

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

PECOT-MARTEL-NORWOOD  
LAND COMPANY, L.L.C., ET AL

NUMBER 1 2 9 8 4 7 DIV. "E"

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

PARISH OF ST. MARY

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.

PECOT-MARTEL-NORWOOD LAND COMPANY, L.L.C., a Louisiana Limited Liability Company, with its principal place of business in the Parish of Orleans, City of New Orleans, State of Louisiana, MEREDITH W. BERRY, JR., WILFRED M. BERRY, EDWARD M. BLOCK, LOUISE H. LADEN, HERMINA CAMBELL MARTIN MARTEL, BESSIE MAY MARTEL DEES, FANNIE MERCEDES MARTEL DELLASSUS, FRANCELLE A. MARTEL, HELEN AGATHA MARTEL GONDER, EARL J. MARTEL, ELODIE MARTEL LADEN, CHRISTINE MARTEL PECOT, JUDY MARTEL VIEIRA, MARJORIE MARTEL WERNER, JOHN R. MARTEL, JOSEPH S. MARTEL, JR., VIRGINIA MARTEL BARRETT, WILLIAM H. MARTEL, MAYBELL PECOT LUNDIN, EVELYN PECOT, HAROLD B. PECOT, LAWRENCE PECOT, WILHEMINA PECOT, ELIZABETH ROSS WATTERS, CAROLINE F. BAKER TRUST NO. 1, MARY DICKEY BLOCK SMITH, ELAINE WOODLEY BLOCK, DONALD MARTEL BLOCK, JOSEPH LUCIEN BLOCK, II, RICHARD C. PECOT LAND COMPANY, MARGUERITE PECOT SINGLETON LAND COMPANY, GREGG E. BECNEL, SHARON BECNEL HURWICH KINSELLA, CHARLES RAY LADEN, JR., ELLIE W. CAFFERY, EARL H. WILLIS, HOWARD H. PECOT, TERRENCE HENRI PECOT, STEPHEN FREDERICK PECOT, RICHARD

CHARLES PECOT, MARCELLE LOUISE PECOT, PERCY L. MCCAY, KATHERINE BAKER SENTER, CAROLINE F. BAKER THORNE THORNE, JAMES C. SENTER, JR., and T. WHITMELL THORNE are the defendants herein.

2.

The Department of Transportation and Development proposes to construct in the Parish of St. Mary, a certain project designated as STATE PROJECT NO. 700-51-0110, H.004932.3, US 90 (FUTURE I-49) LA 318 INTERCHANGE DESIGN BUILD PROJECT, STATE ROUTE US 90 WB RAMPS & LA 318 (DU WB-7 & MOT-1A), which project is more fully described by a Certificate of Authorization to Expropriate, approved by the Secretary, Department of Transportation and Development on February 10, 2016, 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 her 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, required in full ownership, and described as follows, to-wit:

To the extent of an undivided 76.5625% interest three (3) 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 St. Mary, State of Louisiana, and in Sections 69 & 71, Township 13 South, Range 8 East, Southwestern Land District, identified as Parcel Nos. 13-2, 18-2 & 28-1, on a white print of a plat

of survey, consisting of Sheet Nos. 13, 18A, & 28A, made by Sam Holladay, III, Registered Land Surveyor, dated December 2, 2015, 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. 13-2:

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 712+69.65, proceed N36°03'43"E a distance of 99.66 feet to the point of beginning; thence proceed N76°38'25"E a distance of 170.82 feet to a point and corner; thence proceed S57°49'35"E a distance of 11.31 feet to a point and corner; thence proceed S36°03'43"W a distance of 187.44 feet to a point and corner; thence proceed S76°38'25"W a distance of 91.54 feet to a point and corner; thence proceed along a curve to the right having a radius of 1305.00 feet, whose length is 92.85 feet and whose chord length is 92.83 feet and bears S78°40'42"W to a point and corner; thence proceed N36°03'43"E a distance of 194.78 feet to the point of beginning. All of which comprises Parcel 13-2 as shown on Sheet 13 of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 24282.5 square feet or 0.557 of an acre.

PARCEL NO. 18-2:

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 841+80.55, proceed N36°03'43"E a distance of 138.83 feet to the point of beginning; thence proceed S60°11'56"E a distance of 123.13 feet to a point and corner; thence proceed S36°03'43"W a distance of 153.01 feet to a point and corner; thence proceed along a curve to the left having a radius of 1935.00 feet, whose length is 66.36 feet and whose chord length is 66.35 feet and bears N85°18'45"W to a point and corner; thence proceed N86°17'41"W a distance of 77.83 feet to a point and corner; thence proceed N36°03'43"E a distance of 215.78 feet to the point of beginning. All of which comprises Parcel 18-2 as shown on Sheet 18A of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 22511.8 square feet or 0.517 of an acre.

PARCEL NO. 28-1:

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 511+01.01, proceed N36°03'43"E a distance of 73.26 feet to the point of beginning; thence proceed S36°46'13"E a distance of 110.25 feet to a point and corner; thence proceed along a curve to the left having a radius of 2820.00 feet, whose length is 18.70 feet and whose chord length is 18.70 feet and bears S36°57'36"E to a point and corner; thence proceed S36°03'43"W a distance of 256.66 feet to a point and corner; thence proceed N60°11'56"W a distance of 123.96 feet to a point and corner; thence

proceed N36°03'43"E a distance of 308.18 feet to the point of beginning. All of which comprises Parcel 28-1 as shown on Sheet 28 of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 34796.9 square feet or 0.799 of an acre.

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 defendants.

8.

There are no buildings or 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 described property, subject to the mineral reservation set forth below, 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 above described property, subject to the mineral reservation set forth below.

12.

The expropriation of the full ownership of the property described above shall be made subject

to the reservation in favor of the owners 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 defendants are entitled, being the compensation for the full ownership of the above described property, subject to the mineral reservation set forth herein, has been estimated to be the sum of Fifty Three Thousand Four Hundred Sixty Five and 88/100 Dollars (\$53,465.88), which is 76.5625% of the total value of the property, as shown by the written 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 described property, subject to the mineral reservation set forth herein, 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.

