

CITATION

CASTEX DEVELOPMENT LLC  
PLAINTIFF  
VS.  
ANADARKO PETROLEUM CORPORATION ET AL  
DEFENDANT

NO. C-502-20  
31st JUDICIAL DISTRICT COURT  
PARISH OF JEFFERSON DAVIS  
STATE OF LOUISIANA

TO: BP AMERICA PRODUCTION COMPANY, THROUGH ITS ATTORNEYS OF RECORD:  
GEORGE ARCENEUX, III, HUNTER A. CHAUVIN, COURT C. VANTASSELL, EMILY C.  
BORGEN, JOHN S. TROUTMAN, RANDEE V. ILES, LISKOW & LEWIS, 822 HARDING ST.,  
LAFAYETTE, LA 70505

YOU HAVE BEEN SUED.

Attached to this citation is a certified copy of the petition.\* The petition tells you what you are being sued for. You must EITHER do what the petition asks OR, within TWENTY-ONE (21) DAYS after you have received these documents, you must file an answer or other legal pleadings, in writing, in the office of the Clerk of this Court at the Court House, 300 State Street, Jennings, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within TWENTY-ONE (21) DAYS, a judgment may be entered against you without further notice.

This citation was issued by the Clerk of Court for Jefferson Davis Parish, on the 20th day of October, 2022.

ATTORNEY:  
CHRISTOPHER D. MARTIN  
ATTORNEY AT LAW  
17405 PERKINS ROAD  
BATON ROUGE, LA 70810  
225-400-9991

BY: Barbie Reed

\*Also attached are the following documents: 2ND SUPPLEMENTAL & AMENDING PETITION  
☐ INTERROGATORIES ☐ REQUEST FOR ADMISSION OF FACTS ☐ OTHER

ADDITIONAL INFORMATION

These documents mean you have been sued.  
Legal assistance is advisable and you should contact a lawyer immediately.

JUDGES AND COURT PERSONNEL ARE NOT PERMITTED TO GIVE LEGAL ADVICE.

31<sup>st</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

DOCKET NO. C-502-20

CASTEX DEVELOPMENT, LLC

VERSUS

ANADARKO PETROLEUM CORPORATION, ANADARKO US OFFSHORE, LLC,  
BP AMERICA PRODUCTION COMPANY, CONOCOPHILLIPS COMPANY,  
CROWN CENTRAL, LLC, EXXONMOBIL OIL CORPORATION,  
FREEPORT-MCMORAN, INC., and OCCIDENTAL ENERGY COMPANY, INC.

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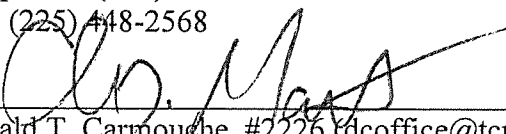
**MOTION FOR LEAVE TO FILE SECOND SUPPLEMENTAL  
AND AMENDING PETITION FOR DAMAGES**

COMES NOW plaintiff, Castex Development, LLC, through undersigned counsel, to respectfully request leave from this Honorable Court to file the attached Second Supplemental and Amending Petition for Damages.

WHEREFORE, plaintiff, Castex Development, LLC, prays that leave be granted to file the Second Supplemental and Amending Petition for Damages and that the Second Supplemental and Amending Petition for Damages be filed.

By Attorneys:

TALBOT, CARMOUCHE & MARCELLO  
17405 Perkins Road  
Baton Rouge, LA 70810  
Telephone: (225) 400-9991  
Fax: (225) 448-2568



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Caroline H. Martin, #33308 (cmartin@tcmlawoffice.com)  
Christopher D. Martin, #30613 (cdmartin@tcmlawoffice.com)  
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and

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Wesley A. Romero, #33344 (wromero@mbklaw.net)  
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422 E. College Street, Suite B  
Lake Charles, LA 70605  
Telephone: (337) 562-2327  
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*Attorneys for Plaintiff*

FILED October 20, 20 22  
Banjo Reed  
DEPUTY CLERK OF COURT  
JENNINGS, JEFF DAVIS PARISH  
A TRUE COPY-ATTEST

31<sup>st</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

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CASTEX DEVELOPMENT, LLC

VERSUS

ANADARKO PETROLEUM CORPORATION, ANADARKO US OFFSHORE, LLC,  
BP AMERICA PRODUCTION COMPANY, CONOCOPHILLIPS COMPANY,  
CROWN CENTRAL, LLC, EXXONMOBIL OIL CORPORATION,  
FREEPORT-MCMORAN, INC., and OCCIDENTAL ENERGY COMPANY, INC.

