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 MOTION FOR PARTIAL SUMMARY JUDGMENT Declaration of Marital Property and Voiding defective, unrecorded Quit Claim Deed

COMES NOW Plaintiff moves under Superior Court Domestic Relations Rule 56 for partial summary judgment declaring the Harbour Square Property (DC Condo) marital and the 2013 quit claim deed null and void. No genuine dispute exists.

I. Undisputable Facts

1. Parties married January 17, 2001 (Exhibit 1: Certificate).
2. Property purchased October 10, 2012 (Exhibit 2: Deed)—post-marriage.
3. 2013 quit claim unrecorded, bears forged signature, never filed at DC Recorder of Deeds (Exhibit R3: Comparison/Affidavit).
4. Plaintiff's contributions: Ongoing assessments/support (Exhibits from Amended Complaint, Nov. 7, 2025).

II. Argument

Under § 16-910, post-marriage property is marital absent transmutation. Quit Claim invalid, unrecorded, and fraudulent —D.C. Code § 42-401 et seq.;
common law forgery voids title). No material fact dispute; Plaintiff entitled to judgment (R. 56(a); Celotex Corp. v. Catrett, 477 U.S. 317 (1986), applied in DC).

III. Prayer for Relief

1. Declare Property marital (50/50 equity), including DC Condo, Fairfield Iowa house, DC Mercedes, Iowa Mercedes.
2. Void Quit Claim deed, unrecorded, with numerous defects (Exhibit B).
3. Schedule final distribution hearing post-January 16, 2026.
4. Enjoin Defendant from actions that dissipate Plaintiff's use and enjoyment of marital property, including deactivation of key fob to elevators, gym, and pool - necessary to comply with doctor's order to exercise daily at 70 years old.
5. Enjoin Defendant, Harbour Square Management, from interfering with Plaintiff's access to his U.S. Mail. (Exhibit M)
6. Order addition of Plaintiff as an Authorized Occupant of Harbour Square Owner's Cooperative.

Respectfully submitted,

/s/ Frederick J. Shaddock

Exhibits

ExhibitM1_MarriageCertificate20010117ShaddockFrederickOksana.pdf

ExhibitM2_ShaddockDeedHarbourSquareCondo20101012.pdf

ExhibitB_BogusOksanaQuitclaimdeed20131207R.pdf - Bogus "Quit Claim Deed" unrecorded, misusing electronic signature and notary

ExhibitM_MailMalfeasance_.pdf - obstruction of mail proving Plaintiff's DC residency (Pentagon Federal bank checks and DMV license), U.S. Code § 1701

Certificate of Service

Served via email to Robert C. Liotta, Esq. (rcl@ldelaw.com), and
Oksana Shaddock. Defendant, OksanaShaddock@gmail.com

/s/ Frederick J. Shaddock
Date: January 8, 2026