Petitioner believes that MEREDITH W. BERRY, JR., WILFRED M. BERRY, EDWARD M. BLOCK, LOUISE H. LADEN, HERMINA CAMBELL MARTIN MARTEL, BESSIE MAY MARTEL DEES, FANNIE MERCEDES MARTEL DELLASSUS, FRANCELLE A. MARTEL, HELEN AGATHA MARTEL GONDER, EARL J. MARTEL, ELODIE MARTEL LADEN, CHRISTINE MARTEL PECOT, JUDY MARTEL VIEIRA, MARJORIE MARTEL WERNER, JOHN R. MARTEL, JOSEPH S. MARTEL, JR., VIRGINIA MARTEL BARRETT, WILLIAM H. MARTEL, MAYBELL PECOT LUNDIN, EVELYN PECOT, HAROLD B. PECOT, LAWRENCE PECOT, WILHEMINA PECOT, ELIZABETH ROSS WATTERS, CAROLINE F. BAKER TRUST NO. 1, MARY DICKEY BLOCK SMITH, ELAINE WOODLEY BLOCK, DONALD MARTEL BLOCK, JOSEPH LUCIEN BLOCK, II, RICHARD C. PECOT LAND COMPANY, MARGUERITE PECOT SINGLETON LAND COMPANY, GREGG E. BECNEL, SHARON BECNEL HURWICH KINSELLA, CHARLES RAY LADEN, JR., ELLIE W. CAFFERY, EARL H. WILLIS, HOWARD H. PECOT, TERRENCE HENRI PECOT, STEPHEN FREDERICK PECOT, RICHARD CHARLES PECOT, MARCELLE LOUISE PECOT, PERCY L. MCCAY, KATHERINE BAKER SENTER, CAROLINE F. BAKER THORNE THORNE, JAMES C. SENTE, JR. and T. WHITMELL THORNE are absentee defendants of the State of Louisiana, and to the best of petitioner's information and belief, have left no agent for service of process within the State of Louisiana, and consequently, it is necessary that an Attorney at Law be appointed to represent MEREDITH W. BERRY, JR., WILFRED M. BERRY, EDWARD M. BLOCK, LOUISE H. LADEN, HERMINA CAMBELL MARTIN MARTEL, BESSIE MAY MARTEL DEES, FANNIE MERCEDES MARTEL DELLASSUS, FRANCELLE A. MARTEL, HELEN AGATHA MARTEL GONDER, EARL J. MARTEL, ELODIE MARTEL LADEN, CHRISTINE MARTEL PECOT, JUDY MARTEL VIEIRA, MARJORIE MARTEL WERNER, JOHN R. MARTEL, JOSEPH S. MARTEL, JR., VIRGINIA MARTEL BARRETT, WILLIAM H. MARTEL, MAYBELL PECOT LUNDIN, EVELYN PECOT, HAROLD B. PECOT, LAWRENCE PECOT, WILHEMINA PECOT, ELIZABETH ROSS WATTERS, CAROLINE F. BAKER TRUST NO. 1,

MARY DICKEY BLOCK SMITH, ELAINE WOODLEY BLOCK, DONALD MARTEL BLOCK, JOSEPH LUCIEN BLOCK, II, RICHARD C. PECOT LAND COMPANY, MARGUERITE PECOT SINGLETON LAND COMPANY, GREGG E. BECNEL, SHARON BECNEL HURWICH KINSELLA, CHARLES RAY LADEN, JR., ELLIE W. CAFFERY, EARL H. WILLIS, HOWARD H. PECOT, TERRENCE HENRI PECOT, STEPHEN FREDERICK PECOT, RICHARD CHARLES PECOT, MARCELLE LOUISE PECOT, PERCY L. MCCAY, KATHERINE BAKER SENTER, CAROLINE F. BAKER THORNE THORNE, JAMES C. SENTE, JR. and T. WHITMELL THORNE, whom service of process may be made and against whom these proceedings may be carried on contradictorily.

WHEREFORE, petitioner prays that an order issue herein directing petitioner to deposit in the registry of this court the sum of Fifty Three Thousand Four Hundred Sixty Five and 88/100 Dollars (\$53,465.88) for payment to the person or persons entitled thereto, and declaring that the full ownership of the above described property, and subject to the mineral reservation set forth herein, has been taken for highway purposes as of the time such deposit is made.

Petitioner further prays that said order direct the defendants 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 PECOT-MARTEL-NORWOOD LAND COMPANY, L.L.C., MEREDITH W. BERRY, JR., WILFRED M. BERRY, EDWARD M. BLOCK, LOUISE H. LADEN, HERMINA CABELL MARTIN MARTEL, BESSIE MAY MARTEL DEES, FANNIE MERCEDES MARTEL DELLASSUS, FRANCELLE A. MARTEL, HELEN AGATHA MARTEL GONDER, EARL J. MARTEL, ELODIE MARTEL LADEN, CHRISTINE MARTEL PECOT, JUDY MARTEL VIEIRA, MARJORIE MARTEL WERNER, JOHN R. MARTEL, JOSEPH S. MARTEL, JR., VIRGINIA MARTEL BARRETT, WILLIAM H. MARTEL, MAYBELL PECOT LUNDIN, EVELYN PECOT, HAROLD B. PECOT, LAWRENCE PECOT, WILHEMINA PECOT, ELIZABETH ROSS

WATTERS, CAROLINE F. BAKER TRUST NO. 1, MARY DICKEY BLOCK SMITH, ELAINE WOODLEY BLOCK, DONALD MARTEL BLOCK, JOSEPH LUCIEN BLOCK, II, RICHARD C. PECOT LAND COMPANY, MARGUERITE PECOT SINGLETON LAND COMPANY, GREGG E. BECNEL, SHARON BECNEL HURWICH KINSELLA, CHARLES RAY LADEN, JR., ELLIE W. CAFFERY, EARL H. WILLIS, HOWARD H. PECOT, TERRENCE HENRI PECOT, STEPHEN FREDERICK PECOT, RICHARD CHARLES PECOT, MARCELLE LOUISE PECOT, PERCY L. MCCAY, KATHERINE BAKER SENTER, CAROLINE F. BAKER THORNE THORNE, JAMES C. SENTER, JR., and T. WHITMELL THORNE, 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.

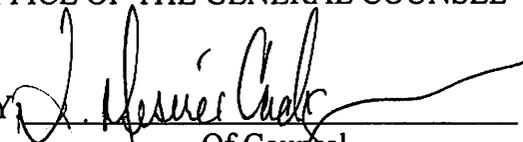
Petitioner further prays that an Attorney at Law be appointed to represent MEREDITH W. BERRY, JR., WILFRED M. BERRY, EDWARD M. BLOCK, LOUISE H. LADEN, HERMINA CAMBELL MARTIN MARTEL, BESSIE MAY MARTEL DEES, FANNIE MERCEDES MARTEL DELLASSUS, FRANCELLE A. MARTEL, HELEN AGATHA MARTEL GONDER, EARL J. MARTEL, ELODIE MARTEL LADEN, CHRISTINE MARTEL PECOT, JUDY MARTEL VIEIRA, MARJORIE MARTEL WERNER, JOHN R. MARTEL, JOSEPH S. MARTEL, JR., VIRGINIA MARTEL BARRETT, WILLIAM H. MARTEL, MAYBELL PECOT LUNDIN, EVELYN PECOT, HAROLD B. PECOT, LAWRENCE PECOT, WILHEMINA PECOT, ELIZABETH ROSS WATTERS, CAROLINE F. BAKER TRUST NO. 1, MARY DICKEY BLOCK SMITH, ELAINE WOODLEY BLOCK, DONALD MARTEL BLOCK, JOSEPH LUCIEN BLOCK, II, RICHARD C. PECOT LAND COMPANY, MARGUERITE PECOT SINGLETON LAND COMPANY, GREGG E. BECNEL, SHARON BECNEL HURWICH KINSELLA, CHARLES RAY LADEN, JR., ELLIE W. CAFFERY, EARL H. WILLIS, HOWARD H. PECOT, TERRENCE HENRI PECOT, STEPHEN FREDERICK PECOT, RICHARD CHARLES PECOT, MARCELLE LOUISE PECOT, PERCY L. MCCAY, KATHERINE BAKER SENTER, CAROLINE F. BAKER THORNE THORNE, JAMES C. SENTER, JR., and T. WHITMELL THORNE, absentee defendants, as authorized by LA C.C.P. Article 5091, as amended.

