

NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

DOCKET NO.: _____ DIVISION “ _____ ”

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

EQUATORIAL DEVELOPMENT ORGANIZATION

FILED: _____
CLERK OF COURT

PETITION FOR EXPROPRIATION

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.

EQUATORIAL DEVELOPMENT ORGANIZATION is the defendant herein (“Defendant”).

2.

The STATE OF LOUISIANA, DEPARTMENT OF TRANSPORTATION & DEVELOPMENT, proposes to construct in the Parishes of West and East Baton Rouge a certain project designated as State Project No. H.004100, I-10: LA 415 to Essen Lane on I-10 and I-12, Phase 1: West of Washington Street to Essen Lane, State Route: LA I-10, (hereinafter referred to as the “Project”), which Project is more fully described by a Certificate of Authorization to Expropriate approved by the Secretary of the Department of Transportation & Development on March 17, 2023, 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.

As reflected in "Exhibit P-1," the construction of said project will be greatly conducive to 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 the Defendant, EQUATORIAL DEVELOPMENT ORGANIZATION, required in full ownership, and described as follows, to-wit:

One (1) certain tract or parcel of land, and all of the rights, ways, privileges, servitudes and advantages thereunto belonging or in anywise appertaining, situated in the Parish of East Baton Rouge, and in Section 50, Township 7 South, Range 1 West, Greensburg Land District, identified as Parcel No. 6-2, on a white print of a plat of survey consisting of Sheet No. 6, made by Carl A. Jeansonne, Registered Land Surveyor, dated August 8, 2022, revised, annexed to the above numbered and entitled suit, said tract or parcel being outlined in red and being more particularly described in accordance with said plat of survey.

REQUIRED IN FULL OWNERSHIP

PARCEL NO. 6-2:

From a point on the centerline of State Project No. H.004100, at Highway Survey Station 216+50.10, proceed N88°09'55"E a distance of 198.50 feet to a point; thence proceed N88°09'55"E a distance of 50.00 feet to the point of beginning; thence proceed N88°09'55"E a distance of 50.00 feet to a point and corner; thence proceed S84°23'53"W a distance of 48.42 feet to a point and corner; thence proceed N29°41'15"W a distance of 3.60 feet to the point of beginning. All of which comprises Parcel 6-2 as shown on Sheet 6 of the Right of Way Plans of State Project No. H.004100 and contains an area of approximately 79.5 square feet or 0.002 acres.

6.

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

7.

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

8.

There are no buildings situated wholly or partially upon the above-described parcel to be expropriated, and there are no improvements situated wholly or partially upon the above-described parcel to be expropriated.

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, 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 the Defendant's interest in the property described as Parcel No. 6-2 so that the Petitioner will have acquired full ownership of said parcel, subject to the mineral reservation set forth below.

11.

The Petitioner has attempted to acquire the Defendant's interest in Parcel No. 6-2 amicably but has been unsuccessful in said attempts; therefore, it is necessary for Petitioner to expropriate the Defendant's interest in full ownership the property described as Parcel No. 6-2, subject to the mineral reservation set forth below.

12.

The expropriation of the full ownership of the property described above as Parcel No. 6-2 shall be made subject to the reservation in favor of the owner, EQUATORIAL DEVELOPMENT ORGANIZATION, 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 or 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 as Parcel No. 6-2, subject to the mineral reservation set forth herein, has been estimated to be the sum of One Thousand One Hundred Ninety-One and 00/100 (\$1,191.00) 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 Defendant's full ownership of the property described as Parcel No. 6-2, 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.

WHEREFORE, Petitioner prays that an Order issue herein directing Petitioner to deposit in the Registry of this Court the sum of One Thousand One Hundred Ninety-One and 00/100 (\$1,191.00) Dollars for payment to the person or persons entitled thereto, and declaring that the Defendant's full ownership of the above-described property, subject to the mineral reservation set forth herein, be taken for highway purposes as of the time such deposit is made.

WHEREFORE, Petitioner further prays that said Order direct Defendant to surrender to Petitioner possession of said property.

WHEREFORE, Petitioner further prays that the Order of Expropriation in this matter be recorded in the conveyance records of East Baton Rouge Parish.

WHEREFORE, Petitioner further prays that notice of this expropriation be issued and served upon Defendant, EQUATORIAL DEVELOPMENT ORGANIZATION, together with a certified copy of this Petition for Expropriation, the Order of Expropriation of this Court, and the Receipt of the Clerk of Court for the deposit made, according to law.

WHEREFORE, 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. art. 1734.1.

