MCCLAY · ALTON, P.L.L.P ·

ATTORNEYS

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July 21, 2022

VIA METRO LEGAL

City of Saint Paul City Clerk's Office Attn: Shari Moore, City Clerk 15 Kellogg Blvd. West 310 City Hall Saint Paul, MN 55102

Re:

In re RAS Ethiopian Bar & Restaurant LLC, d.b.a. RAS Restaurant and Lounge

City Council File No. RES 22-882, RES 22-1154

License No. 2010000006

Memorandum of Law in Support of Petition for a Stay of Proceedings

Dear Ms. Moore:

This filing supplements the July 15, 2022 Petition for Reconsideration or a Stay of Proceedings in the above-noted matter. Enclosed and hereby served upon you is the following:

- 1. Memorandum of Law in Support of Petition for a Stay of Proceedings;
- 2. Declaration of Brian D. Alton;
- 3. Declaration of DJ Bedasso and Zinash Amde; and,
- 4. Declaration of Feneteye Sendba.

This filing is directed to The City Council of the City of St. Paul. Please forward to all council members and others as appropriate and or required.

Very truly yours,

Robert M. McClay

bob@mcclay-alton.com

Attorney ID #69620

RMM: jf Encs.

cc: Therese A. Skarda, Assistant City Attorney via email w/ encs.

Council Member Tolbert via email w/ encs.

Adam Yust via email w/ encs.

Wards 1 through 7 via email w/ encs.
RAS Ethiopian Bar & Restaurant LLC, d.b.a. RAS Restaurant and Lounge:

D.J. Bedasso & Zinash Amde via email w/ encs.