

SUMMONS

STATE OF MINNESOTA

COUNTY OF HENNEPIN

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

Case type: Other civil (Quiet Title)

Court File No.: 27-CV-18-3152

Judge: Daniel C. Moreno

Nancy E. Dalton and

Kevin B. Dalton,

Plaintiffs,

v.

Susan C. Jorgenson, Ben Jorgenson, Alan S. Jorgenson, Maria A. Jorgenson, Jessica Volkmann, Brittany Nicole Vargas, the unknown heirs of Thomas L. Jorgenson, the unknown heirs of Jeremy Monnens, and all other persons unknown claiming any right, title, estate, interest or lien in the real estate described in the complaint herein, Defendants.

THIS SUMMONS IS DIRECTED TO THE ABOVE NAMED DEFENDANTS;

1. YOU ARE BEING SUED. The Plaintiff(s) have started a lawsuit against you.

The Plaintiffs Complaint against you is on file in the office of the court administrator of the above-named court. 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:

Bradley N. Beisel

Beisel & Dunlevy, P.A.

730 Second Avenue S.,

Suite 282

Minneapolis, MN 55402-2444

3. YOU MUST RESPOND TO EACH CLAIM. The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff 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 Plaintiff 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 Hennepin County, Minnesota, commonly known as 7601 101st Street W., Bloomington, MN 55438, and legally described as:

Unit No. 4312 and Garage Unit

No. 419, Condominium No. 355,

Countryside West Condominium,

Hennepin County, Minnesota.

(the "Subject Property")

The purpose of this action is to obtain an Order for the following relief:

1. Declaring that as of the death of Thomas L. Jorgenson, his interest in the Subject Property was held jointly with Susan C. Jorgenson and passed to Susan C. Jorgenson as of the time of his death, and not to his heirs and that, therefore, no heir of Thomas L. Jorgenson has any right, title or interest in the Subject Property.

2. Determining that the Plaintiffs are entitled to an order that they are the lawful fee title owners of the Subject Property, free and clear of any right, title or interest in any of the defendants herein.

3. For such other and further relief as is deemed just by the Court.

557.03 NOTICE OF NO PERSONAL CLAIM

Pursuant to Minn. Stat. § 557.03 you are hereby served with notice that no personal claim is made against you and that any defendant upon whom this notice is served who unreasonably defends this action shall pay full costs to the plaintiff.

Dated: March 15, 2018

BEISEL & DUNLEVY, P.A.

By /s/ Bradley N. Beisel

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