

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

RACETRAC PETROLEUM, INC.

NUMBER *B20-450 M*  
24<sup>TH</sup> JUDICIAL DISTRICT COURT  
PARISH OF JEFFERSON  
STATE OF LOUISIANA

**P E T I T I O N**

The petition of the STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT, legal successor to the Department of Highways, created and organized under the laws of the State of Louisiana, with its domicile in the City of Baton Rouge, Parish of East Baton Rouge, State of Louisiana, with respect, represents that:

1.

**RACETRAC PETROLEUM, INC.** is the defendant herein.

2.

The Department of Transportation and Development, proposes to construct in the Parish of Jefferson, a certain project designated as State Project No. H.004791, LA 23: Belle Chasse Bridge and Tunnel (HBI), State Route LA 23 & LA 3017, which project is more fully described by a Certificate of Authorization to Expropriate, approved by the Secretary, Department of Transportation and Development on July 19, 2021, which declares that it is necessary and useful to take immediately the hereinafter described property for highway purposes, a certified copy of said Certificate of Authorization to Expropriate being marked "Exhibit P-1," attached hereto and made a part hereof.

3.

The construction of said project will be greatly conducive to the public interest, convenience and safety, and will be an important improvement in the State Highway System.

4.

Petitioner has surveyed the right of way and laid out the centerline thereof for said project as the same will exist after said project is completed, and the width of the right of way has been fixed

by the Chief Engineer of the Department of Transportation and Development, as shown by the certificate marked "Exhibit P-2," annexed hereto and made a part hereof.

5.

Included within the right of way required for said project is certain property believed to be owned by the defendant, **RACETRAC PETROLEUM, INC.**, a portion of which is required in full ownership designated as Parcel No. 1-2, and a portion of which is required for a temporary construction servitude for a period of time not to exceed completion of the project designated as Parcel No. 1-2-C-1, and described as follows, to-wit:

Two certain tracts or parcels of land, together with all of the improvements situated wholly or partially thereon, and all of the rights, ways, privileges, servitudes and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, and in Section 30, Township 14 South, Range 24 East, Southeastern West of Mississippi River Land District, identified as Parcel Nos. 1-2 & 1-2-C-1, on a white print of a plat of survey, consisting of Sheet No. 1, made by Robert A. Price, Registered Land Surveyor, dated August 20, 2020, revised, annexed to the above numbered and entitled suit, said tracts or parcels being outlined in red and being more particularly described in accordance with said plat of survey, as follows:

REQUIRED IN FULL OWNERSHIP

PARCEL NO. 1-2:

From a point on the centerline of State Project No. H.004791, at Station 57+98.41, proceed S40°01'46"W a distance of 83.92 feet to the point of beginning; thence proceed S49°58'14"E a distance of 236.42 feet to a point and corner; thence proceed N65°54'57"W a distance of 85.84 feet to a point and corner; thence proceed N49°58'14"W a distance of 79.33 feet to a point and corner; thence proceed N32°25'01"W a distance of 78.19 feet to the point of beginning. All of which comprises Parcel 1-2 as shown on Sheet 1 of the Right of Way Plans of State Project No. H.004791, and contains an area of 3723.0 square feet or 0.085 acres.

REQUIRED FOR A TEMPORARY SERVITUDE

PARCEL NO. 1-2-C-1:

From a point on the centerline of State Project No. H.004791, at Station 57+50.19, proceed S40°01'46"W a distance of 83.92 feet to the point of beginning; thence proceed S49°58'14"E a distance of 48.23 feet to a point and corner; thence proceed S32°25'01"E a distance of 78.19 feet to a point and corner; thence proceed N49°58'14"W a distance of 122.77 feet to a point and corner; thence proceed N40°01'46"E a distance of 23.58 feet to the point of beginning. All of which comprises Parcel 1-2-C-1 as shown on Sheet

1 of the Right of Way Plans of State Project No. H.004791, and contains an area of 2016.2 square feet or 0.046 acres.

6.

This property is outlined in red on a plat of survey marked "Exhibit P-3," annexed hereto and made a part hereof.

7.

This property is a portion of a larger tract believed to be owned by the defendant.

8.

There are no buildings situated wholly or partially upon the above described property, and the only improvements situated wholly or partially thereon consist of 8 x 20 double-faced sign and landscaping.

9.

The location and design of the improvements proposed by said project are in accordance with the best modern practices adopted in the interest of the safety and convenience of the traveling public, as shown by the Certificate on Location and Design, which is marked "Exhibit P-4," annexed hereto and made a part hereof.