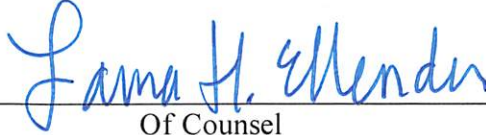
WHEREFORE, Petitioner further prays that it be served with written notice of any trial, motion or other proceeding scheduled before this Honorable Court in accordance with La. R.S. 48:451, and that it be served with notice of any interlocutory or final order, decree or judgment rendered and signed as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

WHEREFORE, 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 One Thousand One Hundred Ninety-One and 00/100 (\$,1,191.00) Dollars.

Respectfully Submitted:

LOUISIANA DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT
OFFICE OF THE GENERAL COUNSEL

By:


Of Counsel

Laura Hopes Ellender (La. Bar Roll No. 32505)
1201 Capitol Access Road (70802)
Post Office Box 94245
Baton Rouge, Louisiana 70804-9245
Phone: (225) 379-1899 | Fax: (225) 242-4691
Email: laura.ellender2@la.gov
Attorney for LA DOTD

PLEASE SERVE:

EQUATORIAL DEVELOPMENT ORGANIZATION

Through its Agent for Service of Process:

Mr. Omer Lange

3108 Plank Road

Baton Rouge, LA 70805.

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.004100
I-10: LA 415 TO ESSEN LANE ON I-10 & I-12
ROUTE LA I-10
WEST AND EAST BATON ROUGE PARISH**

State Project Number H.004100 provides for drainage structures, grading bridges, class II base course, portland cement concrete pavement, asphalt concrete pavement, roundabout, retaining walls, soundwalls, permanent signing and striping, lighting, and earthwork, on I-10 in East Baton Rouge Parish, as follows:

Beginning I-10 at approximate Highway Survey Station 427+31.00, then proceed in a southeasterly direction to end at approximate Highway Survey Station 437+63.65.

Beginning I-10 at approximate Highway Survey Station 201+14.71, then proceed in a southeasterly direction to end at approximate Highway Survey Station 430+00.00.

Beginning Acadian Thwy. at approximate Highway Survey Station 50+95.00, then proceed in a northerly direction to end at approximate Highway Survey Station 71+00.00.

Beginning Nairn Dr. at approximate Highway Survey Station 40+00.00, then proceed in a northerly direction to end at approximate Highway Survey Station 60+00.00.

Bridge Site I-10, is between the following Highway Survey Stations: approximate Highway Survey Station 427+31.00 and Highway Survey Station 241+68.22.

Bridge Site I-10 over City Park Lake, is between the following Highway Survey Stations: approximate Highway Survey Station 261+63.19 and Highway Survey Station 270+00.38.

Bridge Site I-10 Perkins to Acadian, is between the following Highway Survey Stations: 289+38.66 and Highway Survey Station 320+75.66.

Bridge Site Acadian Thruway, is between the following Highway Survey Stations: approximate Highway Survey Station 59+06.10, and Highway Survey Station 60+05.63.

Bridge Site Nairn Dr. over I-10, is between the following Highway Survey Stations: approximate Highway Survey Station 47+06.00 and Highway Survey Station 52+94.00.

Bridge Site I-10 at College Dr., is between the following Highway Survey Stations: approximate Highway Survey Station 350+73.00 and Highway Survey Station 358+42.00.

Bridge Site I-10 EB at Ward Creek, is between the following Highway Survey Stations: approximate Highway Survey Station 403+31.31 and Highway Survey Station 405+04.74.

The total roadway length is approximately 3.263 miles, and the total bridge length is approximately 2.025 miles, for an overall project length of approximately 5.288 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 La. R.S. 36:501 et seq., and La. 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 La. 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.004100, I-10: LA 415 to Essen Lane on I-10 & I-12, Parish of West and East Baton Rouge Parish.

Baton Rouge, Louisiana, this 17th day of March, 2023.


ERIC KALIVODA
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.004100, F.A.P. NO. H004100, I-10: LA 415 TO ESSEN LANE ON I-10 AND I-12, PHASE 1:
WEST OF WASHINGTON STREET TO ESSEN LANE, FINAL R/W AND C OF A, ROUTE LA
I-10, WEST AND EAST BATON ROUGE PARISH, in a manner sufficient in my judgment to
provide presently and in the future for the public interest, safety and convenience.

