

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

DISTRICT OF COLUMBIA  
400 Sixth Street NW  
Washington, D.C. 20001

*Plaintiff,*

v.

422 CHESAPEAKE STREET SE LLC  
1926 Benning Road NE  
Washington, D.C. 20002

**SERVE ON Registered Agent:**

Jerome Bailey  
1926 Benning Road NE  
Washington, D.C. 20002

BAILEY REAL ESTATE HOLDINGS LLC  
1926 Benning Road NE  
Washington, D.C. 20002

**SERVE ON Registered Agent:**

Jerome Bailey  
1926 Benning Road NE  
Washington, D.C. 20002

*Defendant.*

Civ. No. \_\_\_\_\_

**COMPLAINT FOR VIOLATIONS OF THE DRUG-, FIREARM-, OR PROSTITUTION-RELATED NUISANCE ABATEMENT ACT**

The District of Columbia (the “District”), by and through the Office of the Attorney General for the District of Columbia (“OAG”), files suit against Defendants 422 Chesapeake Street SE, LLC and Bailey Real Estate (collectively “Defendants”) for violations of the Drug-, Firearm-, or Prostitution-Related Nuisance Abatement Act (“Nuisance Act”), D.C. Code §§ 42-

3101, *et seq.*, requiring Defendant to abate persistent drug and firearm nuisances at 422 Chesapeake Street SE (the “Property”). In support of this Complaint, the District states as follows:

### **PRELIMINARY STATEMENT**

The District brings this civil enforcement case to compel Defendants to abate a drug- and firearm-related nuisance at the multi-unit apartment building located at 422 Chesapeake Street SE, Washington, DC 20032 (the “Property”). The Property is directly across from Hendley Elementary School, where children cannot play outside for recess without fear of being hit by stray bullets from the Property. Neighbors, school children, and educators in this residential area fear being solicited to buy drugs or becoming shooting victims while walking the streets and alleys near the Property. After an uptick in drug and firearm crimes at the Property this year, Defendants failed to maintain security measures required by the Nuisance Act designed to protect residents and neighbors of the Property. Through this case, the District seeks declaratory relief and an injunction requiring Defendants to take measures to abate the drug- and firearm-related nuisance at their Property, as well as civil damages and attorneys’ fees.

### **I. JURISDICTION**

1. The Court has subject matter jurisdiction pursuant to D.C. Code § 11-921 and § 42-3102(a).

2. The Court has personal jurisdiction pursuant to D.C. Code §§ 13-422 and 423.

### **II. PARTIES**

3. Plaintiff, the District of Columbia, a municipal corporation empowered to sue and be sued, is the local government for the territory constituting the permanent seat of the government of the United States. The District brings this case by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and

conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest. D.C. Code § 1-301.81(a)(1). The Attorney General is also specifically authorized to enforce the Nuisance Act. D.C. Code § 42-3102(a).

4. Defendant 422 Chesapeake Street SE, LLC (“422 Chesapeake LLC”) is a limited liability company organized under the laws of the District of Columbia and conducts business in Washington, D.C. 422 Chesapeake LLC maintains a principal place of business at 1926 Benning Road NE, Washington, DC 20002, with Jerome Bailey as its registered agent. 422 Chesapeake LLC has operated the Property ever since the company acquired legal title to the Property on June 22, 2011.

5. Defendant Bailey Real Estate Holdings LLC (“Bailey Real Estate”) is a limited liability company organized under the laws of the District of Columbia that conducts business in Washington, D.C. Bailey Real Estate maintains a principal place of business at 1926 Benning Road NE, Washington, DC 20002, with Jerome Bailey as its registered agent. Bailey Real Estate manages the Property for 422 Chesapeake LLC.

### **III. FACTS**

#### **A. MPD Has Increasingly Seized Drugs and Firearms and Has Made Drug- and Firearm-Related Arrests at the Property.**

6. The Property is a 13-unit multifamily residential building in the Washington Highlands community of Southeast Washington, D.C.:

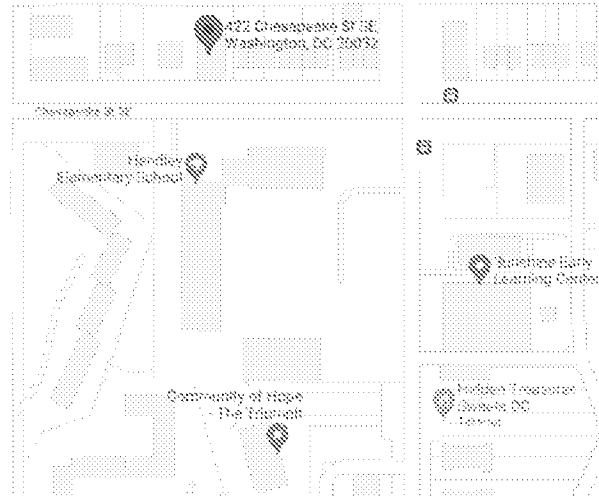
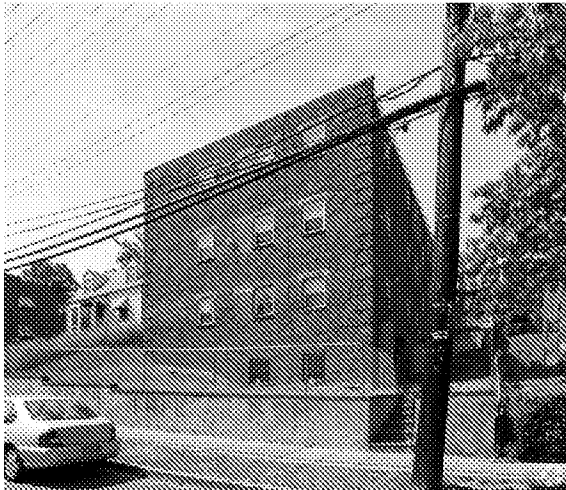


Image of Property, Google Street View (November 2019).

7. Criminal activity at this Property saw a marked increase in early 2021. For example, on March 2, 2021, a pedestrian walking past the Property was shot in her back and abdomen after at least 21 shots were fired. On January 24, 2021, MPD responded to sounds of gunshots at the Property and arrested two individuals that were in possession of heroin and multiple bottles of methadone. The shootings and drug activity at the Property have endangered innocent residents and community members.

8. MPD also executed search warrants on the Property on January 9 and March 27, 2021, and recovered cocaine, 297 grams of fentanyl, drug paraphernalia, three firearms, ammunition, a large-capacity magazine, and over \$3000 in cash.

9. Community members, school officials, and the Advisory Neighborhood Commissioner continue to witness criminal activity at the Property. Neighbors regularly witness persistent foot traffic and short visits to the Property consistent with drug-related activity, including hand-to-hand transactions and neighborhood drug users who loiter at the Property.

10. This recent spate of gun and drug activity is not the first time this Property has posed a nuisance to the surrounding community. Between April 9, 2018 and May 11, 2020, MPD

responded to gun violence at the Property and recovered drugs and firearms there at least nine times. For example, on January 10, 2020, a person sitting on the steps of the Property was shot multiple times. One day later, a second shooting occurred at the Property and multiple bullets went through tenants' windows.

11. During this period, MPD also executed six search warrants at the Property, seizing contraband on each occasion. For example, between August 15 and September 12, 2019, MPD executed three separate search warrants, recovering firearms, ammunition, crack cocaine, PCP, digital scales, and a large amount of currency. During that period MPD also conducted an undercover operation where officers purchased cocaine from individuals at the Property.

**B. The Property Is Located in a Drug-Free Zone Within 1,000 Feet from Two Schools.**

12. The Property is 50 feet away from Hendley Elementary School, which is located at 425 Chesapeake Street SE. *See [School Profiles Home \(dc.gov\)](#).*

13. School officials from Hendley Elementary School have reported automatic gunfire within 30 feet of the school from individuals at the Property. Additionally, the school's windows have been struck by gunfire originating from individuals on the Property on multiple occasions, including when children were outdoors for recess.

14. Children who attend Hendley who walk to the school, and their families, are exposed to drug use and distribution, as well as the danger of gun violence.

**C. Defendant Has Failed to Maintain Security Measures to Abate the Drug Nuisances at the Property Despite Receiving Notice.**

15. In response to the criminal activity in 2018 and 2019, OAG demanded that Defendants take certain measures to secure the Property and better protect tenants and neighbors. Defendants ultimately agreed to hire and maintain Special Police Officers ("SPOs"), add additional lighting and cameras, and secure doors.

16. When criminal activity resumed in force at the Property in early 2021, OAG contacted Bailey Real Estate and requested an update on security measures. In OAG's February 3, 2021 notice to the company, OAG attached police incident reports, which demonstrated that MPD had seized a large amount of controlled substances, paraphernalia, firearms, ammunition and large amounts of currency from the Property in January 2021.

17. On February 10, 2021, after receiving no response to the February 3rd notice, OAG again requested an update on the status of security measures at the Property. Defendants failed to respond to this second notice.

18. On March 3, 2021, OAG issued its third notice to Defendants, requesting they provide an update on current security measures in place to reduce criminal activity at the Property. Defendants failed to respond to this third request.

19. On April 28, 2021, OAG issued a fourth notice to Defendants outlining its efforts to resolve illegal activity at the Property, explaining that since its last requests to receive an update security measures more controlled substances were seized from the Property, and again requesting an update on security measures at the Property. Defendants again failed to respond.

20. On June 24, 2021, prior to filing this Complaint, the District again reached out to Defendants again requesting an update on the security measures at the Property. The District received a vague response that security is present at the Property. However, when pressed for more information on security efforts, Defendants were unable to provide an adequate response that reflected meaningful efforts to abate the nuisance activity at the Property and ensure the safety of the surrounding community.

21. Defendants' lack of full attention to security at the Property and their failure to engage meaningfully with OAG has resulted in continued nuisance activity at the Property given

the ongoing complaints from community members. The surrounding community remains at risk of harm from stray bullets and the emotional impact of living in constant fear of being subjected to drug and gun activity.

**D. Drug- and Firearm-Related Violence on the Property Adversely Impacts Neighbors and Community Members.**

22. The Property's neighbors in the Washington Highlands community have been adversely impacted by the drug- and firearm-related nuisance activity at the Property. Individuals walking near the Property have been victims of gun violence and neighbors are afraid of being shot or solicited to buy drugs.

23. As the Property is located directly across the street from Hendley Elementary School. Families must walk directly past the Property in order to access the school. School administrators have complained that the drug and gun violence at the Property has adversely impacted the school children, their families, teachers, and the school administration. As mentioned above, school officials reported automatic gunfire within 30 feet of the school from individuals at the Property and damage to school windows by the gunfire. Children cannot enjoy school recess outdoors without risking being struck by gunfire coming from the Property.

24. The Property is also within easy walking distance of the Temple of Praise Church, Catholic Charities, the Washington Highland Recreation Center, and Oxon Run Park. Community members who frequent these and other resources and services fear being assaulted by drug-addled strangers in nearby alleys and streets, or being caught in the crossfire of gun violence.

25. Community members frequently report to MPD, Area Neighborhood Commissioners ("ANCs") and the Office of the Attorney General ("OAG") the drug- and firearm-related violence and other disturbances at the Property.

## COUNT I

### **Abatement of a Drug-Related Nuisance (D.C. Code §§ 42-3101 to 3114)**

26. The District fully incorporates by reference Paragraphs 1 through 25.

27. There is frequent gun violence and use and sale of drugs at the Property. Furthermore, the Property has been used to store one or more firearms, firearm-related devices, and drugs. MPD officers have seized drugs and firearms from the Property on several occasions and made drug- and firearm-related arrests on the Property. The Property is therefore a drug- and firearm-related nuisance as defined by D.C. Code § 42-3101(5)(B).

28. Individuals use the Property to facilitate violations of the Controlled Substance Act (Chapter 9 of Title 48), D.C. Code §§ 48-901.01–48-907.03. The drugs that MPD has recovered from the Property— crack cocaine, PCP and opioids —are controlled substances under D.C. Code § 48-902.01–48-902.14. Violations of the Controlled Substances Act include, but are not limited to, “maintain[ing] any place to manufacture, distribute, or store for the purpose of manufacture or distribution a narcotic or abusive drug.” The Property is therefore a drug- related nuisance as defined by per D.C. Code § 42-3101(5)(A).

29. Distributing or possessing a controlled substance within a Drug-Free Zone is a violation of the Controlled Substances Act. D.C. Code § 48–904.07a(b). The Property is within a Drug-Free Zone, as defined in D.C. Code § 48–904.07a(a). MPD has often made arrests at the Property for individuals possessing controlled substances. The Property is therefore a drug- related nuisance as defined by D.C. Code § 42-3101(5)(A).

30. The drug- and firearm-related activity at the Property has an adverse impact on the community due to the violence and daily drug activity, as defined by D.C. Code § 42-3101, *et seq.*



31. Prior to filing this action, OAG made substantial efforts to provide Defendants with reasonable notice of the nuisance activities at the Property, as required by D.C. Code 42-3103(b). Despite receiving several notices from OAG, Defendants have not sufficiently addressed the nuisance activity at the Property.

**RELIEF REQUESTED**

Wherefore, the District of Columbia respectfully requests declaratory and injunctive relief and statutorily authorized damages against the Defendants, as follows:

A. That the Court declare the Property located at 422 Chesapeake Street SE, owned and managed by Defendants, a drug- and firearm-related Nuisance Property pursuant to the Drug-, Firearm-, or Prostitution-Related Nuisance Abatement Act, D.C. Code §§ 42-3101 to 3114;

B. That the Court enter a preliminary and permanent injunction appropriate for Defendants to abate the nuisance by preventing the continuance or recurrence of the drug- and firearm- related nuisance at the Property.

C. That the Court award the maximum damages per day since the date Defendants were first notified of the nuisance to be paid by the Defendants into the Drug-, Firearm-, or Prostitution-Related Nuisance Abatement Fund pursuant to D.C. Code § 42-3111.01(a); and

D. That the Court award the District its attorneys' fees and costs of bringing this action.

E. That the Court enter any other relief that the Court deems appropriate and necessary to abate the nuisance activity at the Property.

Date: June 29, 2021

Respectfully Submitted,

KARL A. RACINE  
Attorney General for the District of Columbia

KATHLEEN KONOPKA  
Deputy Attorney General  
Public Advocacy Division

JIMMY ROCK  
Assistant Deputy Attorney General  
Public Advocacy Division

        /s/        

JENNIFER L. BERGER [Bar No. 490809]  
Chief, Social Justice Section

        /s/        

MONIQUE COBB [Bar No. 1531175]  
Assistant Attorney General  
400 Sixth Street NW, 10th Floor  
Washington, D.C. 20001  
(202) 724-3012  
Email: [Monique.Cobb@dc.gov](mailto:Monique.Cobb@dc.gov)

*Attorneys for the District of Columbia*

# Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

## INFORMATION SHEET

District of Columbia

Case Number: \_\_\_\_\_

vs

Date: June 29, 2021

422 Chesapeake Street SE, LLC

One of the defendants is being sued  
in their official capacity.

Name: <i>(Please Print)</i> <b>Monique Cobb</b>	Relationship to Lawsuit
Firm Name: <b>Office of the Attorney General</b>	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: <b>202 -727-3012</b> Six digit Unified Bar No.: <b>1531175</b>	<input type="checkbox"/> Self (Pro Se)
	<input type="checkbox"/> Other: _____

TYPE OF CASE:  Non-Jury  6 Person Jury  12 Person Jury  
Demand: \$ \_\_\_\_\_ Other: \_\_\_\_\_

### PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar #: \_\_\_\_\_

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar#: \_\_\_\_\_

### NATURE OF SUIT: *(Check One Box Only)*

#### A. CONTRACTS

#### COLLECTION CASES

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> 01 Breach of Contract        | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty        | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent  | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied  |
| <input type="checkbox"/> 06 Negotiable Instrument     | <input type="checkbox"/> 27 Insurance/Subrogation               | <input type="checkbox"/> 26 Insurance/Subrogation         |
| <input type="checkbox"/> 07 Personal Property         | Over \$25,000 Pltf. Grants Consent                              | Over \$25,000 Consent Denied                              |
| <input type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 07 Insurance/Subrogation               | <input type="checkbox"/> 34 Insurance/Subrogation         |
| <input type="checkbox"/> 15 Special Education Fees    | Under \$25,000 Pltf. Grants Consent                             | Under \$25,000 Consent Denied                             |
|   | <input type="checkbox"/> 28 Motion to Confirm Arbitration       |   |
|   | Award (Collection Cases Only)                                   |   |

#### B. PROPERTY TORTS

- |   |   |                                      |
|---|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile                          | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion                          | <input type="checkbox"/> 04 Property Damage                 |                                      |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) |   |                                      |

#### C. PERSONAL TORTS

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> 01 Abuse of Process            | <input type="checkbox"/> 10 Invasion of Privacy                            | <input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice) |
| <input type="checkbox"/> 02 Alienation of Affection     | <input type="checkbox"/> 11 Libel and Slander                              | <input type="checkbox"/> 18 Wrongful Death (Not Malpractice)                   |
| <input type="checkbox"/> 03 Assault and Battery         | <input type="checkbox"/> 12 Malicious Interference                         | <input type="checkbox"/> 19 Wrongful Eviction                                  |
| <input type="checkbox"/> 04 Automobile- Personal Injury | <input type="checkbox"/> 13 Malicious Prosecution                          | <input type="checkbox"/> 20 Friendly Suit                                      |
| <input type="checkbox"/> 05 Deceit (Misrepresentation)  | <input type="checkbox"/> 14 Malpractice Legal                              | <input type="checkbox"/> 21 Asbestos   |
| <input type="checkbox"/> 06 False Accusation            | <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) | <input type="checkbox"/> 22 Toxic/Mass Torts                                   |
| <input type="checkbox"/> 07 False Arrest                | <input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice)  | <input type="checkbox"/> 23 Tobacco  |
| <input type="checkbox"/> 08 Fraud                       |  | <input type="checkbox"/> 24 Lead Paint   |

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# Information Sheet, Continued

## C. OTHERS

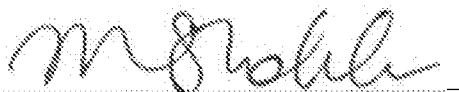
- |   |   |
|---|---|
| <input type="checkbox"/> 01 Accounting                                  | <input type="checkbox"/> 17 Merit Personnel Act (OEA)   |
| <input type="checkbox"/> 02 Att. Before Judgment                        | (D.C. Code Title 1, Chapter 6)  |
| <input type="checkbox"/> 05 Ejectment                                   | <input type="checkbox"/> 18 Product Liability   |
| <input type="checkbox"/> 09 Special Writ/Warrants<br>(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,<br>Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication                        | <input type="checkbox"/> 29 Merit Personnel Act (OHR)   |
| <input type="checkbox"/> 11 Writ of Replevin                            | <input type="checkbox"/> 31 Housing Code Regulations  |
| <input type="checkbox"/> 12 Enforce Mechanics Lien                      | <input type="checkbox"/> 32 Qui Tam   |
| <input checked="" type="checkbox"/> 16 Declaratory Judgment             | <input type="checkbox"/> 33 Whistleblower   |

