

Your Honor,

My name is: Patrick A. Carlone I am part owner of the property at
185 Como Ave, St. Paul MN

I have 7 motions for dismissal.

Motion #1. The city of St. Paul doesn't have jurisdiction over this property on the grounds this property is taxed and assisted as commercial property like all the properties on this block.

Motion #2. This property is under construction, we have spent over: \$12, 000. twelve thousand dollars and have taken out building permits.

Motion #3. The equipment on this property is for maintenance and must be kept on this land, dump truck/skidster for snow removal, lawn ^{equipment} ~~tractors~~ are for cutting the lawn, first aid trailer is for safety, tool shed is to lockup small tools for safety.

Motion #4. The equipment is frozen into the ground, if this equipment is moved now the undercarriage would be damaged.

Motion #5. The Capitol Planning Department said they can issue us a special use permit if we wish to build a residential home.

Motion #6. Due to illness in our family we have decided to sell the property and our equipment to the property owners as commercial, it may take 90 days to close the sale.

Motion #7. If the City were to confiscate our equipment they ^{be} in violation of our United States Constitution and may be Court ordered to pay damages.