

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH**
<http://www.courts.state.nh.us>

Court Name: Belknap - Superior Court
Case Name: David Strang v Douglas Lambert
Case Number: 211-2022-CV-00152
(if known)

ANSWER

Requested: Jury Trial (as allowed by law) Bench Trial

1. Name of person answering: Douglas Lambert

(Relationship to case): Defendant

2. I am answering the Complaint filed by David Strang

Answer each paragraph in the Complaint in corresponding numbered paragraphs, including any affirmative defenses you are asserting:

1. Paragraph 1 Answer:
Agree

2. Paragraph 2 Answer:
Agree

3. Paragraph 3 Answer:
N/A

[See Attachment(s), item 'Additional Answer Details']

Continue on using separately numbered paragraphs (attach additional sheets if necessary)

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ANSWER

For non e-filed cases:

I state that on this date I am mailing by U.S. mail, or Email (only when there is a prior agreement of the parties to use this method), or hand delivering a copy of this document to:

_____ or _____
Other party Other party's attorney

OR

For e-filed cases:

I state that on this date I am sending a copy of this document as required by the rules of the court. I am electronically sending this document through the court's electronic filing system to all attorneys and to all other parties who have entered electronic service contacts (email addresses) in this case. I am mailing or hand-delivering copies to all other interested parties.

Douglas Lambert
Name of Filer

Law Firm, if applicable Bar ID # of attorney

Address

Gilford, NH 03249
City State Zip code

/s/ Douglas Lambert 8/15/22
Signature of Filer Date

Telephone

E-mail

To Answer

Additional Answer Details

4. N/A

5. Agree

6. Agree

7. Agree

8. There is no impact on Gunstock operations in denying Plaintiff his role as Chairman pro-tem

9. Agree

10. Disagree. An August 1, 2022 emergency meeting of the Belknap County Delegation accepted the resignation of Commissioner David Strang from the Gunstock Commission (GAC). This meeting has not been deemed illegal in any court ruling

11. Disagree in part- All correct except there are THREE members of the GAC

12. Agree

13. Disagree. An August 1 meeting of the Belknap County Delegation accepted the resignation of Commissioner David Strang from the(GAC) The GAC By-Laws Article II, 2., (b) states in part: "The Secretary shall preside in the absence of both the Chair and Vice-Chair

14. Disagree. David Strang is no longer a member of the GAC, as the County Delegation accepted his resignation August 1. The GAC By-Laws Article II, 2., (b) states in part: "The Secretary shall preside in the absence of both the Chair and Vice-Chair

15. Disagree. The GAC By-Laws Article II, 2., (b) states in part: "The Secretary shall preside in the absence of both the Chair and Vice-Chair. There is no irreparable harm to Dave Strang, the GAC, or the citizens of Belknap County

Service Information

If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.

To Answer

I state that on this date I am
 e-serving through the court's electronic filing system,
 or mailing by U.S. mail,
 or hand-delivering a copy of this document to:
Other party's attorney: Daniel P. Hynes

I state that on this date I am
 e-serving through the court's electronic filing system,
 or mailing by U.S. mail,
 or hand-delivering a copy of this document to:
Other party: David Strang

16. Disagree. The meeting was noticed prior to 11AM on Friday August 12. Furthermore, the actions leading to Plaintiff's complaint occurred at the Delegation meeting August 1, leaving 12 days to respond. It is not the Defendant's duty to perform extra notices beyond legal meeting requirements in the By-Laws and in accordance with NH law.

17. Disagree. There is no irreparable harm to Plaintiff if not recognized as Chairman pro-tem of the Gunstock Commission. The Commission will continue to conduct business per the By-Laws and NH law.

18. Disagree. A person not on the Gunstock Area Commission has no right to access to the audit firm. A person not on the Gunstock Area Commission has no right to access to the internal legal investigation.

19. Disagree. There is no guarantee or evidence that Plaintiff will succeed in a full hearing

20. Agree

21. Agree
