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REPLY TO: **Minnesota Office****WWW.SJJLAWFIRM.COM**

September 26, 2022

**SENT VIA US MAIL & EMAIL**

All Owners at Hadley Crossing Homeowner Association, Inc.

Re: Garage/Header Project  
Our File No.: 10308

Dear Homeowners:

As you know, our firm represents your homeowner's association, Hadley Crossing Homeowner Association, Inc. (the "Association"). On September 8, 2022, the Association hosted a town-hall Question and Answer session. At the Q&A session, both myself and Derek of Capital Construction provided an overview of the project as well as answered questions from homeowners.

As discussed at that meeting, we have worked with the Board to put together this letter with additional requested information for all Owners. To start, the Association's property manager is Jerilyn Stevens. Her e-mail address is [jerilynstevens@gaughancompanies.com](mailto:jerilynstevens@gaughancompanies.com) and she can be reached by phone at 651-255-5567. If you have questions about this project, or other Association business, please contact Ms. Stevens directly.

Capital Construction, the company that is doing the work related to the garages/headers, has a website that contains a lot of information about this project, including copies of our previous letters and anticipated scheduling. As discussed at the meeting, Capital is not related in any way to Local Motion or JBL (the previous contractors). Capital is properly licensed and is working with the city on the permits. Their website is updated often and can be found here: <https://capitalmn.com/multi-family-roofing/projects/Hadley-Crossing>.

With respect to the final scope of work and cost for each Unit, that will not be known until the project is complete. As mentioned at the September 8th Q&A, Capital Construction is drafting individualized reports for each Unit that outlines, with photos, what work was done. Those reports, as well as the itemized costs for each Unit, will be available to each Owner once the project is complete.

Finally, several homeowners expressed consternation related to the role of Local Motion in this project. As you recall, the Association initially hired Local Motion and paid it a sizeable

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down payment to complete the work. Sadly, Local Motion has been unable to complete the project, and the contract between it and the Association has been terminated. The Association is in the process of reviewing the situation to see if it can and should go after Local Motion, legally, to recoup some of the funds the Association paid to Local Motion.

We also understand that some homeowners paid Local Motion directly. To be clear, our firm represents the Association, not any individual Owner within the Association. Any disputes that an individual Owner may have with Local Motion is a dispute between that Owner and Local Motion. The Association is not involved in any such potential dispute and neither the Association nor its attorney can provide legal advice to individuals on how to proceed. Depending on the facts, individual homeowners may have legal remedies available and therefore may want to discuss such things with their own attorney.

Thank you for your attention to this correspondence. Feel free to reach out to Ms. Stevens with any questions.

Very truly yours,

SMITH JADIN JOHNSON, PLLC

A handwritten signature in black ink, appearing to read 'Finn S. Jacobsen', written in a cursive style.

Finn S. Jacobsen  
Attorney at Law

FSJ/tbm