IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

FREDERICK SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 (Square 0503, Lot 0116). Plaintiff, v. OKSANA SHEMET SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 Defendant	CASE NO. 2025-CAB-004804 EMERGENCY MOTION FOR RESTORATION OF ACCESS, DECLARATORY JUDGEMENT, ADD PLAINTIFF TO TITLE

Plaintiff, Frederick Shaddock, respectfully moves this Court for an Order declaring his ownership interest in the marital property, restoring his access, and directing Defendant to cooperate in adding his name to the title. In support thereof, Plaintiff states:

1. Plaintiff and Defendant were married on January 17, 2001. The property at 520 N St SW, #S-316, Washington, DC, was purchased on October 12, 2012, during the marriage.

2. At the October 12, 2012 closing, Defendant intentionally neglected to inform the settlement company, Flynn Title, that she was married. Plaintiff was unable to attend the closing but trusted Defendant to act in the best interest of the marital partnership. Instead, she acted unilaterally to exclude him from the title.

3. Under D.C. Code § 16-910, property acquired during marriage is presumed to be marital property. Defendant has presented no valid antenuptial or postnuptial agreement to rebut this presumption.
4. Despite this, the property was titled solely in Defendant's name. Plaintiff has been systematically excluded from the property and its management, as detailed in prior filings.
5. Plaintiff's elevator key fob has been deactivated by Management at the request of Defendant, unlawfully restricting his access. He is currently unable to leave the property without being permanently locked out, preventing him from working, obtaining food, and—critically—marketing the unit to prospective tenants to stop the financial waste of $1,200/month in vacant condo fees.

6. Defendant has demonstrated a pattern of refusing to cooperate or recognize Plaintiff's rights, making a court order necessary. She is under a lot of stress after losing her job 6 month ago, getting health issues, her elderly parents in Russia are ill, stress about the Ukraine War, etc. and she is not acting in her own best interests, much less her husband's.

7. **Plaintiff is currently effectively trapped inside the his marital unit at S-316 for the 3rd day.** On September 10 he went up the elevator and used his keys to get into S-316. But on 9/11 the elevator key was electronically deactivated at Defendant's request to Management. He is running out of food and is unable to leave to purchase groceries because he cannot operate the elevator without a functioning fob and will be permanently locked out if he exits the building. This unlawful restraint poses an immediate risk to his health and safety.

WHEREFORE, Plaintiff respectfully requests this Court:

A. **Order Defendant and/or Harbour Square Management to immediately restore Plaintiff's full access, including a working elevator key fob.**

B. Issue a Declaratory Judgment that Plaintiff Frederick Shaddock holds a one-half (50%) marital interest

in the property located at 520 N St SW, #S-316, Washington, DC 20024.

C. Order Defendant Oksana Shemet Shaddock to execute, within 14 days, all documents required by the Harbour Square Cooperative to add Plaintiff to the Proprietary Lease and Stock Certificate for the property.

D. In the event Defendant refuses to comply, authorize the Court Clerk or another appointed official to execute said documents on Defendant's behalf.

E. Grant such other and further relief as the Court deems just and proper.

Dated: September 12, 2025

Respectfully submitted,

/s/ Frederick Shaddock
Frederick Shaddock, Pro Se

CERTIFICATE OF SERVICE

I certify that on September 12, 2025, this motion was served via the DC Court Portal pto:
Oksana Shemet Shaddock
Emailed to Robert Liotta, Esq. (Attorney for Defendant)
and will send via certified mail asap
3726 Harrison St NW, Washington, DC 20015