

## Exhibit K

IN THE CIRCUIT COURT FOR BALTIMORE CITY

**CIVIL - NON-DOMESTIC CASE INFORMATION REPORT** (City or County)**DIRECTIONS**

**Plaintiff:** This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

**Defendant:** You must file an Information Report as required by Rule 2-323(h).

**THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING**

FORM FILED BY: <input type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	CASE NUMBER _____
CASE NAME: <u>FREDERICK KNOTT SR, et al</u> vs. <u>PAUL A DIEM, ET AL</u>	<small>(Clerk to insert)</small>
PARTY'S NAME: <u>FREDERICK KNOTT, SR.</u>	<small>Plaintiff</small>
PARTY'S ADDRESS: <u>5210 TRAMORE ROAD, BALTO. MD.</u>	PHONE: _____
PARTY'S E-MAIL: _____	<small>(Daytime phone)</small>
If represented by an attorney:	
PARTY'S ATTORNEY'S NAME: <u>RICHARD J. HACKERMAN</u>	PHONE: <u>410 243 8800</u>
PARTY'S ATTORNEY'S ADDRESS: <u>116 WEST UNIVERSITY PARKWAY, BALTO. MD. 21210</u>	
PARTY'S ATTORNEY'S E-MAIL: <u>RICHARD@RICHARDHACKERMAN.COM</u>	
JURY DEMAND? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
RELATED CASE PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, Case #(s), if known: _____
ANTICIPATED LENGTH OF TRIAL: _____ hours or _____ days	

**PLEADING TYPE**

New Case: ☒ Original ☐ Administrative Appeal ☐ Appeal  
 Existing Case: ☐ Post-Judgment ☐ Amendment  
 If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

**IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)**

<b>TORTS</b> <input type="checkbox"/> Asbestos <input type="checkbox"/> Assault and Battery <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Conspiracy <input type="checkbox"/> Conversion <input type="checkbox"/> Defamation <input type="checkbox"/> False Arrest/Imprisonment <input type="checkbox"/> Fraud <input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____ <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Malpractice-Medical <input type="checkbox"/> Malpractice-Professional <input type="checkbox"/> Misrepresentation <input type="checkbox"/> Motor Tort <input type="checkbox"/> Negligence <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Specific Performance <input type="checkbox"/> Toxic Tort <input type="checkbox"/> Trespass <input type="checkbox"/> Wrongful Death <b>CONTRACT</b> <input type="checkbox"/> Asbestos <input type="checkbox"/> Breach <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Confessed Judgment (Cont'd) <input type="checkbox"/> Construction <input type="checkbox"/> Debt <input type="checkbox"/> Fraud	<input type="checkbox"/> Government <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability <b>PROPERTY</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Breach of Lease <input type="checkbox"/> Detinue <input type="checkbox"/> Distress/Distrain <input type="checkbox"/> Ejectment <input type="checkbox"/> Forcible Entry/Detainer <input type="checkbox"/> Foreclosure <input type="checkbox"/> Commercial <input type="checkbox"/> Residential <input type="checkbox"/> Currency or Vehicle <input type="checkbox"/> Deed of Trust <input type="checkbox"/> Land Installments <input type="checkbox"/> Lien <input type="checkbox"/> Mortgage <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Statement Condo <input type="checkbox"/> Forfeiture of Property / Personal Item <input type="checkbox"/> Fraudulent Conveyance <input type="checkbox"/> Landlord-Tenant <input type="checkbox"/> Lis Pendens <input type="checkbox"/> Mechanic's Lien <input checked="" type="checkbox"/> Ownership <input type="checkbox"/> Partition/Sale in Lieu <input checked="" type="checkbox"/> Quiet Title <input type="checkbox"/> Rent Escrow <input type="checkbox"/> Return of Seized Property <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Tenant Holding Over	<b>PUBLIC LAW</b> <input type="checkbox"/> Attorney Grievance <input type="checkbox"/> Bond Forfeiture Remission <input type="checkbox"/> Civil Rights <input type="checkbox"/> County/Mncpl Code/Ord <input type="checkbox"/> Election Law <input type="checkbox"/> Eminent Domain/Condemn. <input type="checkbox"/> Environment <input type="checkbox"/> Error Coram Nobis <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Mandamus <input type="checkbox"/> Prisoner Rights <input type="checkbox"/> Public Info. Act Records <input type="checkbox"/> Quarantine/Isolation <input type="checkbox"/> Writ of Certiorari <b>EMPLOYMENT</b> <input type="checkbox"/> ADA <input type="checkbox"/> Conspiracy <input type="checkbox"/> EEO/HR <input type="checkbox"/> FLA <input type="checkbox"/> FMLA <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Wrongful Termination <b>INDEPENDENT PROCEEDINGS</b> <input type="checkbox"/> Assumption of Jurisdiction <input type="checkbox"/> Authorized Sale <input type="checkbox"/> Attorney Appointment <input type="checkbox"/> Body Attachment Issuance <input type="checkbox"/> Commission Issuance	<input type="checkbox"/> Constructive Trust <input type="checkbox"/> Contempt <input type="checkbox"/> Deposition Notice <input type="checkbox"/> Dist Ct Mtn Appeal <input type="checkbox"/> Financial <input type="checkbox"/> Grand Jury/Petit Jury <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Perpetuate Testimony/Evidence <input type="checkbox"/> Prod. of Documents Req. <input type="checkbox"/> Receivership <input type="checkbox"/> Sentence Transfer <input type="checkbox"/> Set Aside Deed <input type="checkbox"/> Special Adm. - Atty <input type="checkbox"/> Subpoena Issue/Quash <input type="checkbox"/> Trust Established <input type="checkbox"/> Trustee Substitution/Removal <input type="checkbox"/> Witness Appearance-Compel <b>PEACE ORDER</b> <input type="checkbox"/> Peace Order <b>EQUITY</b> <input checked="" type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Equitable Relief <input type="checkbox"/> Injunctive Relief <input type="checkbox"/> Mandamus <b>OTHER</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Friendly Suit <input type="checkbox"/> Grantor in Possession <input type="checkbox"/> Maryland Insurance Administration <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Specific Transaction <input type="checkbox"/> Structured Settlements
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IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)			
<input type="checkbox"/> Abatement <input type="checkbox"/> Administrative Action <input type="checkbox"/> Appointment of Receiver <input type="checkbox"/> Arbitration <input type="checkbox"/> Asset Determination <input type="checkbox"/> Attachment b/f Judgment <input type="checkbox"/> Cease & Desist Order <input type="checkbox"/> Condemn Bldg <input type="checkbox"/> Contempt <input type="checkbox"/> Court Costs/Fees <input type="checkbox"/> Damages-Compensatory <input type="checkbox"/> Damages-Punitive	<input type="checkbox"/> Earnings Withholding <input type="checkbox"/> Enrollment <input type="checkbox"/> Expungement <input type="checkbox"/> Findings of Fact <input type="checkbox"/> Foreclosure <input type="checkbox"/> Injunction <input type="checkbox"/> Judgment-Affidavit <input type="checkbox"/> Judgment-Attorney Fees <input type="checkbox"/> Judgment-Confessed <input type="checkbox"/> Judgment-Consent <input type="checkbox"/> Judgment-Declaratory <input type="checkbox"/> Judgment-Default	<input type="checkbox"/> Judgment-Interest <input type="checkbox"/> Judgment-Summary <input type="checkbox"/> Liability <input type="checkbox"/> Oral Examination <input type="checkbox"/> Order <input type="checkbox"/> Ownership of Property <input type="checkbox"/> Partition of Property <input type="checkbox"/> Peace Order <input type="checkbox"/> Possession <input type="checkbox"/> Production of Records <input type="checkbox"/> Quarantine/Isolation Order <input type="checkbox"/> Reinstatement of Employment	<input type="checkbox"/> Return of Property <input type="checkbox"/> Sale of Property <input type="checkbox"/> Specific Performance <input type="checkbox"/> Writ-Error Coram Nobis <input type="checkbox"/> Writ-Execution <input type="checkbox"/> Writ-Garnish Property <input type="checkbox"/> Writ-Garnish Wages <input type="checkbox"/> Writ-Habeas Corpus <input type="checkbox"/> Writ-Mandamus <input type="checkbox"/> Writ-Possession
<p><i>If you indicated Liability above, mark one of the following. This information is <u>not</u> an admission and may not be used for any purpose other than Track Assignment.</i></p> <p> <input type="checkbox"/> Liability is conceded.     <input type="checkbox"/> Liability is not conceded, but is not seriously in dispute.     <input type="checkbox"/> Liability is seriously in dispute. </p>			
MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)			
<input type="checkbox"/> Under \$10,000 <input type="checkbox"/> \$10,000 - \$30,000 <input type="checkbox"/> \$30,000 - \$100,000 <input type="checkbox"/> Over \$100,000			
<input type="checkbox"/> Medical Bills \$ _____ <input type="checkbox"/> Wage Loss \$ _____ <input type="checkbox"/> Property Damages \$ _____			
ALTERNATIVE DISPUTE RESOLUTION INFORMATION			
<p>Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)</p> <p> A. Mediation     <input type="checkbox"/> Yes     <input checked="" type="checkbox"/> No     C. Settlement Conference     <input checked="" type="checkbox"/> Yes     <input type="checkbox"/> No  B. Arbitration     <input type="checkbox"/> Yes     <input checked="" type="checkbox"/> No     D. Neutral Evaluation     <input type="checkbox"/> Yes     <input checked="" type="checkbox"/> No </p>			
SPECIAL REQUIREMENTS			
<input type="checkbox"/> If a Spoken Language Interpreter is needed, check here and attach form CC-DC-041 <input type="checkbox"/> If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form CC-DC-049			
ESTIMATED LENGTH OF TRIAL			
<p><i>With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL.</i></p> <p style="text-align: center;"><i>(Case will be tracked accordingly)</i></p> <p> <input type="checkbox"/> 1/2 day of trial or less     <input type="checkbox"/> 3 days of trial time  <input type="checkbox"/> 1 day of trial time     <input type="checkbox"/> More than 3 days of trial time  <input type="checkbox"/> 2 days of trial time </p>			
BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM			
<p><i>For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.</i></p> <p> <input type="checkbox"/> Expedited- Trial within 7 months of Defendant's response     <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response </p>			
EMERGENCY RELIEF REQUESTED			

COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE MANAGEMENT PROGRAM (ASTAR)	
<p style="text-align: center;"><i>FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.</i></p>	
<input type="checkbox"/> Expedited - Trial within 7 months of Defendant's response	<input type="checkbox"/> Standard - Trial within 18 months of Defendant's response
<p><b>IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.</b></p>	
CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)	
<input type="checkbox"/> Expedited <input checked="" type="checkbox"/> Civil-Short <input type="checkbox"/> Civil-Standard <input type="checkbox"/> Custom <input type="checkbox"/> Asbestos <input type="checkbox"/> Lead Paint <input type="checkbox"/> Tax Sale Foreclosures <input type="checkbox"/> Mortgage Foreclosures	Trial 60 to 120 days from notice. Non-jury matters. Trial 210 days from first answer. Trial 360 days from first answer. Scheduling order entered by individual judge. Special scheduling order. Fill in: Birth Date of youngest plaintiff _____ Special scheduling order. No scheduling order.
CIRCUIT COURT FOR BALTIMORE COUNTY	
<input type="checkbox"/> Expedited (Trial Date-90 days) <input type="checkbox"/> Standard (Trial Date-240 days) <input type="checkbox"/> Extended Standard (Trial Date-345 days) <input type="checkbox"/> Complex (Trial Date-450 days)	Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus. Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases. Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency. Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

DECEMBER 29, 2016

Date

116 WEST UNIVERSITY PARKWAY

Address

BALTIMORE, MARYLAND 21210

City, State, Zip

Signature of Counsel / Party

RICHARD J. HACKERMAN

Printed Name

**FREDRICK KNOTT SR.**  
5210 TRAMORE RD.  
BALTIMORE MD 21214  
PLAINTIFF

AND

**JOHN LESCHEFSKY**  
GREEN MEADOWS DR.  
DAILSTOWN, PA 17313  
PLAINTIFF

V.

**PAUL A DIEM**  
1517 WEST 36<sup>th</sup> ST.  
BALTIMORE, MD 21211  
DEFENDANT

AND

**STATE EMPLOYEES CREDIT UNION  
OF MARYLAND, INC.**  
971 CORPORATE BLVD  
LINTHICUM HEIGHTS, MD 21090  
BY SERVICE UPON IT THE RESIDENT  
AGENT:  
THE CORPORATION TRUST INC.  
351 WEST CAMDEN ST.  
BALTIMORE, MD 21201  
DEFENDANT

AND

**JOHN F. BROWN, TRUSTEE**  
8501 LASALLE RD. SUITE 212  
BALTIMORE, MD 21286-5980  
DEFENDANT

AND

IN THE  
CIRCUIT COURT  
FOR

BALTIMORE CITY

Case No.:

2016 DEC 29 PM 2:13  
CIVIL DIVISION

JAMES R. BROWN, III, TRUSTEE \*  
§501 LASALLE RD SUITE 212 \*  
BALTIMORE, MD 21286-5980 \*  
DEFENDANT \*

\*\*\*\*\*

**COMPLAINT**

Now comes the Plaintiffs, Fredrick Knott Sr. and John Leschefshy by their counsel, Richard J. Hackerman, and brings this action against Defendants, Paul A Diem, State Employees Credit Union Of Maryland, Inc., John F. Brown Trustee, and James R. Brown, III, Trustee, and for reason says:

1. Jurisdiction and venue in Baltimore City is proper in this case as all events occurred in the City of Baltimore.
2. Plaintiffs, Fredrick Knott Sr. and John Leschefshy purchased the real property known as 1517 West 36th St Baltimore, Md 21211, hereinafter "the property" on June 11, 2009 by deed recorded among the Land Records of Baltimore City, Maryland at Liber 11754 Folio 346. Simultaneous thereto a purchase money mortgage was entered into by Plaintiffs as mortgagors to Boardwalk 2001, LLC, mortgagee with respect to a \$40,000.00 purchase money loan entered into on said date. The mortgage is recorded among the Land Records of Baltimore City at Liber 11754 Folio 350.
3. On September 23, 2011 the Plaintiff, Fredrick Knott Sr. filed for relief under Chapter 7 of the Bankruptcy Code.
4. An order for relief was entered in this case on September 23, 2011 pursuant to 11 U.S.C § 301, thus triggering an automatic stay, pursuant to 11 U.S.C. § 362(a) of all debt collection activity against the Debtors. Section 362(a) of the Bankruptcy Code provides:  
(a) Except as provided in subsection (b) of this section, a petition filed under section 301, 302, or 303

of this title, or an application filed under section 5(a)(3) of the Securities Investor Protection Act of 1970, operates as a stay, applicable to all entities, of— (1) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title; (2) the enforcement, against the debtor or against property of the estate, of a judgment obtained before the commencement of the case under this title; (3) any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate; (4) any act to create, perfect, or enforce any lien against property of the estate; (5) any act to create, perfect, or enforce against property of the debtor any lien to the extent that such lien secures a claim that arose before the commencement of the case under this title; (6) any act to collect, assess, or recover a claim against the debt or that arose before the commencement of the case under this title; (7) the setoff of any debt owing to the debtor that arose before the commencement of the case under this title against any claim against the debtor; and (8) the commencement or continuation of a proceeding before the United States Tax Court concerning a tax liability of a debtor that is a corporation for a taxable period the bankruptcy court may determine or concerning the tax liability of a debtor who is an individual for a taxable period ending before the date of the order for relief under this title.

5. On January 6, 2012 Plaintiff Knott received a bankruptcy discharge. On February 7, 2012 a final decree was entered in the bankruptcy case.