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ORDER

Considering the foregoing motion,

IT IS HEREBY ordered that the plaintiff is granted leave to file the Second Supplemental and Amending Petition for Damages and that the Clerk of Court is directed to accept filing of same.

THUS DONE AND SIGNED on this 20<sup>th</sup> day of October, 2022 in,  
Jennings, Louisiana.

s/s STEVE GUNNELL

---

HON. STEVE GUNNELL  
JUDGE, 31<sup>ST</sup> JUDICIAL DISTRICT COURT

FILED October 20, 20 22  
Bonnie Reed  
DEPUTY CLERK OF COURT  
JENNINGS, JEFF DAVIS PARISH  
A TRUE COPY-ATTEST

31<sup>st</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON DAVIS

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VERSUS

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FREEPORT-MCMORAN, INC., and OCCIDENTAL ENERGY COMPANY, INC.

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**PLAINTIFF'S SECOND SUPPLEMENTAL  
AND AMENDING PETITION FOR DAMAGES**

Plaintiff, CASTEX DEVELOPMENT, LLC, respectfully submits this Second Supplemental and Amending Petition for Damages, and asserts as follows:

**I. Amendment to Paragraph 4**

Plaintiff supplements and amends Paragraph 4, of its Original Petition for Damages, and First Supplemental and Amending Petition for Damages, to include the following additional defendant and allegations:

- "I. **FREEPORT-MCMORAN OIL & GAS LLC**, a foreign limited liability company licensed to do business and doing business in Louisiana and having its registered agent for service of process in Louisiana as Registered Agent Solutions, Inc., 3867 Plaza Tower Dr., 1<sup>st</sup> Floor, Baton Rouge, LA 70816. Based upon information and belief, Freeport-McMoRan Oil & Gas LLC is a successor to Nuevo Energy Co. and Plains Exploration & Production Company.

**II. New Allegations**

In addition to the foregoing, Plaintiff adds the following new additional allegations:

**New Paragraphs 48 – 53**

"48.

Plaintiff also appears herein and brings this action as a relator in asserting claims alleged on behalf of the State of Louisiana and the Commissioner of Conservation in this petition under the provisions of La. R.S. 30:14 and La. R.S. 30:16.

49.

Plaintiff has a right to seek the relief set forth in La. R. S. 30:14 and 30:16. Venue is proper under La. R. S. 30:14.

50.

Attached hereto as Exhibit E is a letter sent to the Commissioner of Conservation. The contents of this letter are incorporated herein and made a part by reference. Plaintiff alleges that, in accordance with La. R. S. 30:16, the Commissioner has failed to bring suit within ten days following submission of this letter. Therefore, plaintiff has the right to seek relief set forth in La. R. S. 30:14 and 30:16. Plaintiff alleges that the parties made defendants in this petition are violating Statewide Order 29-B and other regulations and orders of the LDNR and office of the commissioner of conservation by failing to remediate the property to the standards set forth in Statewide Order 29-B and other regulations and orders. Plaintiff is “person[s] in interest adversely affected by the[se] violation[s] who ha[ve] notified the Commissioner in writing of the[se] violation[s]” under La. R. S. 30:16. Plaintiff herein seeks a mandatory and prohibitory injunction: (1) ordering that defendants remediate the contamination on their property caused by oil and gas exploration and production activities to a level that complies with applicable regulations and order, including Statewide Order 29-B; and (2) restraining defendants from further violating, or threatening to violate, applicable regulations and order, including Statewide Order 29-B. Plaintiff alleges that this is a claim for environmental damage to property subject to the provisions of La. R. S. 30:29, as the damage to the property herein constitutes “environmental damage” within the meaning of La. R. S. 30:29(I)(1).

