STATE OF MINNESOTA
COUNTY OF SHERBURNE

DISTRICT COURT TENTH JUDICIAL DISTRICT Court File No. C4-99-1250

Edward G. Palmer Pl	aintiff)	
vs.)	AFFIDAVIT of Ernest Harpster
William N. Matthews Solid Rock Church, Ind De	c.) efendants)	

Being first duly sworn, Ernest Harpster states and deposes as follows:

- I was a member of Solid Rock Church, Inc., a nonprofit corporation organized under the Minnesota Nonprofit Corporation Act at Minn. Stat. §317A.
- 2. I have personal knowledge of the matters discussed in this affidavit, and if called to testify about them, I could do so competently.
- 3. I was a member of Solid Rock Church, Inc. during a period of time, which included the July 1, 1993 business meeting.
- 4. I attended and voted at the July 1, 1993 business meeting.
- 5. I have examined Plaintiffs' Exhibits 1 in the above-cited case concerning the business meeting of Solid Rock Church, Inc. as held on July 1, 1993.
- 6. Plaintiffs' Exhibit 1 is the resolution that was presented to the members for voting on at the July 1, 1993 business meeting of Solid Rock Church, Inc.
- 7. Plaintiffs' Exhibit 1 is the only resolution that was presented to the members for voting on at the July 1, 1993 business meeting of Solid Rock Church, Inc. Notice of the meeting was presented to the members for the sole and exclusive purpose

- of considering the name change from the Elk River Assembly of God Church to the name of Solid Rock Church, Inc.
- 8. In 1993, I believed that William N. Matthews was an honest man of integrity that would engage only in truthful activities.
- 9. Shortly before the July 11, 1995 business meeting, William N. Matthews sent my wife and I a letter that stated we were no longer members of the church because we missed three Sundays in a row. This offended us because we had a sickness in the family.
- 10. I was elected to serve on the board of trustees [deacon board] at the July 1, 1993 meeting. I am a signatory on the Amended Articles of Incorporation filings dated July 22, 1993. I have examined the Articles filed and they contain changes that were not made at the July 1, 1993 meeting.
- 11. I cannot explain why my name in on articles that were not approved by the members except that I was advised by William N. Matthews at the time that I was only signing a document that reflected the name change the members voted on.
- 12. I had no reason to believe that William N. Matthews would have me sign documents that were not entirely truthful.

Further your affiant sayeth not.

()(1,00,199) Signe

Signed: 🕖

Ernest Harpste

20895 Hoover Street NW Elk River, Minnesota 55330

Subscribed and sworn to before me This (a) day of October 1999.

Notary Public

ROBIN J. ANDERSON NOTARY PUBLIC - MINNESOTA My Comm. Expires Jan. 31, 2000

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