

**JOHN G. HOESCHLER, P.A.**  
ATTORNEY

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October 5, 2016

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

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

Sir and Madam,

Please take notice that the taxpayers listed on the attached schedule object to the proposed imposition of 2016 Street Right of Way and Above Standard Lighting Assessments on their St. Paul properties that will be considered by the City Council on October 5, 2016. This notice is based on the grounds outlined in the recent Supreme Court opinion in *First Baptist Church of St. Paul, et al vs. City of St. Paul*, (A15-0015) and my memo to you dated September 29, 2016.

In addition, you should take this to be a formal notice of objection to the 2016 Street Right of Way and special lighting and storm water assessments on behalf of all assessed property owners in the City of St. Paul as a class. This objection is based on the fact that no members of that class have been properly assessed in light of the requirements set forth by the Supreme Court in the aforementioned case.

Yours very truly,



John G. Hoeschler

# SCHEDULE A

Appellants	Address	PIN
Krinkie Company	1400 Concordia	342923340004
J. James Walsh	626 Armstrong	112823410135
	646 Armstrong	112823410122
	560 Randolph	122823320007
	565 Randolph	122823230116
475 Cleveland Assoc. LLC	475 Cleveland Ave. N.	322923410125
Dart Transit	540 Cleveland Ave. N.	332923230008
Midway Fuel	543 Cleveland Ave. N.	322923140015
Eaton Street LLC	260 Eaton St.	082822120104
2085 Capp Road LLC	2185 Capp Road	292923410001
2085 Capp Road LLC	2185 Capp Road	292923140015
1047 Raymond LLC	1043 Raymond	292923120055
802 Prior LLC	802 Prior Ave. N.	282923340084
Eaton Street LLC	0 Chester St.	052822430004
Eaton Street LLC	0 Lafayette Rd	080822120113
Dart Transit	770 Prior N.	282923340126
Church of St. Pascal Baylon	1757 Conway St.	342922140046
	510 White Bear Ave.	352922230088
	0 White Bear Ave.	352922320072
Bolander Real Estate LLC	0 Eustis Ave.	292923220008
	0 Unassigned	292923220014
	251 Starkey St	052822330046
	226 Starkey St	052822330062
Thaemert (White Castle)	1601 White Bear Ave.	222922110155
Craig Thaemert	1567 White Bear Ave.	222922110156
Thaemert (Dairy Queen)	1537 White Bear Ave.	222922140020
Alice Thaemert Trustee	1529 White Bear Ave.	222922140021
Alice Thaemert Trustee	0 Montana E.	222922140022
Le Auto	468 University Ave. W.	362923310033
Dey Properties	525 Snelling N.	332923140052
Lethert, Skwira, Schultz & Co	170 7th Street E	312922440059
Kirtland Properties LLC	570 Hatch	252923230075
	582 Hatch	252923230076



Sewell Properties, LLC (Owner) (Ericson Taxpayer)	2274 University Ave. W.	322923120030
Sewell Properties, LLC	2288 University Ave. W.	322923120035
Sewell Properties, LLC	2288 Myrtle Ave	322923120036
Sewell Properties, LLC	0 Myrtle Ave	322923120041
Minnesota Public Radio	480 Cedar St.	312922431506
Minnesota Public Radio	0 7th Street E.	312922431548
Minnesota Public Radio	0 Frontenac Pl	322923230030
Minnesota Public Radio	0 Frontenac Pl	322923230031
Minnesota Public Radio	0 Frontenac Pl	322923230032
Minnesota Public Radio	0 Frontenac Pl	322923230033
Minnesota Public Radio	0 Frontenac Pl	322923230034
Minnesota Public Radio	0 Frontenac Pl	322923230035
Minnesota Public Radio	0 Frontenac Pl	322923230036
Minnesota Public Radio	0 Frontenac Pl	322923230045
Minnesota Public Radio	10 Exchange St.	312922340264
Minnesota Public Radio	0 7th Street E.	062822210073
Minnesota Public Radio	488 Wabasha	312922340281
Minnesota Public Radio	488 Wabasha	312922340282
Minnesota Public Radio	488 Wabasha	312922340283
Minnesota Public Radio	488 Wabasha	312922340284
Minnesota Public Radio	488 Wabasha	312922340285
Minnesota Public Radio	488 Wabasha	312922340286
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Minnesota Public Radio	488 Wabasha	312922340293
Minnesota Public Radio	488 Wabasha	312922340294
Minnesota Public Radio	488 Wabasha	312922340295
Minnesota Public Radio	480 Cedar St.	312922430505
Minnesota Public Radio	480 Cedar St.	312922430557
Church of St. Mary	261 8th St. E	312922410216
Church of St. Mary	466 Wacouta St.	312922440003
First Baptist Church	499 Wacouta St.	312922410024
First Baptist Church	499 Wacouta St.	312922410182
First Baptist Church	499 Wacouta St.	312922410179
Short and Miller St Paul LLC	278 E. 7th St.	312922440038
Lexington Convenience Properties	390 Lexington	352923320149
Lexington Convenience Properties	Lexington Pkwy N	352923320150
Lexington Convenience Properties	374 Lexington	352923320151

Town & Country Club	336 Otis Avenue	322923340017
Town & Country Club	294 Mississippi River Blvd	322923340018
Town & Country Club	282 Otis Avenue	322923420001
Town & Country Club	300 Mississippi River Blvd. N.	322923340013
Town & Country Club	304 Pelham Blvd	322923310044
Town & Country Club	2380 Beverly Road	322923310023
Town & Country Club	2400 Beverly Road	322923310022
Upper Corner Venture	266 E. 7th St.	312922440040
Center Ice LLC	218 E 7th St.	312922440425
Center Ice LLC	229 E. 6th St.	312922440898