51.

Under La. R. S. 30:14, the Commissioner of Conservation is required to issue orders restraining the continuing violation of laws of this state with respect to the conservation of oil or gas, or both, and any provision of Chapter 1 of Subtitle I of title 30 of the Louisiana Revised Statutes, or any rule, regulation, or order made thereunder. Plaintiff seeks a mandatory injunction and prohibitive injunction in favor of, and on behalf of, the commissioner and the State of Louisiana restraining the continuing violation of laws of this state with respect to the conservation of oil or gas, or both, and any provision of Chapter 1 of Subtitle I of Title 30 of the Louisiana Revised Statutes, or any rule, regulation, or order made thereunder. Plaintiff has the right to claim such injunctive relief under La. R. S. 30:16. Further, plaintiff has a right and a cause of action under La. R. S. 30:16 for the cleanup of the contamination on the Property to bring the Property into compliance with the laws of this state with respect to the conservation of

oil or gas, or both, and any provision of Chapter 1 of Subtitle I of Title 30 of the Louisiana Revised Statutes, or any rule, regulation, or order made thereunder.

52.

Pursuant to the provisions of La. R.S. 30:29(E), plaintiff claims “all costs attributable to producing that portion of the evidence that directly relates to the establishment of environmental damage, including, but not limited to, expert witness fees, environmental evaluation, investigation, and testing, the cost of developing a plan of remediation, and reasonable attorney fees incurred in the trial court and the department.”

53.

Upon information and belief, no party made a defendant in this petition is a licensed remediation contractor. Thus, when this Court issues an injunction mandating compliance with Statewide Order 29-B and other applicable regulations and orders, defendants will have to make “payments” to a licensed remediation contractor to comply with the injunction. Additionally, to the extent that plaintiff is prohibited from hiring its own contractor to perform the remedial work, plaintiff is entitled to the recovery of any costs associated with overseeing the proper implementation of the cleanup.”

### **III. Incorporation of Prior Allegations and Claims**

Plaintiff incorporates, reiterates and renews all of the allegations in the Original Petition for Damages, as if pled *in extenso* herein, except as otherwise previously dismissed in this matter.

WHEREFORE, plaintiff, **CASTEX DEVELOPMENT, LLC**, prays that the defendants be cited to appear and answer this petition and that after due proceedings be had, that there be judgment entered herein as follows:

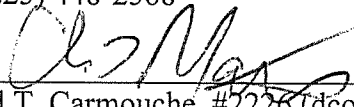
1. Awarding plaintiff all compensatory damages allowed by Louisiana law in an amount to be proven at trial, including payment of the costs to restore lands with identified pollution to its original unpolluted state, civil fruits resulting from defendants’ illegal and bad faith trespass on plaintiff’s lands, storage damages, and other property damages, and damages for loss of use and lost profits and lost income; and further, damages for land loss and subsidence and the cost of backfilling of canals and other excavations, where appropriate;
2. Awarding plaintiff punitive and exemplary damages;
3. Ordering defendants to pay plaintiff sufficient funds so that plaintiff may conduct a comprehensive and expedited environmental assessment of plaintiff’s land to identify all hidden or not yet identified pollution;

