

District Court, La Plata County, Colorado 1060 E. 2nd Ave., Durango, CO 81301 970-247-2304	DATE FILED: May 22, 2024 10:07 AM
PETITIONER: JOSEPH LEE MOORE v. RESPONDENTS: SEAN BRADLEY PARMITER; LONNIE LEE PARMITER aka LON PARMITER, each individually, and LON'S AUTOMOTIVE, INC., a Colorado Corporation	COURT USE ONLY
Attorneys for Petitioner Joseph Lee Moore The Reynolds Law Group Douglas J. Reynolds, Atty. Reg. No. 33272 Michelle Der Ohanesian, Atty. Reg. No. 49687 1099 Main Ave., Suite 318 Durango, Colorado 81301 Phone Number: 970-828-4605 Email: doug@dreylaw.com	Case No.:
NOTICE OF RESPONSE DEADLINE	

IF NO RESPONSE IS FILED BY JUNE 14, 2024 at 08:00 AM, THE COURT MAY ENTER THE ORDER AUTHORIZING THE PUBLIC TRUSTEE'S FORECLOSURE SALE WITHOUT FURTHER HEARING OR NOTICE.

Joseph Lee Moore ("Applicant") has filed a Motion with this Court, claiming to be the holder of a Settlement Agreement and Mutual Release (the "Note") in the original amount of \$160,000.00, dated February 15, 2024, and a Deed of Trust containing the power of sale to the Public Trustee of La Plata County, Colorado dated February 15, 2024, signed by Sean Bradley Parmiter, individually, Sean Bradley Parmiter as Manager of Lon's Automotive, Inc. and Lonnie Lee Parmiter a/k/a Lon Parmiter and recorded March 4, 2024 as Reception Number 1230295 of the records of La Plata County, State of Colorado.

The Motion claims that Applicant has the right to foreclose the Deed of Trust because of the failure to make timely payments as required under the Evidence of Debt and Deed of Trust. The Motion requests a Court Order authorizing the Public Trustee to sell the following real property in La Plata, State of Colorado.

SEE EXHIBIT A ATTACHED HERETO

Purported Common Address: 36111 Hwy 160, Bayfield, CO 81122 and TBD, Bayfield, CO.

Any interested person who disputes, on grounds within the scope of the hearing provided for in C.R.C.P. Rule 120 section (d), the moving party's right to an order authorizing sale may file and serve a response to the motion. The response must describe the facts the respondent relies on in objecting to the issuance of an order authorizing sale and may include copies of documents which

support the respondent's position. The response shall include contact information for the respondent including name, mailing address, telephone number, and if applicable, an e-mail address. The Response must be filed with the Clerk of this Court at 1060 E. 2nd Ave., Durango, CO 81301, no later than June 14, 2024 at 08:00 AM. A copy of the Response must also be mailed or delivered by the same date to The Reynolds Law Group, 1099 Main Ave., Suite 318, Durango, CO 81301.

If a response is filed, the court shall set the matter for hearing at a later date. The clerk shall clear available hearing dates with the parties and counsel, if practical, and shall give notice to counsel and any self-represented parties who have appeared in the matter, in accordance with the rules applicable to e-filing, no less than 14 days prior to the new hearing date.

If this case is not filed in the county where your property or a substantial part of your property is located, you have the right to ask the court to move the case to that county. If you file a response and the court sets a hearing date, your request to move the case must be filed with the court at least 7 days before the date of the hearing unless the request was included in your response.

If you believe that a lender or servicer has violated the requirements for a single point of contact in C.R.S. § 38-38-103.1 or the prohibition on dual tracking in C.R.S. § 38-38-103.2, the borrower may file a complaint with the Colorado Attorney General's office at the Ralph L. Carr Colorado Judicial Center, 1300 Broadway, 7th floor, Denver, Colorado 80203 and the Consumer Financial Protection Bureau at P.O. Box 4503, Iowa City, Iowa 52244, or both. The filing of a complaint will not stop the foreclosure process.

Address of Applicant:
c/o The Reynolds Law Group
1099 Main Ave., Ste. 318
Durango, CO 81301

Dated May 21, 2024

/s/ Douglas Reynolds
Douglas J. Reynolds

Pursuant to C.R.C.P. 121, 1-26(9), the original signature is on file at The Reynolds Law Group and will be made available for inspection upon request.