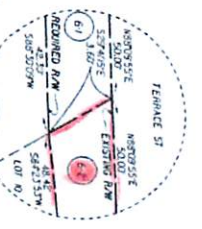
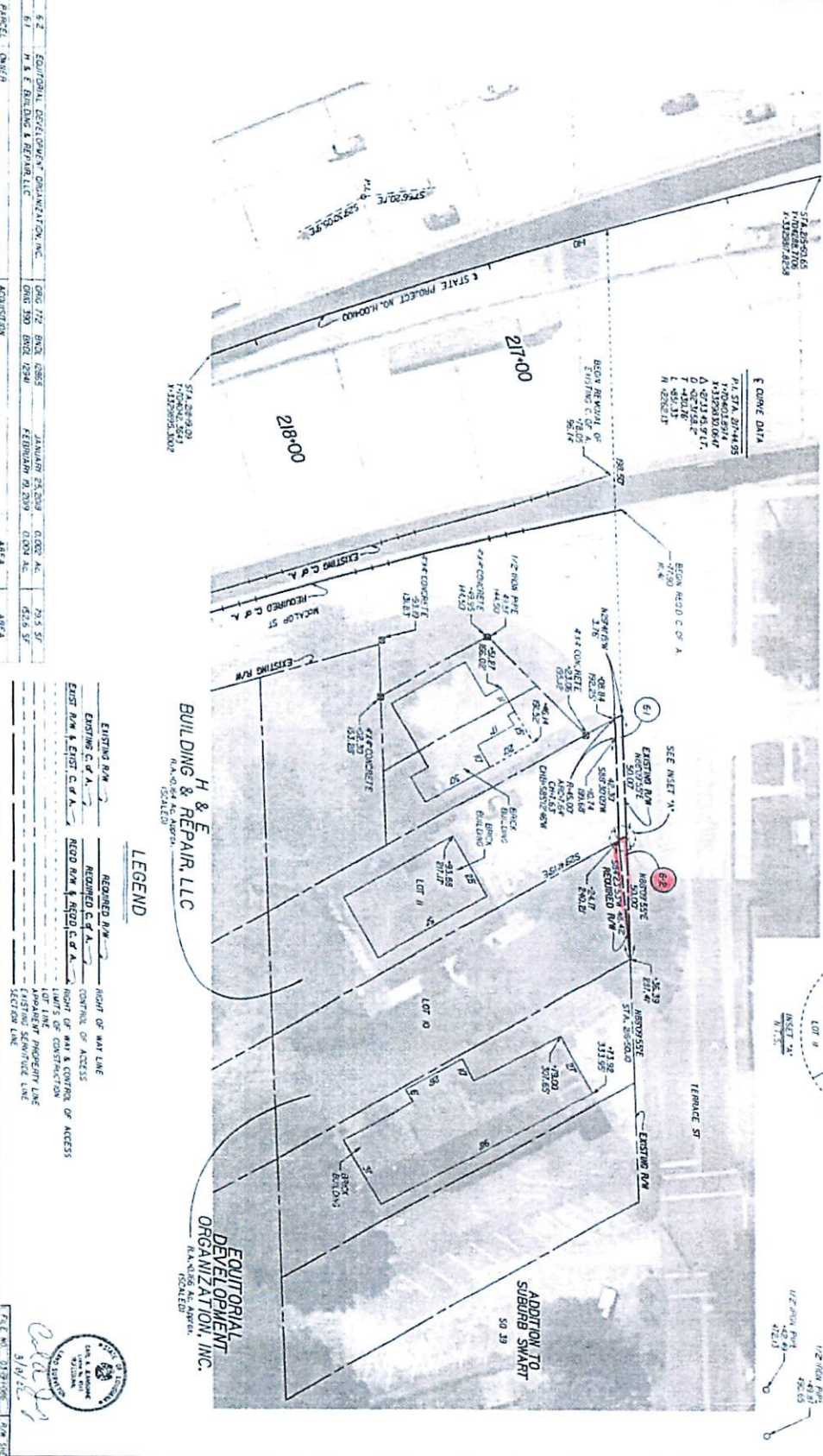


CHAD WINCHESTER, P.E.
DOTD CHIEF ENGINEER

12/11/23

DATE

NOTES:
 1. ALL SPRES AND MONUMENTS SHOWN HEREON WERE FOUND.
 2. THE COORDINATES AND READINGS SHOWN HEREON ARE BASED ON THE DATUM OF 1983. ALL DISTANCES ARE IN FEET AND DECIMALS THEREOF.
 3. TO CONVERT DISTANCES FROM COORDINATES SHOWN HEREON TO MONUMENTAL OR BOUND DISTANCES, USE SCALE FACTOR: 0.9999934.
 4. DISTANCES SHOWN ARE HORIZONTAL, GROUND DISTANCES.
 5. TO CONVERT DISTANCES FROM COORDINATES SHOWN HEREON TO MONUMENTAL OR BOUND DISTANCES, USE SCALE FACTOR: 0.9999934.
BASE STATIONS:
 684594.000
 164194.000
 684594.000
 164194.000
 684594.000
 164194.000
 684594.000
 164194.000
 684594.000
 164194.000
 684594.000
 164194.000



**GREENSBURG LAND DISTRICT
 TTS - RW
 SECTION 50**

DATE	05/23/23	REVISION	REVISED SECTION LABELS
SCALE	1"=20'	PROJECT	STATE PROJECT NO. H.004100
DATE	05/23/23	PROJECT	PHASE I: WEST OF WASHINGTON STREET TO ESSEN LANE
DATE	05/23/23	PROJECT	EAST BATON ROUGE PARISH
DATE	05/23/23	PROJECT	EAST BATON ROUGE
DATE	05/23/23	PROJECT	450-10
DATE	05/23/23	PROJECT	H.004100

