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Rashelle Hobbs, Recorder, Salt Lake County, Utah  
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Attorney for Petitioners

IN THE THIRD JUDICIAL DISTRICT COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

IN THE MATTER OF THE SYLVIA M.  
CHRYSLER TRUST – FBO KENT M.  
CHRYSLER

**NOTICE OF LIS PENDENS**

Case Number: 233900312

Judge: Richard McKelvie

Notice is hereby given that an action has been commenced and is pending in this Court upon a petition by Petitioners, Casidi Chrysler and Kayden Chrysler, beneficiaries to the Sylvia M. Chrysler Trust – FBO Kent M. Chrysler (“Trust”), against Christopher Chrysler, Trustee of the Sylvia M. Chrysler Trust – FBO Kent M. Chrysler, and Christopher Chrysler as personal representative of the Estate of Kent M. Chrysler, who has an ownership interest in Algonquin Limited Partnership (d/b/a Algonquin, LLC), seek to quiet title and gain rightful ownership of real property purchased from the proceeds of the Trust but currently titled in the name of Christopher Chrysler, individually.

Notice is hereby given that the real property affected by the said Notice of Lis Pendens is situated in Salt Lake County, State of Utah, commonly known as 2260 South

2100 East, Salt Lake City, Utah 84109 and is described by the surveyed legal description as follows:

BEG S 1362.90 FT & W 82.95 FT FR SE COR OF BLK 7, 5 AC PLAT C, BIG FIELD SUR; W 195.05 FT; S 53.25 FT; E 278 FT; N 51.25FT; W 82.95 FT; N 0 $\frac{1}{2}$  19'15" W 2 FT TO BEG. 0.336 AC M OR L.

Serial Number 16-22-151-039-0000

Petitioners further seek in their lawsuit filed against Christopher Chrysler, several causes of action, including:

(1) A breach of fiduciary duty cause of action against Christopher Chrysler for failing to properly inventory and appraise estate and trust property; failing to properly account for estate and trust property; failing to protect and possess estate or trust property for administration; failing to administer the estate or trust to the benefit of the beneficiaries and trust; failing to keep estate and trust beneficiaries informed; self-dealing with estate or trust property; incurring unnecessary expense or cost of the estate or trust; disposing, taking, concealing, selling, destroying, alienating, encumbering, or otherwise distributing estate or trust property.

(2) A breach of trust cause of action against Christopher Chrysler for failing to properly inventory and appraise trust property; failing to properly account for trust property; failing to protect and possess trust property for administration; failing to administer the trust to the benefit of the beneficiaries and trust; failing to keep trust beneficiaries informed; self-dealing with trust property; incurring unnecessary expense or cost of the trust; disposing, taking, concealing, selling, destroying, encumbering, alienating, or otherwise distributing trust property.

(3) An injunctive relief cause of action against Christopher Chrysler for the immediate and irreparable harm that the beneficiaries would suffer if Respondent is allowed to sell or encumber the real property listed herein.

DATED this 15<sup>th</sup> day of February, 2023

  
\_\_\_\_\_  
Katherine J. McLain  
Attorney for Petitioners

STATE OF UTAH                    )  
  : ss  
COUNTY OF SALT LAKE    )

On the 16 day of February, 2023, personally appeared before me Katherine J. McLain, the attorney for Petitioners, the signer of the foregoing Notice of Lis Pendens, who acknowledged to me that she executed the same.

  
\_\_\_\_\_  
Notary Public

