

**STATE OF VERMONT**

**SUPERIOR COURT  
ADDISON UNIT**

7 Mahady Court  
Middlebury VT 05753  
802-388-7741  
www.vermontjudiciary.org

**CIVIL DIVISION  
CASE NO. 25-CV-05563**

Date: December 18, 2025

**NOTICE OF HEARING**

**Addison County Community Trust, Inc. v. Kimberly Coleman**

**This is to notify you to appear** at the Court named above in connection with the above-named case on:

DATE: **January 12, 2026**      TIME: **1:00 PM**      DURATION: **30 Minutes**

HEARING RE: Motion Hearing  
Civil Complaint

Civil Division Clerk

Any individual with a disability requiring assistance accessing the services, programs, and/or activities at the Courthouse should contact the Clerk's office at the above address for further assistance

\*For instructions to participate in the remote hearing, please contact the Court at 802-388-7741 or Attorney Lesley Deppman at 802-388-6337.

**STATE OF VERMONT**

**SUPERIOR COURT  
ADDISON UNIT**

In re: Abandoned Mobile Home of Kimberly Coleman  
143 Hillside Drive, Starksboro, Vermont

**CIVIL DIVISION  
DOCKET NO. 25-CV-05563**

**VERIFIED COMPLAINT**

NOW COMES ADDISON COUNTY COMMUNITY TRUST, INC., Plaintiff, by and through its attorneys, Deppman Law PLC, and, pursuant to 10 V.S.A. § 6249, hereby files this action for sale of abandoned mobile home, and hereby complains of and alleges against Defendant as follows:

1. Addison County Community Trust, Inc., a Vermont non-profit corporation with a principal place of business in Addison County, Vermont, is the owner of the mobile home park located at 143 Hillside Drive, Starksboro, Vermont.

2. The name and last known address of the owner of the mobile home which is the subject of this action is believed to be:

Kimberly Coleman  
143 Hillside Drive  
Starksboro, VT 05487

3. The name and last known mailing address of the last resident of the mobile home is:

Kimberly Coleman  
143 Hillside Drive  
Starksboro, VT 05487

4. The mobile home is, on information and belief, a 2016 Commodore Blazer mobile home, serial number CO53457A. Plaintiff credits Defendant with a security deposit of \$271.00. See Exhibit 1, a true and correct copy of the Lease Agreement related to the subject mobile home.

5. Green Mountain Credit Union has a security interest in the subject mobile home; Addison County Community Trust, Inc., is a guarantor of Defendant's debt. See Exhibit 2, a true and correct copy of the Loan and Security Agreements and Disclosure Statement. The address for the credit union is:

Green Mountain Credit Union  
4 Laurel Hill Drive, Suite 3  
South Burlington, VT 05403

6. The facts supporting the claim that the subject mobile home has been abandoned are as follows: Defendant has been evicted and failed to remove the subject mobile home from the lot within three months pursuant to 10 V.S.A. § 6248(a)(2).

7. A disinterested party such as Thomas Hirschak Company, located at 1878 Cady Falls Road, Morrisville, VT 05661, is able to sell the subject mobile home at public auction.

8. The amount of rent due through the date of this action is \$2,835.00. Rent continues to accrue at the rate of \$405 per month. Unpaid property taxes currently total \$5,224.41. Plaintiff has also incurred (and will continue to incur) attorneys' fees and court costs, and will incur costs in connection with the sale of the mobile home.

9. Plaintiff requests that the Court issue an order approving the transfer of the mobile home as unfit for human habitation without a public sale. The mobile home is unfit for human habitation, as verified by Sheriff Michael Elmore in correspondence and photos attached hereto as Exhibit 3, and the attestation of Plaintiff's representative, Tori Marukelli, of the same.

WHEREFORE, Plaintiff prays this Honorable Court grant the relief requested herein and all such other and further relief as to this Court may appear just and equitable.

Dated at Middlebury, Vermont this 12th day of December, 2025.

Plaintiff, ADDISON COUNTY COMMUNITY TRUST, INC.,  
by DEPPMAN LAW PLC, its attorneys

By: /s/ Lesley B. Deppman  
Lesley B. Deppman, Esq  
56 Court Street  
Middlebury, Vermont, 05753

Email: ldeppman@middlaw.com  
Telephone: (802) 388-6337  
Telefacsimile: (802) 382-8840

\*FOR EXHIBITS 1, 2 AND 3, PLEASE CONTACT ATTORNEY LESLEY DEPPMAN AT ldeppman@middlaw.com.

**VERIFICATION**

Tori Marukelli, duly authorized representative of Addison County Community Trust, Inc., Plaintiff herein, states the contents of the foregoing Complaint are true to the best of her knowledge, information and belief and the extent based upon information and belief she believes such information to be true.

Dated at Vergennes, Vermont, this 11th day of December, 2025.

/s/ Tori Marukelli

Tori Marukelli  
STATE OF VERMONT  
COUNTY OF ADDISON, SS.

Subscribed and sworn to before me this 11th day of December, 2025.

/s/ Sasha Bradford

Notary Public  
My Commission Expires: 1/31/27  
Commission No. 157.0015527  
State of Vermont