

**STATE OF NEW MEXICO
COUNTY OF CATRON
SEVENTH JUDICIAL DISTRICT COURT**

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
Judge: Mercedes C. Murphy

ALAN DUGAN, Ex-President, JIM FEEHAN,
Ex-Secretary and Ex-Director, CARMEN
BRONOWSKI, Ex-Treasurer, JERRY
FOWLER, Ex-Director, GREG BRONOWSKI,
Ex-Director, RON RAICOT, Ex-Director,
MITZY LADRON-NICHOLS, Ex-Director,
STEVE MALVITZ, Ex-Director, RACHEL
PONDER, Ex-Director, and ANDY
RHOMBERG, Ex-Director,

Defendants.

**PLAINTIFF'S OBJECTIONS AND RESPONSES TO DEFENDANTS' FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF JESSE CHILDERS**

COMES NOW Plaintiff Jesse Childers ("Mr. Childers" or "Plaintiff"), by and through his attorneys of record, Himes, Petrarca & Fester, Chtd., (Andrew M. Sanchez), and hereby submits his objections and responses to Defendants' First Request(s) for Production as follows:

GENERAL OBJECTIONS:

Plaintiff objects to the Requests to the extent they seek information protected from disclosure by the attorney-client privilege or the work product doctrine. Rules 1-026 and 11-503 NMRA 2000.

In answering these Requests, Plaintiff reserves all evidentiary objections to any responses or documents that may be offered in evidence at trial or in any hearing.

Requests seeking legal arguments on dispositive matters do not require the Plaintiff to set forth a narrative or dispositive motion to be contained in such answers or responses. *See Lucero v. Valdez*, 240 F.R.D. 591, 594–95 (D.N.M. 2007).

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: *See* Answers to Interrogatory Nos. 3 and 8 and Childers 00002-00003. Plaintiff will supplement as additional responsive information is identified.

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

RESPONSE: *See*, Answer to Interrogatory No. 2 and Childers 00002. Plaintiff will supplement as additional responsive information is identified.

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

RESPONSE: *See* Answer to Interrogatory No. 8 and Childers 00002-00003. Plaintiff will supplement as additional responsive information is identified.

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: *See* Answer to Interrogatory No. 11 and Childers 00004-00006, attached hereto. Plaintiff will supplement as additional responsive information is identified.

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: See Answer to Interrogatory No. 22. Plaintiff will supplement as additional responsive information is identified.

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: See Answer to Interrogatory No. 23. Plaintiff will supplement as additional responsive information is identified.

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 Sheriff’s Deputy.

RESPONSE: See Answer to Interrogatory No. 24 and Childers 00001. Plaintiff will supplement as additional responsive information is identified.

HIMES, PETRARCA & FESTER, CHTD.

By: /s/ Andrew M. Sanchez
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**ATTORNEYS FOR THE PLAINTIFF JESSE
CHILDERS AND THE WILD HORSE RANCH
LANDOWNERS’ ASSOCIATION**