6. Duly listed creditors included Boardwalk 2001 LLC and Jay A. Dackman, Esquire, its principal, member and owner as well as its' counsel.
7. On July 11, 2011 Boardwalk 2001 LLC filed a foreclosure action against the Plaintiffs with respect to the real property known as 1517 West 36th Street, Baltimore, Maryland.
8. Despite actual notice of the filing of the bankruptcy, Boardwalk 2001 LLC through its counsel Jay Dackman, Esquire conducted the foreclosure sale on November 18, 2011, while Plaintiff Knott was in the Chapter 7 Bankruptcy case and the automatic stay of Section 362 of the Bankruptcy Code was in effect. Numerous pleadings were filed in the foreclosure case while the automatic stay was in effect. The foreclosure is a nullity under applicable law.
9. The property was purchased at the foreclosure auction by Virginia Mathias by deed dated May 10, 2012, recorded among the land records of Baltimore City at Liber 14342, folio 368. Upon information and belief Ms. Mathias then sold the property to Boardwalk, 2001, LLC by deed dated September 25, 2012.
10. Defendant Paul A. Diem purchased the property on October 16, 2012 by deed recorded among the Land Records of Baltimore City, Maryland at Liber 14679 Folio 245. On said date Mr. Diem entered into a loan, executed a promissory note and a deed of trust in favor of State Employees Credit Union Of Maryland, Inc., Lender/Beneficiary and John F. Brown, and James R. Brown, III, Tthe Trustees named in the deed of trust. The deed of trust is recorded among the Land Records of Baltimore City, Maryland at Liber 14679 folio 252.

11. Defendants have no claim or right to any portion of the property. Plaintiffs are the owners of the subject property.

12. The Plaintiffs seek to remove any cloud from their title to the property resulting from the sale of the property in violation of the automatic stay of Section 362 of the Bankruptcy Code which was in effect at the time of the foreclosure auction and the subsequent purchase and loan transaction with respect to the property by Mr. Diem.

#### COUNT ONE

#### QUIET TITLE

13. The foregoing paragraphs are incorporated herein by reference. The sale which took place during the time the automatic stay and/or the discharge injunction was in effect was a nullity.

14. Defendants have no claim or right to all or any portion of the property. The property is owned by the Plaintiffs.

15. Plaintiffs seek to remove any cloud from their title to the property.

#### COUNT TWO

#### DECLARATORY JUDGMENT

#### COURTS AND JUDICIAL PROCEEDINGS SECTION 3-409

16. The foregoing paragraphs are incorporated herein by reference. The sale which took place during the time the automatic stay and/or the discharge injunction was in effect is a nullity.

17. Plaintiffs are seeking a judgment declaring the sale a nullity and that they are the owners of the property.

18. There exists an actual controversy with respect to the ownership of the property, antagonistic claims are present between the parties involved which indicate imminent and inevitable litigation and presumably Defendants assert an interest in the property.

### COUNT THREE

#### DECLARATORY JUDGMENT

#### COURTS AND JUDICIAL PROCEEDINGS SECTION 3-406

19. The foregoing paragraphs are incorporated herein by reference. The sale which took place during the time the automatic stay and/or the discharge injunction was in effect was a nullity.

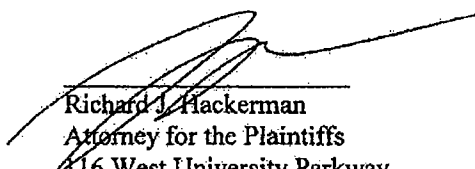
20. Plaintiffs are seeking a judgment declaring same and that they are the owners of the property.

21. There exists an actual controversy with respect to the ownership of the property. Section 3-406 of the Courts and Judicial Proceedings Article provides: "Any person interested under a deed, will, trust, land patent, written contract, or other writing constituting a contract, or whose rights, status, or

other legal relations are affected by a statute, municipal ordinance, administrative rule or regulation, contract, or franchise, may have determined any question of construction or validity arising under the instrument, statute, ordinance, administrative rule or regulation, land patent, contract, or franchise and obtain a declaration of rights, status, or other legal relations under it.”

WHEREFORE, Plaintiffs request an Order:

- A. For a declaration that the foreclosure sale of the property is a nullity.
- B. For a declaration that the Plaintiffs are the leasehold owners of the property.
- C. That the Defendants have no interest in the property.
- D. That Plaintiffs be awarded their reasonable counsel fees and costs.
- E. For such other and further relief as the nature of this cause may require.



Richard J. Hackerman  
Attorney for the Plaintiffs  
116 West University Parkway  
Baltimore, MD 21210  
410-243-8800

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THE CONTENTS OF THE  
AFOREGOING COMPLAINT ARE TRUE AND CORRECT TO THE BEST OF MY  
KNOWLEDGE, INFORMATION AND BELIEF.

  
FREDERICK KNOTT, SR.

  
JOHN LESCHEFSKY