIMMING POOL
21. TANK, TOWER
22. TRANSIENT HOTEL, MOTEL (NO. UNITS
23. OTHER
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MASONRY 1GAS 3ELECTRICITY 1PUBLIC SEWEREXISTS PROPOSED
- WOOD FRAME 2. OIL 4. COAL 2. PRIVATE SYSTEM
TYPE OF WATER SUPPLY SEPTIC EXISTS PROPOSED PRIVY EXISTS PROPOSED
ENTRAL AIR: 1. 12. 1. PUBLIC SYSTEM EXISTS PROPOSED
ENTRAL AIR: 1. 2. PUBLIC SYSTEM EXISTS PROPOSED STIMATED COST: 5 PRIVATE SYSTEM EXISTS PROPOSED F MATERIALS AND LABOR 2. PRIVATE SYSTEM PROPOSED
PROPOSED USE: AND LABOR PROPOSED USE: AND LABOR EXISTING USE: AND LABOR PROPOSED USE: AND LABOR PROPOSED USE: AND LABOR PROPOSED USE: AND LABOR EXISTING USE: AND LABOR
WNERSHIP, EXISTING USE:
1. PRIVATELY OWNED 2. PUBLICLY OWNED 3. SALE 4. RENTAL
ESIDENTIAL CATEGORY: 1. DETACHED 2. SEMI-DET. 3. GROUP 4. TOWNHSE 5. MIDRISE
EFF: #1BED: #2BED: #3BED: TOT BED: TOT DED: TOT DED:
FAMILY BEDROOMS TOT APTS/CONDOS: 0HIKISE ARBAGE DISPOSAL I. Y 2. N BATHROOMS CLASS 4
OWDER ROOMS KITCHENS LIBER FOLIO
ADDDOUAT CTCMADIDEC DADD
BUILDING SIZE LOT SIZE AND SETBACKS BLD INSP/10 GALOT GARCE 1/25/96:
FLOOR
WIDTH FRONT STREET FIRE : OKTOFILE :/-05-96
DEPTH SIDE STREET SEDI CTL: ; /:
HEIGHT FRONT SETBK ZONING / 1: () / // / / / / / / / / / / / / / / / /
STORIES SIDE SETBK PUB SERV / CONTROL : 1/25/96:
CORNER LOT REAR SETBK
1. Y 2. N ZONING PERMITS : :



