

**NOTICE OF HEARING**

Forestdale Mobile Home Park, Inc. v. Warren Keough et al

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

DURATION:  
30 Minutes

DATE:  
June 29, 2026

TIME:  
2:00 PM

HEARING RE: Merits Hearing

**“YOU MAY ATTEND THIS HEARING IN PERSON AT THE COURTHOUSE OR REMOTELY. See attached instructions for remote appearance.”**

**\*\*\*PARTIES SHALL EXCHANGE ANY EXHIBITS OR OTHER EVIDENCE 5 DAYS PRIOR TO THE HEARING\*\*\***

**\*\*\*ANY MEDIA EXHIBITS (VIDEOS, AUDIO) MUST BE UPLOADED TO VDEP (VERMONT DIGITAL EVIDENCE PORTAL). INSTRUCTIONS ARE ATTACHED\*\*\***

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.

**STATE OF VERMONT**

**SUPERIOR COURT  
RUTLAND UNIT**

**CIVIL DIVISION  
CASE NO. 26 CV-02600**

In re Abandoned Mobile Home of  
**WARREN KEOUGH and ASHLEY DUNBAR**

**VERIFIED COMPLAINT**

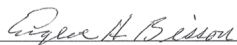
NOW COMES the Plaintiff and complains to this Honorable Court as follows:

1. Plaintiff Forestdale Mobile Home Park, Inc. is a Vermont corporation with offices in the City of Barre, County of Washington, and State of Vermont.
2. Plaintiff is the owner of certain lands in the Town of Brandon, County of Rutland, State of Vermont, which are commonly referred to the Forestdale Mobile Home Park (hereinafter, the "Park").
3. On information and belief, Defendants reside in Binghamton, County of Broome, State of New York.
4. The last known mailing address for the Defendants is 219 Pennsylvania Avenue, Binghamton, NY 13903.
5. The Defendants are the owners of a mobile home located in the Park, at 19 Bridge Park in the Town of Brandon, in the County of Rutland (the "Mobile Home"), as shown on the copy of the Vermont Mobile Home Uniform Bill of Sale attached hereto as Exhibit 1.
6. The Mobile Home is a 1979 Olympic Mobile Home, 14 ft. x 56 ft., Serial Number 2560.
7. The Defendants are the last known residents of the Mobile Home.
8. Creditors holding claims against the Mobile Home are:
  - a. Forestdale Mobile Home Park, Inc. for overdue and unpaid rent in the amount of \$3,180.00.
  - b. Town of Brandon for unpaid property taxes in the amount of \$795.44.
  - c. Town of Brandon Fire District #1 for unpaid water and sewer bills in the amount of \$4,260.21.
9. The facts supporting the claim that this Mobile Home is abandoned are as follows:
  - a. No one has lived in the Mobile Home for over a year.
  - b. There is no heat.
  - c. There is no water service.
  - d. There is no electricity.
10. The facts supporting the claim that this mobile home is unfit for human habitation are as follows:
  - a. The Mobile Home does not appear to be structurally sound.
  - b. The pipes have frozen and burst.
  - c. The Mobile Home contains significant garbage and refuse and is in an extremely unsanitary condition, as shown in the photos attached hereto as Exhibit 2.
11. As of the date of this Complaint, the amount of rent due the Park is as follows: August of 2025 through May of 2026; 10 months at \$318.00 per month, for a total of \$3,180.00.

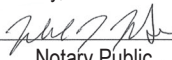
WHEREFORE, the Plaintiff brings this action seeking the following relief:

- A. An Order approving transfer of title to the Mobile Home to the Plaintiff so that it may be removed from the Park and properly disposed of;
- B. Such other and further relief as the Court deems just.

I declare that the above statements are true and accurate to the best of my knowledge and belief. I understand that if the above statements are false, I will be subject to the penalty of perjury or to their sanctions in the discretion of the court.

  
Eugene H. Bisson

Subscribed and sworn to before me this 1st day of May, 2026

  
Notary Public

My Commission expires 01/31/2027