

**PEPER LAW OFFICES, P.C.**  
**10285 YELLOW CIRCLE DRIVE, SUITE 105**  
**MINNETONKA, MINNESOTA 55343**

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TELEPHONE (952) 941-4448

WILLIAM C. PEPER\*

wpeper@peperlaw.com

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*\*CERTIFIED REAL PROPERTY LAW SPECIALIST BY THE MINNESOTA STATE BAR ASSOCIATION*

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November 26, 2019

Mr. Jon Haukaas  
Director of Public Works  
City of Blaine  
1801 101<sup>st</sup> Avenue NE  
Blaine, MN 55449

and

Council member Richard Paul  
City of Blaine  
1801 101<sup>st</sup> Avenue NE  
Blaine, MN 55449

and

✓ Council member Andrew Garvais  
City of Blaine  
1801 101<sup>st</sup> Avenue NE  
Blaine, MN 55449

**RE: My Client: Mr. Jun Li, Property Owner**  
**Property located at: 11848 3<sup>rd</sup> Street NE, Blaine, Minnesota**

Dear Mr. Haukaas, Mr. Paul and Mr. Garvais:

First, thank you Mr. Haukaas for taking time to meet with me and my client, Mr. Jun Li last month. You kindly reviewed Mr. Li's situation which, for the benefit of council members addressed above, I am summarizing here:

On or about July 28, 2019, during a rainstorm, the sewer system backed up and caused significant damage to Mr. Li's home as well as another home in the neighborhood. Mr. Li's home had a finished basement, and the flooding there caused more than \$10,000 in damage. We are in receipt of a letter from the League of Minnesota Cities, whereby the opinion is that the City bears no responsibility or liability.

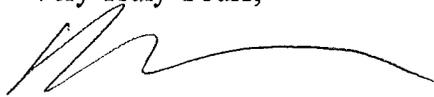
As you can imagine, this has been a difficult situation for Mr. Li, because his insurer, State Farm, excludes water backups caused by city sewer systems.

If the City can review the unique circumstances here, Mr. Lie would appreciate if your office can determine if some assistance can be provided.

I have attached copies of bids and invoices and Mr. Li has other documents, including photographs, if you need them.

Thank you for your time and attention to this matter.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'William C. Peper', with a long horizontal flourish extending to the right.

William C. Peper

Encl.

cc: Client



## 911 Restoration Services of Minneapolis LLC

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"A Fresh Start Company"  
2665 4th Ave  
Suite 21  
Anoka, Mn 55303  
763-496-8340  
www.911RestorationMinneapolisMn.com

Client: Jun  
Property: 11848 3rd St Ne  
Blaine, MN 55434

Home: (612) 501-8353

Operator: JARED

Estimator: Jared Reese  
Company: 911 Restoration Services of Minneapolis LLC  
Business: 2665 4th Ave STE21  
Anoka, MN 55303

Business: (763) 496-8340  
E-mail: Jared@911Restoration.com

Type of Estimate: Water Damage  
Date Entered: 8/6/2019

Date Assigned: 8/6/2019

Price List: MNMN8X\_AUG19  
Labor Efficiency: Restoration/Service/Remodel  
Estimate: JUN-M

Sewer damage mitigation to be performed.



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JUN-M

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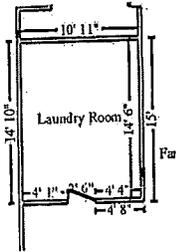
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	TOTAL
1. Service call - during business hours Multiple vehicles dispatched.	1.00 EA	0.00	137.58	9.80	147.38
2. Floor protection - cloth - skid resistant, leak proof Runner from entry to damaged area.	100.00 SF	0.80	0.00	2.42	82.42
3. Dehumidifier (per 24 hour period) - Large - No monitoring 1 dehu(s) for 3 days.	3.00 EA	0.00	71.00	15.18	228.18
4. Air mover (per 24 hour period) - No monitoring 8 air movers for 3 days.	24.00 EA	0.00	24.95	0.00	598.80
5. Neg. air fan/Air scrub.-XLrg (per 24 hr period)-No monit. One air scrubber for three days.	3.00 DA	0.00	140.00	29.93	449.93
6. Add for HEPA filter (for neg. air machine/vacuum - Large)	1.00 EA	0.00	243.20	17.33	260.53
7. Equipment setup, take down, and monitoring (hourly charge) Equipment setup and takedown is charged as follows: 30 minutes per air scrubber, 15 minutes per air mover, 1-2 hours per dryforce unit, 1-2 hours per Inject-Dry Unit. This includes: hauling of equipment to and from truck to equipment operation location, locating and testing proper fuse capacity as to not overload the breaker, extension cord routing, locating and proper attachment of drain lines for any/all dehu's. Job inspection, monitoring, readings, and document signing 1-2 hours.	6.00 HR	0.00	49.62	21.21	318.93
8. Haul debris - per pickup truck load - including dump fees	1.00 EA	134.63	0.00	0.00	134.63
9. Hazardous Waste/Mold Cleaning Technician - per hour Two laborers for 8 hours to tear-out affected materials, clean floors, stud walls, and apply anti-microbial agent.	16.00 HR	0.00	64.74	73.80	1,109.64
10. Cleaning (Bid Item) **Estimated price to clean ductwork throughout home.	1.00 EA	0.00	800.00	57.00	857.00
<b>Total: JUN-M</b>				226.67	4,187.44
<b>Line Item Totals: JUN-M</b>				226.67	4,187.44





