

STATE OF SOUTH DAKOTA

IN CIRCUIT COURT

COUNTY OF PENNINGTON

SEVENTH JUDICIAL CIRCUIT

Expedition League, Inc.,

Plaintiff,

vs.

Badlands Big Sticks Baseball Club, LLC, owner of Badlands Big Sticks, and Dave Ouellette; .402 Sports and Entertainment, LLC, owner of Fremont Moo, and Chad Miller and Daniel Cyza; Frew Enterprises, LLC, owner of Hastings Sodbusters, and Bryan Frew and Scott Galusha; Diamond Enterprises, LLC, owner of Spearfish Sasquatch, and Eric Schmidt, Rory Maynard, Rodney Schatz and Roger Riley; CH Baseball, LLC, owner of Hub City Hotshots, and Charles Heeman and Mayra Heeman; HA Baseball, LLC, owner of Casper Horseheads, and Charles Heeman and Mayra Heeman; HF Baseball, LLC, owner of Western Nebraska Pioneers, and Charles Heeman and Mayra Heeman,

Defendants.

Court File No.: 51CIV22-000150

AFFIDAVIT OF JESSICA CLIFTON

STATE OF NORTH DAKOTA)
) ss
COUNTY OF STARK)

I, Jessica Clifton, being first duly sworn, state as follows:

1) I am Jessica Clifton. I present this Affidavit in support of the Brief Defendants have filed in opposition to the motion for a preliminary injunction filed by the Expedition League, Inc.

2) I am above 18 years of age, and I make this Affidavit of my own personal knowledge.


3) I lead fundraising efforts in Dickinson, North Dakota for the Stark County Veterans Office.

4) Since transitioning to local ownership with Mr. Dave Ouellette, the Badlands Big Sticks have always been major sponsors and assistants with our fundraising efforts.

5) If the Badlands Big Sticks were for some reason not able to put on their events this summer, it would negatively impact the Dickinson community. It would have a particularly detrimental impact on our primary fundraising events that are planned for 2022.

6) Dickinson needs the Badlands Big Sticks to be playing baseball every year, both for the good of our community and for the good of the Stark County Veterans Office's fundraising efforts.

FURTHER YOUR AFFIANT SAYETH NOT.



Jessica Clifton

Subscribed and sworn to before me on
this 22nd day of April, 2022.



Notary Public

PAMELA WINHOLD
NOTARY PUBLIC, STATE OF NORTH DAKOTA
MY COMMISSION EXPIRES AUG 31, 2022