

2011

# Pioneer Builders Company of Nevada v. KDA Corporation : Unknown

Utah Supreme Court

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Joseph M. Chambers; Josh Chambers; Harris, Preston & Chambers; Attorneys for Appellee.

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## Recommended Citation

Legal Brief, *Pioneer Builders Company of Nevada v. KDA Corporation*, No. 20110050.00 (Utah Supreme Court, 2011).  
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THE SUPREME COURT OF UTAH  
Supreme Court Case No. 20110050-SC

FILED  
UTAH APPELLATE COURTS  
JUL 28 2011

Please be advised that on Lot Number 14 of Sunrise Village RV Park that the following names that appear on this lot have never had an interest in this lot.

Michael Budd

Trudi Budd

Robert Gonzales

Sheri Gonzales

Daniel Hunter

Randall Hunter

The above names are listed in error the only people that should be named on that lot are:

Ronald D Hunter and Kay D Hunter

Thank you,

Ronald D Hunter

Kay D Hunter

IN THE SUPREME COURT OF UTAH

FILED  
UTAH APPELLATE COURTS

JUL 28 2011

PIONEER BUILDERS COMPANY OF )  
NEVADA, INC., a Nevada corporation )  
a/k/a PIONEER BUILDERS OF )  
NEVADA, a Nevada corporation a/k/a )  
PIONEER BUILDERS, a Nevada )  
corporation, )

Supreme Court Case No. 20110050-SC

Plaintiff/Appellant )

vs. )

K D A CORPORATION, a Utah )  
corporation a/k/a KDA CORPORATION )  
a/k/a K.D.A. Corporation a/k/a THE )  
K.D.A. Corporation a/k/a K.D.A. )  
CORPORATION, INC.; *et al.*, )

Defendants/Appellees. )

JUL 28 2011

THE SUPREME COURT OF UTAH

SUPREME COURT CASE NO. 20110050-SC

I am filing this information in behalf of Ronald D Hunter and Kay D Hunter concerning lot number 14 at Sunrise Village R V Park. We have been involved in this since the year 2001. I have had to have two different law firms represent us because we have two lots. Joseph Chambers has represented us on this lot and did everything possible to settle this law suit. It has come to the point that we could not continue to pay two law firms any longer. I know that this is not the right way to answer the Brief of Pioneer Builders Company Of Nevada Inc. I do not have the knowledge to answer all the questions nor anyway to find the information needed to produce court cases and answers to all the questions asked. I do realize that Joseph Chambers filed answers to the Brief however we could not afford to continue to use his Law Firm. We just wanted the parties involved to know that we have had and do have an interest in Lot 14 and feel like we followed all the rules when we purchased this lot and paid for it in good faith.

Pioneer had constructive notice by way of record notice as to the interests in the property. Plaintiff had available to it the descriptions and plats recorded on behalf of Sunrise Village RV Park the KDA-United West and KDA-Pine Ridge Purchase and Sale Agreement which provided the buyer with the right to lease the 24 remaining lots on parcel 025. Plaintiff had record notice of numerous existing leaseholders. Plaintiff also had available the warranty deeds that limited the interest conveyed and also provided record notice of existing and future agreements memberships and leases.

I have attached a copy of the Pine Ridge Properties LLC The Ridge at Bear Lake Certificate of Ownership showing that we paid for the lot in full with a copy of the receipt signed by S. Denise Hardy also showing paid in full along with a copy of the Notice of Financial Interest filed September 12, 2003 in the Rich County Recorder's Office. It is our opinion that this is a valid and binding contract and purchased in good faith as per the agreements mentioned above.

We apologize again for the way we have answered this Brief but we did not know any other way to let those involved that we do have an interest in Lot number 14.

Thank you,

Ronald D Hunter

Kay D Hunter

JUL 28 2011

Notice of Financial Interest

We Ronald & Kay Hunter, have a financial interest in The Sunrise Village R.V. Site.

The Legal Description marked Exhibit "A" is the Legal Description of The Sunrise Village Site Plan Exhibit "B" is said Site Plan. This was filed at Rich County Court Recording office on February 19, 1988 Filing No. 36436

My financial Interest is in Parcel 41-08-00-025. The North half of Lot 4. Excepting therefrom Parcel No. 41-08-00-036, 41-08-00-056, & 41-08-00-057. Site # 14 which has been paid for in full is the site we have interest in.

Ronald Hunter

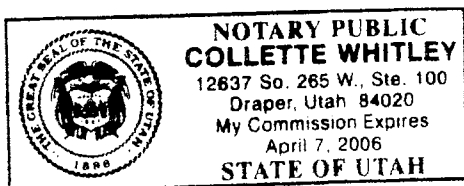
Ronald Hunter

Kay Hunter

Kay Hunter

Subscribed and sworn to before me this  
10th day of Sept. 2003

Collette Whitley  
04.07.06





Pine Ridge Properties, LLC

*The Ridge  
at Bear Lake*

CERTIFICATE OF OWNERSHIP

Ronald and Kay Hunter  
NAME

14  
LOT#

This Certificate of Ownership entitles the holder to a 1/52 share of ownership  
in Phase I of The Ridge/

This Certificate is issued to the above stated party pursuant to Paragraph 3  
of the Ownership Purchase Contract.

S. Denise Hardy  
PINE RIDGE PROPERTIES, LLC  
Managing Member

8-26-2001  
DATE

The Ridge at Bear Lake • 1171 N. Bear Lake Blvd. • Garden City, Utah 84028 (435) 946-8620

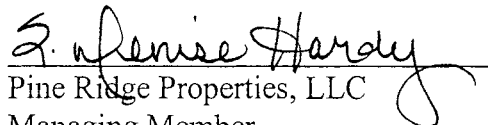
The Ridge  
At Bear Lake

FILED  
UTAH APPELLATE COURTS

JUL 28 2011

To: Ronald D Hunter  
Kay D Hunter  
8723 Oakwood Park Circle  
Sandy, Utah 84094

This receipt is for payment in full on lot #14 for The Ridge At Bear Lake. Cash payment amount is \$8000.00 and was paid in full on August 26, 2001.

  
Pine Ridge Properties, LLC  
Managing Member

JUL 28 2011

Rich County Recorder's Office

No 19635

Randolph, Utah,

Sept 12 20 13

RECEIVED OF

Ron Hunter

\$ 45<sup>00</sup>

forty five and 00/100

DOLLARS

For

Recording Fee - 2 Nts

8723 Oakwood Park Ct.  
Sandy, 84094

62136-62137

*[Signature]*

Recorder of Rich County

Carr Printing Co., Bountiful, Utah