Janet Kinniry Kinniry Law Office PO Box 154 Gardner CO 81040 719 289 8889 cell

June 7, 2024

By Email:

Keith Parson KEITHPARSONS1@aol.com

Re: Turkey Ridge Ranch Homeowners Association v. Keith Parsons Huerfano County Court Case No. 2022C 30013 Case Status

Dear Mr. Parsons;

I provide here the information you requested, indicating that the Homeowners Association case, 2022 C 30013, against you is closed. Please let me know if you need further information. Below is a summary of the course of litigation. The supporting documents are available public records at the Huerfano Combined Courts. If there is any further question, I can also provide the records.

1. On November 22, 2023, the Court issued a Writ of Execution in this case, in the amount of \$10,431.21, for damages, costs and interest for the Turkey Ridge Homeowners Association (HOA) against Keith Parsons.

2. The Huerfano County Court had issued a judgment in favor of HOA, for its attorneys' fees and costs in litigation to enforce an HOA rule that residents can use campers on their lands only for recreation, not for permanent dwellings.

3. The Clerk of the Court indicated that on February 15, 2024, the total amount of the judgment owed to Turkey Ridge Ranch Property Owners Association (hereinafter "HOA") for attorney's fees, costs and interest was \$10,532.71.

4. On February 15, 2024, Mr. Parsons tendered a check endorsed to the Huerfano Combined Courts, executed and paid by George Birrer, in the amount of \$10,539.00, for the HOA judgment.

5. Mr. Parson then filed a motion in the Huerfano Combined Courts, to order the Clerk of the Courts to transfer the funds to Turkey Ridge Ranch Property Owners Association, Inc. in full and final satisfaction of judgment.

6. On February 19, 2024, HOA filed a response objecting to Parson's motion for satisfaction of judgment. HOA stated that Parson's owed an additional amount of \$744 for post judgment interest on the court's order.

7. On February 19, 2024, HOA moved the court for additional attorney's fees of \$7,211.50 and costs of \$249.99 for alleged post judgment expenses.

8. On February 26, 2024, Parson deposited with the court an additional \$790 for post judgment interest.

9. On February 26, 2024, Parsons filed an objection to HOA's motion for post judgment fees and costs and filed a *Second Motion for Satisfaction of Judgment*.

10. On March 13, 2024, HOA moved the court to issue a *Contempt Citation* against Parsons for staying in his camper on his property between the dates of February 27, 2024 and March 13, 2024.

11. On March 13, 2024, HOA filed a *Reply*, again moving for post judgment attorney's fees and costs.

12. On March 22, 2024, Parsons responded to HOA's motion for *Contempt citation*. He indicated that he used his camper for two weeks on his land, between February 28-March 13, 2024, only for recreational purposes, as permitted by HOA rules. He then removed the camper.

13. On April 5, 2024, the Court denied HOA's motion for post judgment fees and costs. The Court did not issue a *Contempt citation*.

14. On April 5, 2024, the Court granted *Parson's Second Motion for Satisfaction of Judgment*.

The litigation between HOA and Parsons has concluded. If you have any questions, feel free to contact me.

Cordially,

Janet Kinniry