

IN THE 82nd DISTRICT COURT
FALLS COUNTY, TEXAS

PHILLIP M. KRUMNOW, JR., et al.,

Plaintiffs,

vs.

PAM KRUMNOW, et al.,

Defendants

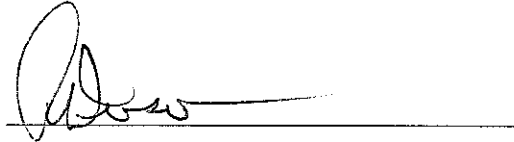
Cause No. 34,538

AFFIDAVIT

I, R.A. DEISON, am greater than 18 years of age, competent to testify, and do testify under oath as follows, as witnessed by my signature below:

1. I am an attorney for the Plaintiffs in the case listed above.
2. I have been provided correspondence indicating that Bryan F. Russ, Jr., counsel for the Defendants, was representing Judge Robert M Stem in a contested matter in 2003, *i e.*, while this case was pending.
3. Neither Mr. Russ nor Judge Stem ever disclosed their attorney-client relationship. Had I known, I would have requested Judge Stem's recusal on the grounds of a conflict of interest.
4. During the tenure of this case, Judge Stem repeatedly called counsel into chambers to engage in off-the-record conversations of factual and legal matters. I can only conclude that Judge Stem has done this to avoid public scrutiny. When I and my co-counsel objected to the practice of holding arguments in chambers and off the

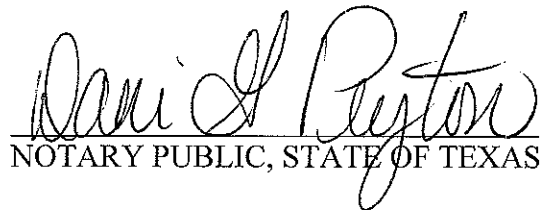
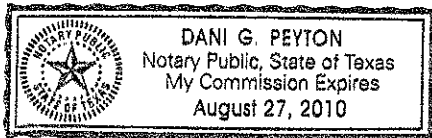
record, Judge Stem started ruling against all our motions. I have been practicing law for over forty (40) years, and it is my observation and my professional opinion that Judge Stem routinely rules in favor of Mr. Russ's clients without regard to the law or the facts.



R. A. DEISON

VERIFICATION

On October 15, 2009, R.A. DEISON personally appeared before me and stated under oath that the foregoing affidavit was true and correct, as witnessed by my seal and signature below.



NOTARY PUBLIC, STATE OF TEXAS