

STATE OF VERMONT

**SUPERIOR COURT
ADDISON UNIT**

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

**CIVIL DIVISION
DOCKET NO. 26-CV-02556**

Date: April 30, 2026

**NOTICE OF HEARING
ACCT Mobile Home Parks LLC v. Diana Bird**

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

DATE: **June 01, 2026** TIME: **10:00 AM – 10:30 AM** DURATION: **30 Minutes**

HEARING RE: Hearing - Abandoned Property
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.

You may appear in person or remotely via Zoom (Zoom ID: 161 085 0087; Passcode: Addison). For further Zoom instructions, please contact Attorney Lesley Deppman at ldeppman@middlaw.com.

STATE OF VERMONT

**SUPERIOR COURT
ADDISON UNIT**

In re: Abandoned Mobile Home of Diana Bird (f/k/a Diana Rochette)
44 Hillside Drive, Starksboro, Vermont

**CIVIL DIVISION
DOCKET NO. 26-CV-02556**

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. ACCT Mobile Home Parks, LLC, 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 Hillside Drive, Starksboro, Vermont.
2. The names and last known address of the owners of the mobile home which is the subject of this action are believed to be:
Diana Bird (f/k/a Diana Rochette)
44 Hillside Drive
Starksboro, VT 05487
3. The names and last known mailing address of the last residents of the mobile home are:
Diana Bird, Brittney Bird and Robert Gratton
44 Hillside Drive
Starksboro, VT 05487
4. The mobile home is, on information and belief, a 1986 Holly Park, serial no. O1FPC1492; 14' x 70'. Plaintiff credits Defendants with a security deposit of \$347.00. See Exhibit 1, a true and correct copy of the Lease Agreement related to the subject mobile home.
5. Creditors, holders of housing subsidy covenants, or others having an interest in the mobile home based on liens or notices of record in the town offices of Starksboro or the Office of the Secretary of State may include:
Paul Rochette
Peter Bird
Leo Rochette
Hillside Manor
Starksboro, VT 05487

M&T Bank, successor to Vermont Federal Bank
ATTN: Loan Servicing
114 S. Village Green
Middlebury, VT 05753

6. The facts supporting the claim that the subject mobile home has been abandoned are as follows: the owner of the mobile home has been evicted from the mobile home park pursuant to 10 V.S.A. § 6237 and the owner has failed to remove or sell the mobile home within three months after execution of a writ of possession pursuant to 12 V.S.A. chapter 169.

7. A disinterested party such as Thomas Hirchak 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 \$3,801.00. Rent continues to accrue at the rate of \$425.00 per month. Unpaid property taxes currently total \$1,670.07. 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.

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 30th day of April, 2026.

Plaintiff, ACCT MOBILE HOME PARKS, LLC,
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 EXHIBIT 1, PLEASE CONTACT ATTORNEY LESLEY DEPPMAN AT ldeppman@middlaw.com.

VERIFICATION

Tori Marukelli, duly authorized representative of ACCT Mobile Home Parks, LLC, Plaintiff herein, states the contents of the foregoing Complaint are true to the best of her knowledge, information and belief, and to the extent based upon information and belief, she believes such information to be true.

Dated at Vergennes, Vermont, this 15th day of April, 2026.

/s/ Tori Marukelli
Tori Marukelli

STATE OF VERMONT
COUNTY OF ADDISON, SS.

Subscribed and sworn to before me this 15th day of April, 2026.

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