

JOHN G. HOESCHLER, P.A.

ATTORNEY

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November 16, 2020

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

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

Dear Mayor and Ms. Moore,

Please accept this, pursuant to our earlier agreement regarding electronic service, as the formal objection of the plaintiffs as to the properties listed on the attached Exhibit A, as well as any other properties owned by these plaintiffs and/or their affiliates regarding the 2020 Street Maintenance Service Program Street Sweeping and Lighting fees and assessments billed and to be levied against their properties in St. Paul. Plaintiffs also object to any fees previously paid for 2019/2020 Street Maintenance Service Program charges.

Plaintiffs believe this work does not cause any special benefit to their properties and these charges are based upon mistakes of law and fact by the city.

Yours very truly,

/s/ John G. Hoeschler

EXHIBIT A

475 Cleveland Assoc. LLC	32-29-23-41-0125
Dart Transit	33-29-23-23-0008
Midway Fuel	32-29-23-14-0015
Eaton Street LLC	08-28-22-12-0104
2085 Capp Road LLC	29-29-23-41-0001
2085 Capp Road LLC	29-29-23-14-0015
802 Prior LLC	28-29-23-34-0084
Eaton Street LLC	05-28-22-43-0004
Eaton Street LLC	08-08-22-12-0113
Dart Transit	28-29-23-34-0216
Krinkie Company	34-29-23-34-0004
Rose M. Walsh, Trustee	11-28-23-41-0135
	11-28-23-41-0122
	12-28-23-32-0007
	12-28-23-23-0116
Church of St. Pascal Baylon	34-29-22-14-0046
	35-29-22-23-0088
	35-29-22-32-0072
Bolander Real Estate LLC	29-29-23-22-0008
Bolander Real Estate LLC	29-29-23-22-0014
Bolander Real Estate LLC	05-28-22-33-0046
R&M Holdings (Bolander)	05-28-22-33-0061
R&M Holdings (Bolander)	05-28-22-33-0013
Bolander Real Estate LLC	05-28-22-33-0062
Thaemert (White Castle)	22-29-22-11-0155
Craig Thaemert	22-29-22-11-0156
Thaemert (Dairy Queen)	22-29-22-14-0020
Alice Thaemert Trustee	22-29-22-14-0021
Alice Thaemert Trustee	22-29-22-14-0022
Dey Properties	33-29-23-14-0052
Lethert, Skwira, Schultz & Co	31-29-22-44-0059
Kirtland Properties LLC	25-29-23-23-0105
Sewell Properties, LLC	32-29-23-12-0030
Sewell Properties, LLC	32-29-23-12-0035
Sewell Properties, LLC	32-29-23-12-0036
Sewell Properties, LLC	32-29-23-12-0041

Church of St. Mary	31-29-22-41-0216
	31-29-22-41-0027
Lexington Convenience Prop.	35-29-23-32-0149
Lexington Convenience Prop.	35-29-23-32-0150
Lexington Convenience Prop.	35-29-23-32-0151
Town & Country Club	32-29-23-34-0017
Town & Country Club	32-29-23-34-0018
Town & Country Club	32-29-23-42-0001
Town & Country Club	32-29-23-34-0013
Town & Country Club	32-29-23-31-0044
Town & Country Club	32-29-23-31-0023
Town & Country Club	32-29-23-31-0022
Huffmann (Dawn and Gary H, LLC	02-28-23-42-0075
	03-28-23-42-0043
	03-28-23-42-0049
NJF Properties	06-28-22-41-0051
	06-28-22-41-0025
	06-28-22-41-0026
	06-28-22-41-0036
	06-28-22-41-0037
	06-28-22-41-0052
Upper Corner Venture	31-29-22-44-0040
Mb Properties LLC	31-29-22-44-0039
Center Ice LLC	31-29-22-44-0425
Center Ice LLC	31-29-22-44-0898
Charles & Caroline McCann	29-29-23-42-0103
McCann Developments	32-29-23-12-0009
McCann Developments	32-29-23-12-0022
McCann Developments	32-29-23-12-0040
McCann Developments	32-29-23-12-0043
Warehouse Rentals	29-29-23-13-0057
Update Company	29-29-23-13-0059
Update Company	29-29-23-13-0060
Update Company	29-29-23-42-0003
Raymond Partners LLC	32-29-23-12-0045
Midtown Commons	32-29-23-12-0038
Midtown Commons	29-29-23-43-0081
Midtown Commons	32-29-23-12-0039
RRB Associates (155 Wabasha) (Jim Rutzick)	06-28-22-41-0045

