

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.

**DEFENDANTS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFF JESSE CHILDERS**

To: Jesse Childers
c/o Andrew M. Sanchez, Esq.
5051 Journal Center Blvd. NE, Suite 320
Albuquerque, NM 87109
(505) 259-2069
asanchez@edlawyer.com

COME NOW, Defendants, by and through their attorney, McKade R. Loe, ROSEBROUGH, FOWLES & FOUTZ P.C., and, pursuant to Rule 2-804 NMRA, requests that Plaintiff JESSE CHILDERS produce and permit the inspection and copying of the documents and

other materials within thirty (30) days from the date of service hereof, at the offices of Rosebrough & Fowles, P.C., P.O. Box 1027, Gallup, New Mexico 87305.

DOCUMENTS TO BE PRODUCED:

REQUEST NO. 1: Any and all minutes of meetings held by you as “Chairman of the Board” or in your purported position as a member of the board of directors since July 5, 2024.

RESPONSE:

REQUEST NO. 2: Any and all minutes and/or notes from the gathering held on July 5, 2024.

RESPONSE:

REQUEST NO. 3: Any and all receipts and/or contract of business dealings you have purportedly occurred on behalf of the association.

RESPONSE:

REQUEST NO. 4: Any and all “announcement(s)” or postings that have been posted and/or shared to the members of the Association on your behalf as “Chairman of the Board” of Directors.

RESPONSE:

REQUEST NO. 5: Any and all documents, reports, video footage, and/or names of witnesses that you rely on in proving the claim “I have received reports (video) of certain board members trespassing and when challenged, use the excuse they are on the board.”

RESPONSE:

REQUEST NO. 6: Any and all documents, receipts and/or invoices you have used to prove the claim that “it is said to cost \$600.00 per month per camera” to operate the security cameras in use by the Association.

RESPONSE:

REQUEST NO. 7: Any and all documents, reports, video footage, and/or names of witnesses that you rely on in proving the claim Jim Feehan was ejected from the July 5, 2024, members meeting by a Sherrif’s Deputy.

RESPONSE:

ROSEBROUGH, FOWLES & FOUTZ P.C.

By /s/ McKade R. Loe
McKade R. Loe
Attorney for Defendants
101 West Aztec Ave., Suite A
P. O. Box 1027
Gallup, New Mexico 87305-1027
(505) 722-9121

VERIFICATION

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

I, JESSIE CHILDERS, being first duly sworn upon his oath, deposes and states that I have answered Defendants' First Request for Production of Documents to Plaintiff Jesse Childers and states that the answers are true and correct to the best of my knowledge and belief.

JESSE CHILDERS

SUBSCRIBED AND SWORN TO before me this _____ day of September, 2024 by
JESSIE CHILDERS.

Notary Public

My Commission Expires:
