

Fields & Tollett

Association of Attorneys

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November 17, 2022

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

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

Dear Matt,

Please advise if I need to, or if it is preferred, submit formal discovery, otherwise, I would hereby informally request the following information to prepare for a settlement conference;

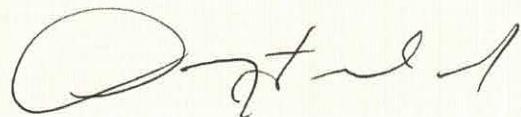
1. Financial Information
 - A. Bank Records for the last 10 years.
Bank statements are fine if they show how, or for what, money is spent on, and deposits. Hopefully, they include those little images of checks & deposits.
 - B. Corporate Books showing the accounting of the corporation, credits to members, dues obligations and the like.
2. Corporate History
Copies of the Charter & By-Laws, and changes to them over the years, whether or not actually recorded.

I think this is sufficient. It could lead to a request for something more, I hope not.

I'll advise I have thought about the minutes of the meetings. Not sure if they have been kept up with, or if it is burdensome. At this point, I will leave it optional to you. Whether it is burdensome, you believe helpful, etc. So, if you choose to include them fine, if it's a hassle and you don't feel its helpful, we'll leave them out, unless felt necessary.

Finally, I chose ten years because it is the longest S.O.L. and I don't think there is a lot of money to account for. While they should have all the financials, if you think something else is appropriate, give me a call or something.

Sincerely,

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

C. Douglas Fields
Attorney at Law

CDF/md