10.

In order to construct said project in a manner and mode conducive to the public interest, convenience and safety, it is necessary that petitioner acquire in full ownership the property described as Parcel No. 1-2, together with all of the improvements situated wholly or partially thereon, subject to the mineral reservation set forth below, and a temporary servitude for construction purposes, for a period of time not to exceed completion of the project, on, over, and across the property described as Parcel No. 1-2-C-1, which property petitioner has attempted to acquire amicably but has been unable to do so.

11.

Therefore, it is necessary for petitioner to expropriate in full ownership the property described as Parcel No. 1-2, together with all of the improvements situated wholly or partially

thereon, subject to the mineral reservation set forth below, and a temporary servitude for construction purposes for a period of time not to exceed completion of the project on, over and across the property described as Parcel No. 1-2-C-1.

12.

The expropriation of the full ownership of the property described as Parcel No. 1-2, shall be made subject to the reservation in favor of the owner, together with all of the improvements situated wholly or partially thereon, of all oil or gas located under the property described above, or the royalties therefrom, in accordance with law, and subject to any existing oil or gas reservation or to any existing oil or gas lease.

13.

The just compensation to which the defendant is entitled, being the compensation for the full ownership of the property described as Parcel No. 1-2, together with all of the improvements situated wholly or partially thereon, subject to the mineral reservation set forth herein, and a temporary servitude for construction purposes for a period of time not to exceed completion of the project on, over and across the property described as Parcel No. 1-2-C-1, has been estimated to be the sum of One Hundred Twelve Thousand Three Hundred Eighty-Seven and No/100 Dollars (\$112,387.00), as shown by the written Estimates of Compensation marked "Exhibit P-5A" and "Exhibit P-5B," annexed hereto and made a part hereof.

14.

Petitioner is entitled to expropriate the full ownership of the property described as Parcel No. 1-2, together with all of the improvements situated wholly or partially thereon, subject to the mineral reservation set forth herein, and a temporary servitude for construction purposes for a period of time not to exceed completion of the project on, over and across the property described as Parcel No. 1-2-C-1, in a manner authorized by Article 1, Section 4 of the Constitution of the State of Louisiana for the year 1974, and Title 48 of the Louisiana Revised Statutes of 1950, Sections 441 to 460, inclusive as amended and reenacted.

15.

Petitioner is entitled to trial by jury as authorized by Title 48 of the Louisiana Revised Statutes, Section 451.2, as amended and reenacted.

16.

Petitioner desires to utilize the cash deposit authorized by Article 1734.1 of the Louisiana Code of Civil Procedure and desires that the amount of the deposit be fixed as required by law.

17.

Petitioner requests written notice at least thirty (30) days prior thereto of any trial, motion or other proceeding scheduled to come before this Honorable Court in this lawsuit in accordance with Title 48 of the Louisiana Revised Statutes, Section 451, and also requests notice of any interlocutory or final order, decree or judgment rendered and signed in this lawsuit as provided by the Louisiana Code of Civil Procedure.

WHEREFORE, petitioner prays that an order issue herein directing petitioner to deposit in the registry of this court the sum of One Hundred Twelve Thousand Three Hundred Eighty-Seven and No/100 Dollars (\$112,387.00) for payment to the person or persons entitled thereto, and declaring that the full ownership of the property described as Parcel No. 1-2, together with all of the improvements situated wholly or partially thereon, and subject to the mineral reservation set forth herein, and a temporary servitude for construction purposes for a period of time not to exceed completion of the project on, over and across the property described as Parcel No. 1-2-C-1, has been taken for highway purposes as of the time such deposit is made.

Petitioner further prays that said order direct the defendant to surrender to petitioner possession of said property.

Petitioner further prays that the Order of Expropriation in this matter be recorded in the conveyance records of this Parish.

Petitioner further prays that notice of this expropriation be issued and served upon **RACETRAC PETROLEUM, INC.**, together with a certified copy of this Petition, the Order of Expropriation of this court and the Receipt of the Clerk of Court for the deposit made, according to law.

Petitioner further prays that this matter be tried by jury and that it be allowed to utilize the cash deposit authorized by LA C.C.P. Article 1734.1.

Petitioner further prays that it be served with written notice of any trial, motion or other proceeding scheduled before this Honorable Court in accordance with LA R.S. 48:451, and that it be served with notice of any interlocutory or final order, decree or judgment rendered and signed as provided by Louisiana Code of Civil Procedure.