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 the Louisiana Code of Civil Procedure.

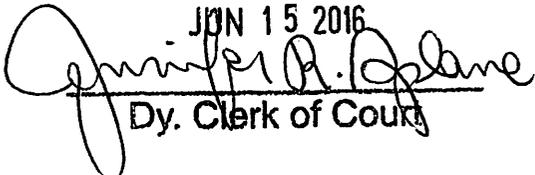
Petitioner further prays that upon a final hearing herein there be judgment herein in favor of petitioner fixing the amount of just compensation at a sum not to exceed FIFTY THREE THOUSAND FOUR HUNDRED SIXTY FIVE AND 88/100 DOLLARS (\$53,465.88).

LOUISIANA DEPARTMENT OF  
TRANSPORTATION & DEVELOPMENT  
OFFICE OF THE GENERAL COUNSEL

BY:   
Of Counsel

Archana Desiree Cadge  
Bar Roll No. 29548  
1201 Capitol Access Road  
Baton Rouge, LA 70802  
P. O. Box 94245  
Baton Rouge, LA 70804-9245  
PH: (225) 242-4659  
FAX: (225) 242-4690  
Attorney for State, DOTD

RECEIVED AND FILED

JUN 15 2016  
  
Dy. Clerk of Court

**PLEASE SERVE:**

PECOT-MARTEL-NORWOOD LAND COMPANY, LLC

Through agent for service of process:

Colvin G. Norwood, Jr.  
5421 St. Charles Ave., Unit 5A  
New Orleans, LA 70115

**Through Court-Appointed Attorney:**

MEREDITH W. BERRY, JR.  
(Last Known Address Unknown)

WILFRED M. BERRY  
(Last Known Address Unknown)

EDWARD M. BLOCK  
(Last Known Address Unknown)

LOUISE H. LADEN  
(Last Known Address Unknown)

HERMINA CABELL MARTIN MARTEL  
(Last Known Address Unknown)

BESSIE MAY MARTEL DEES  
(Last Known Address Unknown)

FANNIE MERCEDES MARTEL DELLESSUS  
(Last Known Address Unknown)

FRANCELLE A. MARTEL  
(Last Known Address Unknown)

HELEN AGATHA MARTEL GONDER  
(Last Known Address Unknown)

EARL J. MARTEL  
(Last Known Address Unknown)

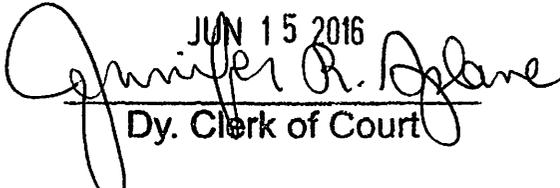
ELODIE MARTEL LADEN  
(Last Known Address Unknown)

CHRISTINE MARTEL PECOT  
(Last Known Address Unknown)

JUDY MARTEL VIEIRA  
(Last Known Address Unknown)

MARJORIE MARTEL WERNER  
(Last Known Address Unknown)

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JUN 15 2016  
  
Dy. Clerk of Court

JOHN R. MARTEL  
(Last Known Address Unknown)

JOSEPH S. MARTEL, JR.  
(Last Known Address Unknown)

VIRGINIA MARTEL BARRETT  
(Last Known Address Unknown)

WILLIAM H. MARTEL  
(Last Known Address Unknown)

MAYBELL PECOT LUNDIN  
(Last Known Address Unknown)

EVELYN PECOT  
(Last Known Address Unknown)

HAROLD B. PECOT  
(Last Known Address Unknown)

LAWRENCE PECOT  
(Last Known Address Unknown)

WILHEMINA PECOT  
(Last Known Address Unknown)

ELIZABETH ROSS WATTERS  
(Last Known Address Unknown)

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JOSEPH LUCIEN BLOCK, II  
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RICHARD C. PECOT LAND COMPANY  
(Last Known Address Unknown)

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(Last Known Address Unknown)

GREGG E. BECNEL  
(Last Known Address Unknown)

SHARON BECNEL HURWICH KINSELLA  
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RICHARD CHARLES PECOT  
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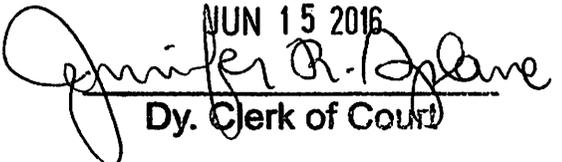
KATHERINE BAKER SENTER  
(Last Known Address Unknown)

CAROLINE F. BAKER THORNE THORNE  
(Last Known Address Unknown)

JAMES C. SENTER, JR.  
(Last Known Address Unknown)

T. WHITMELL THORNE  
(Last Known Address Unknown)

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Dy. Clerk of Court

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

PECOT-MARTEL-NORWOOD  
LAND COMPANY, L.L.C., ET AL

NUMBER 129847 DIV. "E"  
16<sup>TH</sup> JUDICIAL DISTRICT COURT

PARISH OF ST. MARY

STATE OF LOUISIANA

ORDER

The foregoing considered:

IT IS ORDERED that Michael Hoise, Attorney at Law, whose address is 513 Brashear Avenue Morgan City, LA 70380 and whose telephone number is 985-385-1689, be and is hereby appointed to represent MEREDITH W. BERRY, JR., WILFRED M. BERRY, EDWARD M. BLOCK, LOUISE H. LADEN, HERMINA CAMBELL MARTIN MARTEL, BESSIE MAY MARTEL DEES, FANNIE MERCEDES MARTEL DELLASSUS, FRANCELLE A. MARTEL, HELEN AGATHA MARTEL GONDER, EARL J. MARTEL, ELODIE MARTEL LADEN, CHRISTINE MARTEL PECOT, JUDY MARTEL VIEIRA, MARJORIE MARTEL WERNER, JOHN R. MARTEL, JOSEPH S. MARTEL, JR., VIRGINIA MARTEL BARRETT, WILLIAM H. MARTEL, MAYBELL PECOT LUNDIN, EVELYN PECOT, HAROLD B. PECOT, LAWRENCE PECOT, WILHEMINA PECOT, ELIZABETH ROSS WATTERS, CAROLINE F. BAKER TRUST NO. 1, MARY DICKEY BLOCK SMITH, ELAINE WOODLEY BLOCK, DONALD MARTEL BLOCK, JOSEPH LUCIEN BLOCK, II, RICHARD C. PECOT LAND COMPANY, MARGUERITE PECOT SINGLETON LAND COMPANY, GREGG E. BECNEL, SHARON BECNEL HURWICH KINSELLA, CHARLES RAY LADEN, JR., ELLIE W. CAFFERY, EARL H. WILLIS, HOWARD H. PECOT, TERRENCE HENRI PECOT, STEPHEN FREDERICK PECOT, RICHARD CHARLES PECOT, MARCELLE LOUISE PECOT, PERCY L. MCCAY, KATHERINE BAKER SENTER, CAROLINE F. BAKER THORNE THORNE, JAMES C. SENTE, JR. and T. WHITMELL THORNE as authorized in LA C.C.P. Article 5091, as amended.

Franklin, Louisiana, the 15 day of June, 2016.



JUDGE, SIXTEENTH JUDICIAL DISTRICT COURT

CLERK'S OFFICE, FRANKLIN, LA

RECEIVED AND FILED

JUN 22 2016

A true copy of the original

Attest

Jennifer R. Dplane  
Dy. Clerk of Court

JUN 15 2016

Jennifer R. Dplane  
Dy. Clerk of Court

February 10, 2016

**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(S). H.004932  
STATE PROJECT NO(S). 700-51-0110  
US 90 (FUTURE I-49) LA 318 INTERCHANGE  
DESIGN-BUILD PROJECT  
STATE ROUTE US 90 WB RAMPS &  
LA 318 (DU WB-7 & MOT-1A)  
PARISH OF ST. MARY

State Project Number H.004932 / 700-51-0110 provides for asphaltic concrete pavement, base course, LG-54 girder span bridge, cold plane & overlay, drainage structures, signing, striping and related work, on US 90 (future I-49) LA 318 Interchange in St Mary Parish, as follows:

Beginning US 90 at approximate Highway Survey Station 100+83.72, then proceed in a southeasterly direction to end at approximate Highway Survey Station 201+71.85.

Beginning LA 318 at approximate Highway Survey Station 310+48.48, then proceed in a northeasterly direction to end at approximate Highway Survey Station 352+00.00. There is a Bridge Site between the following Highway Survey Stations: approximate Highway Survey Station 157+00.00 to approximate Highway Survey Station 175+87.00 (WB) and approximate Highway Survey Station 156+90.00 to 175+77.00 (EB).

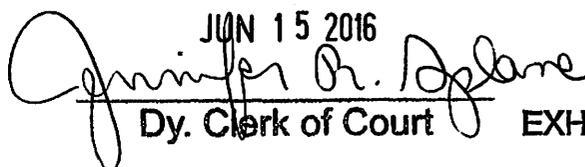
The total roadway length is approximately 1.786 miles, and the total bridge length is approximately 0.357 miles for an overall project length of approximately 2.143 miles.

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.

**RECEIVED AND FILED**

- 1 -

JUN 15 2016  
  
Dy. Clerk of Court EXHIBIT P-1

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(s). H.004932 / 700-51-0110, US 90 (Future I-49) LA 318 Interchange Design-Build Project, State Route US 90 WB Ramps & LA 318 (DU WB-7 & Mot-1A), Parish of St. Mary.

Baton Rouge, Louisiana, this 10 day of February, 2016.



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

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.004932 (DESIGN-BUILD PROJECT), US 90 (FUTURE I-49) LA 318  
INTERCHANGE, DESIGN-BUILD PROJECT, ROUTE US 90 EB RAMPS & S. FRONTAGE  
RD., ST. MARY PARISH, in a manner sufficient in my judgment to provide presently and in the  
future for the public interest, safety and convenience.

  
\_\_\_\_\_  
JANICE P. WILLIAMS, P.E.  
DOTD CHIEF ENGINEER

5-31-16  
\_\_\_\_\_  
DATE

RECEIVED AND FILED

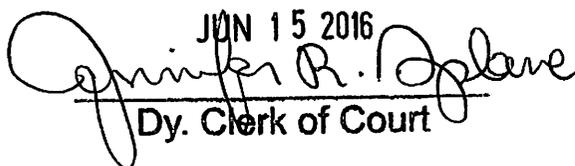
JUN 15 2016  
  
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Dy. Clerk of Court

EXHIBIT P-2



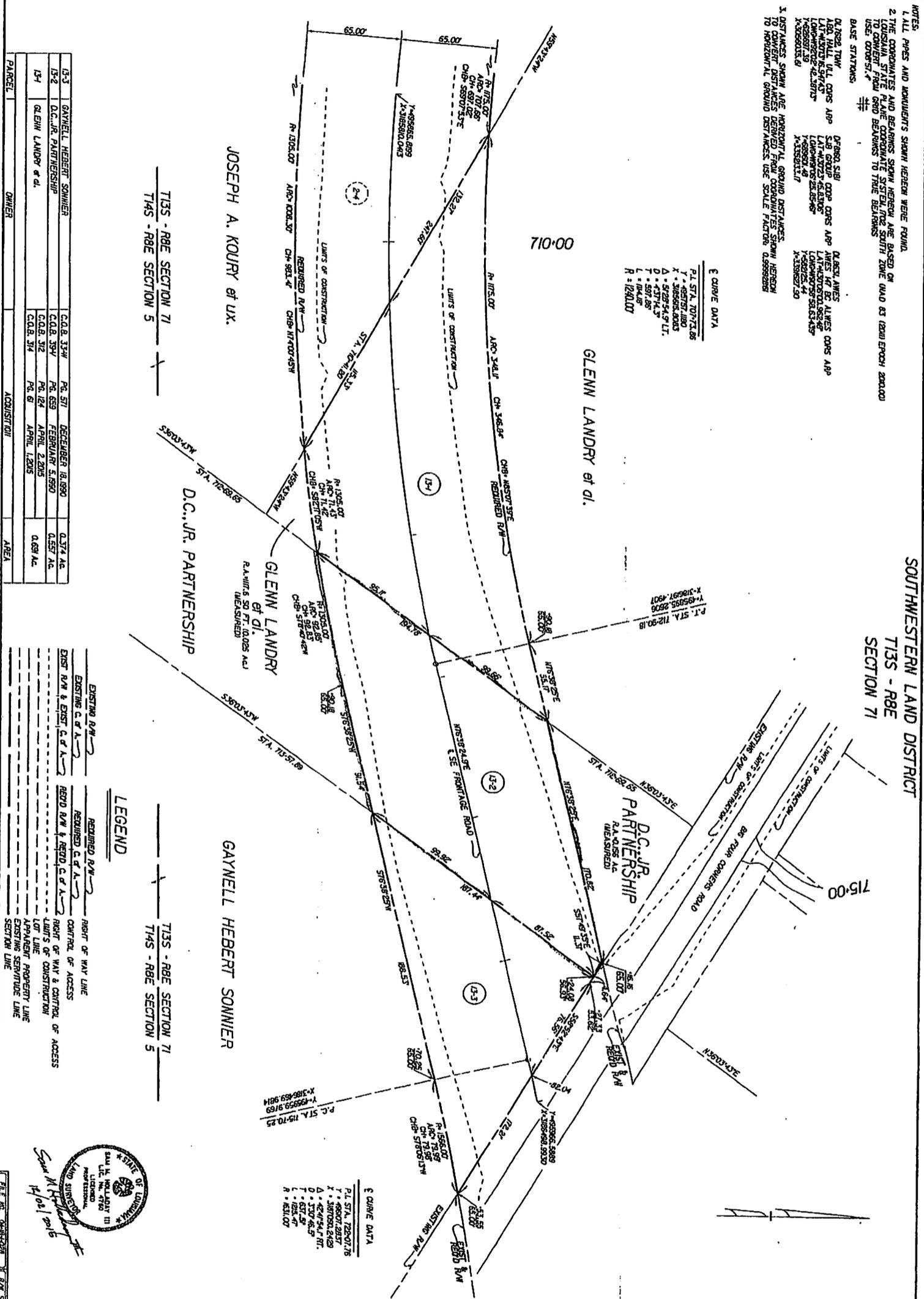
NOTES  
 1. ALL PAGES AND REQUIREMENTS SHOWN HEREON WERE FOUND.  
 2. THE COORDINATES AND BEARINGS SHOWN HEREON ARE BASED ON THE LOUISIANA STATE PLANE COORDINATE SYSTEM, 1922 SOUTH ZONE, QUAD 83 (2000 EPOCH 2000.00) USGS 0808514.  
 3. DISTANCES SHOWN ARE HORIZONTAL GROUND DISTANCES. TO CONVERT DISTANCES DERIVED FROM COORDINATES SHOWN HEREON TO HORIZONTAL GROUND DISTANCES, USE SCALE FACTOR 0.999998281.