4. Awarding plaintiff all costs of this suit and for legal interest therein for any amount awarded from the date of judicial demand until paid, and further awarding plaintiff judicial interest on all contract claims from the date of breach; and further awarding attorneys' fees where appropriate under the provisions of applicable law, including, but not limited to, La. R.S. 30:29;
5. Awarding plaintiff damages for diminution in property value before and after restoration, and stigma damages;
6. Ordering a mandatory and prohibitory injunction to restore plaintiff's property to its pre-contaminated condition and to prevent the migration and spread of toxic and hazardous substances onto plaintiff's property;
7. To the extent La. R.S. 30:29 applies, approving a feasible remediation plan under La. R.S. 30:29 that complies with all applicable state regulations, without variances therefrom, including Statewide order 29-B and state regulations requiring remediation of usable groundwater to drinking water standards;
8. To the extent La. R.S. 30:29 applies, approving a feasible remediation plan under La. R.S. 30:29 that protects the health, safety, and welfare of the people of Louisiana;
9. To the extent La. R.S. 30:29 applies, approving a feasible remediation plan under La. R.S. 30:29 that protects and replenishes the natural resources of the state;
10. Awarding all damages allowed under Subsection H of La. R.S. 30:29;
11. To the extent that plaintiff is prohibited from hiring its own contractor to perform the remedial work, awarding plaintiff any costs associated with overseeing the property implementation of the cleanup;
12. For all just and equitable relief, and for all relief appropriate and reasonable under the premises;
13. Awarding damages or other relief allowable under Louisiana law under any of the causes of action alleged in the petition;
14. Awarding damages for failure to provide proper notification under the provisions of article 2688;
15. Alternatively, for all appropriate unjust enrichment damages as provided by Louisiana law;
16. Awarding of damages and other relief allowable under Louisiana law pursuant to La. R.S. 30:14 and 30:16;
17. Trial by jury; and
18. Awarding plaintiff all costs attributable to producing that portion of the evidence that directly relates to the establishment of environmental damage, including, but not limited to, expert witness fees, environmental evaluation, investigation, and testing, the cost of developing a plan of remediation to comply with the injunctive relief awarded by the court, and reasonable attorneys' fees incurred in the trial court and the department.



By Attorneys:

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John H. Carmouche, #22294 jcarmouche@tcmlawoffice.com)  
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Leah C. Poole, #35092 (lpool@tcmlawoffice.com)  
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422 E. College Street, Suite B  
Lake Charles, LA 70605  
Telephone: (337) 562-2327  
Fax: (337) 562-2391

*Attorneys for Plaintiff*

**PLEASE SERVE THE ORIGINAL, FIRST, AND SECOND  
SUPPLEMENTAL AND AMENDING PETITIONS FOR DAMAGES:**

**FREEPORT-MCMORAN OIL & GAS LLC**

Through its registered agent for service of process:  
Registered Agent Solutions, Inc.  
3867 Plaza Tower Dr., 1<sup>st</sup> Floor  
Baton Rouge, LA 70816

**PLEASE SERVE THE SECOND SUPPLEMENTAL  
AND AMENDING PETITION FOR DAMAGES:**

**MOBIL PRODUCING TEXAS & NEW MEXICO, INC.**

Through its attorneys of record:  
James E. Lapeze  
Cristian M. Soler  
LISKOW & LEWIS  
701 Poydras St., Ste. 5000  
New Orleans, LA 70139-5099

**BP AMERICA PRODUCTION COMPANY**

Through its attorneys of record:

George Arceneaux III  
Hunter A. Chauvin  
Court C. VanTassell  
Emily C. Borgen  
John S. Troutman  
Randee V. Iles  
LISKOW & LEWIS  
822 Harding St  
Lafayette, LA 70505

**ANADARKO PETROLEUM CORPORATION  
ANADARKO US OFFSHORE, LLC**

Through their attorneys of record:

Christopher C. Friend  
Meghan E. Smith  
JONES WALKER LLP  
201 St. Charles Ave., Ste. 4700  
New Orleans, LA 70130

**CONOCOPHILLIPS COMPANY**

Through its attorneys of record:

Eric E. Jarrell  
Robert J. Burvant  
Michael J. Cerniglia  
Patrick T. Isacks  
KING & JURGENS, LLC  
201 St. Charles Ave., 45<sup>th</sup> Floor  
New Orleans, LA 70170

**CROWN CENTRAL, LLC**

Through its attorney of record:

Charles S. (Trey) McCowan III  
KEAN MILLER LLP  
400 Convention St., Ste. 700  
Baton Rouge, LA 70802

**PLEASE SERVE THE SECOND SUPPLEMENTAL  
AND AMENDING PETITION FOR DAMAGES THROUGH  
THE LOUISIANA LONG ARM STATUTE:**

**OCCIDENTAL ENERGY COMPANY, INC**

Through its officer:

M. D. Keyes, President  
14760 Memorial, Ste. 203  
Houston, TX 77079

FILED October 20, 20 22  
Baile Reek  
DEPUTY CLERK OF COURT  
JENNINGS, JEFF DAVIS PARISH  
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31<sup>st</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON DAVIS

STATE OF LOUISIANA

DOCKET NO. C-502-20

CASTEX DEVELOPMENT, LLC

VERSUS

ANADARKO PETROLEUM CORPORATION, ANADARKO US OFFSHORE, LLC, BP AMERICA PRODUCTION COMPANY, CONOCOPHILLIPS COMPANY, CROWN CENTRAL, LLC, EXXONMOBIL OIL CORPORATION, FREEPORT-MCMORAN, INC., and OCCIDENTAL ENERGY COMPANY, INC.

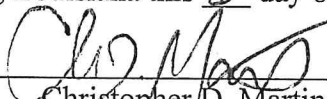
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and forgoing document has been forwarded to the following counsel of record by electronic mail and/or by placing same in the United States mail, postage prepaid, and properly addressed.

<p>James E. Lapeze <a href="mailto:jelapeze@liskow.com">jelapeze@liskow.com</a> Cristian M. Soler <a href="mailto:csoler@liskow.com">csoler@liskow.com</a> LISKOW &amp; LEWIS 701 Poydras St., Ste. 5000 New Orleans, LA 70139-5099 and Jamie D. Rhymes <a href="mailto:jdrhymes@liskow.com">jdrhymes@liskow.com</a> LISKOW &amp; LEWIS 822 Harding St. (70503) Post Office Box 52008 Lafayette, LA 70505 <i>Attorneys for Mobil Producing Texas &amp; New Mexico, Inc.</i></p> <p>George Arceneaux III Hunter A. Chauvin Court C. VanTassell Emily C. Borgen John S. Troutman Randee V. Iles LISKOW &amp; LEWIS 822 Harding St Lafayette, LA 70505 <i>Attorneys for BP America Production Company</i></p>	<p>Eric E. Jarrell <a href="mailto:ejarrell@kingjurgens.com">ejarrell@kingjurgens.com</a> Robert J. Burvant <a href="mailto:rburvant@kingjurgens.com">rburvant@kingjurgens.com</a> Michael J. Cerniglia <a href="mailto:mcerniglia@kingjurgens.com">mcerniglia@kingjurgens.com</a> Patrick T. Isacks <a href="mailto:pisacks@kingjurgens.com">pisacks@kingjurgens.com</a> KING &amp; JURGENS, LLC 201 St. Charles Ave., 45<sup>th</sup> Floor New Orleans, LA 70170 <i>Attorneys for ConocoPhillips Company</i></p> <p>Charles S. (Trey) McCowan III <a href="mailto:trey.mccowan@keanmiller.com">trey.mccowan@keanmiller.com</a> KEAN MILLER LLP 400 Convention St., Ste. 700 (70802) Post Office Box 3513 Baton Rouge, LA 70821-3513 <i>Attorney for Crown Central, LLC</i></p>
--	---

<p>Christopher C. Friend <a href="mailto:cfriend@joneswalker.com">cfriend@joneswalker.com</a> Meghan E. Smith <a href="mailto:msmith@joneswalker.com">msmith@joneswalker.com</a> JONES WALKER LLP 201 St. Charles Ave., Ste. 4700 New Orleans, LA 70130 and William D. Lampton <a href="mailto:wlampton@joneswalker.com">wlampton@joneswalker.com</a> Justin J. Marocco <a href="mailto:jmarocco@joneswalker.com">jmarocco@joneswalker.com</a> W. Thomas McCall <a href="mailto:tmcall@joneswalker.com">tmcall@joneswalker.com</a> Tiffany N. Dupree <a href="mailto:tdupree@joneswalker.com">tdupree@joneswalker.com</a> JONES WALKER LLP 445 N. Blvd., Ste. 800 Baton Rouge, LA 70802 <i>Attorneys for Anadarko Petroleum Corporation and Anadarko US Offshore, LLC</i></p>	
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Baton Rouge, Louisiana this 20<sup>th</sup> day of October, 2022.

