IN THE CIRCUIT COURT OF SHELBY COUNTY, ALABAMA

KRISTIE M. CORNELIOUS, TRUSTEE OF THE JANET	
MOORE LIVING TRUST DATED NOVEMBER 27, 2018,)))
Plaintiff,) CIVIL ACTION NO.: CV-2022-900145
\mathbf{V}_{ullet}	
DAVID D. BURKE,	
Defendant.	20220311000102370 1/2 \$25.00 Shelby Cnty Judge of Probate, AL 03/11/2022 01:10:32 PM FILED/CERT

NOTICE OF LIS PENDENS

NOTICE is hereby given that Kristie M. Cornelious, as Trustee of the Janet Moore Living Trust Dated November 27, 2018, commenced a Civil Action in the Circuit Court of Shelby County Alabama, CV-2022-900145, against David D. Burke on the 11th day of March, 2022, in which Plaintiff claims a right, title, interest, or claim in and to the following described property:

LOT 306, ACCORDING TO THE FINAL PLAT HADDINGTON PARC AT BALLANTRAE, PHASE I, AS RECORDED IN MAP BOOK 32, PAGE 12, IN THE PROBATE OFFICE OF SHELBY COUNTY, ALABAMA.

This property has United States Postal address of 911 Haddington Dale, Pelham, Alabama 35124.

In the aforesaid Civil Action, the Plaintiff alleges, among other things, that a Deed was purportedly executed on February 23, 2022, in which Janet Moore, individually, and on behalf of the Janet Moore Living Trust Dated November 27, 2018, executed a Deed conveying her entire property to David D. Burke to the exclusion of her family and the Trust. The Plaintiff believes that, at the time the Deed was purportedly executed, Ms. Moore did not have capacity, either individually or as Trustee of the of the Janet Moore Living Trust Dated November 27, 2018, to execute the Deed of conveyance and, in addition, was the victim of undue influence executed on



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her by David D. Burke. The Plaintiff seeks to have the Deed determined to be void such that the property at issue would be owned by the Janet Moore Living Trust Dated November 27, 2018. The Janet Moore Living Trust Dated November 27, 2018, through its Trustee, asserts claim to the above described property, seeks to quiet title in the name of the Plaintiff, seeks to obtain a declaration from the Court that the Plaintiff is the rightful owner of the property, and seeks to hold the Defendant liable for conversion of the above described property.

Respectfully submitted,

Michael R. Lunsford (LUN006)

Attorney for Plaintiff, Kristie M. Cornelious, Trustee of the Janet Moore Living Trust Dated November 27, 2018

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