

PATRICK J. NEATON MICHAEL L. PUKLICH MARK E. DOOLEY LEGAL ASSISTANTS: TORIE LaFAVE COURTNEY M. OLSON

October 27, 2025

City of St. Paul
ATTN: Marcia Moermond, Legislative Hearing Officer
310 CITY HALL
15 WEST KELLOGG BOULEVARD
SAINT PAUL, MN 55102-1615
legislativehearings@ci.stpaul.mn.us

**Re:** Tawhid Islamic Center

Removal or Repair of the Structure at 430 DALE STREET NORTH

Officer Moermond,

My firm represents the Tawhid Islamic Center and I am in receipt of the Council's letter dated October 3, 2025. First, my apologies that I will not be able to attend the hearing in person. I have a conflicting hearing in Duluth, MN at that time and am unable to reschedule.

With respect to my client's options with respect to rehabilitation or removal of the subject property, my client has been in litigation with their insurance company since April 14, 2024 (Tawhid Islamic Center of Minnesota vs Auto-Owners Insurance Company, Case Number 62-CV-24-2246). Our case is set for trial on December 15, 2025, and the Court will issue a decision no later than March 15, 2025. I do anticipate a sooner decision as the major elements of the case have been resolved by motion. The Court has ordered that the Center's insurance company is liable to the Tawhid Islamic Center for the loss—the trial is simply to determine the amount owed to the Center. Given the limited scope of the trial, I do not anticipate that the Court will take the time allotted to issue its decision. In fact, the parties are diligently working toward a settlement to resolve this matter prior to trial.

As Auto-Owners Insurance has dragged out this case, the Center has not been able to obtain the funds for either a renovation or removal. Without resolution of this claim, the Center does not even know the amount of funds that will be available to it for renovation.

The Center respectfully requests that the Council stay this matter until the Center can resolve its litigation and properly assess the options to address this property. Should the Council have any questions, feel free to contact the undersigned.

Sincerely,

Mark Dooley