

IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR  
FLAGLER COUNTY, FLORIDA

MUD MUCKERS, LLC,

Plaintiff.

v.

CASE NO.: 2018 CA 000484

GEORGE E. ALLEN, III an individual,  
etc., all d/b/a ALLEN OPERATING COMPANY,  
a partnership or joint venture,

Defendants.

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**AFFIDAVIT IN SUPPORT OF DEFENDANTS'**  
**MOTION FOR SUMMARY JUDGMENT**

STATE OF FLORIDA  
COUNTY OF FLAGLER


COMES NOW the undersigned affiant and hereby states that he has personal knowledge of the following:

1. My name is George E. Allen, III. I am one of the Defendants in the above styled Case No. 2018-CA-000484, in the Circuit Court of the Seventh Judicial Circuit, In and For Flagler County, Florida. I have personal knowledge of the facts stated herein.
2. I was involved with the management of the real property where Mud Muckers was conducting their four wheeler events. I met on site with Billy Stevens, who ran many of the events for Mud Muckers.
3. In July 2013, prior to expiration of the lease, I was notified by the St. Johns River Water Management District of potential wetland violations being caused by the Mud Muckers events. I met on site with SJRWMD staff and observed areas of the wetlands where the riders had caused an impact.
4. I discussed these wetlands issues with Billy Stevens, who had indicated that Mud Muckers wanted to renew the lease. We could not agree to renew the lease due to the environmental concerns.

5. I never received a written notice of lease renewal from Mud Muckers. We did try to find another location for Mud Muckers to conduct riding events, but due to a lack of mud, the other site did not work for them. As a result, a lease renewal was never agreed upon by the parties.

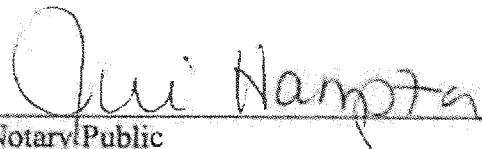
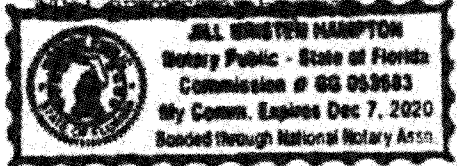
6. We have allowed Mud Muckers to remove their personal property from the site, but they have still not removed most of the items, most of which are junk. I am not aware of any of the defendants named in this case causing any damage to the personal property of Mud Muckers.

FURTHER AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
George E. Allen, III

STATE OF FLORIDA  
COUNTY OF FLAGLER

Before me, the undersigned authority, this 29 day of July, 2020, personally appeared the Affiant, George E. Allen, III, who produced FL DL as identification/is personally known to me, and who, first by me being duly sworn says that he is the Affiant in the above styled cause, that he has read the foregoing Affidavit and has personal knowledge of the facts and matters herein set forth and states that each and all of those facts are true and correct.

  
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Notary Public  
Ms. Commission Expires  
  
JILL BRISTEN HAMPTON  
Notary Public - State of Florida  
Commission # 00 053683  
My Comm. Expires Dec 7, 2020  
Bonded through National Notary Assn.