BASE STATIONS:  
 D17292 TBM  
 LAT: 30°07'45.34"N  
 LONG: 90°57'42.38"W  
 X=335827.39  
 Y=459927.48  
 D17292 TBM  
 LAT: 30°07'45.34"N  
 LONG: 90°57'42.38"W  
 X=335827.39  
 Y=459927.48

OBJECT POINTS:  
 S18+000.00 CORNERS APP  
 LAT: 30°07'45.34"N  
 LONG: 90°57'42.38"W  
 X=335827.39  
 Y=459927.48

OBJECT POINTS:  
 S18+000.00 CORNERS APP  
 LAT: 30°07'45.34"N  
 LONG: 90°57'42.38"W  
 X=335827.39  
 Y=459927.48

§ CURVE DATA  
 P.L. STA. 707+21.86  
 Y = 459927.48  
 X = 335827.39  
 A = 57°04'37"  
 T = 597.85'  
 L = 104.41'  
 R = 1240.00'



PARCEL	OWNER	ACQUISITION	AREA
0-3	GAYNELL HERBERT SONNIER	DECEMBER 18, 1990	0.374 AC.
0-3-2	D.C. JR. PARTNERSHIP	FEBRUARY 5, 1990	0.557 AC.
0-3-1	GLENN LANDRY et al.	APRIL 2, 2005	0.691 AC.

T133 - RBE SECTION 71  
 T145 - RBE SECTION 5

SOUTHWESTERN LAND DISTRICT  
 T133 - RBE SECTION 71

T133 - RBE SECTION 71  
 T145 - RBE SECTION 5

LEGEND

- EXISTING R/W
- REQUIRED R/W
- 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



DATE	REVISION OR DESCRIPTION	Scale	COMPUTED	TP	PARISH	ST. MARY
			CHECKED	SMH	SECTION	424-05 & 239-31
			DETAILED	TAH	STATE PROJECT	H.004932
			CHECKED	SMH		
			DATE	12/02/2015		
			SCALE	1" = 30'		

