

Fields & Tollett

Association of Attorneys

C. Douglas Fields
Attorney at Law
doug@fieldsandtollett.com
michelle@fieldsandtollett.com



169 E First St.
Crossville, TN 38555
(931) 456-4541

Kelly A. Tollett
Attorney at Law

Fax:(931) 456-5747

September 11, 2023

Matthew J. McClanahan, Esq.
McClanahan & Winston, P.C.
P.O. Box 1110
Crossville, TN 38557

Re: Lake Park Resort, Inc., et al. vs. Lake Park Resort, Inc., et al
Cumberland County Chancery Court No. 2022-CH-2308

Dear Matt,

Please find enclosed, the Second Set of Interrogatories and Requests for Production of Documents for your clients to answer, regarding the above matter.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Douglas Fields".

C. Douglas Fields
Attorney at Law

CDF/md
Enclosure

IN THE CHANCERY COURT FOR CUMBERLAND COUNTY, TENNESSEE

LAKE PARK RESORT, INC.)
by its members;)
LONNA O'LEARY,)
BOB & PATTY BELCHER,)
TONY JOHNSON,)
ANNA JACKSON,)
ROBYN PESSON,)
JACOB & AMANDA VOSS,)
SHIRLEY TURNER,)
JONATHON WADE HENDRIX,)
MICHAEL HOLDSAMBECK, and)
ZACH BURGESS,)

Plaintiffs,)

vs.)

No. 2022-CH-2308

LAKE PARK RESORT, INC. directors;)
ROBYN MORGAN RIEL,)
JERRILYN TOMS,)
JENNIFER SPIVEY and)
those signing as DIRECTORS on)
EXHIBIT D.)

Defendants.)

SECOND SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS PROPOUNDED TO DEFENDANTS

TO: All Named Defendants
c/o Matthew J. McClanahan, Esq.
McClanahan & Winston, P.C.
P.O. Box 1110
Crossville, TN 38557

The Plaintiffs, pursuant to Rule 34 of the Tennessee Rules of Civil Procedure, requests that the Defendants respond to the following requests for production of documents separately and fully in writing and under oath within thirty (30) days from the date of service.

The requests which follow are to be considered as continuing, and you are requested to

provide, by way of supplementary answers thereto, such additional information as you or other persons acting on your behalf may hereafter obtain which will augment or otherwise modify your answers now given to the interrogatories below.

Further, please take notice that the information sought in these interrogatories should be supplied, whether the same be within the knowledge or under the control of the party or within the knowledge or under the control of counsel. The information referred to within the knowledge or under control of counsel does not relate to matters that would come under the attorney/client privilege.

Please note as used herein:

(a) The word "document" means any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts and both sides thereof, and including but not limited to: papers, books, letters, photographs, objects, tangible things, messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings, affidavits, statements, summaries, opinions, reports, studies, analysis, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, summaries, sound recordings, computer printouts, data processing input and output, microfilms, and all other records kept by electronic, photographic, or mechanical means, and things similar to any of the foregoing.

(b) The word "or" means "and/or".

(c) The word "identify" means, with respect to any statements, documents, act, practice, occurrence, event, device, scheme, meeting, conference, communications, or other utterance, the date thereof, the party or parties causing, issuing, or communicating said statement, communications, or utterance, the parties to whom and in whose presence such statement, communication or utterance was given or transmitted, the parties who participated in, caused, or had knowledge of any act, practice, occurrence, event, device, scheme, meeting or conference, and whether any of the foregoing was in writing, in which event describe the terms thereof (or annex a copy to the answers to these interrogatories), or oral, in which event state the substance thereof.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce a copy or for inspection and copying, the association's records that reflect the payment and/or non-payment of dues, and credits against dues obligations of any members and current balances of member dues obligations.

ATTACHED? ☐ Yes ☐ No

If no, why?


2. Please produce a copy or for inspection and copying, the board election records that reflect the payment and/or non-payment of dues, and credits against dues obligations of any members and current balances of member dues obligations.

ATTACHED? ☐ Yes ☐ No

If no, why?

Respectfully submitted this the 11th day of September, 2023.

LAKE PARK RESORT, INC.
by its members;
LONNA O'LEARY,
BOB & PATTY BELCHER,
TONY JOHNSON,
ANNA JACKSON,
ROBYN PESSON,
JACOB & AMANDA VOSS,
SHIRLEY TURNER,
JONATHON WADE HENDRIX,
MICHAEL HOLDSAMBECK, and
ZACH BURGESS


BY: C. DOUGLAS FIELDS, ESQ., BPR# 018647
Attorney for Plaintiffs
Fields & Tollett
Association of Attorneys
18 East Street
Crossville, TN 38555
(931) 456-4541

CERTIFICATE OF SERVICE

I, C. DOUGLAS FIELDS, ESQ., do hereby certify that a true and exact copy of the foregoing has been served upon:

All Named Defendants
c/o Matthew J. McClanahan, Esq.
McClanahan & Winston, P.C.
P.O. Box 1110
Crossville, TN 38557

by placing a true and exact copy of the same in the United States Mail with sufficient postage thereupon to carry it to its destination.

This the 11th day of September, 2023.


C DOUGLAS FIELDS, ESQ., BPR# 018647