FRONT 7501 PARK Heights AVE





Western Side Park Heylut AVE



7505 PARK Heights. Ave



7505 PARK Heights AVE



Western Side PARK Heights Ave



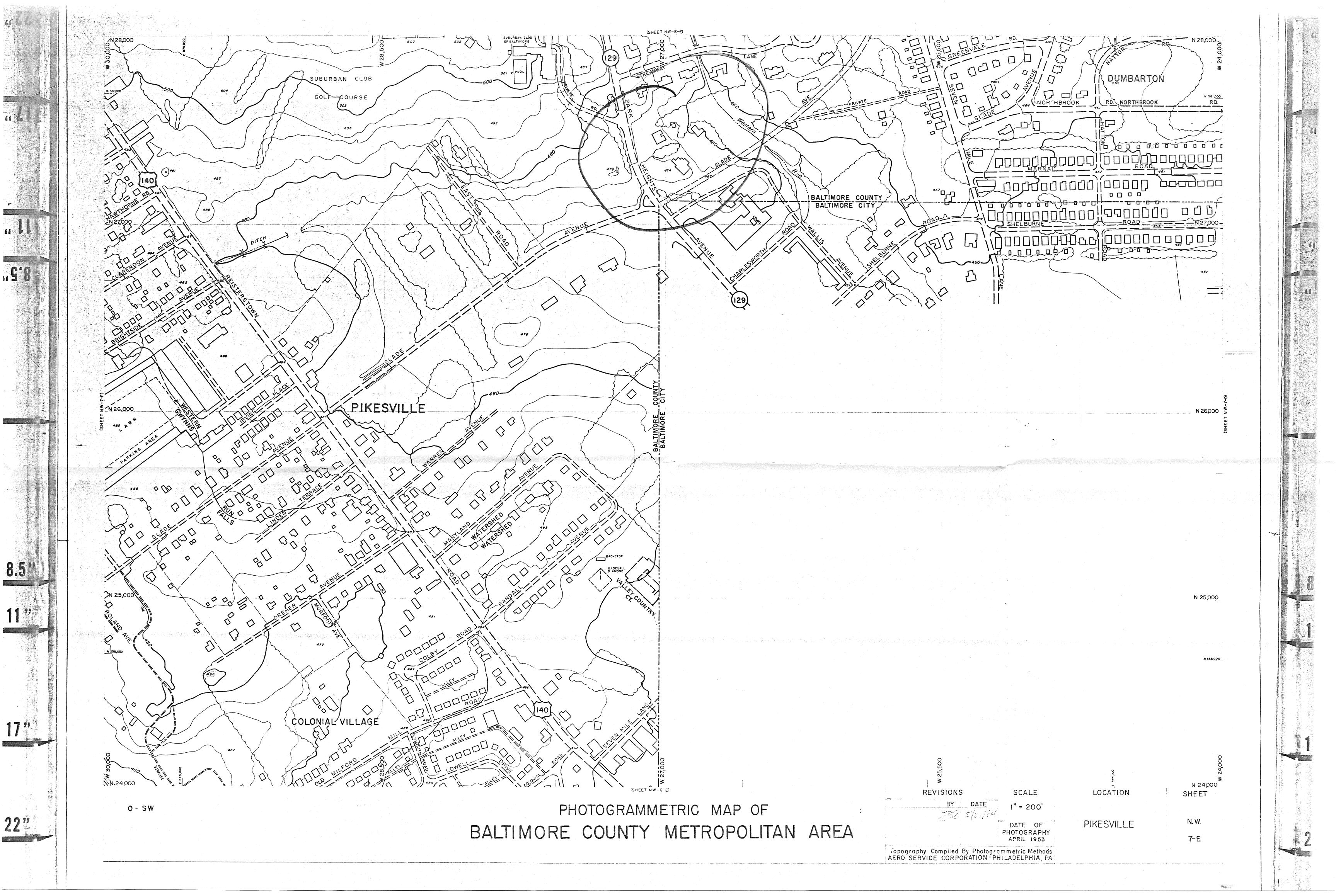


REAR 7503 PARK Heights AVE





Front 7503 PARK Heights AVE



ZONING USE PERMIT PLAN FOR CLASS A" ASSISTED LIVING FACILITY

LOCATED AT 7503 PARK HEIGHTS AVE BALTIMORE MD 21208

PROPERTY DWNER SIADE MAMSION L.L.C. 9455 BAITIMORE NATIONAL PIKE ELLICOH CITY 21042 410-461-7722

3RD ELECTION DIST

ZONING MAP ZONE D.R.Z AREA REQUIRED FOR 12 BEDS = 44,000 SQ.Ft.

DENSITY CALCULATIONS , 12 BEDS D.R. 2 25000 SOFT. FOR 7 BEDS 3,800 SOFT FOR EACH ADDED BED 25,000 19,000 44,000

LOT 51ZE 44,000 59. Ft OR 1.00 ACT PARKING SPACES I SPACE FOR EACH 3 BEDS 4 SPACES REQUIRED ALL PAIZKING USES SHOWN EXISTED PRIOR TO THE DATE OF THIS PIAN ALL PARKING WILL BE

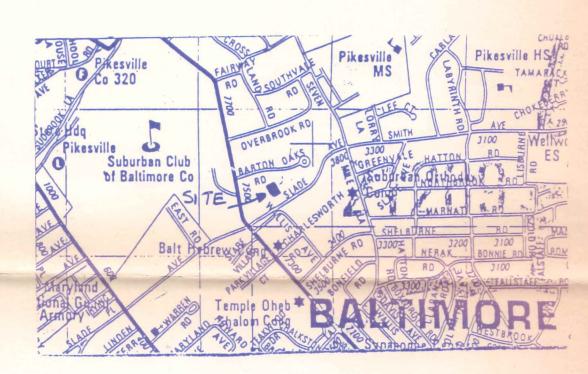
PERMANENTLY STRIPED

EXISTING FLOOR AREA 1st FLOOR 2,000 SQ.Ft. 200 FLOOR 1,800 SQFT. BASEMENT FOR STORAGE AND MECHANICAL EQUIP.

PHE . 1 NO. ALL EXISTING PAIRKING

ALL EXISTING PAIRKING

AREA PRIOR TO 2/24/94 Her



VICINITY MAP.

"This building has not been orginially 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 ploicies 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:

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

The undersigned are responsible for the accuracy of the information on this

(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 DWNER!

SINDE MAMSION L.L.C.

9455 BAIHIMORE NATIONAL PIKE

ELLICOH CITY 21042

410-461-7722

3RD ElECTION DIST

ZONING MAP ZONE D.R.Z AREA REQUIRED FOR 12 BEDS = 44,000 SQ.Ft.

DENSITY CALCULATIONS.

12 BEDS D.P. 2

25000 SOFT, FOR 7 BEDS

3,800 SOFT, FOR EACH ADDED BED

25,000

19,000

44,000

PARKING SPACES

I SPACE FOR EACH 3 BEDS

4 SPACES REQUIRED

ALL PARKING USES SHOWN
EXISTED PRIOR, TO THE DATE

OF THIS PIAN ALL

PARKING WIll BE

PERMANENTLY STRIPED

EXISTING FLOOR AREA

1st FLOOR 2,000 5Q.Ft.

2nd FLOOR 1,800 SQFT.

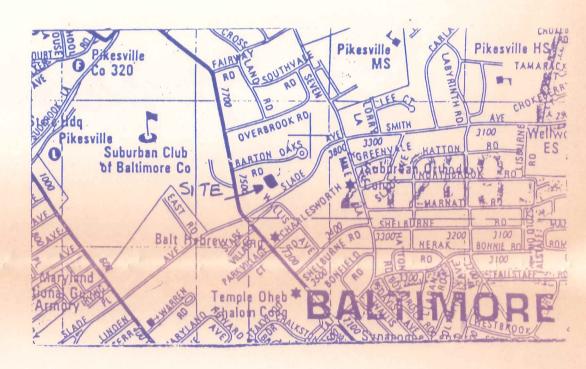
BASEMENT FOR STORAGE

AND MECHANICAL EQUIP.

· PS E6. 2 DP. L.10040 F.80 ALL EXISTING PAIRKING

ALL EXISTING PAIRKING

AREA PRIDE TO 2/24/94 9 てい



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m //A-

The undersigned are responsible for the accuracy of the information on this

(Signature)

(Print or Type Name)

(Signature)

(Print or Type Name)

SCALE 1" = 50