

2023-009585

Klamath County, Oregon



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Fee: \$82.00

After recording return to:

Blossom Van Kinkle
The Reynolds Law Firm, P.C.
555 NW 5th Street
Corvallis, Oregon 97321

NOTICE OF PENDENCY OF AN ACTION

Pursuant to ORS 93.740, the undersigned states:

1. As Defendants, Jeffrey Bailey and Danae Drews have filed counterclaims in an action in the Circuit Court for Klamath County, Oregon, Case No. 23CV17541.
2. The Plaintiff is Donald Kearney, Jr.
3. The objects of the counterclaims filed by Defendants are tortious interference with contractual relations to sell the motel to a third party; financial abuse of vulnerable persons; breach of land sale contract; and fraud.
4. The description of the real property affected is commonly known as the Crescent Moon Motel, located at 136731 US-97N, Crescent, Oregon 97733.
5. The counterclaims of Defendants on which this lis pendens rests involve, affect, or bring into question the title to or interest in the Crescent Moon Motel. When properly adjudicated on the merits, these counterclaims could determine interests in real property.

Signed and sworn on this date.

STATE OF OREGON)
County of Deschutes)^{ss}

Dated 10-30-23

Danae Drews
Danae Drews, Defendant

Dated 10/30/23

Jeffrey Bailey
Jeffrey Bailey, Defendant

Signed and affirmed before me by Danae Drews and Jeffrey Bailey on this 30th of October 2023.

Devon R Bogart
Notary Public - State of Oregon