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## Laundry Room

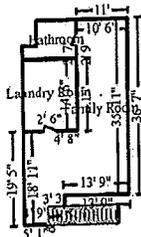
Height: 8'

406.86 SF Walls  
 565.42 SF Walls & Ceiling  
 17.62 SY Flooring  
 50.86 LF Ceil. Perimeter

158.56 SF Ceiling  
 158.56 SF Floor  
 50.86 LF Floor Perimeter

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
16. Contents - move out then reset	1.00 EA	0.00	54.49	0.00	10.90	65.39
17. 1/2" - drywall per LF - up to 2' tall	38.14 LF	0.00	9.54	3.10	73.40	440.36
18. R&R Interior door unit	1.00 EA	18.76	189.51	9.87	43.64	261.78
19. Stain & finish door slab only (per side)	2.00 EA	0.00	54.00	1.06	21.82	130.88
20. Door lockset - Detach & reset	1.00 EA	0.00	22.89	0.00	4.58	27.47
				14.03	154.34	925.88

Totals: Laundry Room



## Family Room

Height: 8'

990.06 SF Walls  
 1,549.97 SF Walls & Ceiling  
 62.21 SY Flooring  
 123.76 LF Ceil. Perimeter

559.91 SF Ceiling  
 559.91 SF Floor  
 123.76 LF Floor Perimeter

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
Missing Wall	3' 2 1/8" X 8'					
21. 1/2" - drywall per LF - up to 2' tall	23.00 LF	0.00	9.54	1.87	44.26	265.55
22. Seal the surface area w/PVA primer - one coat	46.00 SF	0.00	0.55	0.16	5.10	30.56
23. Paint the surface area - two coats	512.00 SF	0.00	0.89	7.30	92.60	555.58
24. Baseboard - 3 1/4"	40.00 LF	0.00	2.84	3.22	23.36	140.18
25. Stain & finish baseboard	40.00 LF	0.00	1.45	0.48	11.70	70.18
26. Carpet pad	559.91 SF	0.00	0.63	20.74	74.68	448.16
27. Carpet	643.90 SF	0.00	3.39	117.45	460.06	2,760.33
15 % waste added for Carpet.						

Totals: Family Room

151.22      711.76      4,270.54



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Total: Main Level				217.18	1,310.84	7,864.53
<b>Labor Minimums Applied</b>						
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
28, Finish hardware labor minimum	1.00 EA	0.00	110.68	0.00	22.14	132.82
Totals: Labor Minimums Applied				0.00	22.14	132.82
Line Item Totals: JUN-R				219.60	1,376.38	8,257.80

## Grand Total Areas:

2,075.70 SF Walls	835.69 SF Ceiling	2,911.40 SF Walls and Ceiling
872.58 SF Floor	96.95 SY Flooring	247.59 LF Floor Perimeter
0.00 SF Long Wall	0.00 SF Short Wall	241.72 LF Ceil. Perimeter
872.58 Floor Area	902.28 Total Area	1,670.35 Interior Wall Area
1,102.22 Exterior Wall Area	122.47 Exterior Perimeter of Walls	
0.00 Surface Area	0.00 Number of Squares	0.00 Total Perimeter Length
0.00 Total Ridge Length	0.00 Total Hip Length	



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**Summary**

Line Item Total	6,661.82
Matl Sales Tax Reimb	219.60
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Subtotal	6,881.42
Overhead	688.19
Profit	688.19
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Replacement Cost Value	\$8,257.80
Net Claim	\$8,257.80
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Jared Reese