RIGHT OF WAY MAP
 STATE PROJECT NO. H.004100
 1-10, LA 415 TO ESSEN ON I-10 AND I-12
 PHASE I: WEST OF WASHINGTON STREET TO ESSEN LANE
 EAST BATON ROUGE PARISH

LEGEND

- EXISTING R/W
- REQUIRED R/W
- RIGHT OF WAY LINE
- EXIST. C.O.A.
- REQUIRED C.O.A.
- CONTROL OF ACCESS
- RIGHT OF WAY & CONTROL OF ACCESS
- RIGHT OF WAY & CONTROL OF ACCESS
- LOT LINE CONSTRUCTION
- APPEARANCE PROPERTY LINE
- EXISTING SEWAGE LINE
- SECTION LINE

DOTD
 MISSISSIPPI DEPARTMENT OF TRANSPORTATION

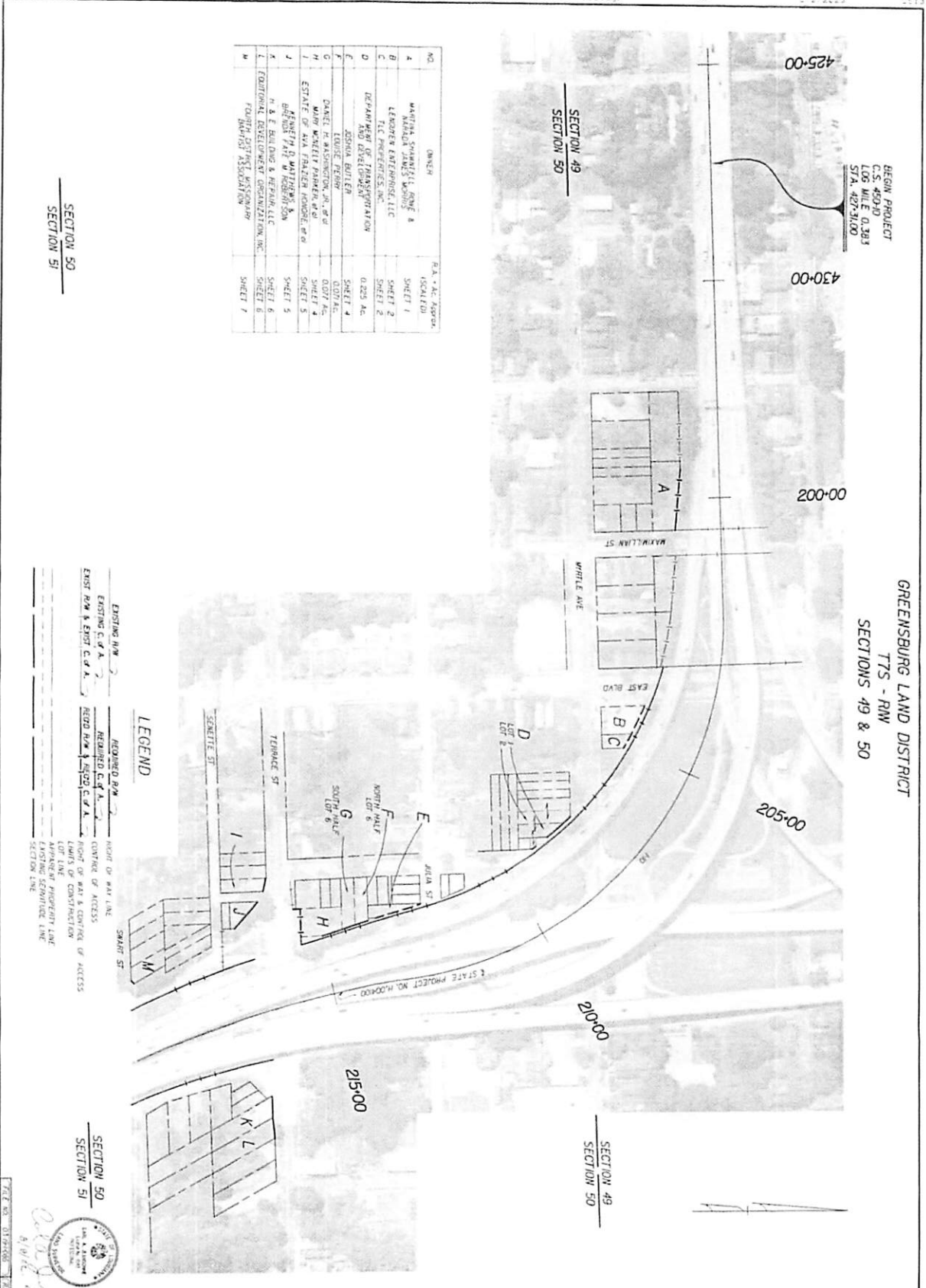
STATE OF MISSISSIPPI
 MISSISSIPPI DEPARTMENT OF REVENUE

PLANNING & ENGINEERING
 3181 N. I-10
 BATON ROUGE, LA 70802



GREENSBURG LAND DISTRICT
 TTS - ROW
 SECTIONS 49 & 50

NO	OWNER	S.A. * AC. Approx.
A	MARTINA SHAWWILL, RONE & MARLOLA JAMES MOHNS	SHEET 1
B	LENDOR ENTERPRISES, LLC	SHEET 2
C	FIC PROPERTIES, INC.	SHEET 2
D	DEPARTMENT OF TRANSPORTATION	0.225 AC.
E	ISSOLA BUTLER	SHEET 4
F	LIQUID PEBBLES	DOT AC.
G	DAKEL H. WASHINGTON, JR., et al	DOT AC.
H	WAIN WENDEY PARKER, et al	SHEET 4
I	ESTATE OF AYA FRATZER HONORE, et al	SHEET 5
J	KENNETH D. WATKINS & BRIGIDA FAYE W. ROBINSON	SHEET 5
K	H & E BUILDING & REPAIR, LLC	SHEET 6
L	TRADITIONAL DEVELOPMENT ORGANIZATION, INC.	SHEET 6
M	FOUR POINT RESIDENTIAL DEVELOPMENT ORGANIZATION, INC.	SHEET 7