  
\_\_\_\_\_  
Christopher D. Martin

FILED October 20, 20 22  
Bonnie Reed  
DEPUTY CLERK OF COURT  
JENNINGS, JEFF DAVIS PARISH  
A TRUE COPY-ATTEST

TALBOT, CARMOUCHE & MARCELLO

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WILLIAM R. COENEN, III  
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D. ADELE OWEN  
LEAH C. POOLE  
CAROLINE H. MARTIN  
CHRISTOPHER D. MARTIN  
DONALD T. CARMOUCHE, JR.  
MICHAEL L. HEATON

AUBERT D. TALBOT  
(1925-2005)

October 3, 2022

VIA CERTIFIED MAIL RETURN RECEIPT

NO. 9489 0090 0027 6257 4091 59

Honorable Commissioner Richard Ieyoub  
Louisiana Department of Natural Resources  
Office of Conservation  
617 North Third Street  
Post Office Box 94275  
Baton Rouge, LA 70804

Re: Property Located in Jefferson Davis Parish, Louisiana

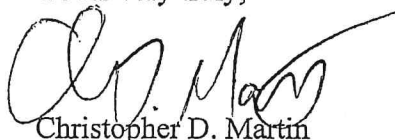
Dear Mr. Ieyoub:

This letter is being sent to you pursuant to La. R. S. 30:16. Please be advised that we represent one or more of the owners of the property located in Jefferson Davis Parish as shown and described in Exhibit A. Violations of Statewide Order 29-B are evident on the property today. These violations include, but are not limited to, environmental damage and impacts associated with contamination of the soil and groundwater on or near the site which is used for oil and gas production and processing and which is further identified in the aerial photographs attached as Exhibit B. These represent the likely violations that are known to the undersigned at this time.

Pursuant to La. R. S. 30:16, please consider this letter a formal notice of regulatory violations under La. R. S. 30:14. If action is not taken by your office within 10 days, we plan to sue the responsible parties for injunctive and other appropriate relief pursuant to the aforementioned statutes.

With kindest regards, I am

Yours very truly,

  
Christopher D. Martin

CDM/jke  
Attachments

FILED October 20, 2022  
Barthe Reed  
DEPUTY CLERK OF COURT  
JENNINGS, JEFF DAVIS PARISH  
A TRUE COPY-ATTEST



## EXHIBIT A

Property located in Jefferson Davis Parish, LA:

That tract of property in Jefferson Davis Parish, Louisiana, with all improvements thereon, located and situated, which contains 1,125.35 acres, more or less, and the whole of said tract of land is more particularly described as follows, to-wit: (a) Section 39, Township 10 South, Range 3 West, La. Mer., except that portion lying in triangular form West of the East boundary line of Section 14 if extended through said Section 39; (b) Lot 2 of Fractional Section 13, Township 10 South, Range 3 West, La. Mer.; (c) Section 17 in Township 10 south, Range 2 West, La. Mer., less and except the 328 acres, more or less, of swamp timber land lying in the Eastern portion thereof which was sold by Jean, Castex and others to A.S. Alston & Co., on February 14, 1922, by deed recorded in Jefferson Davis Parish in Conveyance Book W, Page 515, and which is shown by a plat of survey made by E. J. Mead, C.E., dated on 1921; including the two tracts of prairie land along the North line of said swamp land, one of said tracts containing 16.5 acres, more or less, and the other 5.5 acres, more or less, which two tracts were not included in the aforesaid sale to A. S. Alston & Co.; and (d) Section 18, Township 10 South, Range West, La. Mer., lying between the southeast corner of the aforesaid Section 39 on the West and the Mermentau River on the East, all as per plat showing the above described property attached to Act No. 81759, by which Albert Sidney Johnson and Adolph C. Boudreaux acquired the said property from Jean Castex, Jr., and which act is recorded in Jefferson, Davis Parish, Louisiana;