Petitioner further prays that upon a final hearing herein there be judgment herein in favor of petitioner fixing the amount of just compensation at a sum not to exceed One Hundred Twelve Thousand Three Hundred Eighty-Seven and No/100 Dollars (\$112,387.00).

LOUISIANA DEPARTMENT OF  
TRANSPORTATION & DEVELOPMENT  
OFFICE OF THE GENERAL COUNSEL

BY: *Cheryl K. Sibley*  
Of Counsel

Cheryl Sibley (McKinney)  
Bar Roll No. 33084  
1201 Capitol Access Road  
Baton Rouge, LA 70802  
P. O. Box 94245  
Baton Rouge, LA 70804-9245  
PH: (225) 379-1899  
FAX: (225) 242-4690  
Attorney for State, DOTD

**PLEASE SERVE:**  
**RACETRAC PETROLEUM, INC.**  
**Through Agent for Service of Process**  
**Corporate Creations Louisiana, LLC**  
**3350 Ridgelake Drive #200**  
**Metairie, LA 70002**

**CERTIFICATE OF AUTHORIZATION TO EXPROPRIATE**

The Department of Transportation and Development contemplates and plans to construct certain projects for the improvement of various highways throughout the State of Louisiana.

The project presently planned by the Department of Transportation and Development is hereinafter set forth:

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**STATE PROJECT NO. H.004791  
LA 23: BELLE CHASSE BRIDGE & TUNNEL (HBI)  
ROUTE LA 23 & LA 3017  
PLAQUEMINES & JEFFERSON PARISH**

---

State Project Number H.004791 provides for removing asphalt pavement, drainage structures, grading, bridges, MSE walls, base course, asphalt concrete, concrete curb, traffic signalization, permanent striping on LA 23 & LA 3017 in Plaquemines & Jefferson Parish, as follows:

Beginning LA 23 at approximate Highway Survey Station 57+00.00, then proceed in a southeasterly direction to end at approximate Highway Survey Station 125+00.00.

Beginning Engineers Road (LA 3017) at approximate Highway Survey Station 200+00.00 then proceed in a southerly direction to end at approximate Highway Survey Station 216+00.00.

Beginning Ramp X/X Street at approximate Highway Survey Station 300+00.00, then proceed in a southerly direction to end at approximate Highway Survey Station 313+56.02.

Beginning Railroad at approximate Highway Survey Station 2+00.00, then proceed in a southeasterly direction to end at approximate Highway Survey Station 5+28.17.

Beginning North Tunnel Road at approximate Highway Survey Station 10+00.00, then proceed in a southeasterly direction to end at approximate Highway Survey Station 15+00.00.

Beginning Q Street at approximate Highway Survey Station 30+00.00, then proceed in a southerly direction to end approximate Highway Survey Station 38+00.00.

Beginning South Tunnel Road at approximate Highway Survey Station 22+00.00, then proceed in a westerly direction to end at approximate Highway Survey Station 24+09.97.

There is a Bridge Site between the following Highway Survey Stations: approximate Highway Survey Station 67+49.37 and Highway Survey Station 69+49.37, and approximate Highway Survey Station 83+46.50 and Highway Survey Station 117+33.50.

The total roadway length is approximately 1.513 miles, and the total bridge length is approximately 0.679 miles, for an overall project length of approximately 2.192 miles.


The construction of the above described project will be conducive to the public interest, convenience and safety and will enable the Department of Transportation and Development to properly fulfill the functions imposed upon it by law.

The proper construction of said described project is dependent upon the acquisition of the rights of way as fixed by the Chief Engineer, Office of Engineering, for the said project and such other rights as may be appurtenant thereto.

It is necessary and useful to take, by expropriation for highway purposes and in the manner provided by law, in servitude or in full ownership, the property and property rights not otherwise acquired, which are needed for the proper construction of said project.

Pursuant to the authority vested in me by the provisions of L.R.S. 36:501 et seq., and L.R.S. 48:11 et seq., as Secretary of the Department of Transportation and Development, it is necessary and useful to take and, as required by L.R.S. 48:442(3)(a), I hereby approve and authorize the Department of Transportation and Development to take by expropriation for highway purposes and in the manner provided by law, in servitude or in full ownership, the property and property rights not otherwise acquired, and which are needed for the proper construction of State Project No. H.004791, LA 23: Belle Chasse Bridge & Tunnel (HBI), Parish of Plaquemines & Jefferson.