RECEIVED AND FILED

EXHIBIT P-3

JUN 15 2016  
 Jennifer R. D'Almeida  
 Dy. Clerk of Court

Final Right-of-Way Map

V:\2018\active\201802570\03 disciplines\survey\right-of-way\ROW sheet18A.dgn

3/24/2016

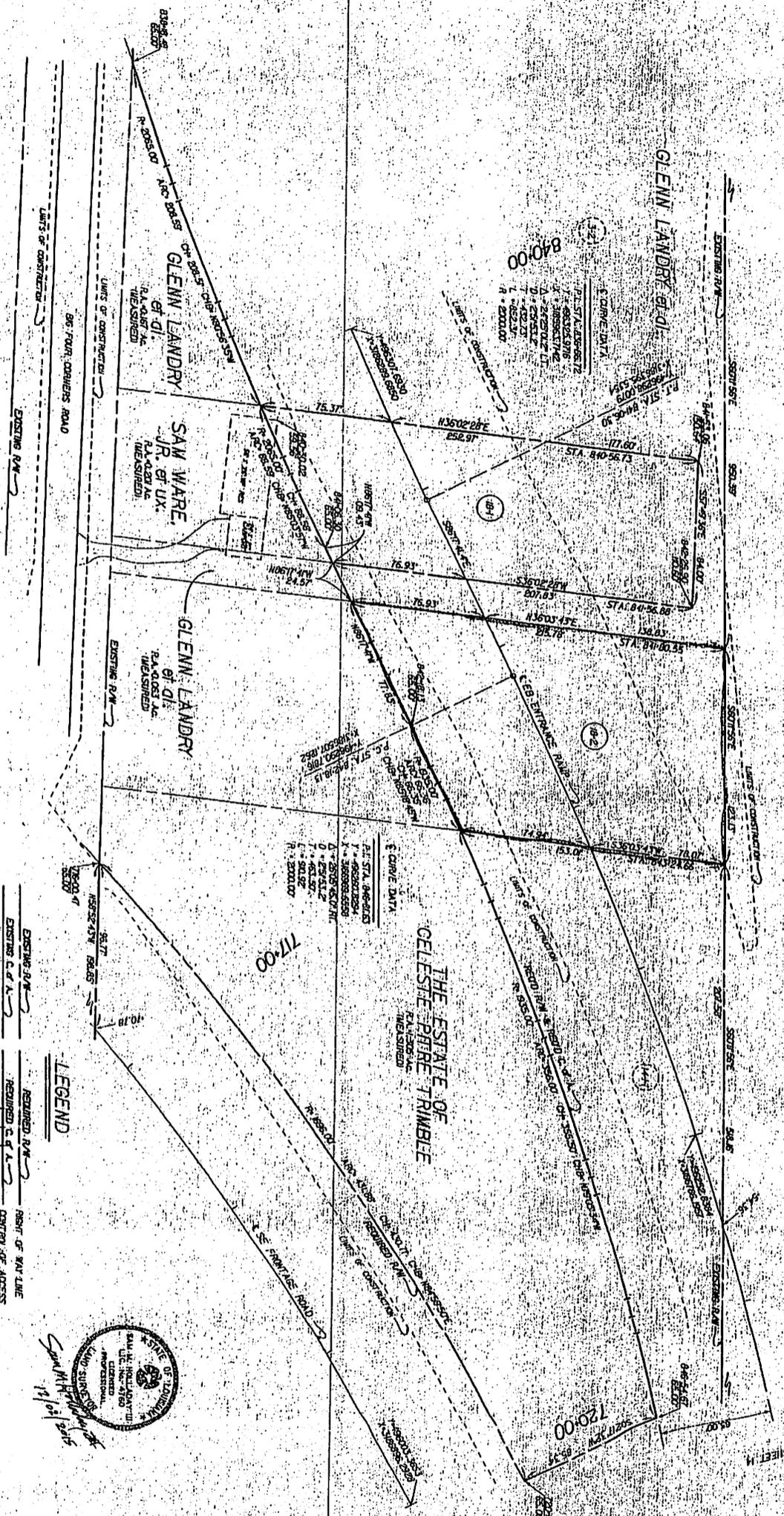
14:0

- NOTES:
1. ALL PIERES AND ADJUMENTS SHOWN HEREON WERE FOUND.
  2. THE COORDINATES AND BEARINGS SHOWN HEREON ARE BASED ON THE STATE PLANE SOUTH ZONE NAD 83 (2011 EPOCH) 200.00 MGS. 000953.37
  3. DISTANCES SHOWN ARE HORIZONTAL. GROUND DISTANCES TO CORNER DISTANCES DERIVED FROM COORDINATES SHOWN HEREON TO HORIZONTAL GROUND DISTANCES, USE SCALE FACTOR CLASSIFIED AS FOLLOWS:
- BASE STATIONS:
- DEBBEY TOWN  
 480 HALL WLL CORN APP  
 LAT: 43°21'16.94" N  
 LONG: 107°52'45.85" W  
 ELEVATION: 42.8737  
 ACCURACY: 1:100,000
- DEBBEY TOWN  
 SUB GROUP COOP CORN APP  
 LAT: 43°21'16.94" N  
 LONG: 107°52'45.85" W  
 ELEVATION: 42.8737  
 ACCURACY: 1:100,000
- DEBBEY TOWN  
 SUB GROUP COOP CORN APP  
 LAT: 43°21'16.94" N  
 LONG: 107°52'45.85" W  
 ELEVATION: 42.8737  
 ACCURACY: 1:100,000

SOUTHWESTERN LAND DISTRICT  
 T13S - R8E  
 SECTION 71

LA-US 90 (69 LANE)

SECTION-69  
 SECTION 71  
 845.00



PARCEL	OWNER	ACQUISITION	AREA
18-1	D.C. JR. PARTNERSHIP	NUMEROUS ACQUISITIONS	0.517 AC.
18-2	SAM WARE JR. ET UX.	RC SBO MARCH 1988	0.444 AC.

LEGEND

	REQUIRED R/W	RIGHT OF WAY LINE
	EXISTING C.O.A.	CONTROL OF ACCESS
	EXIST R/W & EXIST C.O.A.	RIGHT OF WAY & CONTROL OF ACCESS
	LIMITS OF CONSTRUCTION	LIMITS OF CONSTRUCTION
	EXISTING R/W & EXIST C.O.A.	EXISTING R/W & EXIST C.O.A.
	LIMITS OF CONSTRUCTION	LIMITS OF CONSTRUCTION
	EXISTING R/W & EXIST C.O.A.	EXISTING R/W & EXIST C.O.A.

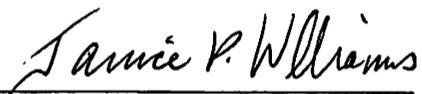


DATE: 3/24/2016	REVISED PARCEL: 18-1	PROJECT: STATE PROJECT NOV 1504832 INTERCHANGE US 90 & LA 210 ST. MARY PARISH LA - US 90 @ US 316		<table border="1"> <tr> <td>ENGINEER</td> <td>TIP</td> <td>PARISH</td> <td>ST. MARY</td> </tr> <tr> <td>DRAWN</td> <td>TAI</td> <td>CONTROL SECTION</td> <td>424-05 &amp; 239-31</td> </tr> <tr> <td>CHECKED</td> <td>SGD</td> <td>DATE</td> <td>2/02/2015</td> </tr> <tr> <td>DATE</td> <td>3/30/15</td> <td>SCALE</td> <td>AS SHOWN</td> </tr> </table>	ENGINEER	TIP	PARISH	ST. MARY	DRAWN	TAI	CONTROL SECTION	424-05 & 239-31	CHECKED	SGD	DATE	2/02/2015	DATE	3/30/15	SCALE	AS SHOWN
ENGINEER	TIP	PARISH	ST. MARY																	
DRAWN	TAI	CONTROL SECTION	424-05 & 239-31																	
CHECKED	SGD	DATE	2/02/2015																	
DATE	3/30/15	SCALE	AS SHOWN																	



CERTIFICATE  
ON  
LOCATION AND DESIGN

We hereby certify that the location and design of the improvements proposed within STATE PROJECT NO. H.004932 (DESIGN-BUILD PROJECT), US 90 (FUTURE I-49) LA 318 INTERCHANGE, DESIGN-BUILD PROJECT, ROUTE US 90 EB RAMPS & S. FRONTAGE RD., ST. MARY PARISH, are in accordance with the best modern practices adopted in the interest of the safety and convenience of the traveling public.

  
\_\_\_\_\_  
JANICE P. WILLIAMS, P.E.  
DOTD CHIEF ENGINEER

5-31-16  
\_\_\_\_\_  
DATE

  
\_\_\_\_\_  
SIMONE A. ARDOIN, P.E.  
ROAD DESIGN ENGINEER

05/27/16  
\_\_\_\_\_  
DATE

  
\_\_\_\_\_  
PAUL FOSSIER, P.E.  
BRIDGE DESIGN ENGINEER

5/27/16  
\_\_\_\_\_  
DATE

RECEIVED AND FILED

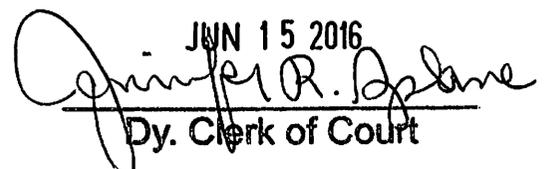
JUN 15 2016  
  
\_\_\_\_\_  
Dy. Clerk of Court

EXHIBIT P-4

Parcel No. 13-2 & 18-2  
S. P. No. H.004932

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) 13-2 & 18-2, 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 AND IMPROVEMENTS	\$ 28,461
DAMAGES	\$ 22,196
ADDITIONAL COMPENSATION	\$
TOTAL ESTIMATE OF COMPENSATION	\$ 50,657

Methodology Used:

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

\*Buckley W. Maurin\*  
\*P. O. Box 2557, Hammond, LA 70404\*

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

Hammond, Louisiana, November 16, 2015.



\*Buckley W. Maurin\*  
LOUISIANA CERTIFIED GENERAL REAL ESTATE APPRAISER  
CERTIFICATE NO. G1214

Total Approved Amount of Compensation to the full extent of the owner's loss \$ 38,784.25

Heather Corsetino 6/3/2016  
HEATHER CORSENTINO Date

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

76.5625%  
ownership

RECEIVED AND FILED

JUN 15 2016  
Jennifer R. Deane  
Dy. Clerk of Court

EXHIBIT P-5A

Parcel No. 28-1  
S. P. No. H.004932

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) 28-1, 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 AND IMPROVEMENTS	<u>\$ 19,176</u>
DAMAGES	<u>\$ 450</u>
ADDITIONAL COMPENSATION	<u>\$</u>
TOTAL ESTIMATE OF COMPENSATION	<u>\$ 19,626</u>

Methodology Used:

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

\*Buckley W. Maurin\*  
\*P. O. Box 2557, Hammond, LA 70404\*

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

Hammond, Louisiana, November 16, 2015.



\*Buckley W. Maurin\*  
LOUISIANA CERTIFIED GENERAL REAL ESTATE APPRAISER  
CERTIFICATE NO. G1214

Total Approved Amount of Compensation to the full extent of the owner's loss \$ 14,681.63

76.5625%

Heather Corsetino 6/3/2016  
HEATHER CORSENTINO Date

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

RECEIVED AND FILED

JUN 15 2016  
Amber R. Opbone  
Dy. Clerk of Court

EXHIBIT P-5B

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

PECOT-MARTEL-NORWOOD  
LAND COMPANY, L.L.C., ET AL

NUMBER 1 2 9 8 4 7 DIV. "E"

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

PARISH OF ST. MARY

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 Fifty Three Thousand Four Hundred Sixty Five and 88/100 Dollars (\$53,465.88).

AND IT IS HEREBY FURTHER ORDERED that the full ownership of the property described below, subject to the reservation in favor of the owners 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, 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:

To the extent of an undivided 76.5625% interest three (3) 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 St. Mary, State of Louisiana, and in Sections 69 & 71, Township 13 South, Range 8 East, Southwestern Land District, identified as Parcel Nos. 13-2, 18-2 & 28-1, on a white print of a plat of survey, consisting of Sheet Nos. 13, 18A, & 28A, made by Sam Holladay, III, Registered Land Surveyor, dated December 2, 2015, 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. 13-2:

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 712+69.65, proceed N36°03'43"E a distance

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

PECOT-MARTEL-NORWOOD  
LAND COMPANY, L.L.C., ET AL

NUMBER 1 2 9 8 4 7 DIV. "E"

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

PARISH OF ST. MARY

STATE OF LOUISIANA

**ORDER OF EXPROPRIATION (Continued Page 2)**

of 99.66 feet to the point of beginning; thence proceed N76°38'25"E a distance of 170.82 feet to a point and corner; thence proceed S57°49'35"E a distance of 11.31 feet to a point and corner; thence proceed S36°03'43"W a distance of 187.44 feet to a point and corner; thence proceed S76°38'25"W a distance of 91.54 feet to a point and corner; thence proceed along a curve to the right having a radius of 1305.00 feet, whose length is 92.85 feet and whose chord length is 92.83 feet and bears S78°40'42"W to a point and corner; thence proceed N36°03'43"E a distance of 194.78 feet to the point of beginning. All of which comprises Parcel 13-2 as shown on Sheet 13 of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 24282.5 square feet or 0.557 of an acre.

**PARCEL NO. 18-2:**

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 841+80.55, proceed N36°03'43"E a distance of 138.83 feet to the point of beginning; thence proceed S60°11'56"E a distance of 123.13 feet to a point and corner; thence proceed S36°03'43"W a distance of 153.01 feet to a point and corner; thence proceed along a curve to the left having a radius of 1935.00 feet, whose length is 66.36 feet and whose chord length is 66.35 feet and bears N85°18'45"W to a point and corner; thence proceed N86°17'41"W a distance of 77.83 feet to a point and corner; thence proceed N36°03'43"E a distance of 215.78 feet to the point of beginning. All of which comprises Parcel 18-2 as shown on Sheet 18A of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 22511.8 square feet or 0.517 of an acre.

**PARCEL NO. 28-1:**

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 511+01.01, proceed N36°03'43"E a distance of 73.26 feet to the point of beginning; thence proceed S36°46'13"E a distance of 110.25 feet to a point and corner; thence proceed along a curve to the left having a radius of 2820.00 feet, whose length is 18.70 feet and whose chord length is 18.70 feet and bears S36°57'36"E to a point and corner; thence proceed S36°03'43"W a distance of 256.66 feet to a point and corner; thence proceed

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

PECOT-MARTEL-NORWOOD  
LAND COMPANY, L.L.C., ET AL

NUMBER 1 2 9 8 4 7 DIV. "E"

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

PARISH OF ST. MARY

STATE OF LOUISIANA

**ORDER OF EXPROPRIATION (Continued Page 3)**

N60°11'56"W a distance of 123.96 feet to a point and corner; thence proceed N36°03'43"E a distance of 308.18 feet to the point of beginning. All of which comprises Parcel 28-1 as shown on Sheet 28 of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 34796.9 square feet or 0.799 of an acre.

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.

AND IT IS HEREBY FURTHER ORDERED that the defendants, PECOT-MARTEL-NORWOOD LAND COMPANY, L.L.C., MEREDITH W. BERRY, JR., WILFRED M. BERRY, EDWARD M. BLOCK, LOUISE H. LADEN, HERMINA CAMBELL MARTIN MARTEL, BESSIE MAY MARTEL DEES, FANNIE MERCEDES MARTEL DELLASSUS, FRANCELLE A. MARTEL, HELEN AGATHA MARTEL GONDER, EARL J. MARTEL, ELODIE MARTEL LADEN, CHRISTINE MARTEL PECOT, JUDY MARTEL VIEIRA, MARJORIE MARTEL WERNER, JOHN R. MARTEL, JOSEPH S. MARTEL, JR., VIRGINIA MARTEL BARRETT, WILLIAM H. MARTEL, MAYBELL PECOT LUNDIN, EVELYN PECOT, HAROLD B. PECOT, LAWRENCE PECOT, WILHEMINA PECOT, ELIZABETH ROSS WATTERS, CAROLINE F. BAKER TRUST NO. 1, MARY DICKEY BLOCK SMITH, ELAINE WOODLEY BLOCK, DONALD MARTEL BLOCK, JOSEPH LUCIEN BLOCK, II, RICHARD C. PECOT LAND

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

PECOT-MARTEL-NORWOOD  
LAND COMPANY, L.L.C., ET AL

NUMBER 129847 DIV. "E"

