

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT  
CASE TYPE: Assessment Appeal

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Arvold Properties LLC; Saul R. Sanchez  
Henriquez and America R. Jimenez de  
Tobar; Tina Lassahn; Tracy and Matthew  
Arends; Brian Gove; Christine Mack;  
Scott and Ericka Schultz; Rebecca  
Loeding; Robert Batta; Brian J. Ludwig;  
Henry Schnitzer; Bethlehem Tegegne;  
Nell McClung (Midway Commercial  
Building), Sisaneoun Vang,  
Tom Kosobayashi, Darlene Heiskary

**Plaintiffs**

v.

City of St. Paul,

**Defendant.**

**SUMMONS**

**AMENDED (Oct. 15, 2019)**

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THIS SUMMONS IS DIRECTED TO CITY OF ST. PAUL, DEFENDANT.

**1. YOU ARE BEING SUED.** The Plaintiffs have started a lawsuit against you. The Plaintiffs' Complaint (denominated as an appeal) against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

**2. YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this summons a **written response** called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at:

John G. Hoeschler, P.A.  
800 Lone Oak Road  
Eagan, MN 55121

**3. YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiffs' Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiffs should not be given everything asked for in the Complaint, you must say so in your Answer.

**4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiffs everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

**7. THIS LAWSUIT MAY AFFECT OR BRING INTO QUESTION TITLE TO REAL PROPERTY** located in Ramsey County, State of Minnesota, legally described on Exhibit A attached hereto.

The object of this action is Special Assessments Appeal.

**John G. Hoeschler, P.A.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
John G. Hoeschler  
MN# 45810  
800 Lone Oak Road  
Eagan, MN 55121  
Telephone: 651-324-1694  
Facsimile: 651-681-6868  
jghoeschler@comcast.net

**ATTORNEY FOR PLAINTIFFS**

## EXHIBIT A

Name	Property ID
Arvold Properties LLC	332823210006
Saul R. Sanchez Henriquez and America R. Jimenez de Tobar	352922140154
Tina Lassahn	352922130074
Tracy and Matthew Arends	352922130068
Brian Gove	352922140151
Christine Mack	252923420164
Scott and Ericka Schultz	352922140161
Rebecca Loeding	252823310024
Robert Batta	252923420214
Brian J. Ludwig	352922140160
Henry Schnitzer	252923420167
Bethlehem Tegegne	352922140082
Nell McClung (Midway Comm'l Bldg)	292923340027
Sisanekoun Vang	352922130165
Tom Kosobayashi	332923240006
Darlene Heiskary	252923310047