

SWORN AFFIDAVIT OF GRANT BILLINGS

STATE OF TENNESSEE
COUNTY OF PUTNAM

Pursuant to ongoing litigation in Case # 2022-CH-2308 filed in Cumberland County, TN (hereafter "the Case") and first being duly sworn according to law, Affiant would state the following:

1. My name is William Grant Billings a/k/a Grant Billings.
2. I am a property owner at Lake Park Resort and am also a Member in Good Standing according to the By-laws of Lake Park Resort, Inc. (herein "Lake Park")
3. At the request of Dr. Robyn Reil, a member of the board of directors of Lake Park, I have from time to time assisted the board, and accompanied them to Attorney Matthew McClanahan's office, and the Courtroom, regarding the above stated Case in which Lake Park is the Defendant.
4. Because of my participation with the Board of Lake Park in the Case I've become familiar with the Plaintiff's attorney, C. Douglas Fields and he has become familiar with me.
5. Mr. Fields called me on October 29, 2024. I recall speaking with him while in the waiting area of my Vet's office. He said that Lake Park had not followed up with anything he (Attorney Fields) had asked for, and nothing was provided to his office. Furthermore, he said that that I personally had not held up my end of any arrangements we had made, as we have not yet held an election. He went on to say that the things he has asked for have not been furnished and could be reported to the judge as contempt of court which could result in fines or even time in jail. I felt very threatened by the whole situation because, to my knowledge, we had already provided ALL the information Mr. Fields had requested several times and were waiting to hear back from him with the names of those who had made POA dues payments into the escrow account held at his office for the Lake Park dues. I recall that I thought the interaction with him, and just his calling me, was very unusual and strange. By this time, every interaction with our attorney, Matthew McClanahan, or theirs, C. Douglas Fields, was very weird.
6. To digress, before the October 29 phone call to me by the other side's attorney, at the initial meeting of myself, our attorney Matthew McClanahan, Douglas Fields, and plaintiffs' representative, Anthony Johnson, Jr., everyone had agreed that these four would be overseeing a Member's election and counting the votes. This initial meeting was a Zoom call, with Matthew in his automobile but it became obvious to me that Matthew was hardly paying attention, for the entire time. Originally, I agreed to COUNT votes in the Lake Park election, however, I felt that a lot more had been dropped onto my plate since the beginning, where I was merely tasked with collecting member names

and contact information so that the election could be announced. I explained to them all that the Board had it, but it was as if they wanted me to do it without the Board's input and just go it alone.

7. There has been nothing right about this whole lawsuit and every interaction, I have come to dread. I almost do not feel safe to go out to my property, and have even talked with my wife, Luna, about selling it due to this whole lawsuit matter. The defense has provided everything asked for while the plaintiffs have done nothing but change the rules and issue threats. Mr. Fields has telephoned me, harassed me for sensitive member information, and has called every play unchecked. Our attorney has allowed this to continue by not acting swiftly in our interests and has neglected, over and over again for 2 years, to get Plaintiff's response to our discovery and documents requests. In my humble opinion, BOTH attorneys deserve some form of censure.

8. If requested, I agree to confirm all the facts contained herein to the Consumer Assistance Program for The Board Of Professional Responsibility upon their giving me an agreed upon time and place of a telephonic or in person meeting.

9. I have not been paid and will not receive any compensation whatsoever or other remuneration or thing of value in connection with my assistance to the Board of Directors of Lake Park or, as it may relate to this Sworn Affidavit.

FURTHER AFFIANT SAYETH NOT.

Dated this 11 day of April, 2025.


William Grant Billings

Personally appeared before me, the undersigned authority, William Grant Billings, personally known to me or who produced sufficient identification, and who upon being sworn, deposes and says that he signed and above and foregoing AFFIDAVIT.

SWORN TO BE BEFORE ME this 11 day of April, 2025


NOTARY PUBLIC, State of Tennessee

My Commission Expires

