

IN THE CHANCERY COURT for CUMBERLAND COUNTY, TENNESSEE

LAKE PARK RESORT, INC. by its members,
LONNA O'LEARY, MIGS
BOB & PATTY BELCHER, Owes \$600
TONY JOHNSON, Owes \$1,290
ANNA JACKSON, Owes \$825
ROBYN PESSON, Owes \$70
JACOB & AMANDA VOSS, Owes \$770
SHIRLEY TURNER,
JONATHON WADE HENDRIX, Owes \$1,330
MICHAEL HOLDSAMBECK Non-member, and
ZACH BURGESS, Owes \$75
Plaintiffs.

vs.

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

No. 2022-CH-2308

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS PROPOUNDED TO PLAINTIFFS**

TO: All Named Plaintiffs
c/o C. Douglas Fields, Attorney at Law
Association of Attorneys
169 E First Street
Crossville, TN 38555

The **Defendants**, pursuant to Rules 33 & 34 of the Tennessee Rules of Civil Procedure requests that the **Plaintiffs** answer the following interrogatories and requests for production of documents separately and fully in writing and under oath within thirty (30) days from the date of service.

The interrogatories and 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.

1. Please list current **plaintiffs** by full name, including address, membership status (paid/unpaid), and source of annual income:

ANSWER:

2. If Sarai David formed a not-for-profit corporation with her as president, created an HOA within the Park again, with her as president, and initiated this and another lawsuit against LPRI, why is she no longer a **plaintiff**? Does she still hold offices in the new HOA and not-for-profit corporation? If so, please list title(s) here:

ANSWER:

___ YES ___ NO

TITLE(S) _____

3. Is Michael Holdsambeck an owner/renter/resident/guest (of whom), and what is his Park address?

___ OWNER ___ RENTER ___ RESIDENT ___ GUEST OF _____

ADDRESS _____

4. Is Joe Springer an owner/renter/resident/guest (of whom), and what is his Park address?

___ OWNER ___ RENTER ___ RESIDENT ___ GUEST OF _____

ADDRESS _____

5. Explain the duties and authorizations of Joe Springer and James Havrilka, who are listed as "Park Security" in the new homeowners' association.

ANSWER:

6. What is **plaintiffs'** future plan for Lake Park if this lawsuit is settled in their favor? How will **plaintiffs** generate income for the Park?

ANSWER:

7. Will plaintiffs assess existing and new property owners dues as well as an annual membership fee? Why do the plaintiffs refuse to pay annual dues/fees currently owed to LPRI, some as far back as 14 years?

☐ YES ☐ NO

WHY:

8. What is Anna Jackson's relationship to former Cumberland County Clerk, Judy Swallows? To attorney, C. Douglas Fields? To Gordon W. Selby?

ANSWER:

9. What is Anna Jackson's interest in the following properties located in Crossville, TN:

171 McClarty Lane

160 VFW Loop

100 VFW Loop

210 VFW Loop and

116 East Lane?

10. Who made the threat of litigation to Member-at-Large Jennifer Spivey, as well as when and where did this occur?

ANSWER:

11. Did Sarai David and Anna Jackson refuse entry to Savanna Robison, a member in good standing, at the "alternate" members meeting held at Sarai David's house on June 10, 2022 and why?

☐ YES ☐ NO

WHY: