



ATTORNEYS AT LAW

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For Hearing December 13, 2022

Re: Fee Ownership and Correction of Title at 1508 Como Avenue, St. Paul, Minnesota

To whom it may concern:

As you know, this firm has been engaged to assist Christopher J. Boylan and Kristin L.M. Boylan (the "Owners") with correcting legal title to 1508 Como Avenue, St. Paul, Minnesota (the "Property") to accurately reflect the Owners as holding fee title to the Property. These comments are being provided for the sole purpose of the Legislative Hearing on Tuesday, December 13, 2022.

Since our update in October, we are making progress in getting the Owners clear legal title. Specifically, we commenced our quiet title action in Ramsey County on November 8, 2022. The matter has been assigned Court File No. 62-CV-22-5958. Service via publication on the unknown defendants has been completed. We are still working to complete service on the prior owner's only child, Helen J. Hudson. We have been working with a representative for Ms. Hudson to coordinate service as Ms. Hudson is living in an assisted-living facility.

It is expected that service on Ms. Hudson will take place soon. Once service is completed and the time to answer has expired, we will move forward with our Motion for Default Judgment in front of the Examiner of Titles. At this time, it is unknown exactly when we would be heard by the Examiner of Titles and how long it would take the Examiner of Titles to issue its Order granting the Owners clear legal title. However, we expect to have the process wrapped up by mid-February. At that time, our clients intend to move forward with selling the Property and the next owner can further renovate the Property as he or she desires.

Perhaps it makes the most sense to set a follow-up hearing for March 7 or 14 and hopefully the process will be completed. At that time, I expect us to be in a position where the City can allow the Owners to proceed with selling the Property.

Please let me know if you have any questions regarding this matter.

Regards,

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