

RECEIVED

2021 AUG 27 PM 2:06

CLERK OF DISTRICT COURT

TWENTY-FIFTH JUDICIAL DISTRICT COURT
PARISH OF PLAQUEMINES
STATE OF LOUISIANA

DOCKET NO.: 66926

DIV./SEC. NO.: B

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

FILED

VERSUS

LA BONNE AFFAIRE, L.L.C.

AUG 17 2021
s/ LANE STOCKSTILL
DEPUTY CLERK

FILED: _____

CLERK OF COURT

PETITION

The petition of the STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION & DEVELOPMENT, ("Petitioner"), 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.

LA BONNE AFFAIRE, L.L.C., is the defendant herein ("Defendant").

2.

The STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION & DEVELOPMENT proposes to construct in the Parish of Plaquemines a certain project designated as State Project No. H.004791, LA 23: Belle Chasse Bridge & 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, STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION & 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 to 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 & Development, as shown by the Certificate of the Chief Engineer 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 Defendant, LA BONNE AFFAIRE, L.L.C., a portion of which is required in full ownership designated as Parcel No. 3-4, 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. 3-4-C-1, and described as follows, to wit:

Two (2) certain tracts or parcels of land, and all of the rights, ways, privileges, servitudes and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Plaquemines, State of Louisiana, and in Section 30, Township 14 South, Range 24 East, Southeastern West of Mississippi River Land District, identified as Parcel Nos. 3-4 & 3-4-C-1, on a white print of a plat of survey, consisting of Sheet No. 3, 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 AND TEMPORARY
CONSTRUCTION SERVITUDE

PARCEL NOS. 3-4 AND 3-4-C-1

PARCEL NO. 3-4:

From a point on the centerline of State Project No. H.004791, at Highway Survey Station 77+81.92, proceed S55°13'43"W a distance of 46.79 feet to the point of beginning; thence proceed S49°58'14"E a distance of 23.59 feet to a point and corner; thence proceed S10°03'50"E a distance of 49.68 feet to a point and corner; thence proceed along a curve to the left having a radius of 378.50 feet, whose length is 68.00 feet and whose chord length is 67.91 feet and bears N35°54'49"W to a point and corner; thence proceed N55°13'43"E a distance of 15.94 feet to the point of beginning. All of which comprises Parcel 3-4 as shown on Sheet 3

of the Right of Way Plans of State Project No. H.004791, and contains an area of approximately 851.6 square feet or 0.020 acres.

PARCEL NO. 3-4-C-1:

From a point on the centerline of State Project No. H.004791, at Highway Survey Station 77+81.92, proceed S55°13'43"W a distance of 62.72 feet to the point of beginning; thence proceed along a curve to the right having a radius of 378.50 feet, whose length is 12.50 feet and whose chord length is 12.50 feet, and bears S40°06'51"E to a point and corner; thence proceed S54°51'32"W a distance of 11.60 feet to a point and corner; thence proceed N35°08'28"W a distance of 12.52 feet to a point and corner; thence proceed N55°13'43"E a distance of 10.51 feet to the point of beginning. All of which comprises Parcel 3-4-C-1 as shown on Sheet 3 of the Right of Way Plans of State Project No. H.004791, and contains an area of approximately 138.5 square feet or 0.003 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 Defendant.

8.

There are no buildings situated wholly or partially upon the above-described property, and there are no improvements situated wholly or partially upon the above-described property.

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. 3-4, 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. 3-4-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. 3-4, 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. 3-4-C-1.

12.

The expropriation of the full ownership of the property described as Parcel No. 3-4 shall be made subject to the reservation in favor of the owner, LA BONNE AFFAIRE, L.L.C., of all oil or gas located under the property described hereinabove, or the royalties therefrom, in accordance with law, and subject to any existing oil or gas reservation to any existing oil or gas lease, such reservation of mineral rights being imprescriptible as authorized by LA R.S. 31:149.

13.

The just compensation to which Defendant is entitled, being the compensation for the full ownership of the property described hereinabove as Parcel No. 3-4, 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 herein as Parcel No. 3-4-C-1 has been estimated to be the sum of Five Thousand Seven Hundred Eighteen and 00/100 (\$5,718.00) Dollars, as shown by the written Certificates of Estimate 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 above property described as Parcel No. 3-4, 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 herein as Parcel No. 3-4-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 an Order issue herein directing Petitioner to deposit in the Registry of the Court the sum of Five Thousand Seven Hundred Eighteen and 00/100 (\$5,718.00) Dollars for payment to the person or persons entitled thereto, and declaring that the full ownership of the property described as Parcel No. 3-4, 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. 3-4-C-1, has been taken for highway purposes as of the time such deposit is made.

Petitioner further prays that said order directs Defendant to surrender to Petitioner possession of said property.

Petitioner further prays that notice of this expropriation be issued and served upon LA BONNE AFFAIRE, L.L.C., 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.

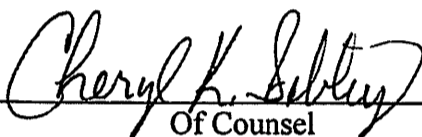
Petitioner further prays that it be served with written notice of any trial, motion or other proceeding scheduled before this Honorable Court in accordance with LA R.S. Section 48:451,

and that it be served with notice of any interlocutory or final order, decree or judgment rendered and signed as provided by the Louisiana Code of Civil Procedure.

Petitioner further prays that upon a final hearing there be judgment herein in favor of Petitioner fixing the amount of just compensation at a sum not to exceed Five Thousand Seven Hundred Eighteen and 00/100 (\$5,718.00) Dollars.

Respectfully Submitted:

LOUISIANA DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT
OFFICE OF THE GENERAL COUNSEL

By: 
Of Counsel

Cheryl Sibley (McKinney) (#33084)
1201 Capitol Access Rd. (70802)
P. O. Box 94245
Baton Rouge, LA 70804-9245
Telephone: (225) 379-1899
Fax: (225) 242-4691
Email: cheryl.mckinney@la.gov

PLEASE SERVE:

LA BONNE AFFAIRE, L.L.C.,
Through its Agent for Service of Process:
James F. Gasquet, Jr.
129 Chancellor Drive
Belle Chasse, LA 70037

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:

**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.

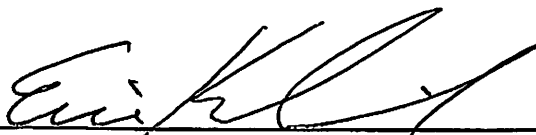
The construction of the above described project will be conducive to the public interest, convenience and safety and will enable the Department of Transportation and Development to properly fulfill the functions imposed upon it by law.

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 19th day of July, 2021.


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

ERIC KALIVODA
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

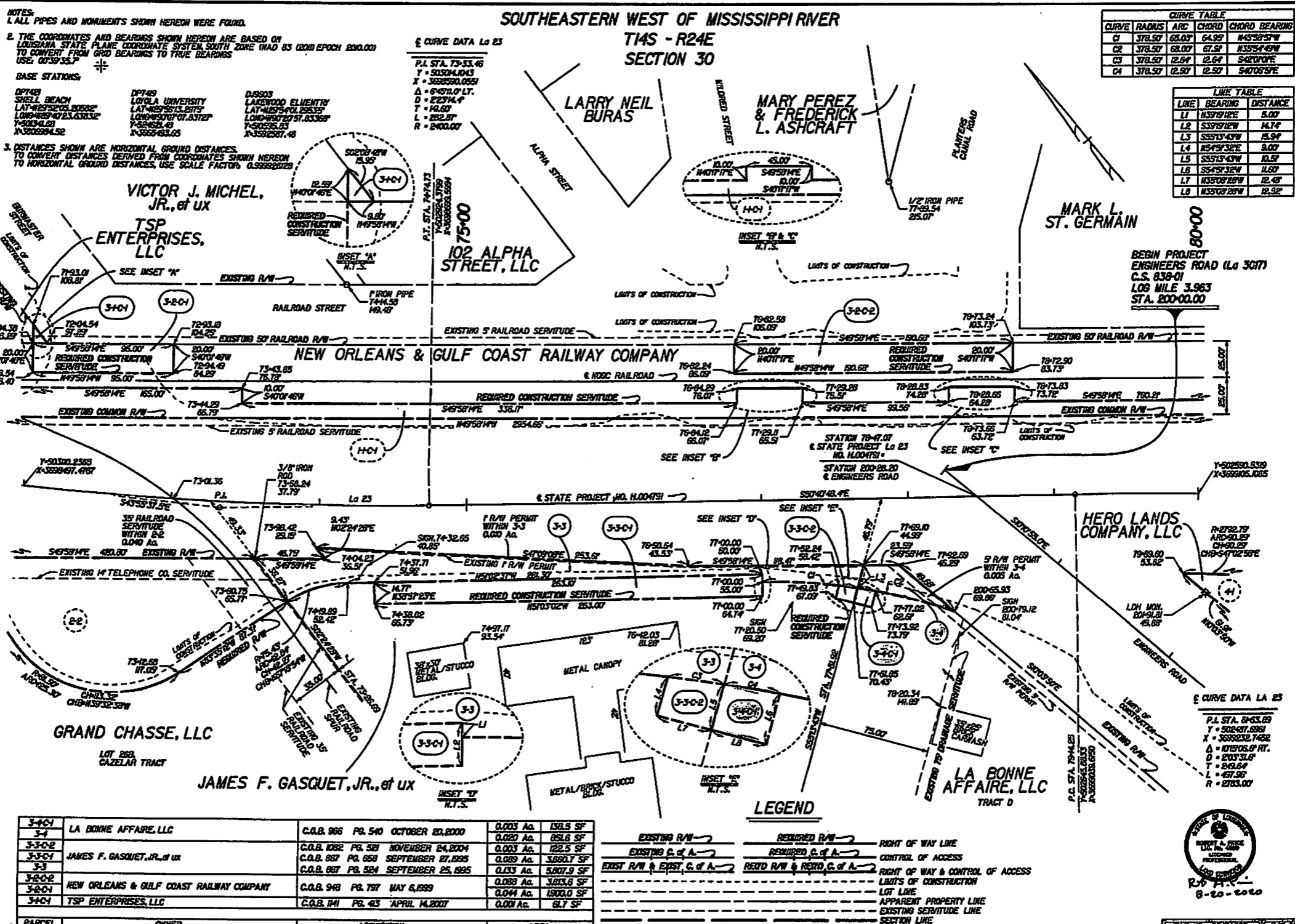
FILED

AUG 17 2021
c/ LANE STOCKSTILL

DEPUTY CLERK

EXHIBIT P-2

08:27
 10/23/2020
 AUG 17 2021
 S/LANE STOCKSTILL
 DEPUTY CLERK
 Final Right of Way Map
 T:\PROJECTS\917 Haval - Belle Chasse Bridge\Drawings\working\1000 ROW FROM BRD\3.dwg



CURVE TABLE

CURVE	RADIUS	ARC	CHORD	CHORD BEARING
C1	378.50'	68.03'	64.95'	N45°59'57"W
C2	378.50'	68.07'	67.95'	N55°54'43"W
C3	378.50'	12.64'	12.64'	S42°00'00"E
C4	378.50'	12.50'	12.50'	S40°05'59"E

LINE TABLE

LINE	BEARING	DISTANCE
L1	N39°19'12"E	8.00'
L2	S39°19'12"W	14.74'
L3	S59°13'43"W	15.94'
L4	N59°13'43"E	9.00'
L5	S59°13'43"W	10.59'
L6	S5°59'35"W	11.50'
L7	N39°08'18"W	12.48'
L8	N39°08'18"W	12.52'

Curve Data La 23

P.I. STA. 73+33.46
 Y = 50324.043
 X = 368890.0551
 Δ = 6°45'10" LT.
 D = 22314.4'
 T = 14.60'
 L = 282.89'
 R = 2400.00'

Curve Data La 23

P.I. STA. 8433.03
 Y = 20247.039
 X = 355828.7482
 Δ = 105°05.0' RT.
 D = 203°31.5'
 T = 243.64'
 L = 457.58'
 R = 2783.00'

PARCEL	OWNER	ACQUISITION	AREA
3-3-01	LA BONNE AFFAIRE, LLC	C.O.B. 966 PG. 540 OCTOBER 20, 2000	0.003 Ac. 138.5 SF
3-3			0.020 Ac. 851.6 SF
3-3-02		C.O.B. 1082 PG. 581 NOVEMBER 24, 2004	0.003 Ac. 122.5 SF
3-3-01	JAMES F. GASQUET, JR., et ux	C.O.B. 887 PG. 658 SEPTEMBER 27, 1995	0.089 Ac. 3,860.7 SF
3-3		C.O.B. 887 PG. 524 SEPTEMBER 25, 1995	0.133 Ac. 5,807.9 SF
3-3-02	NEW ORLEANS & GULF COAST RAILWAY COMPANY	C.O.B. 948 PG. 797 MAY 6, 1999	0.088 Ac. 3,813.6 SF
3-3-01			0.044 Ac. 1,900.0 SF
3-3-01	TSP ENTERPRISES, LLC	C.O.B. 741 PG. 413 APRIL 14, 2007	0.001 Ac. 61.7 SF

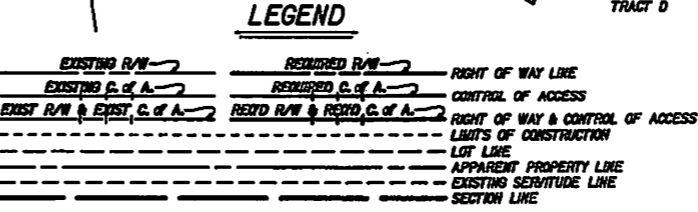


EXHIBIT P-3
 SHEET NUMBER
 PLACEMENTS
 DATE: 08-02-2020
 DRAWN BY: M. COATTON
 CHECKED BY: J. COATTON
 DATE: 08-02-2020
 PROJECT: 1000 ROW FROM BRD
 SCALE: AS SHOWN
 DRAWING: 3.dwg
 PROJECT: 917 Haval - Belle Chasse Bridge
 STATE: MISSISSIPPI
 COUNTY: ORLEANS
 ROUTE: LA 23 & LA 3017
 GOTSCHAL, INC.
 1000 ROW FROM BRD
 DATE: 08-20-2020
 FILE NO. 20200001

RECORDED

AUG 17 2004

S/ LANE STOCKSTILL
DEPUTY CLERK

08:27
10/23/2020

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: 073935.7

BASE STATIONS:
 DPT493 SHELL BEACH
 LAT: 48°52'05.2082E
 LONG: 89°47'23.6313W
 Y: 50034.69
 X: 300694.52

DPT493 LOUISIANA UNIVERSITY
 LAT: 48°52'56.8321E
 LONG: 89°07'04.5372W
 Y: 52662.43
 X: 305543.65

D8903 LACROIX ELEMENTRY
 LAT: 48°57'42.5833E
 LONG: 89°07'57.8336W
 Y: 52655.63
 X: 305257.48

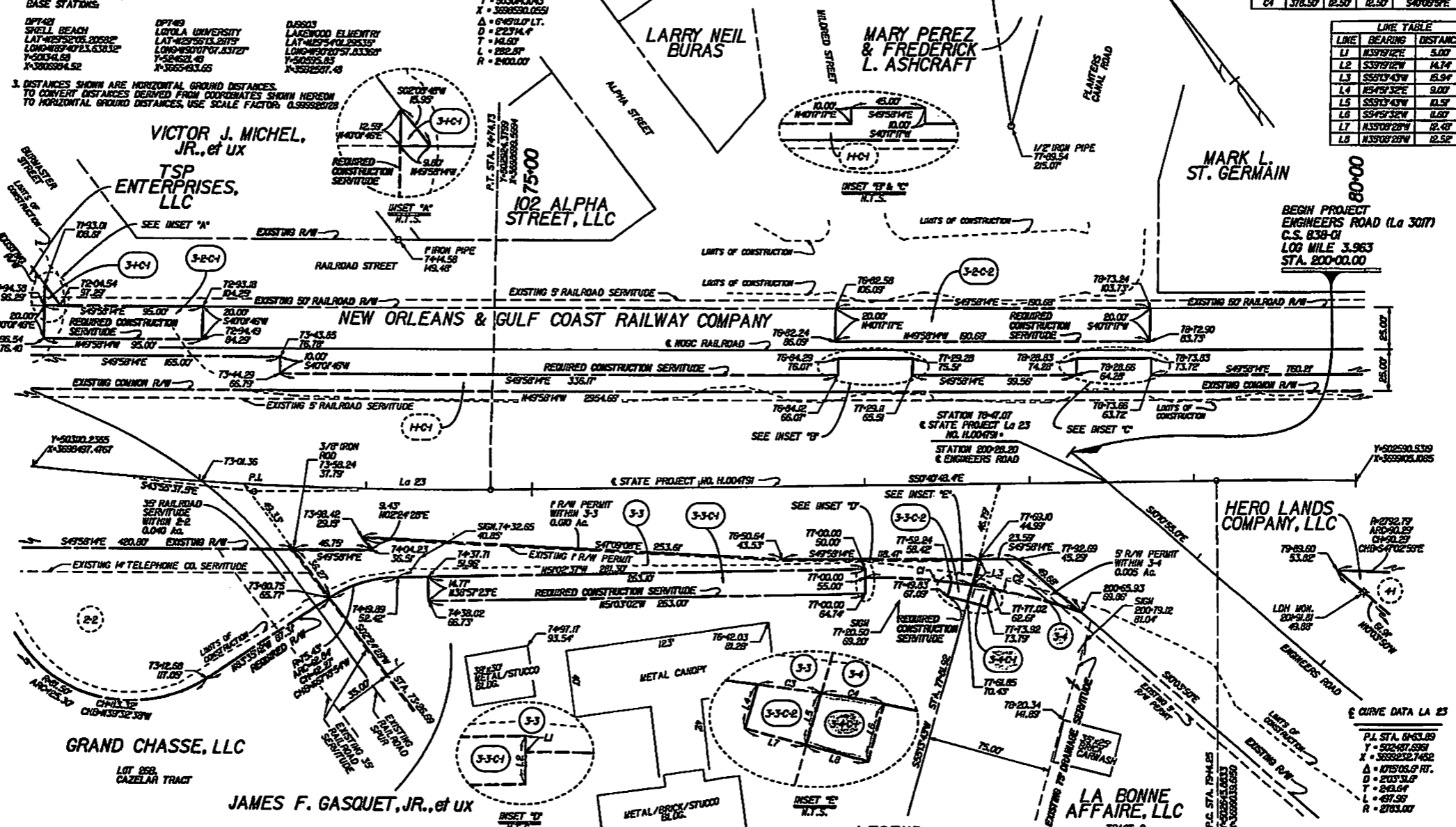
§ CURVE DATA La 23
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 X = 305959.0591
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 D = 223.94'-F
 T = 14.87'
 L = 282.87'
 R = 2400.00'

SOUTHEASTERN WEST OF MISSISSIPPI RIVER
 T14S - R24E
 SECTION 30

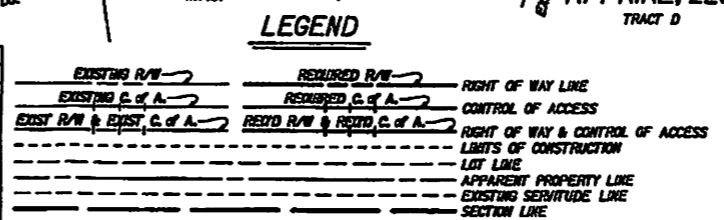
CURVE TABLE				
CURVE	RADIUS	ARC	CHORD	CHORD BEARING
C1	378.50'	65.03'	64.93'	N45°39'57"W
C2	378.50'	65.00'	67.97'	N35°54'49"W
C3	378.50'	12.84'	12.84'	S42°00'00"E
C4	378.50'	12.50'	12.50'	S40°00'00"E

LINE TABLE		
LINE	BEARING	DISTANCE
L1	N35°19'16"W	5.00'
L2	S35°19'16"W	14.74'
L3	S55°13'43"W	15.94'
L4	N54°19'32"E	9.00'
L5	S55°13'43"W	0.57'
L6	S54°19'32"E	0.50'
L7	N35°19'16"W	12.48'
L8	N35°19'16"W	12.52'

Final Right of Way Map
 State Project No. 0001006 BONAVON BRIDGE, dgn



PARCEL	OWNER	ACQUISITION	AREA
3-1C1	LA BONNE AFFAIRE, LLC	C.O.B. 986 PG. 540 OCTOBER 20, 2000	0.003 Ac. 138.5 SF
3-4			0.020 Ac. 85.6 SF
3-3C2	JAMES F. GASQUET, JR., et ux	C.O.B. 1062 PG. 501 NOVEMBER 24, 2004	0.003 Ac. 122.5 SF
3-3C1		C.O.B. 857 PG. 658 SEPTEMBER 27, 1995	0.009 Ac. 3,880.7 SF
3-3		C.O.B. 867 PG. 524 SEPTEMBER 25, 1995	0.133 Ac. 5,807.9 SF
3-2C2	NEW ORLEANS & GULF COAST RAILWAY COMPANY	C.O.B. 948 PG. 797 MAY 6, 1999	0.089 Ac. 3,813.6 SF
3-2C1			0.044 Ac. 1,900.0 SF
3-1C1	TSP ENTERPRISES, LLC	C.O.B. 149 PG. 413 APRIL 14, 2007	0.001 Ac. 6.7 SF



PLAQUEMINES
 C66-02, 638-01
 N.004781

RIGHT OF WAY MAP
 STATE PROJECT NO. 0001006
 PLAQUEMINES BRIDGE
 ROUTE LA 28 & LA 3017

LA 28
 PLAQUEMINES BRIDGE
 ROUTE LA 28 & LA 3017

DATE: 8/20/2000
 TIME: 10:00 AM

SCALE: 1" = 100'

PROJECT NO. 0001006
 DRAWING NO. 10000

FILE NO. 0001006
 DRAWING NO. 10000

EXHIBIT P-3

08127
10/23/2020

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: 003935.7
 BASE STATIONS:
 DPT49 SHELL BEACH
 LAT: N28°52'05.8082"E
 LONG: W89°47'23.6383"W
 Y: 50034.63
 X: 300394.52
 DPT49 LOROLA UNIVERSITY
 LAT: N28°52'13.2179"E
 LONG: W89°47'07.6372"W
 Y: 50042.46
 X: 300563.65
 D19603 LAKEWOOD ELEMENTARY
 LAT: N28°54'40.2953"E
 LONG: W89°47'57.8336"W
 Y: 50065.83
 X: 300287.48

§ CURVE DATA La 23
 P.I. STA. 73+33.46
 Y = 50304.043
 X = 300980.0551
 Δ = 6°49'10.17"
 D = 22374.4'
 T = 141.80'
 L = 882.67'
 R = 2400.00'

**SOUTHEASTERN WEST OF MISSISSIPPI RIVER
 T14S - R24E
 SECTION 30**

CURVE TABLE

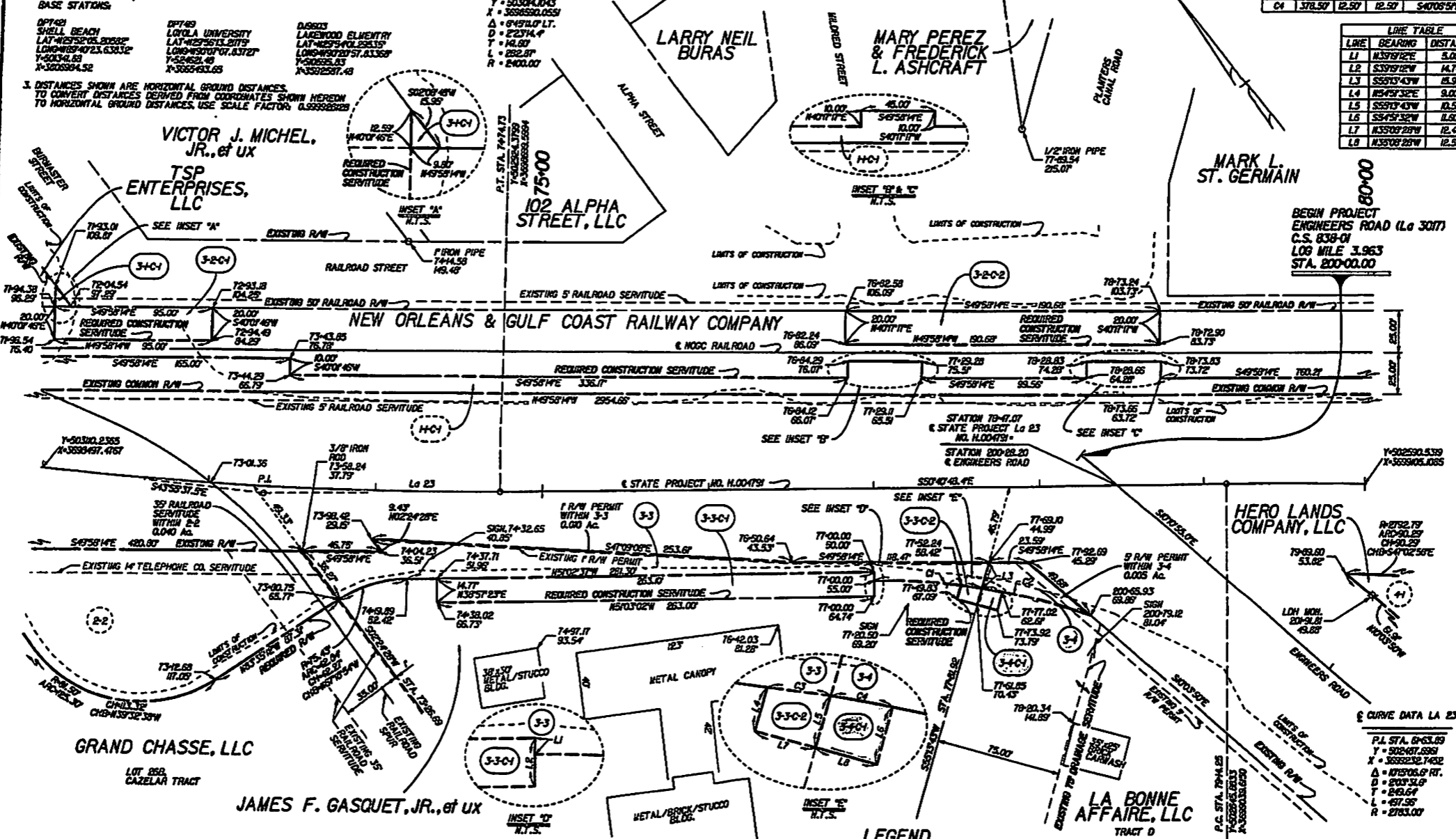
CURVE	RADIUS	ARC	CHORD	CHORD BEARING
C1	378.50	65.03	64.99	N49°58'57"W
C2	378.50	60.00	67.91	N35°54'49"W
C3	378.50	12.64	12.64	S42°00'00"E
C4	378.50	12.50	12.50	S40°05'56"E

LINE TABLE

LINE	BEARING	DISTANCE
L1	N39°12'21"E	5.00'
L2	S39°12'21"E	14.74'
L3	S55°13'47"W	15.94'
L4	N54°53'32"E	9.00'
L5	S59°13'47"W	10.52'
L6	S54°53'32"E	11.07'
L7	N35°08'28"W	12.43'
L8	N35°08'28"W	12.52'

SLANE STOCKSTILL
 DEPUTY CLERK

Final Right of Way Map
 T:\PROJECTS\817 Buvel - Belle Chasse Bridge\DRAWINGS\WORKING\100% ROW\ROW SET\02.dgn



PARCEL	OWNER	ACQUISITION	AREA
3-4C1	LA BONNE AFFAIRE, LLC	C.O.B. 966 PG. 540 OCTOBER 20,2000	0.003 Ac. 138.5 SF
3-4C2			0.020 Ac. 851.6 SF
3-3C1	JAMES F. GASQUET, JR., et ux	C.O.B. 1082 PG. 521 NOVEMBER 24,2004	0.003 Ac. 122.5 SF
3-3		C.O.B. 957 PG. 628 SEPTEMBER 27,1995	0.089 Ac. 3,880.7 SF
		C.O.B. 957 PG. 524 SEPTEMBER 25,1995	0.133 Ac. 5,807.9 SF
3-2C2	NEW ORLEANS & GULF COAST RAILWAY COMPANY	C.O.B. 948 PG. 797 MAY 6,1999	0.089 Ac. 3,813.6 SF
3-2C1			0.044 Ac. 1,900.0 SF
3-4C1	TSP ENTERPRISES, LLC	C.O.B. 148 PG. 413 APRIL 14,2007	0.004 Ac. 61.7 SF

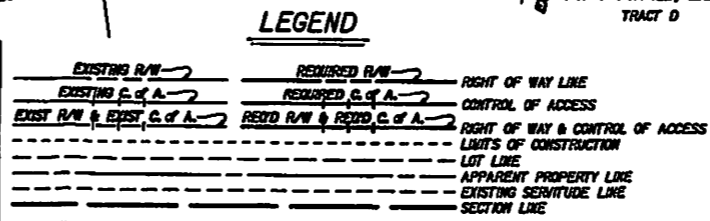


EXHIBIT P-3

RIGHT OF WAY MAP
 STATE OF LOUISIANA
 LA 23 BELLE CHASSE BRIDGE BUILDING
 FLAQUEMINES & JEFFERSON PARISH
 ROUTE LA 25 & LA 3017

DATE: 10/23/2020
 DRAWN BY: [Name]
 CHECKED BY: [Name]

PROJECT NO. 10000
 SHEET NO. 10000

09:27
 10/23/2020
 Final Right of Way Map
 T:\PROJECTS\817 Ruval - Belle Chasse Bridge Drawings\WORKING\1.001 ROW\ROW_81703.dgn

NOTES:
 1. ALL PIPES AND MONUMENTS SHOWN HEREON WERE FOUND.
 2. THE COORDINATES AND BEARINGS SHOWN HEREON ARE BASED ON LAUISIANA STATE PLANE COORDINATE SYSTEM SOUTH ZONE (NAD 83 (2011) EPOCH 2010.00) TO CONVERT FROM GRID BEARINGS TO TRUE BEARINGS USE: 007325.7"

BASE STATIONS:
 DPT483 SHELL BEACH
 LAT: 29°52'05.2000"
 LONG: 90°47'03.6383"
 Y=36634.68
 X=366384.52
 DPT489 LOYOLA UNIVERSITY
 LAT: 29°56'15.8175"
 LONG: 90°20'07.8327"
 Y=36651.48
 X=366483.65
 DIS603 LAKEWOOD ELEMENTARY
 LAT: 29°54'01.2533"
 LONG: 90°20'57.8338"
 Y=36652.83
 X=366257.48