188 Plato LLC 06-28-22-43-0026

Minnesota Comm'l Railway
20-29-23-23-0004
20-29-23-32-0004
20-29-23-32-0032
20-29-23-33-0006
20-29-23-33-0016
28-29-23-32-0015
28-29-23-32-0018
28-29-23-33-0006
29-29-23-13-0015
29-29-23-14-0008
32-29-23-14-0018
33-20-23-22-0035
33-29-23-23-0005
33-29-23-23-0010
33-29-23-22-0027

Soo Line Railroad
03-28-23-22-0162
03-28-23-44-0121
04-28-22-13-0004
04-28-22-14-0004
04-28-22-22-0066
04-28-22-41-0004
05-28-22-11-0011
05-28-22-22-0049
06-28-22-11-0028
06-28-22-11-0036
06-28-22-24-0019
06-28-22-24-0020
06-28-22-24-0021
06-28-22-24-0022
06-28-22-24-0048
06-28-22-31-0002
06-28-22-31-0010
06-28-22-31-0015
06-28-22-32-0089
10-28-23-11-0324
11-28-23-11-0112
11-28-23-21-0003
11-28-23-21-0004
11-28-23-21-0005
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11-28-23-22-0083
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12-28-23-21-0052
12-28-23-21-0070
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15-28-23-41-0060
15-28-23-41-0180
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15-28-23-43-0026
15-28-23-43-0040
15-28-23-44-0008
16-28-23-33-0068
17-28-23-41-0001
17-28-23-41-0002
19-29-22-24-0036
19-29-22-31-0007
19-29-22-34-0006
19-29-22-34-0053
21-28-23-11-0113
21-28-23-11-0114
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21-28-23-12-0014
21-28-23-21-0119
21-28-23-22-0021

	21-28-23-22-0157
	22-28-23-21-0062
	22-28-23-21-0079
	22-28-23-22-0034
	22-28-23-22-0038
	32-29-22-43-0009
	32-29-23-13-0001
	33-29-23-43-0104
	33-29-23-32-0001
	33-29-23-32-0036
Nativity of Our Lord Church	09-28-23-21-0157
	09-28-23-21-0191
	09-28-23-21-0127
	09-28-23-21-0128
	09-28-23-21-0129
	09-28-23-21-0124
	09-28-23-21-0125
	09-28-23-21-0126
Holy Spirit Church	10-28-23-31-0024
	10-28-23-31-0020
Sacred Heart Church	33-29-22-22-0185
	33-29-22-22-0195
St. Agnes Church	36-29-23-22-0062
	36-29-23-22-0064
	36-29-23-22-0068
	36-29-23-22-0069
	36-29-23-22-0071
	36-29-23-22-0073
	36-29-23-22-0280
	36-29-23-22-0282
	36-29-23-22-0284
St. Bernard Church	25-29-23-11-0055
	25-29-23-11-0054
	25-29-23-11-0007
	25-29-23-11-0095
	25-29-23-11-0096
	25-29-23-11-0111
	25-29-23-11-0112
	25-29-23-11-0113
	25-29-23-11-0114
Cathedral of St. Paul	01-28-23-11-6028
	01-28-23-11-0031
	01-28-23-11-0057
	01-28-23-11-0056