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

PARISH OF ST. MARY

STATE OF LOUISIANA

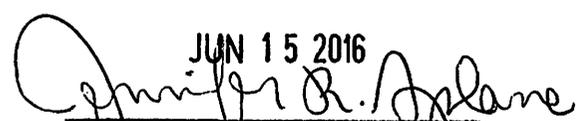
**ORDER OF EXPROPRIATION (Continued Page 4)**

COMPANY, MARGUERITE PECOT SINGLETON LAND COMPANY, GREGG E. BECNEL, SHARON BECNEL HURWICH KINSELLA, CHARLES RAY LADEN, JR., ELLIE W. CAFFERY, EARL H. WILLIS, HOWARD H. PECOT, TERRENCE HENRI PECOT, STEPHEN FREDERICK PECOT, RICHARD CHARLES PECOT, MARCELLE LOUISE PECOT, PERCY L. MCCAY, KATHERINE BAKER SENTER, CAROLINE F. BAKER THORNE THORNE, JAMES C. SENTER, JR., and T. WHITMELL THORNE, vacate the above described property and surrender possession thereof unto the plaintiff immediately.

Franklin, Louisiana, this 15 day of June, 2016.

  
\_\_\_\_\_  
JUDGE, SIXTEENTH JUDICIAL DISTRICT COURT

RECEIVED AND FILED

JUN 15 2016  
  
\_\_\_\_\_  
Dy. Clerk of Court

STATE OF LOUISIANA, DEPARTMENT  
OF TRANSPORTATION & DEVELOPMENT

VS.

PECOT-MARTEL-NORWOOD  
LAND COMPANY, L.L.C., ET AL

NUMBER 1 2 9 8 4 7 DIV. "E"

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

PARISH OF ST. MARY

STATE OF LOUISIANA

**RECEIPT**

**CLIFF DRESSEL, CLERK OF COURT**

**TO**

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

In the cause entitled "STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION  
AND DEVELOPMENT, VS. PECOT-MARTEL-NORWOOD LAND COMPANY, L.L.C., ET AL"

No. 1 2 9 8 4 7 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 owners 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:

To the extent of an undivided 76.5625% interest three (3) 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 St. Mary, State of  
Louisiana, and in Sections 69 & 71, Township 13 South, Range 8 East, Southwestern  
Land District, identified as Parcel Nos. 13-2, 18-2 & 28-1, on a white print of a plat  
of survey, consisting of Sheet Nos. 13, 18A, & 28A, made by Sam Holladay, III,  
Registered Land Surveyor, dated December 2, 2015, 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. 13-2:**

From a point on the centerline of State Project No. H.004932, at  
Highway Survey Station 712+69.65, proceed N36°03'43"E a distance  
of 99.66 feet to the point of beginning; thence proceed N76°38'25"E  
a distance of 170.82 feet to a point and corner; thence proceed

S57°49'35"E a distance of 11.31 feet to a point and corner; thence proceed S36°03'43"W a distance of 187.44 feet to a point and corner; thence proceed S76°38'25"W a distance of 91.54 feet to a point and corner; thence proceed along a curve to the right having a radius of 1305.00 feet, whose length is 92.85 feet and whose chord length is 92.83 feet and bears S78°40'42"W to a point and corner; thence proceed N36°03'43"E a distance of 194.78 feet to the point of beginning. All of which comprises Parcel 13-2 as shown on Sheet 13 of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 24282.5 square feet or 0.557 of an acre.

PARCEL NO. 18-2:

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 841+80.55, proceed N36°03'43"E a distance of 138.83 feet to the point of beginning; thence proceed S60°11'56"E a distance of 123.13 feet to a point and corner; thence proceed S36°03'43"W a distance of 153.01 feet to a point and corner; thence proceed along a curve to the left having a radius of 1935.00 feet, whose length is 66.36 feet and whose chord length is 66.35 feet and bears N85°18'45"W to a point and corner; thence proceed N86°17'41"W a distance of 77.83 feet to a point and corner; thence proceed N36°03'43"E a distance of 215.78 feet to the point of beginning. All of which comprises Parcel 18-2 as shown on Sheet 18A of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 22511.8 square feet or 0.517 of an acre.

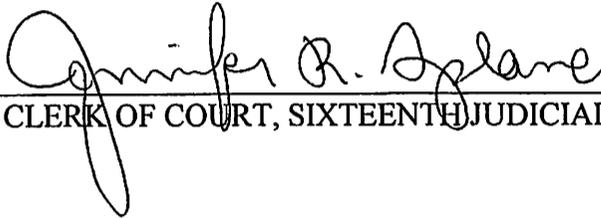
PARCEL NO. 28-1:

From a point on the centerline of State Project No. H.004932, at Highway Survey Station 511+01.01, proceed N36°03'43"E a distance of 73.26 feet to the point of beginning; thence proceed S36°46'13"E a distance of 110.25 feet to a point and corner; thence proceed along a curve to the left having a radius of 2820.00 feet, whose length is 18.70 feet and whose chord length is 18.70 feet and bears S36°57'36"E to a point and corner; thence proceed S36°03'43"W a distance of 256.66 feet to a point and corner; thence proceed N60°11'56"W a distance of 123.96 feet to a point and corner; thence proceed N36°03'43"E a distance of 308.18 feet to the point of beginning. All of which comprises Parcel 28-1 as shown on Sheet 28 of the Right of Way Plans of State Project No. H.004932, and contains an area of approximately 34796.9 square feet or 0.799 of an acre.

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 Fifty Three Thousand Four Hundred Sixty Five and 88/100 Dollars (\$53,465.88) 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 has placed same in the registry of said court.

Signed at Franklin, Louisiana, this 15<sup>th</sup> day of June, 2016.

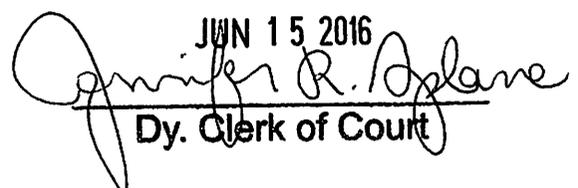


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DEPUTY CLERK OF COURT, SIXTEENTH JUDICIAL DISTRICT COURT

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JUN 15 2016

  
Dy. Clerk of Court

RECEIVED

2016 JUN 23 PM 2:23

DOTD  
OFFICE OF GENERAL COUNSEL

STATE OF LOUISIANA  
PARISH OF ST. MARY

I, the undersigned Deputy Clerk, 16<sup>th</sup> Judicial District Court, St. Mary Parish, LA, Ex-Officio Recorder, thereof, duly commissioned and qualified, do hereby certify that the attached is a true and correct copy of the original Order of Expropriation: Receipt on file and recorded in Conv Book 337, Entry No. 325178, Page 505 of date 6-15-16.

IN EVIDENCE WHEREOF, witness my official signature and impress of the seal of my office this 6-22-16 at Franklin, St. Mary Parish, Louisiana.

Jennifer R. Oxlane  
Deputy Clerk of Court