

In the  
District Court  
for  
Baltimore County  
Maryland

Chet Knaup

*Plaintiff*

v.

Matthew O'Reilly

*Defendant*

Civil Action: D-08-CV-22-031892

AFFIDAVIT OF MATTHEW O'REILLY

1. I, Matthew O'Reilly, am a party to this action, above the age of majority, and declare the following by firsthand, personal experience and perception:
2. Sarameredythe Merrill had vacated the property at 708 Cliveden Road W ("708 Cliveden"), Pikesville, MD 21208 prior to 04 October 2022, and held no possessory, property, or occupation interest after that date;
3. I notified Plaintiff Chet Knaup on 04 October 2022 that Sarameredythe Merrill had previously and permanently vacated the property at 708 Cliveden;
4. I have been attempting in good faith to vacate the property at 708 Cliveden for several months, including by hiring persons and businesses to remove my property and clean and maintain the premises;
5. Plaintiff Chet Knaup has interfered on numerous occasions with the persons and businesses I hired to assist in vacating the premises, causing significant delays in the vacancy process;

1 6. I have been informed by several women working on my behalf to vacate the  
2 property that they were "intimidated" and "harrassed" by Mr. Knaup on  
3 multiple occasions, and are willing to testify as such to this Court;

4 7. On 07 January 2023, two women informed me that Mr. Knaup attempted  
5 to forcibly enter 708 Cliveden, intimidating and frightening them, making  
6 them fear for their safety;

7 8. Mr. Knaup has threatened on several occasions to collect or secure my  
8 property against my will, including after this action was filed;

9 9. I brought a rented truck to 708 Cliveden on Sunday, 22 January 2023 to  
10 remove the last of my property and was unable to gain access to the property  
11 because my key no longer unlocks the doors;

12 10. Baltimore COunty Police Officer Norris responded to my call on 22 January  
13 and spoke with Mr. Knaup, and Officer Norris informed me that body camera  
14 footage is available to the Court for review under Incident Number  
15 230221159;

16 11. Officer Norris informed me that Mr. Knaup admitted to changing the locks  
17 at 708 Cliveden when he spoke with Mr. Knaup via telephone;

18 12. Mr. Knaup is therefore currently preventing me from removing my  
19 property from the premises by changing the locks/codes/access to the  
20 property; and

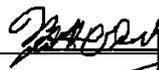
21 13. The only reason 708 Cliveden still contains any of my property and  
22 possessions is that Mr. Knaup has effectively prevented me from removing  
23 them.

24 14. I declare, this 25<sup>th</sup> day of January, 2023, under penalty of perjury under  
25 the laws of the United States of America that upon personal knowledge  
26 and/or to the best of my information and belief, the foregoing is true and  
27 correct.

28 Executed : \_\_\_\_\_  
25 January 2023

Signed:  \_\_\_\_\_  
Matthew O'Reilly

1  
2 Respectfully submitted to the Court this 25<sup>th</sup> day Of January, 2023.  
3  
4  
5  
6  
7  
8  
9  
10  
11



---

12 Matthew O'Reilly  
13 *14316 Reese Blvd*  
14 *Huntersville, NC 28078*  
15 *+1.704.906.3422*  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28