Vang, Mai (CI-StPaul)

From: Jared M. Goerlitz <JGoerlitz@pfb-pa.com>
Sent: Wednesday, January 20, 2016 3:20 PM
To: Moermond, Marcia (CI-StPaul)
Cc: Magner, Steve (CI-StPaul); Yannarelly, Joe (CI-StPaul); Dornfeld, Matt (CI-StPaul); Vang, Mai (CI-StPaul)
Subject: 839 Thomas Avenue Abatement Notice
Attachments: Sheriff's Report of Sale.pdf; OTSC signed.pdf; Order.pdf

Hi Marcia:

This follows our telephone conversation today whereby my client, JN Homes LLC, wants to be proactive regarding the City's Order to Abate Nuisance on the above property. This property was the subject of a judicial foreclosure where a defense was raised by the borrower, McKusick Building Services, LLC, and the attached order was entered allowing my client to foreclose beginning November 1, 2015. Once the borrowers time under the order expired, my client proceeded with foreclosure and a foreclosure sale occurred on January 7th with JN Homes LLC being the successful bidder. The Sheriff's Report of Sale is attached. We obtained the first available hearing date before Judge Guthmann (February 1, 2016) to reduce the redemption period to 5 weeks. The court just moved that hearing to February 8th, 2016 because the judge didn't sign the order to show cause in time for the original hearing. The signed Order to Show Cause is attached. Assuming our motion to confirm the January 7th, 2016 foreclosure and to reduce the redemption period to 5 weeks are both granted, JN Homes LLC would have title on March 15th, 2016.

Based upon my messages with Matt Dornfeld, our legislative hearing is February 23 and our City County hearing is March 16th. We haven't received the letters with those dates yet, but are hopeful the City will work with us for additional time while we are being proactive. Because my client won't have title until March 15th (after being very diligent in this process), we are requesting the legislative hearing and City County hearing be pushed back so that it can begin taking curative actions immediately after March 15th and then appropriately address you at the legislative hearing with its rehabilitation plan.

Thank you for your attention to our request.

Jared M. Goerlitz
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