LESS AND EXCEPT AND NOT INCLUDED in the aforesaid tract are those 10 acre parcels of property described as follows and designated as "First" and "Second", to-wit:

First. That ten acre parcel of land situated in Section 18, Township 10 South, Range 2 West, upon which are situated the terminal facilities of Pelican Oil Purchasers, Inc. and which ten acres were sold by Albert Sidney Johnson and Adolph C. Boudreaux to Pelican Oil Purchasers, Inc. by deed dated March 3, 1949, and recorded in Conveyance Book 139, Page 3, and which ten acre parcel is more particularly described, to-wit: Starting at the Northwest corner of Section 18, Township 10 South, Range 2 West, at a one-and-a-quarter (1 1/4") inch galvanized iron pipe on the right descending bank of the Mermentau River on the line between Township 10 South, Range 2 and 3 West; thence south 51 degrees, 13 minutes East 276.5 feet; thence South 53 degrees, 00 minutes East 600 feet to a one-and-a-quarter (1 1/4") inch galvanized pipe, the lower front corner of the Robira Ten ( 10) acre tract for a point of beginning; thence following the right bank of the Mermentau River south 65 degrees, 30 minutes East 450 feet; thence South 84 degrees, 00 minutes East 250 feet; thence leaving the River and running south 3 7 degrees, 00 minutes West 693.5 feet; thence North 72 degrees, 06 minutes West 691.5 feet to lower side line of the Robira ten acres tract; thence following the said line North 37 degrees, 00 minutes East 693.5 feet to place of beginning and containing ten acres; as per plat by F. Shutts Sons, Civil engineers, attached to said deed; said tract of land is bounded on the North by a ten acre tract owned now or formerly by John I. Robira, his widow, heirs and assigns, on the West by other land of Albert Sidney Johnston and Adolph C. Boudreaux.

