

STATE OF VERMONT

**SUPERIOR COURT
ADDISON UNIT**

**CIVIL DIVISION
DOCKET NO. 26-CV-03663**

7 Mahady Court
Middlebury VT 05753
802-388-7741

www.vermontjudiciary.org

Date: July 15, 2026

NOTICE OF HEARING

ACCT Mobile Home Parks LLC v. Jamie Leduc et al

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

DATE:	TIME:	DURATION:
August 14, 2026	1:30 PM - 2 PM	30 Minutes

HEARING RE: Merits 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
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In re: Abandoned Mobile Home of Jamie Leduc and Rebecca Merrihew
6 Hillside Drive, Starksboro, Vermont

VERIFIED COMPLAINT

NOW COMES ACCT Mobile Home Parks LLC, 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 Defendants as follows:

1. ACCT Mobile Home Parks LLC, a Vermont limited liability company 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 addresses of the owners of the mobile home which is the subject of this action are believed to be:
Jamie Leduc & Rebecca Merrihew
6 Hillside Drive
Starksboro, VT 05487
3. The names and last known addresses of the owners of the mobile home which is the subject of this action are believed to be:
Jamie Leduc & Rebecca Merrihew
6 Hillside Drive
Starksboro, VT 05487
4. The mobile home is, on information and belief, a 1981 Hallmark mobile home, serial number 70143 FDK-Special. There is a security deposit in the amount of \$248.00. See Exhibit 1, a true and correct copy of the Lease Agreement related to the subject mobile home.
5. Plaintiff is aware of no creditors, holders of housing subsidy covenants, or others having a valid interest in the mobile home based on liens or notices of record in the Starksboro Land Records or the Office of the Secretary of State.
6. The facts supporting the claim that the mobile home has been abandoned are that the owners of the mobile home have been evicted pursuant to 10 V.S.A. § 6237 and the owners have failed to remove or sell the mobile home within three months of the execution of the writ of possession. Said writ was executed on February 4, 2026.
7. A disinterested party such as Thomas Hirschak Company, located at 1878 Cady Falls Road, Morrisville, VT 05661, is able to sell the mobile home at public auction.
8. The amount of rent due through the date of this action is \$3,432.44. Rent continues to accrue at the rate of \$425.00 per month. Unpaid property taxes currently total \$2,222.61 (through July 30, 2026). 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 26 day of June, 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

Sam Ryan, 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 the extent based upon information and belief she believes such information to be true.

Dated at Vergennes, Vermont, this 25th day of June, 2026.
/s/ Sam Ryan
Sam Ryan

STATE OF VERMONT
COUNTY OF ADDISON, SS.

Subscribed and sworn to before me this 25th day of June, 2026.

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