

# NOTICE OF INTENT TO FILE MOTION FOR EXPEDITED DISCOVERY

\*\*IN THE UNITED STATES DISTRICT COURT\*\*

\*\*FOR THE DISTRICT OF MARYLAND\*\*

\*\*MARVIN TUTT\*\*

\*Plaintiff,\*

v.

\*\*STATE OF MARYLAND, et al.\*\*

\*Defendants.\*

\*\*Case No.: 8:25-cv-02006-TDC\*\*

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## NOTICE OF INTENT TO FILE MOTION FOR EXPEDITED DISCOVERY

Pursuant to the Case Management Order, Plaintiff provides notice of intent to file a Motion for Expedited Discovery based on imminent witness unavailability and evidence destruction concerns.

## ## CRITICAL TIMELINE EVIDENCE

- \*\*June 23, 2025\*\*: Plaintiff files federal lawsuit
- \*\*June 24, 2025\*\*: Governor Wes Moore announces employee buyouts (NEXT DAY!)
- \*\*August 4, 2025\*\*: Buyout acceptance deadline

This timeline correlation suggests witness tampering through financial inducements.

## ## WITNESSES AT RISK OF DISAPPEARING

Key witnesses likely accepting buyouts include:

- DSS employees with knowledge of phantom income scheme
- IT personnel who can explain database manipulations
- Supervisors who approved fraudulent garnishments
- Staff involved in co-plaintiff arrangement

Once these witnesses accept buyouts and leave state employment, they become effectively unreachable for discovery.

## ## SPECIFIC DISCOVERY NEEDED BEFORE AUGUST 4

1. \*\*Depositions\*\* of key DSS personnel
2. \*\*Document preservation\*\* from departing employees

3. **\*\*Electronic data\*\*** before systems are modified
4. **\*\*Communication records\*\*** about Plaintiff's case
5. **\*\*Federal incentive payment\*\*** documentation

## ## EVIDENCE OF URGENCY

The day-after timing (lawsuit filed June 23, buyouts announced June 24) creates reasonable inference of:

- Consciousness of liability
- Attempt to remove witnesses
- Evidence destruction plan
- Obstruction of justice

### **\*\*The Suspicious Timing:\*\***

The close temporal proximity of these events raises questions about potential coordination that discovery could clarify.

### **\*\*What Defendants Know That We Need to Discover:\*\***

1. Who ordered the phantom income entry?
2. How many federal incentive dollars were claimed?
3. Which officials knew income was false?
4. What communications preceded the co-plaintiff scheme?
5. Why was Magistrate Khoury (9 years at DSS) assigned?

## RELIEF TO BE SOUGHT

The Motion will request:

1. Expedited discovery order by July 20, 2025
2. Immediate depositions of at-risk witnesses
3. Emergency preservation order
4. Shortened response times
5. Priority scheduling given August 4 deadline

\*\*Respectfully submitted,\*\*

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Email: owner@caiatech.com

\*\*Date: July 15, 2025\*\*

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## CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I served a true and correct copy of the foregoing NOTICE OF INTENT TO FILE MOTION FOR EXPEDITED DISCOVERY upon the following parties via certified mail and first-class mail:

Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Charles County Department of Social Services

200 Kent Avenue

La Plata, MD 20646

State of Maryland

c/o Office of the Attorney General

200 Saint Paul Place

Baltimore, MD 21202

Charles County, Maryland

200 Charles Street

La Plata, MD 20646

Shara Gabrielle Hendler, Esq.

c/o Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Andrea Khoury

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

Mistey L. Metzgar

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Date: July 15, 2025