



December 29, 2014

City of Saint Paul
Attn.: Dan Bostrom, St. Paul City Councilman
15 Kellogg Avenue W.
St. Paul, MN 55102

Re: In re the Demolition of 676 Wells Street, Saint Paul

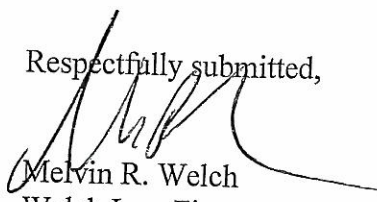
Dear Sir or Ma'am:

This missive is regarding the scheduled demolition of 676 Wells Street. As you are aware, I represent Mr. Adams and Ms. Woolsey regarding their efforts and litigation to save their residence and home of 676 Wells Street, currently scheduled for demolition on Monday, January 5, 2014. Currently, the decision to demolish the home has been submitted to the Minnesota Court of Appeals for their consideration as to whether the decision to demolish the home is supported by the findings of the legislative hearing and city council. Notably, Mr. Adams has – with the help of the Dayton's Bluff Neighborhood Housing Services – abated nearly all of the original code violations which rendered the residence uninhabitable, namely: removed all living accoutrements from the basement; electrical service to the house exist; the guardrails have been fixed; there are exiting components to the basement (although unnecessary with the abatement of the original living space); the foundation has been repaired; no-one inspected the water heater or the smoke detectors – the former which was newly installed and the latter which are hardwired into the residence; and all of the wiring in the house was covered. It is not argued that numerous code violations remain, but the ones which were identified as "life safety issues" no longer exist, which would address the issues relating to the inhabitability of the house. New problems now exist, but this issue will be heard and decided by a higher forum who can give guidance going forward.

Accordingly, I respectfully request that the City of Saint Paul withhold further action against the residence until such time as the Minnesota Court of Appeals has issued its decision.

RECEIVED
DEC 30 2014
CITY ATTORNEY

Respectfully submitted,


Melvin R. Welch
Welch Law Firm

cc: Beth Woolsey
Ginger Palmer, St. Paul City Attorney's Office