

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
CIRCUIT DIVISION AT KANSAS CITY**

**VILLA DEL SEÑOR
17400 E. COURTNEY ATHERTON RD.
INDEPENDENCE, MO 64058**

Plaintiff,

v.

**JIM L. CONAWAY
3619 ROBERTS ST.
KANSAS CITY, MO 64124**

Defendant.

Case. No.: _____

**PETITION FOR TEMPORARY POSSESSION OF PROPERTY
FOR REHABILITATION, AND CONVEYANCE BY DEED, PURSUANT
TO RSMO SECTIONS 447.620 TO 447.640**

COMES NOW Plaintiff, Villa Del Señor, by and through its attorney, Paul J. Glaser, and for its Petition for Temporary Possession of Property for Rehabilitation, and conveyance by deed, pursuant to RSMO Sections 447.620 to 447.640, states as follows:

1. Plaintiff is a Missouri not-for-profit corporation validly organized pursuant to law, has been incorporated for more than six months and is currently in good standing. Its purpose includes the provision or enhancement of housing opportunities in its community. Its business address is set forth in the caption of this petition.

2. Defendant, Jim L. Conaway, whose address is set forth in the caption of this petition, is the owner of real property located at 3619 Roberts St., Kansas City, MO 64124 and legally described as the West 55 feet of the East 130 feet of the North one-half of Block 2, SETZLER'S

ADDITION, lying North of the East and West alley, a subdivision in Kansas City, Jackson County, Missouri (hereinafter "Property").

3. Said Property has been continuously unoccupied by any person legally entitled to possession thereof for at least six months immediately prior to the filing of this petition.
4. The taxes on said Property are delinquent.
5. Said Property is a nuisance within the meaning of RSMO Section 447.620(4).
6. Plaintiff intends to rehabilitate said Property pursuant to a rehabilitation plan which will be presented to the court.

WHEREFORE, the Plaintiff prays that this Court issue an order approving its plan of rehabilitation and granting it temporary possession of said Property to complete the rehabilitation, and that upon completion of said rehabilitation, issue an order for conveyance of said Property to plaintiff as provided by law, and for all other such Orders as this Court deems just and necessary.

Respectfully Submitted,



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Attorney for Plaintiff

CERTIFICATION

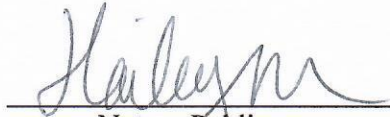
STATE OF MISSOURI)
) ss.
CUONTY OF JACKSON)

Edward Glaser, of lawful age and being duly sworn upon his oath, states that he is a director of Plaintiff corporation, that he has read the above and foregoing petition, and that facts stated in the above and foregoing are true according to his best knowledge and belief.



Edward Glaser

Subscribed and sworn to before me this 23 day of MAY, 2024.



Notary Public

My Commission expires:

