

2023-009585

Klamath County, Oregon



00321782202300095850010018

11/06/2023 02:43:39 PM

Fee: \$82.00

After recording return to:

Blossom Van Kinkle  
The Reynolds Law Firm, P.C.  
555 NW 5<sup>th</sup> 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 30<sup>th</sup> of October 2023.

Devon R. Bogart  
Notary Public - State of Oregon