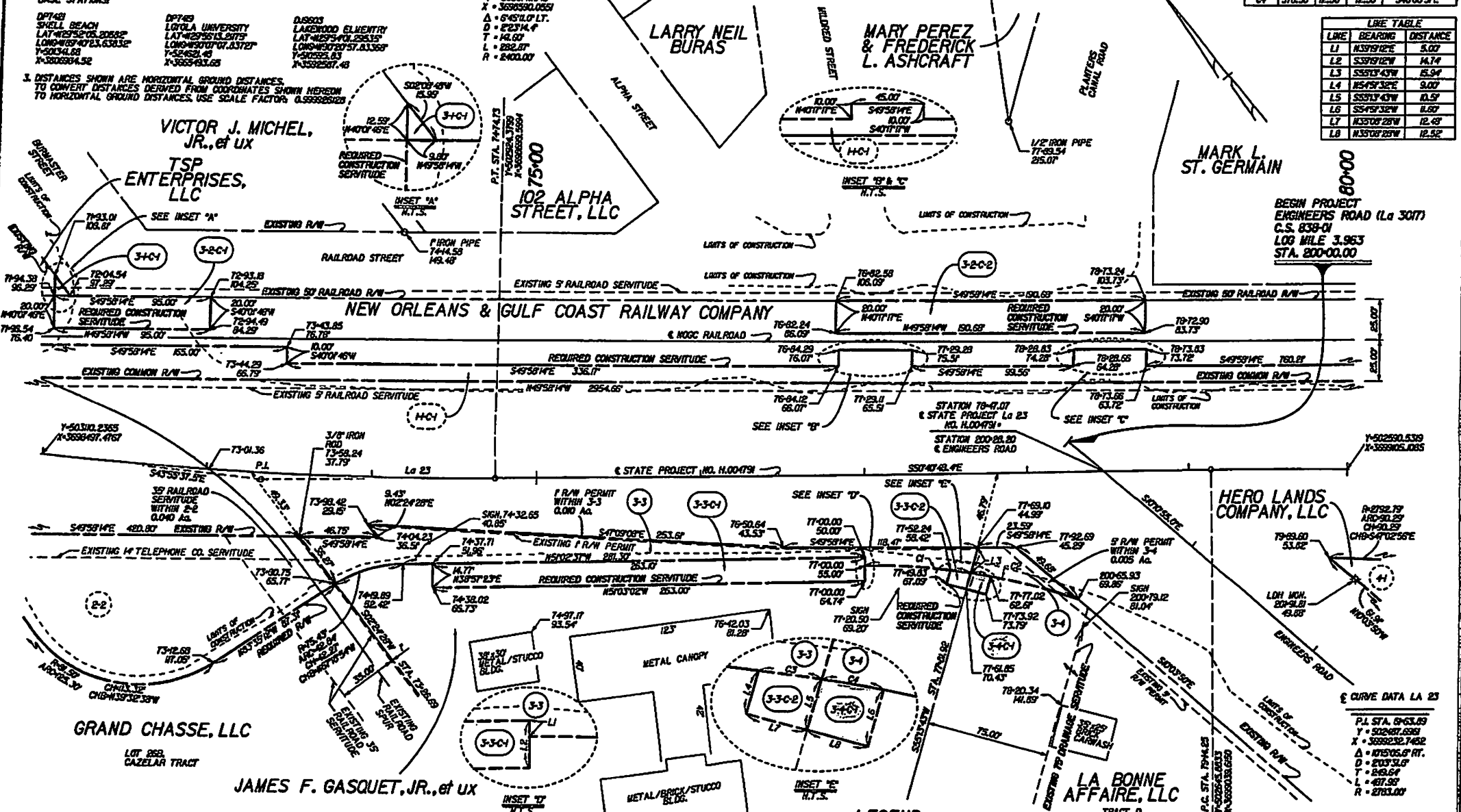
3. DISTANCES SHOWN ARE HORIZONTAL GROUND DISTANCES. TO CONVERT DISTANCES DERIVED FROM COORDINATES SHOWN HEREON TO HORIZONTAL GROUND DISTANCES, USE SCALE FACTOR: 0.999986028

SOUTHEASTERN WEST OF MISSISSIPPI RIVER
T14S - R24E
SECTION 30

§ CURVE DATA LA 23
 P.I. STA. 73+33.46
 Y + 50304.043
 X + 36390.0251
 Δ = 64°51'01.17"
 D = 22374.4'
 T = 14.00'
 L = 222.07'
 R = 2400.00'

CURVE TABLE			
CURVE	RADIUS	ARC CHORD	CHORD BEARING
C1	378.57	65.03	64.95°
C2	378.57	65.07	67.57°
C3	378.57	12.64	12.64°
C4	378.57	12.50	12.50°

LINE TABLE		
LINE	BEARING	DISTANCE
L1	N39°12'E	5.00
L2	S39°12'W	14.74
L3	S39°13'43"W	15.94
L4	N5°54'32"E	9.00
L5	S39°13'43"W	10.57
L6	S39°13'21"W	8.60
L7	N35°08'28"W	12.43
L8	N35°08'05"W	12.52



PARCEL	OWNER	ACQUISITION	AREA
3-4-C1	LA BONNE AFFAIRE, LLC	C.O.B. 966 PG. 540 OCTOBER 20, 2000	0.003 Ac. 152.5 SF
3-4			0.020 Ac. 851.6 SF
3-3-C2	JAMES F. GASQUET, JR., et ux	C.O.B. 1082 PG. 591 NOVEMBER 24, 2004	0.003 Ac. 122.5 SF
3-3-C1		C.O.B. 667 PG. 693 SEPTEMBER 27, 1995	0.069 Ac. 3,000.7 SF
3-3		C.O.B. 667 PG. 624 SEPTEMBER 25, 1995	0.133 Ac. 5,807.9 SF
3-2-C2	NEW ORLEANS & GULF COAST RAILWAY COMPANY	C.O.B. 948 PG. 797 MAY 6, 1999	0.068 Ac. 3,013.6 SF
3-2-C1			0.044 Ac. 1,900.0 SF
3-1-C1	TSP ENTERPRISES, LLC	C.O.B. 141 PG. 43 APRIL 4, 2007	0.001 Ac. 61.7 SF

LEGEND

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




S/LANE STOCKSTILL
 DEPUTY CLERK

EXHIBIT P-3
 SHEET NUMBER
 PLACEMENTS
 062-02, 838-01
 H.004731
 RIGHT OF WAY MAP
 STATE PROJECT NO. H.000791
 LA 24 BELLE CHASSE BRIDGE & TUNNEL, ORBI
 PLACEMENTS TO PARSELS 3-2 & 3-3
 ROUTE LA 23 & LA 3017
 GOTTSCHE, INC.
 8-20-2010

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. KNOTTS, 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

FILED

AUG 17 2021
s/ LANE STOCKSTILL

DEPUTY CLERK

EXHIBIT P-4

Parcel No. 3-4 and 3-4-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) 3-4 and 3-4-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>\$ 5,718.00</u>
VALUE OF IMPROVEMENTS	<u>\$0.00</u>
DAMAGES	<u>\$0.00</u>
ADDITIONAL COMPENSATION	<u>\$0.00</u>
TOTAL ESTIMATE OF COMPENSATION	<u>\$ 5,718.00</u>

Methodology Used:

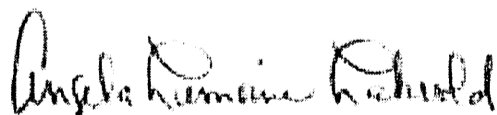
1. Sales Comparison Approach
 2. Cost Approach
 3. Income Capitalization Approach

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 \$ 5,718.00

Heather Corsetino 8/13/2021
HEATHER CORSETINO Date

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

FILED
AUG 17 2021
J. LANE STOCKSTILL
DEPUTY CLERK

EXHIBIT P-5A

Parcel No. 3-4 and 3-4-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) 3-4 and 3-4-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>\$3,265</u>
VALUE OF IMPROVEMENTS	_____
DAMAGES	_____
ADDITIONAL COMPENSATION	_____
TOTAL ESTIMATE OF COMPENSATION	<u>\$3,265</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 \$ 5,718.00

Heather Cosentino 8/13/2021
HEATHER CORSENTINO Date

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

LANE STOCKSTILL
DEPUTY CLERK

EXHIBIT P-5B

Plaquemines Parish Recording Page

Kim Turlich-Vaughan
Clerk of Court
PO Box 40
Belle Chasse, LA 70037
(504) 934-6610

RECEIVED

2021 AUG 27 PM 2:06

DOTD
OFFICE OF GENERAL COUNSEL

Received From :
ADVANCE DEPOSIT ACCOUNT

First VENDOR

LA BONNE AFFAIRE LLC

First VENDEE

LOUISIANA STATE TRANSPORTATION & DEVELOPMENT DEPT

Index Type : CONVEYANCE

File Number : 2021-00003557

Type of Document : ORDER

Book : 1441 Page : 692

Recording Pages : 6

Recorded Information

I hereby certify that the attached document was filed for registry and recorded in the Clerk of Court's office for Plaquemines Parish, Louisiana.

On (Recorded Date) : 08/24/2021

At (Recorded Time) : 9:06:56AM

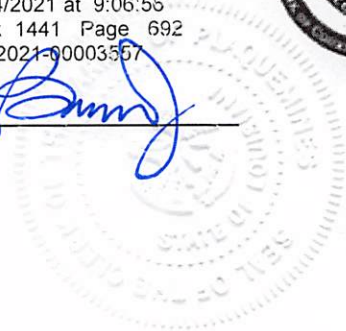


Doc ID - 005486510006

CLERK OF COURT
KIM TURLICH-VAUGHAN
Parish of Plaquemines
I certify that this is a true copy of the attached
document that was filed for registry and
Recorded 08/24/2021 at 9:06:56
Recorded in Book 1441 Page 692
File Number 2021-00003557



Frank J. Bandy
Deputy Clerk



Return To :



[Handwritten signature]

RECORDED
2021 AUG 27 PM 2:06
OFFICE OF CLERK OF COURT

TWENTY-FIFTH JUDICIAL DISTRICT COURT
PARISH OF PLAQUEMINES
STATE OF LOUISIANA

DOCKET NO.: 66926

DIV./SEC. NO.: B

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

LA BONNE AFFAIRE, L.L.C.

FILED

AUG 19 2021
Bucky N. Kabisinski
DEPUTY CLERK

FILED: _____

CLERK OF COURT

ORDER OF EXPROPRIATION

The petition, exhibits and premises considered:

IT IS HEREBY ORDERED that the STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION & DEVELOPMENT ("Petitioner"), deposit in the Registry of the Court, for the use and benefit of the person or persons entitled thereto, the sum of Five Thousand Seven Hundred Eighteen and 00/100 (\$5,718.00) Dollars.

IT IS HEREBY FURTHER ORDERED that the full ownership of the property described as Parcel No. 3-4, together with all improvements situated wholly or partially thereon, subject to the reservation in favor of LA BONNE AFFAIRE, L.L.C. ("Defendant"), 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, such reservation of mineral rights being imprescriptible as authorized by LA R.S. 31:149, 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. 3-4-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 (2) certain tracts or parcels of land, and all of the rights, ways, privileges, servitudes and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Plaquemines, State of Louisiana, and in Section 30, Township 14 South, Range 24 East, Southeastern West of Mississippi River Land District, identified as Parcel Nos. 3-4 & 3-4-C-1, on a white print of a plat of

survey, consisting of Sheet No. 3, 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 AND TEMPORARY
CONSTRUCTION SERVITUDE**

PARCEL NOS. 3-4 AND 3-4-C-1

PARCEL NO. 3-4:

From a point on the centerline of State Project No. H.004791, at Highway Survey Station 77+81.92, proceed S55°13'43"W a distance of 46.79 feet to the point of beginning; thence proceed S49°58'14"E a distance of 23.59 feet to a point and corner; thence proceed S10°03'50"E a distance of 49.68 feet to a point and corner; thence proceed along a curve to the left having a radius of 378.50 feet, whose length is 68.00 feet and whose chord length is 67.91 feet and bears N35°54'49"W to a point and corner; thence proceed N55°13'43"E a distance of 15.94 feet to the point of beginning. All of which comprises Parcel 3-4 as shown on Sheet 3 of the Right of Way Plans of State Project No. H.004791, and contains an area of approximately 851.6 square feet or 0.020 acres.

PARCEL NO. 3-4-C-1:

From a point on the centerline of State Project No. H.004791, at Highway Survey Station 77+81.92, proceed S55°13'43"W a distance of 62.72 feet to the point of beginning; thence proceed along a curve to the right having a radius of 378.50 feet, whose length is 12.50 feet and whose chord length is 12.50 feet, and bears S40°06'51"E to a point and corner; thence proceed S54°51'32"W a distance of 11.60 feet to a point and corner; thence proceed N35°08'28"W a distance of 12.52 feet to a point and corner; thence proceed N55°13'43"E a distance of 10.51 feet to the point of beginning. All of which comprises Parcel 3-4-C-1 as shown on Sheet 3 of the Right of Way Plans of State Project No. H.004791, and contains an area of approximately 138.5 square feet or 0.003 acres.

IT IS HEREBY FURTHER ORDERED that this matter be tried by jury upon Petitioner making a cash deposit in accordance with LA C.C.P. Article 1734.I. 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.

TWENTY-FIFTH JUDICIAL DISTRICT COURT
PARISH OF PLAQUEMINES
STATE OF LOUISIANA

DOCKET NO.: 166926

DIV./SEC. NO.: B

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

LA BONNE AFFAIRE, L.L.C.

FILED

AUG 19 2021
Becky N. Kalogoski
DEPUTY CLERK

FILED: _____

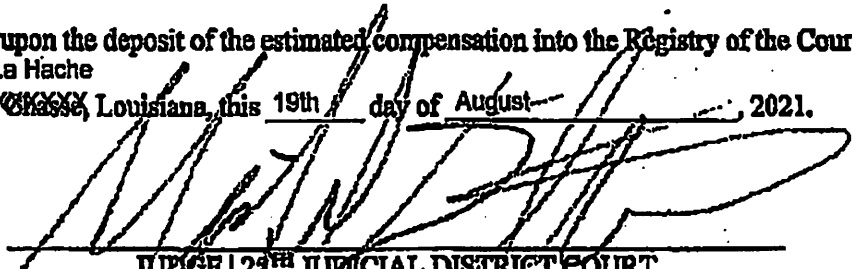
CLERK OF COURT

ORDER OF EXPROPRIATION (continued)

IT IS HEREBY FURTHER ORDERED that Defendant, LA BONNE AFFAIRE, L.L.C., vacate the above described property and surrender possession thereof unto Petitioner immediately upon the deposit of the estimated compensation into the Registry of the Court.

Pointe A La Hache

~~Pointe A La Hache~~, Louisiana, this 19th day of August, 2021.



JUDGE | 25TH JUDICIAL DISTRICT COURT
PARISH OF PLAQUEMINES | STATE OF LOUISIANA

A TRUE COPY

Becky N. Kalogoski
Deputy Clerk of Court
Parish of Plaquemines, La.

TWENTY-FIFTH JUDICIAL DISTRICT COURT
PARISH OF PLAQUEMINES
STATE OF LOUISIANA

DOCKET NO.: 66926

DIV./SEC. NO.: B

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

LA BONNE AFFAIRE, L.L.C.

FILED

AUG 19 2021

Becky N. Halajsek
DEPUTY CLERK

FILED: _____

CLERK OF COURT

RECEIPT

HONORABLE KIM TURLICH-VAUGHAN, CLERK OF COURT

TO

STATE OF LOUISIANA,
DEPARTMENT OF TRANSPORTATION & DEVELOPMENT

In the cause entitled "STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT VS. LA BONNE AFFAIRE, L.L.C.", No.
66926 of the docket of said Court, the State of Louisiana seeks the
expropriation of the full ownership of the property described below, subject to the reservation in
favor of the owner, LA BONNE AFFAIRE, L.L.C., 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 (2) certain tracts or parcels of land, and all of the rights, ways, privileges,
servitudes and advantages thereunto belonging or in anywise appertaining, situated
in the Parish of Plaquemines, State of Louisiana, and in Section 30, Township 14
South, Range 24 East, Southeastern West of Mississippi River Land District,
identified as Parcel Nos. 3-4 & 3-4-C-1, on a white print of a plat of survey,
consisting of Sheet No. 3, 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 AND TEMPORARY
CONSTRUCTION SERVITUDE**

PARCEL NOS. 3-4 AND 3-4-C-1

PARCEL NO. 3-4:

From a point on the centerline of State Project No. H.004791, at Highway Survey Station 77+81.92, proceed S55°13'43"W a distance of 46.79 feet to the point of beginning; thence proceed S49°58'14"E a distance of 23.59 feet to a point and corner; thence proceed S10°03'50"E a distance of 49.68 feet to a point and corner; thence proceed along a curve to the left having a radius of 378.50 feet, whose length is 68.00 feet and whose chord length is 67.91 feet and bears N35°54'49"W to a point and corner; thence proceed N55°13'43"E a distance of 15.94 feet to the point of beginning. All of which comprises Parcel 3-4 as shown on Sheet 3 of the Right of Way Plans of State Project No. H.004791, and contains an area of approximately 851.6 square feet or 0.020 acres.

PARCEL NO. 3-4-C-1:

From a point on the centerline of State Project No. H.004791, at Highway Survey Station 77+81.92, proceed S55°13'43"W a distance of 62.72 feet to the point of beginning; thence proceed along a curve to the right having a radius of 378.50 feet, whose length is 12.50 feet and whose chord length is 12.50 feet, and bears S40°06'51"E to a point and corner; thence proceed S54°51'32"W a distance of 11.60 feet to a point and corner; thence proceed N35°08'28"W a distance of 12.52 feet to a point and corner; thence proceed N55°13'43"E a distance of 10.51 feet to the point of beginning. All of which comprises Parcel 3-4-C-1 as shown on Sheet 3 of the Right of Way Plans of State Project No. H.004791, and contains an area of approximately 138.5 square feet or 0.003 acres.

In accordance with an order of the Court signed herein, the Department of Transportation & Development, on behalf of the State of Louisiana and of itself, has this day paid into the Registry of said Court the sum of Five Thousand Seven Hundred Eighteen and 00/100 (\$5,718.00) Dollars 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 the same has been placed in the Registry of said Court.

SIGNED at Belle Chasse, Louisiana, this 19th day of August, 2021.

Becky N. Kalogreski

DEPUTY CLERK OF COURT | 25TH JUDICIAL DISTRICT COURT

A TRUE COPY
Becky N. Kalogreski
Deputy Clerk of Court
Parish of Plaquemines, La.

TWENTY-FIFTH JUDICIAL DISTRICT COURT
PARISH OF PLAQUEMINES
STATE OF LOUISIANA

DOCKET NO.: 66926

DIV./SEC. NO.: B

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

LA BONNE AFFAIRE, L.L.C.

FILED

AUG 19 2021

Becky N. Kaliszewski
DEPUTY CLERK

FILED: _____

CLERK OF COURT

NOTICE

THE STATE OF LOUISIANA

TO: LA BONNE AFFAIRE, L.L.C.,
Through its Agent for Service of Process:
James F. Gasquet, Jr.
129 Chancellor Drive
Belle Chasse, LA 70037

Pursuant to an Order issued by a Judge of the Twenty-Fifth Judicial District Court of the State of Louisiana for the Parish of Plaquemines on the 19th day of August, 2021, in the above numbered and entitled cause on petition of the State of Louisiana, Department of Transportation & Development, a duly certified copy of which Petition and Order is hereunto annexed to be served on you herewith, Notice is hereby given of the expropriation of the property described in said Petition and of the deposit into the Registry of this Honorable Court of the sum of Five Thousand Seven Hundred Eighteen and 00/100 (\$5,718.00) Dollars on the 19th day of August, 2021, a certified copy of the Receipt for such deposit being annexed hereunto to be served on you herewith.

YOU ARE HEREBY SUMMONED to comply with the demand contained in that Petition or to deliver your answer to the Petition in the office of the Clerk of the Twenty-Fifth Judicial District Court in and for the Parish of Plaquemines, within one (1) year from the date you are notified by the Louisiana Department of Transportation & Development that it has finally accepted the construction of the highway project for which the property was expropriated, in accordance with LA R.S. 48:450.

If you desire to contest the validity of the taking on the ground that the property was not expropriated for a public use or on the ground that the Petition and exhibits do not satisfy the provisions contained in LA R.S. 48:442 through 444, you are required to file a Motion to Dismiss on that ground within twenty (20) days after the service hereof, in accordance with LA R.S. 48:447.

By order of an Honorable Judge of the Twenty-Fifth Judicial District Court for the Parish of Plaquemines, State of Louisiana.

Becky N. Kaliszewski

DEPUTY CLERK OF COURT
25TH JUDICIAL DISTRICT COURT

A TRUE COPY
Becky N. Kaliszewski
Deputy Clerk of Court
Parish of Plaquemines, La.

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY

RESEARCH REPORT

NO. 1000

1950

BY

ROBERT M. HARRIS

AND

WALTER H. RAY

DEPARTMENT OF CHEMISTRY

UNIVERSITY OF CHICAGO

ABSTRACT

INTRODUCTION

EXPERIMENTAL

DISCUSSION

REFERENCES

Robert M. Harris
Walter H. Ray