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# ARNDT BUSWELL & THORN S.C.

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March 3, 2022

City of La Crosse  
Common Council

Dear Common Council of the City of La Crosse,

My firm represents Dawn and Steve Martin, the owners of 1374 County Road SS, Onalaska, WI. That property is located directly adjacent to the property known as 2500 County Road SS, La Crosse, WI which is the subject of a re-zoning petition. That Martins, along with their neighbors, are deeply concerned about the possibility of a Heavy Industrial zoning district immediately adjacent to a number of residential homes. Their concern is both over the obvious reasons that arise in such a mixed use, but is also due to a potential adverse possession claim that they and their neighbors may have against the owners of the property that is subject to the re-zoning petition. I have no doubt that you have spend time with the maps of the properties, however, I have attached one for ease of reference that clearly shows the area maintained by the Martins.

An unsuccessful attempt by the Martins to resolve this issue amicably was made at the end of 2021/beginning of 2022, and further preparation/investigation is currently underway. The intent of this letter is merely to inform the Council that this is a more complicated situation than it would initially appear. Obviously, the Common Council is not the Circuit Court and has no authority or obligation to evaluate or make any sort of decision regarding disputes between property owners.

I should also point out that despite a deed to the Martin's being recorded on 1-18-22, the County GIS website has not yet been updated to reflect the Martin's ownership of the real estate. This is due to the discovery of an error made in the chain of title in 1994 that is currently in the process of being corrected

Sincerely,

ARNDT, BUSWELL & THORN, S.C.



Matt Klos

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