

SEVENTH JUDICIAL DISTRICT COURT
COUNTY OF CATRON
STATE OF NEW MEXICO

JESSE CHILDERS, Individually and on behalf of
WILD HORSE RANCH LANDOWNER'S ASSOCIATION,
CHAIRMAN OF THE BOARD,

Plaintiff,

v.

No. D-728-CV-2024-00026

ALAN DUGAN, EX-PRESIDENT;
JIM FEEHAN, EX-SECRETARY and EX-TREASURER;
CARMEN BRONOWSKI, EX-TREASURER;
JERRY FOLWER, EX-DIRECTOR;
GREG BRONOWSKI, EX-DIRECTOR;
RON RACICOT, EX-DIRECTOR;
MITZY LADRON-NICHOLS, EX-DIRECTOR;
STEVE MALVITZ, EX-DIRECTOR;
RACHEL PONDER, EX-PONDER, EX-DIRECTOR;
ANDY RHOMERG, EX-DIRECTOR; AND
RON RACICOT, EX-DIRECTOR,

Defendants.

AFFIDAVIT OF JIM FEEHAN

STATE OF NEW MEXICO)
) ss.
COUNTY OF CATRON)

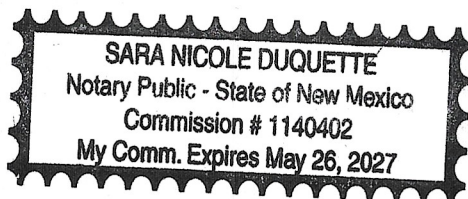
I, JIM FEEHAN aka JAMES FEEHAN, the affiant herein, having been duly sworn, states upon oath:

1. I am a resident of the State of New Mexico.
2. I am over eighteen (18) years of age.
3. This Affidavit is submitted in support of Defendants Motion for Temporary Restraining Order and Preliminary Injunction.

4. I was appointed Secretary of the Wild Horse Landowners' Association during the Regular Board Meeting held May 2nd, 2024
5. I did not receive any written proxies prior to the July 5th Member's Meeting. The WHRLA By Laws, Article III, Section 5 require all proxies to be in writing and filed with the secretary.
6. The WHRLA President Allen Dugan was approached by Nesbitt Hagood prior to calling the Member's Meeting to order and told his position as President was not recognized and he would not allowed to conduct the meeting. There was obvious tension amongst the gathered landowners and a Sherriff's Deputy was present. Rather than contribute to the contentious atmosphere, the Board members and Officers chose to leave the area and reconvene at a later date.
7. The Member's Meeting was rescheduled for July 20th to be held via Zoom. Notification of the rescheduled meeting was posted to the WHRLA website on July 9th in order to provide 10 days notice in compliance with the WHRLA By Laws, Article III, Section 3.


(Signature)
James Feehan, Affiant
(Print Name)

SUBSCRIBED AND SWORN to before me this 16 day of October, 2024 by




Notary Public