

JOHN G. HOESCHLER, P.A.

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November 18, 2020

Mayor Melvin Carter
390 City Hall and Court House
15 West Kellogg Blvd.
St. Paul, MN 55102

City Clerk Shari Moore
315 City Hall and Court House
15 West Kellogg Blvd.
St. Paul, MN 55102

Dear Mayor and Ms. Moore,

Please accept this, pursuant to our earlier agreement regarding electronic service, as the formal objection of the plaintiffs as to the properties listed on the attached Exhibit B, as well as any other properties owned by these plaintiffs and/or their affiliates regarding the 2020 Street Maintenance Service Program Street Sweeping and Lighting fees and assessments billed and to be levied against their properties in St. Paul. Plaintiffs also object to any fees previously paid for 2019/2020 Street Maintenance Service Program charges.

Plaintiffs believe this work does not cause any special benefit to their properties and these charges are based upon mistakes of law and fact by the city.

Yours very truly,

/s/ John G. Hoeschler

EXHIBIT B

Bigos – Galtier LLC	31-29-22-44-0443
Bigos – Galtier LLC	31-29-22-44-0894
Bigos – Jackson Tower LLC	31-29-22-44-0108
Bigos – Jackson Parking	31-29-22-44-0523
Bigos – Jackson Parking	31-29-22-44-0611
Bigos – Jackson Parking	31-29-22-44-0893
Bigos – Kellogg Square	06-28-22-11-0022
Bigos – Lowertown Lofts LLC	31-29-22-44-0098
Bigos – Mears Park	31-29-22-44-0058
Bigos – Sibley Tower	31-29-22-44-0107
Joe Clancy	04-28-23-22-0104
Victoria & Richard Lemanczykafka	04-28-23-22-0118
Nath Companies (Factory Lane LLC)	32-29-22-21-0104