

FILED
06-25-2025
Clerk of Circuit Court
Manitowoc County, WI
2025CV000015

STATE OF WISCONSIN
MANITOWOC COUNTY
CIRCUIT COURT

MANITOWOC TIMESHARE
MANAGEMENT, LLC

Plaintiff,

v.

FOX HILLS OWNERS
ASSOCIATION, INC.

Defendant and Third-Party Plaintiff,

v.

FH RESORT
LIMITED PARTNERSHIP

Third-Party Defendant.

Case No. 25 CV 15
Class Code: 30301

The undersigned, states as follows:

1. I am the owner of 1 timeshare weeks within the Fox Hills Condominium Vacation Ownership Plan.
2. I was in attendance at the Fox Hills Owners Association annual meeting of the members on April 12, 2025.
3. At the meeting, the election of three (3) directors was held.
4. Members of the Association were presented with a paper ballot that stated: "Due to developer-appointed board member resignations, there will be three (3) open board seats to fill," and the ballot then provided that members were to select from a slate of four individuals and/or a write-in candidate.

5. Because there were three board positions to fill, I cast a ballot selecting three individuals.

6. After ballots were cast and the votes were counted, the individual(s) presiding over the meeting advised those in attendance of who the winners were.

7. It became clear that some votes were not being counted, and questions were raised by the members about this.

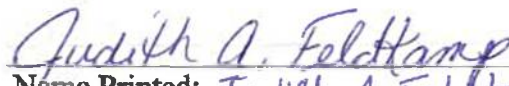
8. Ultimately, members were told that even though there were three board positions to fill, if a member only owned one timeshare week, they could only vote once.

9. Thus, for any member who voted for more board positions than they had weeks (i.e. voting for 3 board positions but only owned one week), that member's ballot was not counted at all.

10. As a result, I believe a significant number of members' ballots were not counted.

11. I believe the current board may not be properly constituted based on how the election was handled at the annual meeting, and I believe action must be taken to ensure that whoever is on the board is there properly and lawfully.

Dated this 11th day of June, 2025.


Name Printed: Judith A. Feldkamp

STATE OF WISCONSIN
MANITOWOC COUNTY
CIRCUIT COURT

MANITOWOC TIMESHARE
MANAGEMENT, LLC

Plaintiff,

v.

FOX HILLS OWNERS
ASSOCIATION, INC.

Defendant and Third-Party Plaintiff,

v.

FH RESORT
LIMITED PARTNERSHIP

Third-Party Defendant.

Case No. 25 CV 15
Class Code: 30301

The undersigned, states as follows:

1. I am the owner of 3 timeshare weeks within the Fox Hills Condominium Vacation Ownership Plan.
2. I was in attendance at the Fox Hills Owners Association annual meeting of the members on April 12, 2025.
3. At the meeting, the election of three (3) directors was held.
4. Members of the Association were presented with a paper ballot that stated: "Due to developer-appointed board member resignations, there will be three (3) open board seats to fill," and the ballot then provided that members were to select from a slate of four individuals and/or a write-in candidate.

5. Because there were three board positions to fill, I cast a ballot selecting three individuals.

6. After ballots were cast and the votes were counted, the individual(s) presiding over the meeting advised those in attendance of who the winners were.

7. It became clear that some votes were not being counted, and questions were raised by the members about this.

8. Ultimately, members were told that even though there were three board positions to fill, if a member only owned one timeshare week, they could only vote once.

9. Thus, for any member who voted for more board positions than they had weeks (i.e. voting for 3 board positions but only owned one week), that member's ballot was not counted at all.

10. As a result, I believe a significant number of members' ballots were not counted.

11. I believe the current board may not be properly constituted based on how the election was handled at the annual meeting, and I believe action must be taken to ensure that whoever is on the board is there properly and lawfully.

Dated this 24 day of June, 2025.

Nick Klaseus

Name Printed: