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1 After recording return to:  
 2 David B. Paradis  
 3 P. O. Box 128  
 4 Medford, OR 97501

## IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR KLAMATH COUNTY

5 PATSY (PATRICIA) MANN, )  
 6 INDIVIDUALLY AND AS )  
 7 SUCCESSOR TRUSTEE OF THE )  
 8 PHYLLIS E. MADDOX DECEDENT'S )  
 9 TRUST AND SURVIVOR'S TRUST )  
 10 AND JAMES K. MADDOX, )

Plaintiffs, )

No. 0602453-CV

vs. )

NOTICE OF PENDENCY OF ACTION

11 LINDA SUE THOMAS, )  
 12 INDIVIDUALLY AND AS TRUSTEE )  
 13 OF THE PHYLLIS ELAINE )  
 14 MADDOX REVOCABLE LIVING )  
 15 TRUST; MITCHELL THOMAS AND )  
 16 JON COX aka JON THIEL, )

Defendants. )

17 Pursuant to ORS 93.740, the undersigned states:

18 1. As plaintiffs, Patsy (Patricia) Mann, individually and as successor trustee of  
 19 the Phyllis E. Maddox Decedent's Trust and Survivor's Trust and James K. Maddox, has  
 20 filed an action in the Circuit Court for Klamath County, State of Oregon;

21 2. The defendants are Linda Sue Thomas, individually and as trustee of the  
 22 Phyllis Elaine Maddox Revocable Living Trust, Mitchell Thomas and Jon Cox aka Jon  
 23 Thiel;

24 3. The object of this action is undue influence;

25 4. The real property and improvements to be affected is described as follows:

26 Lot 10 and the Northerly 190 feet of the Westerly 25.7 feet of Lot 11,  
 Homedale, in the County of Klamath, State of Oregon.

(Map 39-09-11A TL 3600).

1 Dated this 6 day of January, 2009.

2 

3 David B. Paradis, OSB #85301  
4 Tamara L. Gledhill, OSB #02311  
5 BROPHY, MILLS, SCHMOR,  
6 GERKING, BROPHY & PARADIS, LLP  
7 201 West Main, Ste. 5 / P.O. Box 128  
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11 Email: [dparadis@brophymills.com](mailto:dparadis@brophymills.com)  
12 Trial Attorney: David B. Paradis

13 STATE OF OREGON )  
14 ) ss.  
15 County of Jackson )

16 Personally appeared before me on this 6 day of January, 2009 the above named  
17 David B. Paradis, the attorney for the plaintiff, and acknowledged the foregoing instrument  
18 to be their voluntary act and deed.

19   
20 Notary Public for Oregon  
21 My Commission expires: 2-7-2012

