

STATE OF VERMONT

SUPERIOR COURT  
WINDSOR UNIT

CIVIL DIVISION  
CASE NO. 24-CV-01868

IN RE: ABANDONED MOBILE HOME  
OF BRYAN COBB, SR. & TINA COBB

**NOTICE OF HEARING**

A hearing on The Housing Foundation, Inc.'s Verified Complaint to declare abandoned and uninhabitable the mobile home of Bryan Cobb, Sr. & Tina Cobb located at the Windy Hill Acres Mobile Home Park, Lot #66, 87 Dogwood Lane in Springfield, Vermont has been set for July 1, 2024 at 9:00 a.m. at the Vermont Superior Court, Windsor Unit, Civil Division located at 12 The Green in Woodstock, Vermont. To participate in this hearing, the WEBEX Login Information is as follows:

App: Cisco Webex Meeting  
Website: <https://vtcourts.webex.com>  
Meeting Number: 2347 351 3269  
Password: courtroom1

If you do not have a computer or sufficient bandwidth, you may call (802) 636-1108 to appear by phone. (This is not a tollfree number). When prompted enter the meeting ID number listed above, followed by the pound symbol (#). You will be prompted to enter your attendee number (which you do not have). Instead, press pound (#). If you have technical difficulties, call the Court at (802) 457-2121.

Date: May 16, 2024

Alison Kaufman, Judicial Assistant

**VERIFIED COMPLAINT FOR ABANDONMENT  
PURSUANT TO 10 V.S.A. § 6249(i) (Uninhabitable)**

NOW COMES The Housing Foundation, Inc. ("HFI"), by and through its counsel Nadine L. Scibek, and hereby complains pursuant to 10 V.S.A. § 6249(i) as follows:

1. HFI, a Vermont non-profit corporation with a principal place of business in Montpelier, County of Washington, State of Vermont, is the record owner of a mobile home park known as the Windy Hill Acres Mobile Home Park (the "Park"), located in the Town of Springfield, Vermont. HFI purchased the Park from the Vermont State Housing Authority ("VSHA") on December 31, 2023. VSHA manages the Park.

2. Bryan Cobb, Sr. ("B. Cobb") and Tina Cobb ("T. Cobb") are the record owners of a certain mobile home described as 1987 Skyline Allison, 14' x 70', bearing Serial #0116-0226R (the "Mobile Home") located on Lot #66 at the Windy Hill Acres Mobile Home Park, 87 Dogwood Lane in Springfield, Vermont according to the Town of Springfield Land Records. See attached Bill of Sale.

3. B. Cobb leased Lot #66 in the Park from VSHA pursuant to a written lease. B. Cobb paid a security deposit in the amount of \$250.00 to VSHA. See attached Lease.

4. B. Cobb's last known mailing address is 895 VT Route 10, Chester, VT 05143.

5. T. Cobb has not resided in the Mobile Home for over 15 years and her last known mailing address is 87 Dogwood Lane (f/k/a 242 Town Farm Road, Lot #66), Springfield, VT 05156.

6. The mobile home has been abandoned and is empty. The last known resident of the mobile home was B. Cobb. B. Cobb is believed to have removed his personal belongings. Utility services have been terminated to the Mobile Home.

7. B. Cobb was evicted from the Park for non-payment of lot rent on or about December 8, 2023. A Judgment Order for the outstanding lot rent and court costs was entered against the B. Cobb on October 26, 2023 in the amount of \$3,984.59. See Vermont State Housing Authority v. Cobb, Vermont Superior Court, Windsor Civil Unit, Case No. 23-CV-03967. See attached Judgment Order, Writ of Possession & Sheriff's Return of Service.

8. On November 29, 2023 Counsel for HFI spoke with B. Cobb who indicated that he was walking away from the Mobile H. Counsel for HFI has attempted to communicate in writing with B. Cobb on March 11, 2024 regarding his intentions with the mobile home. He has failed to respond. See attached.

9. The following security interests, mortgages, liens and encumbrances appear of record with respect to the mobile home:

a. Property taxes to the City of Springfield are current according to the Town Clerk. See attached Tax Bill.

10. Mobile home lot rent/storage fees continue to accrue at the rate of \$485.00 per month. Monies due to HFI as of May, 2024 total \$6,166.75. Attorney's fees and court costs incurred by HFI currently exceed \$2,000.00. See attached Account History.

11. HFI sent written notice by certified mail to the Town of Springfield on March 11, 2024 of Plaintiff's intent to commence this action. See attached.

12. The mobile home is uninhabitable. Property Manager Thomas Young, duly authorized agent for HFI, will testify under oath as to the poor and unlivable condition of this mobile home at the abandonment hearing.

**WHEREFORE**, HFI respectfully requests that the Honorable Court enter an order as follows:

1. Declare that the mobile home has been abandoned;
2. Transfer the mobile home that is unfit for human habitation to Park owner HFI without a public auction so that it may be removed and disposed of accordingly.
3. Order pursuant to 10 V.S.A. § 6249(j) that the mobile home and any security deposit paid be conveyed to the Park Owner in "as is" condition, and free from all liens and other encumbrances of record.

DATED May 10, 2024.

THE HOUSING FOUNDATION, INC.

BY: Nadine L. Scibek  
Attorney for HFI

I declare that the above statement is true and accurate to the best of my knowledge and belief. I understand that if the above statement is false, I will be subject to the penalty of perjury or other sanctions in the discretion of the Court.

May 10, 2024

BY: Thomas Young  
Duly Authorized Agent for HFI