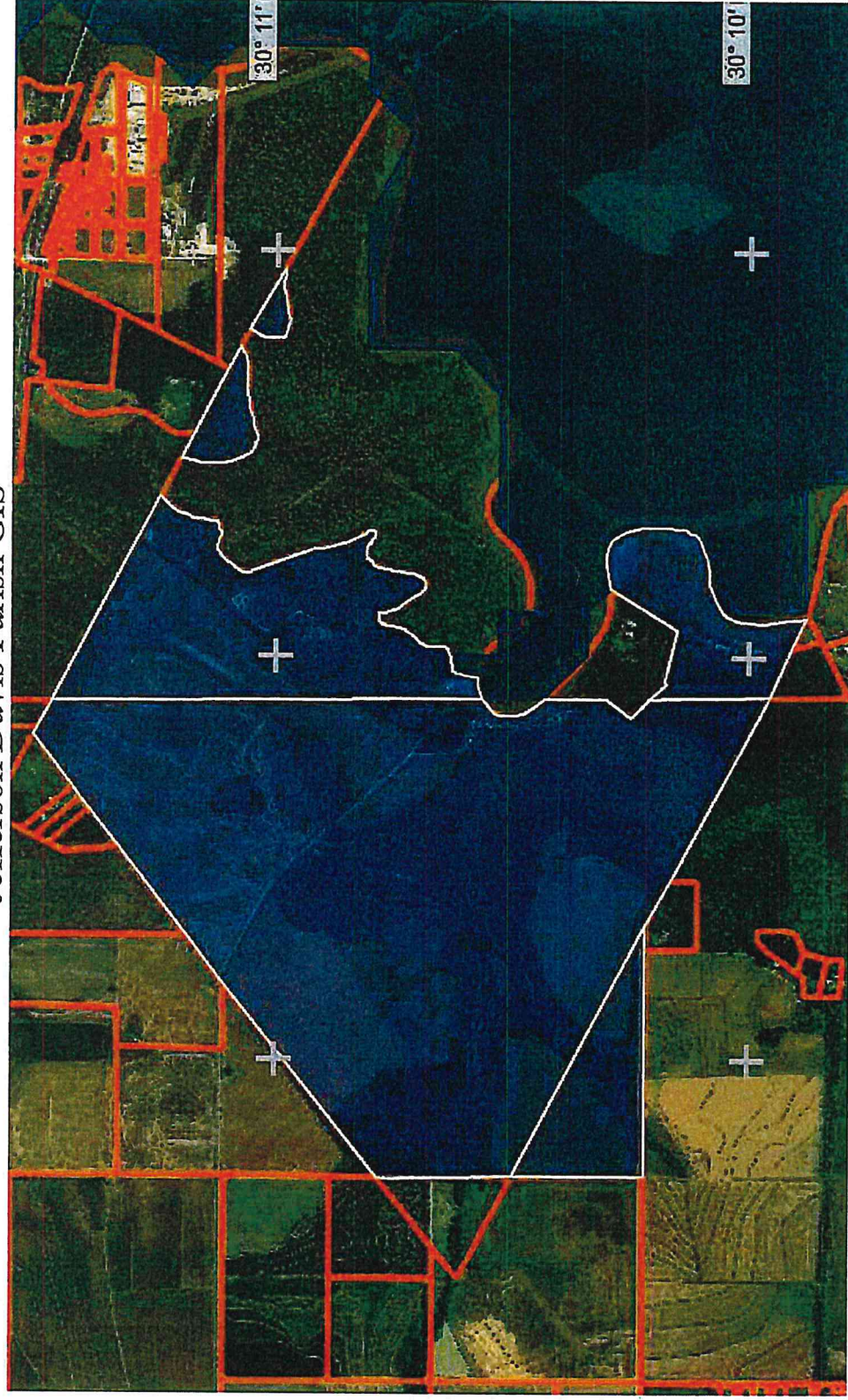
Second. That certain parcel of land comprising ten acres, more or less, situated in Section 18, Township 10 south, Range 2 West, and in Section 39, Township 10 South, Range 3 West, which was conveyed by Albert Sidney Johnson and Adolph C. Boudreaux to Fred Shutts by deed dated March 6, 1936, recorded in Conveyance Book 66, Page 101, of the records of Jefferson Davis Parish, Louisiana, and is more particularly described as follows, to-wit: Beginning at a point 459 feet South of the corner between Section 18, Township 10 South, Range 3 West, said corner being on the right descending bank of the Mermentau River; thence South 37 degrees West 368 feet to a one-and-a-quarter (1 1/4") inch galvanized pipe; thence South 53 degrees East 272.4 feet to the line between Section 18, Township 10 South, Range 2 West, and Section 39, Township 10 South, Range 3 West, 921 feet South of the corner between the two said Sections; thence South 53 degrees East 327.6 feet to a one-and-a-quarter (1 1/4") inch galvanized iron pipe, thence North 37 degrees East 726 feet to a one-and-a-quarter (1 1/4") inch galvanized pipe on the right descending bank of the Mermentau River, 600 feet to a one-and-a-quarter (1 1/4") inch galvanized pipe; thence South 37 degrees West 358 feet to the point of beginning and containing ten acres.







Jefferson Davis Parish GIS





October 6, 2022

Dear Michelle Willie:

The following is in response to your request for proof of delivery on your item with the tracking number:  
**9489 0090 0027 6257 4091 59.**

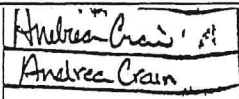

**Item Details**

<b>Status:</b>	Delivered, Front Desk/Reception/Mail Room
<b>Status Date / Time:</b>	October 6, 2022, 9:44 am
<b>Location:</b>	BATON ROUGE, LA 70801
<b>Postal Product:</b>	First-Class Mail®
<b>Extra Services:</b>	Certified Mail™ Return Receipt Electronic

**Shipment Details**

**Weight:** 2.0oz

**Recipient Signature**

Signature of Recipient:	
Address of Recipient:	

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Sincerely,  
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FILED October 20, 20 22  
Barke Reed  
DEPUTY CLERK OF COURT  
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A TRUE COPY-ATTEST