	01-28-23-11-0034
Blessed Sacrament Church	26-29-22-42-0197
Holy Childhood Church	22-29-23-31-0173
Maternity of Mary Church	24-29-23-32-0161
Lumen Christi Church	16-28-23-22-0101
	16-28-23-22-0102
	16-28-23-41-0002
St. Casimir Church	28-29-22-22-0052
St. Cecilia Church	29-29-23-31-0020
St. Columba Church	34-29-23-12-0221
St. Francis de Sales Church	11-28-23-14-0144
	11-28-23-42-0213
	11-28-23-42-0007
St. Patrick Church	29-29-22-22-0170
	29-29-22-22-0184
	29-29-22-22-0185
St. Peter Claver Church	35-29-23-32-0152
St. Stanislaus Church	01-28-23-34-0112
	01-28-23-34-0113
	01-28-23-34-0229
First Baptist Church	31-29-22-41-0024
First Baptist Church	31-29-22-41-0182
First Baptist Church	31-29-22-41-0179
Christina Anderson & Simon Taghioff	02-28-23-43-0118
Daniel Sullivan	02-28-23-42-0167
Robert Bloomer Jr.	02-28-23-42-0187
Kevin Fenelon	02-28-23-43-0153
Michael Brennan	02-28-23-42-0188
Monica Carlson	07-28-22-44-0019
Matthew Russell	02-28-23-34-0001
Mary Porter and Thomas Hays	02-28-23-34-0023
Tom Gallagher	19-29-22-23-0029
Tom Gallagher	19-29-22-23-0028
Samuel J. Varghese	02-28-23-34-0093
Sherri Mortenson-Brown	02-28-23-42-0123
Denny and Mary Thalhuber	02-28-23-34-0073
Caprice Glaser	07-28-22-41-0142
John Pitera and Kate Patterson	02-28-23-43-0117
Kenneth and Harriet Goodpaster	02-28-23-34-0024
Lindsay Drebenstedt	02-28-23-43-0143
Pearl Bejblik	07-28-22-41-0072
Paul and Deanne Gieser	02-28-23-31-0036
Judith Miller	02-28-23-43-0175
Arvold Properties LLC	33-28-23-42-0214
Saul R Sanchez Henriquez & America Jimenez de Tobar	35-29-22-14-0154

Tina Lassahn	35-39-22-13-0074
Tracy and Matthew Arends	35-29-22-13-0068
Brian Gove	35-29-22-14-0151
Christine Mack	25-29-23-42-0164
Scott and Ericka Schultz	35-29-22-14-0161
Rebecca Loeding	25-28-23-31-0024
Robert Batta	25-29-23-42-0214
Brian J. Ludwig	35-29-22-14-0160
Henry Schnitzer	25-29-23-42-0167
Bethlehem Tegegne	35-29-22-14-0082
Nell McClung (Midway Comm'I Bldg)	29-29-23-34-0027
Sisanekoun Vang	35-29-22-13-0165
Tom Kosobayashi	33-29-23-24-0006
Darlene Heiskary	25-29-23-31-0047

Swalboski, Doug (Culvers)	35-29-22-43-0001
Christopher Diekman & Pamela Hofda (5 Stars MN LLC)	26-29-22-32-0094
Mannillo, John	15-28-23-13-0021
Fercello, Nick (Hazel Park Auto)	26-29-22-32-0093
Leonard Anderson	11-28-22-41-0008
Michael Schumann	01-28-23-22-0013

BNSF Railway Co.	04-28-22-22-0061
	25-29-23-33-0031
	25-29-23-34-0002
	25-29-23-34-0003
	25-29-23-34-0005
	25-29-23-44-0009
	26-29-23-32-0142
	27-29-23-31-0005
	27-29-23-32-0001
	28-29-23-14-0005
	28-29-23-42-0054
	29-29-23-11-0104
	29-29-23-24-0103
	30-29-22-41-0026
	31-29-22-11-0051
	32-29-22-23-0075
	32-29-22-31-0060

Northern Pacific Ry Co.	19-29-22-31-0018
	20-29-23-33-0004
	24-29-23-34-0039
	25-29-23-22-0015
	26-29-23-11-0027
	26-29-23-12-0079
	26-29-23-12-0080
	26-29-23-23-0001

	29-29-23-21-0002
	32-29-22-22-0114
	32-29-22-23-0006
	32-29-22-24-0095
	32-29-22-24-0176
Glacier Park Company	29-29-23-21-0003
Burlington Northern, Inc.	26-29-23-12-0074
Leaetta Hough & Robert	01-28-23-13-0184
	01-28-23-13-0185
	01-28-23-13-0186
	32-29-22-14-0190
Susan B. Foote	01-28-23-32-0108
Terence G. O'Brien and Kristen H. O'Brien	16-28-23-11-0044
Harris Building, LLC (Sandy Schmitt)	06-28-22-41-0021
John Purdy	08-28-22-22-0001
Donerly, Inc.	31-29-22-42-0112
	31-29-22-43-0032
	31-29-22-43-0031
	32-29-22-34-0022
Kristy Nguyen (Liquor Vault)	31-29-22-43-1562
	31-29-22-43-1561
PAK Properties	31-29-22-44-0003