Baton Rouge, Louisiana, this 19<sup>th</sup> day of July, 2021.

  
for **SHAWN D. WILSON, Ph.D.**  
SECRETARY  
DEPARTMENT OF TRANSPORTATION  
AND DEVELOPMENT

**ERIC KALIUDA**  
DEPUTY SECRETARY

The custodian of official records of the Department of Transportation and Development of the State of Louisiana certifies under the provisions of R.S. 13:3712 and Chapter 9 of the Louisiana Code of Evidence that the attached 2 page(s) is(are) a true and correct copy (copies) of the original(s).



CERTIFICATE  
OF THE  
CHIEF ENGINEER

I hereby certify that I have fixed the right of way required to construct STATE PROJECT NO. H.004791, F.A.P. NO. H004791, LA 23: BELLE CHASSE BRIDGE & TUNNEL (HBI), ROUTE LA 23 & LA 3017, PLAQUEMINES & JEFFERSON PARISH, in a manner sufficient in my judgment to provide presently and in the future for the public interest, safety and convenience.

  
CHRISTOPHER P. KNOTTS, P.E.      8/5/2021  
DOTD CHIEF ENGINEER      DATE

FILED FOR RECORD 08/17/2021 15:42:08  
 MALISSA K. ADAMS, DYC CLERK  
 JEFFERSON PARISH, LA

09:06

1/19/2021



Final Right of Way Map  
 T:\PROJECTS\817 Huval - Belle Chase Bridge\DRAWINGS\WORKING\100% ROW\ROW\_SHEET1.dgn

NOTES:  
 1. ALL PIPES AND MONUMENTS SHOWN HEREON WERE FOUND.  
 2. THE COORDINATES AND BEARINGS SHOWN HEREON ARE BASED ON LOUISIANA STATE PLANE COORDINATE SYSTEM, SOUTH ZONE (NAD 83 (2011) EPOCH 2010.00) TO CONVERT FROM GRID BEARINGS TO TRUE BEARINGS USE: 00°39'28.9"  
 BASE STATIONS:  
 DP7421 SHELL BEACH  
 LAT=N29°52'05.20582"  
 LONG=W89°40'23.63832"  
 Y=501341.88  
 X=3806584.52  
 DP7419 LOYOLA UNIVERSITY  
 LAT=N29°56'13.21775"  
 LONG=W90°07'07.83727"  
 Y=524621.48  
 X=3665493.65  
 DJ9603 LAKEWOOD ELEMENTRY  
 LAT=N29°54'01.28535"  
 LONG=W90°20'57.83368"  
 Y=510595.83  
 X=3592587.48  
 3. DISTANCES SHOWN ARE HORIZONTAL GROUND DISTANCES. TO CONVERT DISTANCES DERIVED FROM COORDINATES SHOWN HEREON TO HORIZONTAL GROUND DISTANCES, USE SCALE FACTOR: 0.999928018