## II.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name                                 | <input type="checkbox"/> 15 Libel of Information                                    | <input type="checkbox"/> 21 Petition for Subpoena<br>[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic                      | <input type="checkbox"/> 19 Enter Administrative Order as<br>Judgment [ D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien                   |
| <input type="checkbox"/> 08 Foreign Judgment/International                 | 2-1802.03 (h) or 32-151 9 (a)]  | <input type="checkbox"/> 23 Rule 27(a)(1)<br>(Perpetuate Testimony)  |
| <input type="checkbox"/> 13 Correction of Birth Certificate                | <input type="checkbox"/> 20 Master Meter (D.C. Code §                               | <input type="checkbox"/> 24 Petition for Structured Settlement       |
| <input type="checkbox"/> 14 Correction of Marriage<br>Certificate          | 42-3301, et seq.)   | <input type="checkbox"/> 25 Petition for Liquidation                 |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle)  |   |  |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) |   |  |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other)    |   |  |

## D. REAL PROPERTY

- |  |  |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate                | <input type="checkbox"/> 08 Quiet Title                                  |
| <input type="checkbox"/> 12 Specific Performance                     | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted           |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain)            | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied            |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale       | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) |  |



Attorney's Signature

June 29, 2021

Date



**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
 Civil Actions Branch  
 500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001  
 Telephone: (202) 879-1133 Website: [www.dccourts.gov](http://www.dccourts.gov)

District of Columbia

Plaintiff

vs.

Case Number \_\_\_\_\_

422 Chesapeake Street SE, LLC

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Monique Cobb

*Clerk of the Court*

Name of Plaintiff's Attorney

400 6th Street NW, 10th Floor

Address

Washington, DC 20001

202-727-3012

Telephone

如需翻译,请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하 시면, (202) 879-4828 로 전화 주십시오. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይያው቉

By \_\_\_\_\_

Deputy Clerk

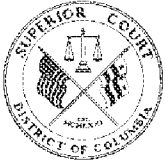
Date \_\_\_\_\_

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
**500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001**  
**Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

District of Columbia

Demandante

contra

Número de Caso: \_\_\_\_\_

422 Chesapeake Street SE, LLC

Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Monique Cobb

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante

400 6th Street NW, 10th Floor

Por: \_\_\_\_\_

Dirección

Subsecretario

Washington, DC 20001

202- 727- 3012

Fecha \_\_\_\_\_

Teléfono

如需翻译,请打电话 (202) 879-4828

Veillez appeier au (202) 879-4828 pour une traduction

Đề có một bản dịch, hãy gọi (202) 879-4828

如需翻译,请打电话 (202) 879-4828

የአገልግሎት ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés  
 See reverse side for English original



**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
 Civil Actions Branch  
 500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001  
 Telephone: (202) 879-1133 Website: www.dccourts.gov

District of Columbia

Plaintiff

vs.

Case Number \_\_\_\_\_

Bailey Real Estate Holdings LLC

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Monique Cobb

*Clerk of the Court*

Name of Plaintiff's Attorney

400 6th Street NW, 10th Floor

Address

Washington, DC 20001

202-727-3012

Telephone

如需翻译,请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하 시면, (202) 879-4828 로 전화주세요. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይያው቉

By \_\_\_\_\_

Deputy Clerk

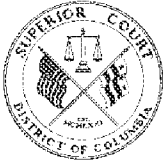
Date \_\_\_\_\_

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
**500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001**  
**Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

District of Columbia

Demandante

contra

Número de Caso: \_\_\_\_\_

Bailey Real Estate Holdings LLC

Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Monique Cobb

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante

400 6th Street NW, 10th Floor

Por: \_\_\_\_\_

Dirección

Washington, DC 20001

Subsecretario

202- 727- 3012

Fecha \_\_\_\_\_

Teléfono

如需翻译,请打电话 (202) 879-4828

Veillez appeier au (202) 879-4828 pour une traduction

Đề có một bản dịch, hãy gọi (202) 879-4828

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የአገልግሎት ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés  
 See reverse side for English original