

# Fax

**To:** Brad  
**From:** Juanita Myrick/Marguerite Morris

---

**Fax:** 866-301-1146  
**Pages:** 5 6

---

**Phone:** 1-877-510-2831  
**Date:** 11/7/2013

---

**Re:** Copy of Subpoena  
**CC:**

---

**Urgent**     **For Review**     **Please Comment**     **Please Reply**     **Please Recycle**

---

● **Comments:**

Will accept records instead of appearance and this is a resend of what was delivered to Michael Maresca on October 23, 2013.

When I tried to confirm appearance by Mr. Maresca, he was very rude and told me to not call him again and did not refer me to your legal counsel

Thank you in advance for your assistance.

Email [morrisrite@msn.com](mailto:morrisrite@msn.com)

CIRCUIT COURT FOR ST. MARY'S COUNTY  
P.O. BOX 676  
LEONARDTOWN, MARYLAND 20650 - 0676

The Estate of Katherine  
Sarah Morris et al  
vs.  
Isaac Cardwell et al

Case Number 18-C-13-000911  
 Civil  
 Criminal

SUBPOENA

STATE OF MARYLAND, ST. MARY'S COUNTY, TO WIT:

TO: Michael Maresca - Valor Security Svcs, INC  
(Name, Address and County)  
407000 Arundel Mills Circle  
Hanover MD 21076

**YOU ARE HEREBY COMMANDED TO ATTEND AND TESTIFY AT A**

Court Proceeding  Deposition

at 21677 FDR Blvd, Lexington Park, MD (Lorifellow)  
Conf Rm  
on the 8 day of November, 2013 at 9 A. M.

and **YOU ARE COMMANDED TO PRODUCE THE FOLLOWING DOCUMENTS AND OBJECTS:**

See Attachment will accept documents  
in lieu of appearance

Subpoena requested by  Plaintiff,  Defendant; and any questions should be referred to Marguerite Morris 45985 North Greens Post Dr.  
(Name of Party or Attorney, Address & Phone Number)  
Great Mills MD 20634 (301) 408-8833

Date Issued: 10-22-13 Jean N. Williams, Clerk  
CLERK (Signature and Seal)

- 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.  
 - Unserved, by reason of \_\_\_\_\_

Date: \_\_\_\_\_ Fee \$ \_\_\_\_\_

THE CIRCUIT COURT OF ST MARY'S COUNTY MARYLAND

The Estate of Katherine Sarah Morris

\*  
\*

By Court Appointed Administrator  
Marguerite R. Morris et al

\* Case No. 18-C-13-000911 OT  
\*

Plaintiff,

\*  
\*

vs.

\*\*

Isaac Jerome Goodwin  
1920 Rayconda Place, Apt 108  
Fayetteville, NC 28304, et al

\*  
\*  
\*  
\*

Defendant

NOTICE OF PARTIES' ORAL DEPOSITIONS  
AND DEPOSITIONS DUCES TECUM

Marguerite Morris, *Pro Se* pursuant to the Maryland Rules of Procedure, will take the deposition and upon oral examinations of the following persons on the dates and at the times indicated, 21677 FDR Blvd., Lexington, Park, Maryland 20653. Deponents may submit requested documents in lieu of appearing for deposition.

DEPONENT: Valor Security Company  
Michael Maresca, Director or  
Representative  
c/o 7000 Arundel Mills Circle  
Hanover, Maryland 21076

TIME: 9:00 a.m. EST.

DATE: November 8, 2013

The deponents are to produce the following documents at the above-listed time and place:

1. Any contracts, correspondence, or downloaded communications regarding the May 5th and 6<sup>th</sup> incident regarding the death of Katherine Sarah Morris at the Arundel Mills Mall

location and any subsequent communications occurring from the incident at any of your locations.

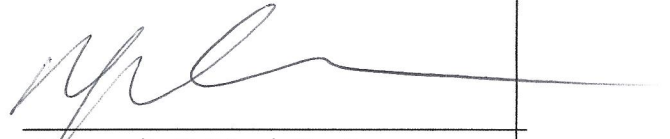
2. Any contract between the Arundel Mills Mall, Simon Properties, Anne Arundel Community College, Anne Arundel County Police, and any other officers to include any person or entity responsible for caring for the premises at the time of Plaintiff's death and the surveillance equipment and its recordings .
3. Any and all surveillance video/photo's as abstracted from the hard drive or digital back up of the May 5<sup>th</sup> and 6<sup>th</sup> incident leading to the death of Katherine Sarah Morris on May 6, 2012.
4. Any indemnity agreement between Anne Arundel Community College, Simon Properties, Anne Arundel County Police, the security services at the Arundel Mills Mall and any party to this case and nonparty which is relevant to the incident which is the basis of this suit.
5. Any rules, management guidelines, operating guidelines, or other similar writing or document that purports to show procedures for the management, care, maintenance, repair, and service of the premises in question.
6. Any and all photographs that the Deponents have of the scene of the incident or the resulting injuries to the deceased.
7. Any and all expert reports which have been obtained from any expert and if a report has not been prepared, the preparation of a report is hereby requested.
8. Copies of any and all statements previously made by Mall and College officers and Associates or any other witnesses concerning the subject matter of this lawsuit, including any written statement signed or otherwise adopted or approved by staff hereto

- and any stenographic, mechanical, electrical or other type of recording or any transcription thereof made by any person hereto and contemporaneously recorded.
9. Any and all drawings, maps or sketches of the scene of the incident which has been made.
  10. A copy of any surveillance movies or photographs which have been made of the Plaintiff.
  11. Surveillance footage of adjacent parking lots from the evening of May 5, 2012 and into the morning of May 6, 2012 to where the deceased vehicle was located.
  12. Reports or call-ins of any other vehicles parked on the lots between the hours or 6:30 p.m. May 5, 2012 to 6:00 a.m. May 6, 2012.
  13. All materials including, but not limited to, employee manuals, memoranda, and correspondence pertaining to safety rules and/or regulations to be followed by the employees to ensure safety of common space areas. This includes any training films and/or videotapes used.
  14. Any complaints about the performance of the safety officers and or other mall security personnel within the past 2 years.
  15. All premises inspection reports or other documents relating to observation of common areas safety by any person or entity, for the premises in question, for a period of one (1) years prior to, and all dates subsequent to May 6, 2012.
  16. Copies of any and all documentation, including but not limited to clean-up orders, log books, journals, and service orders relating to the incident upon which this suit is based, which set forth all requests for inspection, observation and verification that each was

completed, including the name of the employee who was assigned the work and the name of the person who carried out the service on May 5<sup>th</sup> and 6<sup>th</sup>, 2012.

17. Copies of any interviews or statements with alleged witnesses to the incident.
18. Copies of all documents, communications, records and other tangible things relied upon and/or referred to in your response.
19. Copies of any memoranda, correspondence, or minutes from any meetings regarding the May 6<sup>th</sup> incident from 2012 - present.
20. Any documents regarding complaints made by any other persons regarding the handling of incidents, prior to May 5, 2012 and subsequently.

Respectfully submitted,



---

Marguerite R. Morris Pro Se  
Hm 301-408-8833  
Fax 301-994-1862