

SECOND AMENDED SUMMONS

STATE OF MINNESOTA
COUNTY OF WRIGHT
DISTRICT COURT
TENTH JUDICIAL DISTRICT
Other Civil/Quiet Title
Court File No. 86-CV-19-65
Denn Family Limited Partnership,
a Minnesota limited partnership
Plaintiff,
vs.
Mark J. Holker, First Minnesota
Bank, United States of America,
through Farm Service Agency,
United States Department of Agriculture,
Thomas R. Collins, Kathryn L. Collins,
Robert M. Collins, Jane C. Cornelius
and Shannon Leah Bye, also all other
persons or entities who claim any right,
title, estate, lien or other interest in
the real estate described herein,
Defendants.

Mark J. Holker, First Minnesota Bank,
United States of America, through Farm
Service Agency, United States Department
of Agriculture, Thomas R. Collins,
Kathryn L. Collins, Robert M. Collins,
Jane C. Cornelius and Shannon Leah Bye:

1. **YOU ARE BEING SUED.** This Plaintiff
has started a lawsuit against you. The
Plaintiffs Complaint 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, except
that the United States of America shall
have sixty (60) days in which to serve
its Answer to the Complaint.. You must
send a copy of your Answer to the person
who signed this summons located at:

BARNA, GUZY & STEFFEN,
LTD.
400 Northtown Financial Plaza
200 Coon Rapids Blvd.
Minneapolis, MN 55433

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 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 Wright County, State of
Minnesota, legally described as follows:

EXHIBIT A
PARCEL 1:
That part of the Northwest Quarter of
Section 24, Township 121, Range 25,
Wright County, Minnesota, described as
follows:
Commencing at the Northwest corner of
said Northwest Quarter of Section 24;
thence South 00 degrees 07 minutes 45
seconds West, assuming the West line of
said Northwest Quarter bears South 02
degrees 06 minutes 16 seconds West,
408.28 feet to the centerline of 85th
Street NE as described in Monticello
Town Road Map per Document No. 390488;
thence North 48 degrees 18 minutes 15
seconds West along the northwesterly
extension of said centerline of 85th
Street NE, 18.26 feet to the West line
of said Northwest Quarter, and the point
of beginning of the parcel to be
described; thence South 48 degrees 18
minutes 15 seconds East, along said
northwesterly extension of 85th Street
NE, 18.26 feet; thence continuing South
48 degrees 18 minutes 15 seconds East,
along said centerline of 85th Street NE,
1301.99 feet; thence South 00 degrees 02
minutes 46 seconds East, 468.94 feet,
more or less, to the intersection with
the westerly extension of the South line
lying westerly of said centerline of 85th
Street NE of the parcel described in
Certificate of Title No. 6386.0; thence
North 89 degrees 22 minutes 37 seconds
East, along said South line lying
westerly of said centerline of 85th
Street NE of the parcel described in
Certificate of Title No. 6386.0 and its
westerly extension, 414.57 feet to the
southwesterly right of way line of 85th
Street NE as described in said Monticello
Town Road Map per Document No. 390488;
thence southeasterly and southerly,
along said southwesterly right of way
line of 85th Street NE to the South line
of said Northwest Quarter; thence South
89 degrees 10 minutes 07 seconds West,
along said South line of the Northwest
Quarter, 1773.52 feet to the Southwest
corner of said Northwest Quarter; thence
North 02 degrees 06 minutes 16 seconds
East, along the West line of said
Northwest Quarter, 2239.29 feet to the
point of beginning.

AND
The North 854.06 feet of the West half
of the Southwest Quarter of Section 24,
Township 121, Range 25, Wright County,
Minnesota.

PARCEL 2:
The West half of the Southeast Quarter
of Section 23, Township 121, Range 25,
Wright County, Minnesota.

AND
That part of the Northeast Quarter of
the Southeast Quarter of Section 23,
Township 121, Range 25, Wright County,
Minnesota, lying northerly and westerly
of the following described line:
Commencing at the Southeast corner of
said Northeast Quarter of the Southeast
Quarter; thence northerly, along the East
line of said Northeast Quarter of the
Southeast Quarter, 436.26 feet to the
point of beginning of the line to be
described; thence westerly, parallel with
the South line of said Northeast Quarter
of the Southeast Quarter, to the
centerline of Eisele Avenue NE, as
described in Monticello Town Road Map
per Document No. 390488; thence
southerly, along said centerline of Eisele
Avenue NE, to the South line of said
Northeast Quarter of the Southeast
Quarter and said line there terminating.

AND
That part of the Southeast Quarter of
the Southeast Quarter of Section 23,
Township 121, Range 25, Wright County,
Minnesota, lying West of the centerline
of Eisele Avenue NE, as described in
Monticello Town Road Map per Document
No. 390488.

PARCEL 3:
That part of the Northwest Quarter of
the Northeast Quarter of Section 26,
Township 121, Range 25, Wright County,
Minnesota, lying northerly of a line
drawn from a point on the West line of
said Northwest Quarter of the Northeast
Quarter distant 660.00 feet South, as
measured along said West line, of the
Northwest corner of said Northwest
Quarter of the Northeast Quarter, to a
point on the East line of said Northwest
Quarter of the Northeast Quarter distant
990.00 feet North, as measured along
said East line, of the Southeast corner
of said Northwest Quarter of the
Northeast Quarter and said line there
terminating.

AND
That part of the North half of the
Northeast Quarter of the Northeast
Quarter of Section 26, Township 121,
Range 25, Wright County, Minnesota,
lying West of the centerline of Eisele
Avenue NE, as described in Monticello
Town Road Map per Document No. 390488.

AND
PARCEL 4:
That part of the Northwest Quarter of
Section 24, Township 121, Range 25,
Wright County, Minnesota, lying
southerly of the centerline of 85th
Street NE as described in Monticello
Town Road Map per Document No. 390488,
lying westerly of the parcel described
in Certificate of Title No. 6386.0, lying
northerly of the westerly extension of
the South line lying westerly of said
centerline of 85th Street NE of the
parcel described in Certificate of Title
No. 6386.0, and lying easterly of the
following described line:
Commencing at the Northwest corner of
said Northwest Quarter of Section 24;
thence South 00 degrees 07 minutes 45
seconds West, assuming the West line of
said Northwest Quarter bears South 02
degrees 06 minutes 16 seconds West,
408.28 feet to said centerline of 85th
Street NE as described in Monticello
Town Road Map per Document No. 390488;
thence North 48 degrees 18 minutes 15
seconds West, along the northwesterly
extension of said centerline of 85th
Street NE, 18.26 feet to the West line
of said Northwest Quarter; thence South
48 degrees 18 minutes 15 seconds East,
along said northwesterly extension of
the centerline of 85th Street NE, 18.26
feet; thence continuing South 48 degrees
18 minutes 15 seconds East, along said
centerline of 85th Street NE, 1302.04
feet to the point of beginning of the
line to be described; thence South 00
degrees 00 minutes 03 seconds East,
468.91 feet, more or less, to the
intersection with the westerly extension
of the South line lying westerly of
said centerline of 85th Street NE of
said parcel described in Certificate of
Title No. 6386.0 and said line there
terminating.

8. **OBJECT OF ACTION.** The object of
the action is to quiet title to the
above-described property and obtain
judgment declaring plaintiff is owner
in fee of the above-described property
and that the defendants have no right,
title, estate, interest or lien in or
upon the above-described property.

Dated: January 11, 2019
BARNA, GUZY & STEFFEN, LTD.
/s/ Charles M. Seykora
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