

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO

RED OAK VENTURES, LLC
581 Country Club Drive, Suite D
Newark, Ohio 43055,

Plaintiff,

-vs-

LOTUS CONSTRUCTION
GROUP, LLC
c/o 4599 Stonehill Street
Hilliard, Ohio 43026,

and

c/o RAJNARAYANAN SUNDARAMAN
aka RAJNARAYANAN
SUNDARARAMAN
Statutory Agent
Manager/Sole Member
4599 Stonehill Street
Hilliard, Ohio 43026,

Defendants.

Case No. _____

Judge _____

COMPLAINT ON JUDGMENT
AND FOR FORECLOSURE OF
MORTGAGE

Parcel Number: 010-137150-00

Plaintiff Red Oak Ventures, LLC ("Plaintiff") asserts as follows:

BACKGROUND:

1. On or about September 20, 2024, Defendant Lotus Construction Group, LLC executed and delivered to Plaintiff its Cognovit Promissory Note ("Cognovit Note") in the principal amount of \$196,500.00. A true and correct copy of the Cognovit Note is attached as Exhibit 1.

2. Defendant Lotus Construction Group, LLC defaulted in the payment of the Cognovit Note.

3. On or about September 20, 2024, Defendant Rajnarayanan Sundaraman aka Rajnarayanan Sundararaman executed and delivered to Plaintiff his Unconditional Guaranty of Payment and Performance (hereafter “Cognovit Guaranty”) guaranteeing payment of the Cognovit Note. A true and correct copy of the Cognovit Guaranty is attached as Exhibit 2.

4. Defendant Rajnarayanan Sundaraman aka Rajnarayanan Sundararaman defaulted in the performance of the obligations set out in his Cognovit Guaranty.

CLAIMS ON JUDGMENT AND MORTGAGE

5. On May 21, 2025, Plaintiff obtained a judgment against Defendants Lotus Construction Group, LLC and Rajnarayanan Sundaraman aka Rajnarayanan Sundararaman in Franklin County Common Pleas Court Case No. 25CV003861, on which there is currently due to Plaintiff the sum of \$188,109.69 plus compound interest at the rate of 18% per annum thereon from March 31, 2025, plus late charges equal to 5% of the unpaid portion of the regularly scheduled payment, and disbursements and advances for taxes, insurance and matters related to the premises securing the Cognovit Note, plus Plaintiff’s costs and expenses herein, including Plaintiff’s attorney fees pursuant to the Cognovit Note and the Cognovit Guaranty. A Certificate of Judgment was filed on Plaintiff’s behalf against Defendant Lotus Construction Group, LLC and Defendant Rajnarayanan Sundaraman aka Rajnarayanan Sundararaman on May 23, 2025 as Certificate of Judgment No. 25JG039743. True and correct copies of the May 21, 2025 Judgment Entry and May 23, 2025 Certificate of Judgment lien are attached hereto as Exhibits 3 and 4, respectively.

6. On September 20, 2024, as security for the payment of the Cognovit Note, Defendant Lotus Construction Group, LLC executed and delivered to Plaintiff its Open-End Mortgage, Assignment of Rents and Security Agreement (hereafter “Mortgage”) on real property

known as 1438 East Gates Street, Columbus, OH 43206. The legal description of the property that is subject to the Mortgage is contained in the Mortgage. A true and correct copy of the Mortgage is attached hereto as Exhibit 5.

7. The Mortgage was delivered to the Recorder of Franklin County, Ohio for recording, at which time it was recorded as Instrument No. 202410010102061 of the mortgage records of said county. Subject only to the real estate taxes and the costs of this proceeding, the Mortgage is the first and best lien upon the real property described in the Mortgage.

8. Plaintiff is the holder of the Mortgage.

9. Defendant Lotus Construction Group, LLC failed to pay the Cognovit Note, and Defendant Rajnarayanan Sundaraman aka Rajnarayanan Sundararaman defaulted in the performance of the obligations set out in his Cognovit Guaranty. Plaintiff has declared to Defendant Lotus Construction Group, LLC and Defendant Rajnarayanan Sundaraman aka Rajnarayanan Sundararaman that the unpaid principal balance of the Cognovit Note, together with all accumulated interest, fees, and late charges, and Plaintiff's attorney fees, is immediately due and payable.

10. Defendants Lotus Construction Group, LLC, and Franklin County Treasurer have, or may claim to have, some interest in the real property described as Parcel Number 010-137150-00 in the Auditor's Records of Franklin County, Ohio.

WHEREFORE, Plaintiff RED OAK VENTURES, LLC respectfully demands that its Mortgage be foreclosed; that the amount of liens on the property be marshaled; that the real property described in the Mortgage be sold and that the judgment in Plaintiff's behalf as described in paragraph 5 herein be paid from the proceeds of said sale, together with costs herein; and that all Defendants be required to set up their claims upon or interests in the real

property described in the Mortgage or be forever barred from asserting the same.

Respectfully submitted,

/s/ John L. Chaney

John L. Chaney (0072447)

Ray P. Drexel (0020515)

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LLC*