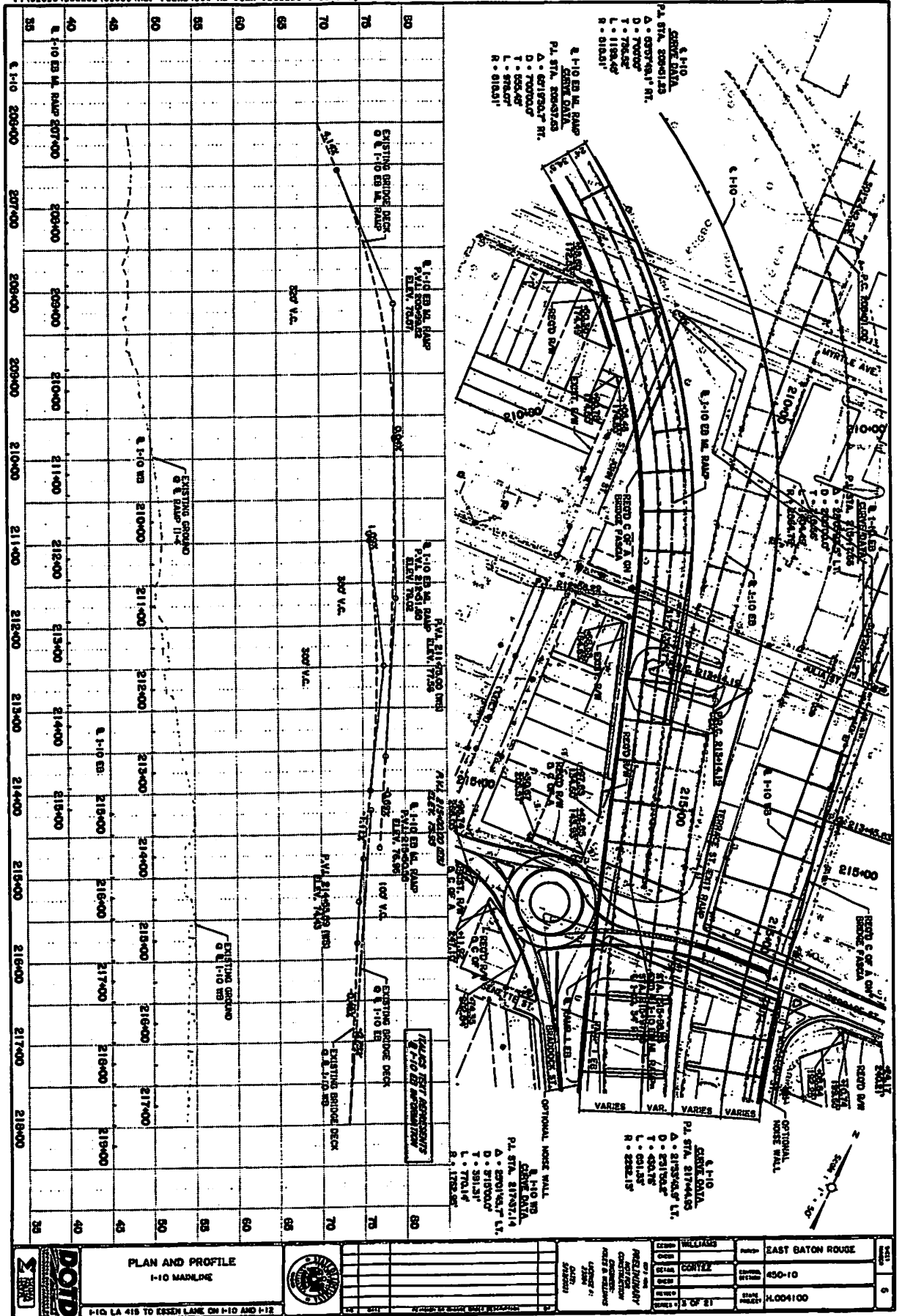
LEGEND

	EXISTING ROW		REQUIRED ROW		RIGHT OF WAY LINE
	EXIST C.O.A.		REQUIRED C.O.A.		LIMITS OF CONSTRUCTION
	EXIST LOT LINE		REQUIRED LOT LINE		PROPOSED PROPERTY LINE
	EXIST SECTION LINE		PROPOSED SECTION LINE		

04/26/23 REVISED TO CONFORM WITH SHEET 1	C&J	DOTD GROUP, LLC	RIGHT OF WAY MAP STATE PROJECT NO. H004100 1-10 LA 415 TO ESSEN ON 1-12 PHASE 1: WEST OF WASHINGTON STREET TO ESTEN LANE EAST BATON ROUGE PARISH	STATE OF LOUISIANA DEPARTMENT OF TRANSPORTATION SCALE: 1" = 100' DATE: 02/02/2023	DRAWN: EAST BATON ROUGE CHECKED: PCS DATE: 02/02/23 SCALE: 1" = 100'	SHEET: 450-10 SECTION: H004100
02/23/23 REVISED SECTION LINES	C&J					
02/23/23 REVISED TO CONFORM WITH SHEETS 4 & 5	C&J					
12/22/22 REVISED TO CONFORM WITH SHEET 4	C&J					

"Exhibit P-3"

