

Case No: CV-06-00077

FILED

2006 JAN 18 AM 11:29

We, COLLIN COUNTY GAY & LESBIAN ALLIANCE INC. (CCGLA) BOARD OF DIRECTORS, a Texas Nonprofit Corporation (Dawnetta Miller, Registered Agent, Morris Garcia, President, Rosalinda Martinez, Treasurer, Michael Agan, Vice President, Wendell Mott, Secretary and Kenneth Stowe, Director), Defendant

Vs

JAMES DAVID NUNN, Plaintiff

TO THE HONORABLE COURT:

We, COLLIN COUNTY GAY & LESBIAN ALLIANCE (CCGLA) INC., Defendant generally deny all the allegations set forth in the Plaintiff's petition and deny Plaintiff's claim. The facts of said defense are:

The CCGLA Board fulfilled the legal obligations and represented the best interests of the membership / organization by making efforts to retain the organizational structure of the organization and adhering to the organization's bylaws regarding the removal of James David Nunn as a board member and a member of the organization by:

- Providing two hearings, the causes of removal and adequate notice regarding the removal as James David Nunn as a board member and as a member of the organization;
- Withdrew "written consent" at a November 20, 2005 meeting which had no impact on the outcome of the Collin Equality Foundation Special Meeting;

The CCGLA Board also denies the allegations of falsely accusing James David Nunn of inimical activity and of accusing James David Nunn of the sole responsibility for actions taken by the Collin Equality Foundation Board of Trustees. Furthermore, the CCGLA Board contends the best interests of the organization where upheld and the board acted in a professional manner.

Wherefore premise considered, Defendant prays that the Plaintiff take nothing in this cause of action; and the Defendant go hence without delay and cost of said suit be taxed against Plaintiff.

COLLIN COUNTY GAY & LESBIAN ALLIANCE INC.
Defendant

Rosalinda Martinez (Rosalinda Martinez)

214-521-5342 x 1715

3321 Ashington Drive
Plano, Texas 75023

COLLIN COUNTY TEXAS

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