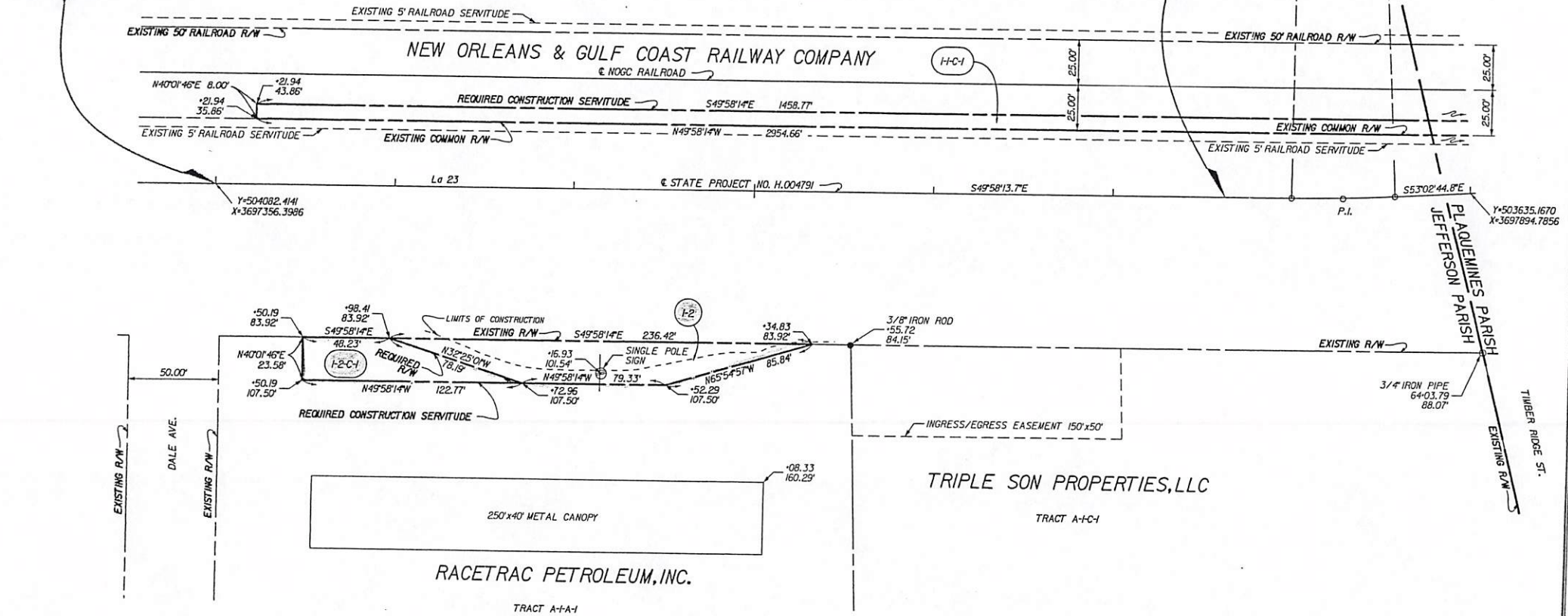
SOUTHEASTERN WEST OF MISSISSIPPI RIVER  
 T14S - R24E  
 SECTION 30

☺ CURVE DATA La 23

P.I. STA. 63+28.84  
 Y = 503677.9523  
 X = 3697837.9131  
 Δ = 30°4'31.1" LT.  
 D = 518'18.6"  
 T = 28.99'  
 L = 57.97'  
 R = 1080.00'

BEGIN PROJECT La 23  
 C.S. 062-01  
 LOG MILE 3.630  
 STA. 57+00.00

STA. 62+54.47  
 LOG MILE 3.735  
 END C.S. 062-01  
 LOG MILE 0.000  
 BEGIN C.S. 062-02



LEGEND

- EXISTING R/W →
- REQUIRED R/W →
- EXISTING C. of A. →
- REQUIRED C. of A. →
- EXIST R/W & EXIST. C. of A. →
- REQD R/W & REQD. C. of A. →
- RIGHT OF WAY LINE
- CONTROL OF ACCESS
- RIGHT OF WAY & CONTROL OF ACCESS
- LIMITS OF CONSTRUCTION
- LOT LINE
- APPARENT PROPERTY LINE
- EXISTING SERVITUDE LINE
- SECTION LINE

PARCEL	OWNER	ACQUISITION	AREA
I-2-C1	RACETRAC PETROLEUM, INC.	C.O.B. 3321 PG. 515 SEPTEMBER 23, 2013	0.046 Ac. 2D/6.2 SF
I-2			0.085 Ac. 3,723.0 SF
I-C-1	NEW ORLEANS & GULF COAST RAILWAY COMPANY	C.O.B. 948 PG. 797 MAY 6, 1999	0.680 Ac. 29,629.3 SF



8-20-2020

RIGHT OF WAY MAP  
 STATE PROJECT NO. 004791  
 LA 23: BELLE CHASSE BRIDGE TUNNEL (HBI)  
 PLAQUEMINES & JEFFERSON PARISH  
 ROUTE LA 23 & LA 3017

JEFFERSON PLAQUEMINES  
 CONTROL SECTION 062-01, 062-02  
 STATE PROJECT H.004791

COMPUTER BDK CHECKED  
 DRAWING BDK CHECKED  
 DATE 8/19/2020  
 SCALE 1"=50'

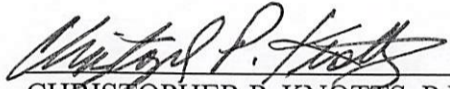
GOTECH, INC.  
 REVISED PARCEL I-2-C-1  
 DATE 1-19-2021

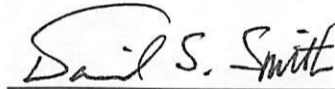
FILE NO. 03-19-083 R/W SHEET NO. 1

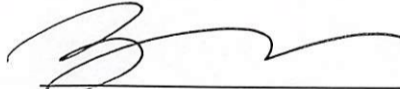
EXHIBIT P-3

CERTIFICATE  
ON  
LOCATION AND DESIGN

We hereby certify that the location and design of the improvements proposed within STATE PROJECT NO. H.004791, F.A.P. NO. H004791, LA 23: BELLE CHASSE BRIDGE & TUNNEL (HBI), ROUTE LA 23 & LA 3017, PLAQUEMINES & JEFFERSON PARISH, are in accordance with the best modern practices adopted in the interest of the safety and convenience of the traveling public.

  
CHRISTOPHER P. KNOTT'S, P.E.      8/5/2021  
DOTD CHIEF ENGINEER      DATE

  
DAVID S. SMITH P.E.      8/4/21  
ROAD DESIGN ENGINEER      DATE

  
ZHENG ZHENG FU, P.E.      8/4/21  
BRIDGE DESIGN ENGINEER      DATE

Parcel No. 1-2 and 1-2-C-1  
S. P. No. H.004791

CERTIFICATE  
OF  
ESTIMATE OF COMPENSATION

I, the undersigned, hereby certify that I have made a careful investigation of the property identified as Parcel Number(s) 1-2 and 1-2-C-1, and its (their) remainder(s) which is the subject matter of this estimate, that I am familiar with land values in the vicinity, and that I estimate the compensation to be as follows:

VALUE OF LAND	<u>\$58,887.00</u>
VALUE OF IMPROVEMENTS	<u>\$52,516.00</u>
DAMAGES	<u>\$0.00</u>
ADDITIONAL COMPENSATION	<u>\$0.00</u>
TOTAL ESTIMATE OF COMPENSATION	<u>\$111,403.00</u>

Methodology Used:

- 1. Sales Comparison Approach
- 2. Cost Approach
- 3. Income Capitalization Approach

The Lakvold Group, LLC  
Angela Lemoine-Lakvold, MAI, SRA, R/W-AC, MBA  
4520 Jamestown Avenue, Suite 1  
Baton Rouge, Louisiana 70808

Qualifications:

- 1. Designated Appraiser
- 2. Candidate for Designation
- 3. Louisiana Certified Residential Real Estate Appraiser
- 4. Louisiana Certified General Real Estate Appraiser
- 5. Right of Way Appraiser in the regular employ of the Department

Baton Rouge, Louisiana, 70808, August 5, 2021.

ANGELA LEMOINE-LAKVOLD, MAI, SRA, R/W-AC, MBA  
LOUISIANA CERTIFIED GENERAL REAL ESTATE APPRAISER G#0575

Total Approved Amount of Compensation to the full extent of the owner's loss \$ 112,387.00

Heather Corsetino 8/10/2021  
Date

HEATHER CORSETINO  
Assistant R/E Administrator,  
Department of Transportation and  
Development, State of Louisiana

DOTD pays Cost  
New for sign

Parcel No. 1-2 and 1-2-C-1  
S. P. No. H.004791

CERTIFICATE  
OF  
ESTIMATE OF COMPENSATION

I, the undersigned, hereby certify that I have made a careful investigation of the property identified as Parcel Number(s) 1-2 and 1-2-C-1, and its (their) remainder(s) which is the subject matter of this estimate, that I am familiar with land values in the vicinity, and that I estimate the compensation to be as follows:

VALUE OF LAND	<u>\$46,654</u>
VALUE OF IMPROVEMENTS	<u>\$52,516</u>
DAMAGES	<u>                    </u>
ADDITIONAL COMPENSATION	<u>                    </u>
TOTAL ESTIMATE OF COMPENSATION	<u>\$99,170</u>

Methodology Used:

- XX 1. Sales Comparison Approach
- 2. Cost Approach
- 3. Income Capitalization Approach

AGUILAR CONSULTANTS, LLC  
ROBERTO J. AGUILAR, IFAS, ASA, SR/WA, R/W-AC  
MAILING ADDRESS: 17732 HIGHLAND ROAD, SUITE G-159,  
BATON ROUGE, LOUISIANA 70810

Qualifications:

- XX 1. Designated Appraiser
- XX 2. Candidate for Designation
- 3. Louisiana Certified Residential Real Estate Appraiser
- XX 4. Louisiana Certified General Real Estate Appraiser
- 5. Right of Way Appraiser in the regular employ of the Department

Baton Rouge, Louisiana, August 5, 2021.

**Roberto J. Aguilar, IFAS, ASA, SR/WA, R/W-AC**  
Louisiana State Certified General Real Estate Appraiser, License No. G476  
Senior Independent Fee Appraiser, American Society of Appraisers  
Senior Member, American Society of Appraisers  
Right of Way-Appraisal Certified, International Right of Way Association  
Senior Right of Way Agent, International Right of Way Association

Total Approved Amount of Compensation to the full extent of the owner's loss \$ 112,337.00

Heather Corsetino 8/10/2021  
HEATHER CORSETINO Date

Assistant R/E Administrator,  
Department of Transportation and  
Development, State of Louisiana

DOTD pays cost  
New for sign.

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

RACETRAC PETROLEUM, INC.

NUMBER *820-450 m*

24<sup>TH</sup> JUDICIAL DISTRICT COURT

PARISH OF JEFFERSON

STATE OF LOUISIANA

### **ORDER OF EXPROPRIATION**

The petition, exhibits and the premises considered:

IT IS HEREBY ORDERED that the STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT, do deposit in the registry of this court, for the use and benefit of the person or persons entitled thereto, the sum of One Hundred Twelve Thousand Three Hundred Eighty-Seven and No/100 Dollars (\$112,387.00).

AND IT IS HEREBY FURTHER ORDERED that the full ownership of the property described as Parcel No. 1-2, together with all of the improvements situated wholly or partially thereon, subject to the reservation in favor of **RACETRAC PETROLEUM, INC.**, of all oil or gas located under the property described below, or the royalties therefrom, in accordance with law, and subject to any existing oil or gas reservation or to any existing oil or gas lease, and a temporary servitude for construction purposes for a period of time not to exceed completion of the project on, over and across the property described as Parcel No. 1-2-C-1, is expropriated and taken for highway purposes as of the time of such deposit, according to law, said property being described as follows, to-wit:

Two certain tracts or parcels of land, together with all of the improvements situated wholly or partially thereon, and all of the rights, ways, privileges, servitudes and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, and in Section 30, Township 14 South, Range 24 East, Southeastern West of Mississippi River Land District, identified as Parcel Nos. 1-2 & 1-2-C-1, on a white print of a plat of survey, consisting of Sheet No. 1, made by Robert A. Price, Registered Land Surveyor, dated August 20, 2020, revised, annexed to the above numbered and entitled suit, said tracts or parcels being outlined in red and being more particularly described in accordance with said plat of survey, as follows:

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

RACETRAC PETROLEUM, INC.

NUMBER *820-450 M*

24<sup>TH</sup> JUDICIAL DISTRICT COURT

PARISH OF JEFFERSON

STATE OF LOUISIANA

**ORDER OF EXPROPRIATION (CONTINUED)**

**REQUIRED IN FULL OWNERSHIP**

**PARCEL NO. 1-2:**

From a point on the centerline of State Project No. H.004791, at Station 57+98.41, proceed S40°01'46"W a distance of 83.92 feet to the point of beginning; thence proceed S49°58'14"E a distance of 236.42 feet to a point and corner; thence proceed N65°54'57"W a distance of 85.84 feet to a point and corner; thence proceed N49°58'14"W a distance of 79.33 feet to a point and corner; thence proceed N32°25'01"W a distance of 78.19 feet to the point of beginning. All of which comprises Parcel 1-2 as shown on Sheet 1 of the Right of Way Plans of State Project No. H.004791, and contains an area of 3723.0 square feet or 0.085 acres.

**REQUIRED FOR A TEMPORARY SERVITUDE**

**PARCEL NO. 1-2-C-1:**

From a point on the centerline of State Project No. H.004791, at Station 57+50.19, proceed S40°01'46"W a distance of 83.92 feet to the point of beginning; thence proceed S49°58'14"E a distance of 48.23 feet to a point and corner; thence proceed S32°25'01"E a distance of 78.19 feet to a point and corner; thence proceed N49°58'14"W a distance of 122.77 feet to a point and corner; thence proceed N40°01'46"E a distance of 23.58 feet to the point of beginning. All of which comprises Parcel 1-2-C-1 as shown on Sheet 1 of the Right of Way Plans of State Project No. H.004791, and contains an area of 2016.2 square feet or 0.046 acres.

AND IT IS HEREBY FURTHER ORDERED that this matter be tried by jury upon the plaintiff making a cash deposit in accordance with LA C.C.P. Article 1734.1. Upon the setting of this matter for trial, the court shall fix the amount due and the time of said deposit, which time shall be no later than thirty (30) days prior to trial.

AND IT IS HEREBY FURTHER ORDERED that this Order of Expropriation be recorded in the conveyance records of this Parish.

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

RACETRAC PETROLEUM, INC.

NUMBER 820-450m

24<sup>TH</sup> JUDICIAL DISTRICT COURT

PARISH OF JEFFERSON

STATE OF LOUISIANA

**ORDER OF EXPROPRIATION(CONTINUED)**

AND IT IS HEREBY FURTHER ORDERED that the defendant, **RACETRAC  
PETROLEUM, INC.**, vacate the above described property and surrender possession thereof unto  
the plaintiff immediately.

Gretna, Louisiana, this 18<sup>th</sup> day of August, 2021.

**s/SHAYNABEEVERS MORVANT**

\_\_\_\_\_  
JUDGE, TWENTY-FOURTH JUDICIAL DISTRICT COURT

A TRUE COPY OF THE ORIGINAL  
ON FILE IN THIS OFFICE.

  
\_\_\_\_\_  
DEPUTY CLERK  
24<sup>TH</sup> JUDICIAL DISTRICT COURT  
PARISH OF JEFFERSON, LA.



STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

RACETRAC PETROLEUM, INC.

NUMBER 820450

M

24<sup>TH</sup> JUDICIAL DISTRICT COURT

PARISH OF JEFFERSON

STATE OF LOUISIANA

FILED

AUG 19 2021

DEPUTY CLERK

RECEIPT

JON GEGNHEIMER, CLERK OF COURT

TO

THE STATE OF LOUISIANA, AND  
THE DEPARTMENT OF TRANSPORTATION  
AND DEVELOPMENT

gag  
pal

In the cause entitled "STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT, VS. RACETRAC PETROLEUM, INC." No. 820-450 of the docket of said court, the State of Louisiana seeks the expropriation of the full ownership of the property described below, together with all of the improvements situated wholly or partially thereon, subject to the reservation in favor of the owner of all oil or gas located under the property described below, or the royalties therefrom, in accordance with law, and subject to any existing oil or gas reservation or to any existing oil or gas lease, for the project set forth in the petition, said property being described as follows, to-wit:

Two certain tracts or parcels of land, together with all of the improvements situated wholly or partially thereon, and all of the rights, ways, privileges, servitudes and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, and in Section 30, Township 14 South, Range 24 East, Southeastern West of Mississippi River Land District, identified as Parcel Nos. 1-2 & 1-2-C-1, on a white print of a plat of survey, consisting of Sheet No. 1, made by Robert A. Price, Registered Land Surveyor, dated August 20, 2020, revised, annexed to the above numbered and entitled suit, said tracts or parcels being outlined in red and being more particularly described in accordance with said plat of survey, as follows:

REQUIRED IN FULL OWNERSHIP

PARCEL NO. 1-2:

From a point on the centerline of State Project No. H.004791, at Station 57+98.41, proceed S40°01'46"W a distance of 83.92 feet to



STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

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NUMBER 820-450

24<sup>TH</sup> JUDICIAL DISTRICT COURT

PARISH OF JEFFERSON

STATE OF LOUISIANA

**RECEIPT (CONTINUED)**

the point of beginning; thence proceed S49°58'14"E a distance of 236.42 feet to a point and corner; thence proceed N65°54'57"W a distance of 85.84 feet to a point and corner; thence proceed N49°58'14"W a distance of 79.33 feet to a point and corner; thence proceed N32°25'01"W a distance of 78.19 feet to the point of beginning. All of which comprises Parcel 1-2 as shown on Sheet 1 of the Right of Way Plans of State Project No. H.004791, and contains an area of 3723.0 square feet or 0.085 acres.

**REQUIRED FOR A TEMPORARY SERVITUDE**

**PARCEL NO. 1-2-C-1:**

From a point on the centerline of State Project No. H.004791, at Station 57+50.19, proceed S40°01'46"W a distance of 83.92 feet to the point of beginning; thence proceed S49°58'14"E a distance of 48.23 feet to a point and corner; thence proceed S32°25'01"E a distance of 78.19 feet to a point and corner; thence proceed N49°58'14"W a distance of 122.77 feet to a point and corner; thence proceed N40°01'46"E a distance of 23.58 feet to the point of beginning. All of which comprises Parcel 1-2-C-1 as shown on Sheet 1 of the Right of Way Plans of State Project No. H.004791, and contains an area of 2016.2 square feet or 0.046 acres.

In accordance with an order of the court signed herein, the Department of Transportation and Development, on behalf of the State of Louisiana and of itself, has this day paid into the registry of said court the sum of One Hundred Twelve Thousand Three Hundred Eighty-Seven and No/100 Dollars (\$112,387.00) in cash, lawful current money of the United States of America, by delivering said sum to the said Clerk of Court, who acknowledges receipt of said sum and declares that he/she has placed same in the registry of said court.

Signed at Gretna, Louisiana, this 19<sup>th</sup> day of August, 2021.



DEPUTY CLERK OF COURT, TWENTY-FOURTH JUDICIAL DISTRICT COURT