F:\02020\200502\01800\RCP Plans\006 RD Plan-Profile I-10 3.dgn



PLAN AND PROFILE
I-10 MAINLINE

DOTD
Louisiana Department of Transportation and Development

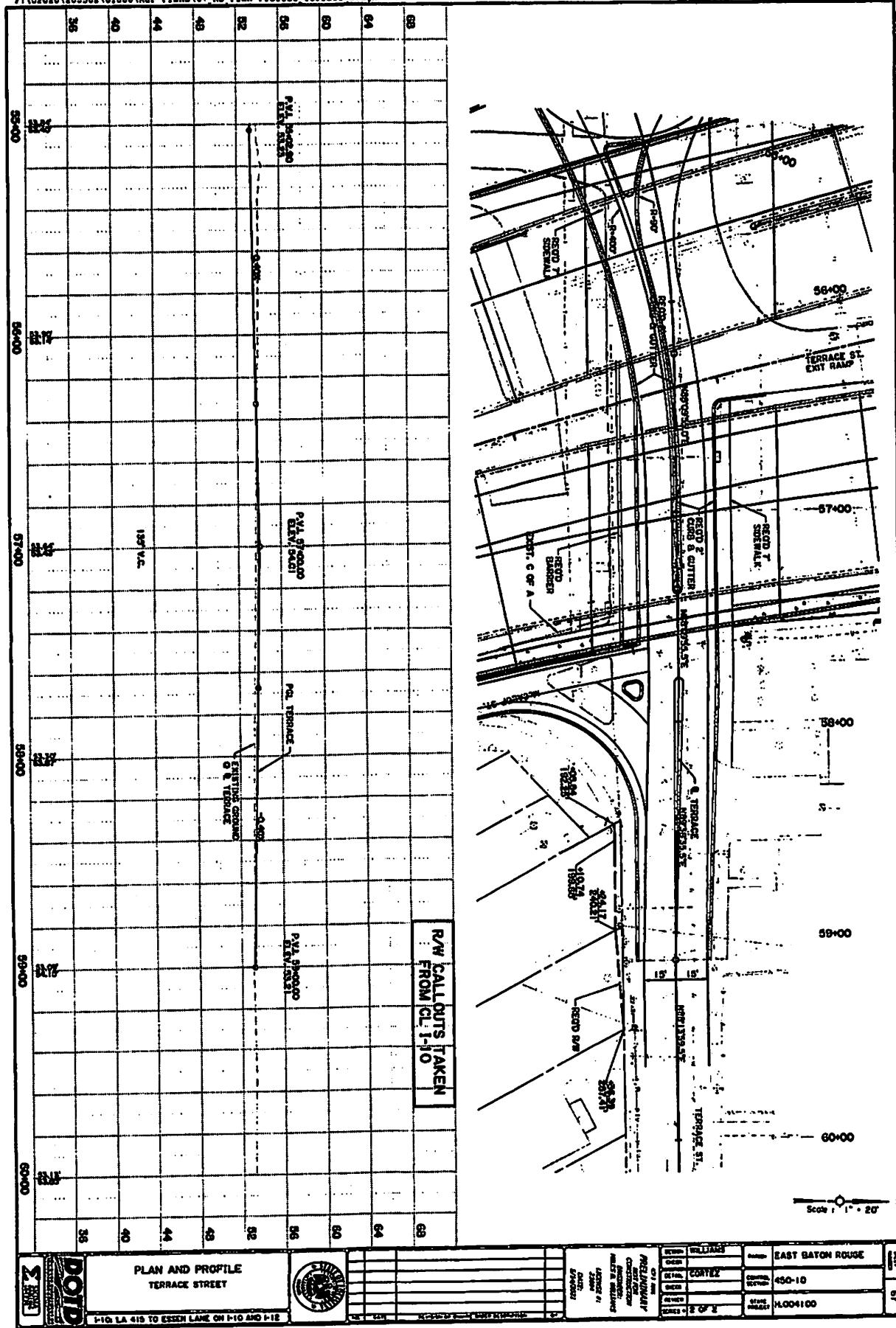
LA 415 TO ECHEN LAKE ON I-10 AND I-12



DATE	5/12/2021
BY	CONYER
CHECKED	
DESIGNED	
IN CHARGE	
PROJECT	EAST BATON ROUGE
CONTRACT NO.	450-10
DATE	12/31/20
SCALE	H.004100
SHEET NO.	5 OF 21

"Exhibit P-3"

F:\02020\205502\01800\RCP Plans\67_RD Plan-Profile Terrace 2.dgn



	PLAN AND PROFILE TERRACE STREET			APPROVED FOR CONSTRUCTION DATE: 5/14/2021 LICENSE #: EXPIRES:	PROJECT NO.:	EAST BATON ROUGE
	SHEET NO.:	450-10				
	TOTAL SHEETS:	1,000/100				

"Exhibit P-3"

CERTIFICATE
ON
LOCATION AND DESIGN

We hereby certify that the location and design of the improvements proposed within STATE PROJECT NO. H.004100, F.A.P. NO. H004100, I-10: LA 415 TO ESSEN LANE ON I-10 AND I-12, PHASE 1: WEST OF WASHINGTON STREET TO ESSEN LANE, FINAL R/W AND C OF A, ROUTE LA I-10, WEST AND EAST BATON ROUGE PARISH, are in accordance with the best modern practices adopted in the interest of the safety and convenience of the traveling public.



CHAD WINCHESTER, P.E.
DOTD CHIEF ENGINEER

12/11/23
DATE



ROBERT ISEMANN, P.E.
ROAD DESIGN ENGINEER

12/8/23
DATE



MARK BUCCI, P.E.
BRIDGE DESIGN ENGINEER

12/8/2023
DATE

Parcel No. 6-2
S. P. No. H.004100

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) 6-2, 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	\$1,191
VALUE OF IMPROVEMENTS	_____
DAMAGES	_____
ADDITIONAL COMPENSATION	_____
TOTAL ESTIMATE OF COMPENSATION	\$1,191

Methodology Used:

- 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:

- 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, December 7, 2023.



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 \$ 1,191.00

Heather Corsetino 1/9/2024
Date

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

NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

DOCKET NO.: _____ DIVISION " _____ "

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

EQUATORIAL DEVELOPMENT ORGANIZATION

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 One Thousand One Hundred Ninety-One and 00/100 (\$1,191.00) Dollars.

IT IS HEREBY FURTHER ORDERED that the Defendant's full ownership of the property described below as Parcel No. 6-2, subject to the reservation in favor of Defendant, EQUATORIAL DEVELOPMENT ORGANIZATION, 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, is expropriated and taken for highway purposes as of the time of such deposit, according to law. Said parcel is further described as follows, to-wit:

One (1) certain tract or parcel of land, and all of the rights, ways, privileges, servitudes and advantages thereunto belonging or in anywise appertaining, situated in the Parish of East Baton Rouge, and in Section 50, Township 7 South, Range 1 West, Greensburg Land District, identified as Parcel No. 6-2, on a white print of a plat of survey consisting of Sheet No. 6, made by Carl A. Jeansonne, Registered Land Surveyor, dated August 8, 2022, revised, annexed to the above numbered and entitled suit, said tract or parcel being outlined in red and being more particularly described in accordance with said plat of survey.

REQUIRED IN FULL OWNERSHIP

PARCEL NO. 6-2:

From a point on the centerline of State Project No. H.004100, at Highway Survey Station 216+50.10, proceed N88°09'55"E a distance of 198.50 feet to a point; thence proceed N88°09'55"E a distance of 50.00 feet to the point of beginning; thence proceed N88°09'55"E a distance of 50.00 feet to a point and corner; thence proceed S84°23'53"W a distance of 48.42 feet to a point and corner; thence proceed N29°41'15"W a distance of 3.60 feet to the point of beginning. All of which comprises Parcel 6-2 as shown on Sheet 6 of the Right of Way Plans of State Project No. H.004100 and contains an area of approximately 79.5 square feet or 0.002 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 1734.1. 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.

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

IT IS HEREBY FURTHER ORDERED that Defendant, EQUATORIAL DEVELOPMENT ORGANIZATION, 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.

Baton Rouge, Louisiana, this _____ day of _____, 2024.

JUDGE | 19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

DOCKET NO.: _____ DIVISION " _____ "

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

EQUATORIAL DEVELOPMENT ORGANIZATION

FILED: _____
CLERK OF COURT

RECEIPT

HONORABLE DOUG WELBORN, CLERK OF COURT

TO

STATE OF LOUISIANA,
DEPARTMENT OF TRANSPORTATION & DEVELOPMENT

STATE OF LOUISIANA
PARISH OF EAST BATON ROUGE

In the cause entitled "STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT VERSUS EQUATORIAL DEVELOPMENT
ORGANIZATION," No. _____ of the docket of said Court, the State of
Louisiana seeks the expropriation of the Defendant's full ownership of the property described
below, which is identified as Parcel No. 6-2, subject to the reservation in favor of the owner,
EQUATORIAL DEVELOPMENT ORGANIZATION, 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, which is identified as Parcel No. 6-2, for the
I-10: LA 415 to Essen Lane on I-10 and I-12, Phase 1: West of Washington Street to Essen Lane,
State Route I-10 project, being State Project No. H.004100, in the Parishes of West Baton Rouge
and East Baton Rouge, said property being described as follows, to-wit:

One (1) certain tract or parcel of land, and all of the rights, ways, privileges,
servitudes and advantages thereunto belonging or in anywise appertaining,
situated in the Parish of East Baton Rouge, and in Section 50, Township 7 South,
Range 1 West, Greensburg Land District, identified as Parcel No. 6-2, on a white

print of a plat of survey consisting of Sheet No. 6, made by Carl A. Jeansonne, Registered Land Surveyor, dated August 8, 2022, revised, annexed to the above numbered and entitled suit, said tract or parcel being outlined in red and being more particularly described in accordance with said plat of survey.

REQUIRED IN FULL OWNERSHIP

PARCEL NO. 6-2:

From a point on the centerline of State Project No. H.004100, at Highway Survey Station 216+50.10, proceed N88°09'55"E a distance of 198.50 feet to a point; thence proceed N88°09'55"E a distance of 50.00 feet to the point of beginning; thence proceed N88°09'55"E a distance of 50.00 feet to a point and corner; thence proceed S84°23'53"W a distance of 48.42 feet to a point and corner; thence proceed N29°41'15"W a distance of 3.60 feet to the point of beginning. All of which comprises Parcel 6-2 as shown on Sheet 6 of the Right of Way Plans of State Project No. H.004100 and contains an area of approximately 79.5 square feet or 0.002 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 the Court the sum of One Thousand One Hundred Ninety-One and 00/100 (\$1,191.00) 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 same has been placed in the Registry of the Court.

Signed at Baton Rouge, Louisiana, this _____ day of _____, 2024.

DEPUTY CLERK OF COURT
19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

DOCKET NO.: _____ DIVISION “ _____ ”

STATE OF LOUISIANA, DEPARTMENT OF
TRANSPORTATION & DEVELOPMENT

VERSUS

EQUATORIAL DEVELOPMENT ORGANIZATION

FILED: _____
CLERK OF COURT

NOTICE

THE STATE OF LOUISIANA

TO: EQUATORIAL DEVELOPMENT ORGANIZATION
Through its Agent for Service of Process:
Mr. Omer Lange
3108 Plank Road
Baton Rouge, LA 70805

Pursuant to an Order issued by a Judge of the Nineteenth Judicial District Court of the State of Louisiana for the Parish of East Baton Rouge on the _____ day of _____, 2024, 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 One Thousand One Hundred Ninety-One and 00/100 (\$1,191.00) Dollars on the _____ day of _____, 2024, 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 Nineteenth Judicial District Court in and for the Parish of East Baton Rouge **within ninety (90) days** 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 Nineteenth Judicial District Court for the Parish of East Baton Rouge, State of Louisiana.

Signed and delivered to the Sheriff of East Baton Rouge Parish this _____ day of _____ in the year 2024.

DEPUTY CLERK OF COURT | 19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA