CLARE LINN WELKER and ABIGAIL METZGER WELKER, Trustees of the Big Sky Trust UDT 11-14-2002, Plaintiffs,

V.

MOUNT DALLAS ASSOCIATION, a Washington non-profit corporation; et al., Defendants.

NO. 15-2-05069-0

REPLY DECLARATION OF SANDRA HAWLEY TO PLAINTIFFS' RESPONSIVE PLEADINGS

I, Sandra J Hawley, declare as follows:

- 1. I am over the age of 18 and I am competent to be a witness in this lawsuit. I make the following statements based upon my personal knowledge. In February 2015, I was appointed by the Board as Treasurer of Mount Dallas Association (the Association). I was previously the elected Treasurer from 2012 to August 2014. My husband Robert C. Tauscher and I are also Defendants in this lawsuit. We own one parcel of land on San Juan Island, which we access via Mount Dallas Road and the side road Kiya Way.
- 2. I make this Declaration in reply to the Plaintiffs' Responsive Pleadings, Summary Judgment hearing date: April 15, 2016 at 1:30 pm.
- 3. I testify herein as to certain Association matters from personal involvement, and to certain such matters after a careful review of the Association's records. The Association was formed and incorporated in the State of Washington in 1989. Article III of the Articles of Incorporation state that:

DECLARATION OF SANDRA HAWLEY IN - 1 SUPPORT OF MOUNT DALLAS ASSOCIATION'S MOTION FOR SUMMARY JUDGMENT Derek Mann & Associates, PLLC P.O. Box 399 Eastsound, WA 98245 360-376-3299

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"The corporation is organized exclusively for civic improvement, road maintenance, and neighborhood beautification purposes, in accordance with the Washington Non-Profit Corporation Act, RCW 24.03 and Section 501(c)(4) of the Internal Revenue Code of 1954, as may be amended from time to time. Without limitation of the foregoing, the corporation has the following specific purposes:

- 1. To maintain and upgrade the Mt. Dallas Road.
- 2. To foster the improvement beautification, betterment, and preservation of the Mt. Dallas area.
- 3. To identify and describe problems and general areas of community concern relating to Mt. Dallas and its environs.
- 4. To provide a method for the establishment of communication and cooperation between the community and local government.
- 5. To provide a means for actions (including administrative appeals and litigation) for the protection of the interests of its members and the community regarding issues of concern, governmental or otherwise."

The records show that the Association has filed and paid all requisite State and Federal licensing fees and taxes. It also maintains liability insurance for the approximately six miles of roads in the Mt. Dallas road network. An analysis of financial records since 1989 revealed that over \$500,000 has been received by the Association through March 1, 2016, for its use in administering and maintaining all the roads.

- Plaintiffs allege that the Association is not a legal entity, relying on a recent Court of 4. Appeals case with different facts. Our Association was not formed as a result of a road maintenance agreement, but instead was formed on a voluntary basis, has existed for 27 years, and has filed all required legal, licensing, tax and other documents. The Association was not formed to own the roads, but to maintain them. Judge Eaton said in the October 30, 2015 Summary Judgment Hearing that, "It's not disputed that the Association exists. That it's a legal entity, that's not disputed."
- Plaintiffs also allege, and I quote: "Given this Court's prior statement at the October 30, 2015 hearing that the Association lacked the authority to impose a road maintenance agreement..." I attended that court hearing and have a copy of and have listened to the audio

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recording of that court hearing and a transcription. What the Court actually said is that the Association lacked LEGAL rights or LEGAL interest in the road – the physical roadbed itself." The Association has never claimed to have any ownership in the road. One of the reasons that the Association was formed was to facilitate the maintenance of the road. See item 3 above. What the Court did say was that "There may be some EQUITABLE rights that we need to address..." The Judge also said "The Association may have legal authority to manage the roads on behalf of some of the benefitted owners." And "it's undisputed that there are at least some benefitted owners that have never agreed to be bound by anything the Association has done."

There currently are at least 63% of the 84 properties and 64% of the 61 owners who have signed a joinder with the Mt. Dallas Road Maintenance Agreement and by doing so have entered into a legal contract with the Association giving the Association the legal authority to manage the roads on their behalf.

6. Abigail Welker's declaration attempts to confuse this Court with inaccurate and misleading statements. She alleges that the Actual Use Method used by the Association assumes that the Mt. Dallas Road is a contiguous non-exclusive easement where all properties have rights to use all portions of the road. That is not true. Attached hereto as <u>EXHIBIT A is an example of the data used and how the Association proposes to calculate assessments</u>.

Column 1 of <u>EXHIBIT A</u> shows the lineal feet as calculated by the GIS program coordinator of San Juan County.

Column 2 contains verbal descriptions of each assessment point as designated on a map provided to me by the GIS program coordinator.

Column 3 contains cumulative assessment points. These assessment points calculate to a total lineal distance of 10,858 feet. (Compare this to the total lineal distance of 10,859 feet of chip seal applied and as calculated by the contractor, Tom Doolittle.)

Columns 4 through 7 shows the data from the Association Road Committee comprised of three property owners from various parts of the Mt Dallas Association area. The Mt. Dallas Road was measured by them in 2011 from West Side Road to the end of the chip-sealed area.

Column 4 shows the width of the road using measurements at 100 ft. intervals from the beginning to the end of Mt. Dallas Road as measured by the road committee.

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DECLARATION OF SANDRA HAWLEY IN SUPPORT OF MOUNT DALLAS ASSOCIATION'S

MOTION FOR SUMMARY JUDGMENT

Column 5 is a calculation of the area by multiplying the measurements in Column 1 by the measurements in Column 4.

Column 6 shows the areas calculated between assessment points.

Column 7 is the total of these assessment points in Column 6 at intervals to match the areas as shown in Column 8 as calculated by San Juan Surveying in 2015. The cumulative area from the road committee data totals 139,996 which was before Mt Dallas Road was chip sealed the second time in 2011. Compare this with the final Tom Doolittle total area that was actually chipsealed of 140,305 square feet of road. This difference can be accounted for by the road committee measurements taken before the 2011 chip-sealing and the actual chip-sealing which would have added additional chip-seal along road edges, etc.

Column 8 shows the areas as shown on the San Juan Surveying map that the Association was permitted to use. That total square footage area was 145,728.

Column 9 brings in only 4 additional assessment points which were missing from the San Juan Surveying data. This was necessary because the Mount Dallas Association Mt Dallas reserve calculation is based on square feet of road used to the access point to a property's driveway, to a side road or to the midpoint of an undeveloped lot if there is no driveway.

EXHIBIT B shows an example of the Mt Dallas reserve calculation for 2015 and a method for future reserve assessment calculations. This uses the area in square feet (distance x width) traversed by each property and is based on the San Juan Survey data in Exhibit A. An undeveloped lot is assessed at 25% of a developed lot which is shown in the columns labeled 25% and 100%.

For example, the first section is 14,304 square feet of area traversed to Lower No Name Road. There are two developed lots at 100% of the 14,304 square feet and one undeveloped lot at 25% of the 14,304 square feet. This translates to a Mt Dallas reserve assessment of \$68.36 each for the two developed lots and \$17.09 for the undeveloped lot which is shown under the columns labeled Road Reserves. All 84 owners of lots traverse this section to get to the access point of their property.

The next property has a cumulative area of 15,184 divided by 25% or 3,796 because this is an undeveloped lot resulting in a reserve assessment of \$18.09. For this calculation, only 81 owners of lots traverse this additional section to get to their access point of their property.

This concept continues all the way to the end of the chip seal calculated for the area traversed and either a developed or undeveloped property to each property's access point from Mt. Dallas Road. As each section is calculated, the number of owners of lots traversed to the next point decreases. Until the last section where the total area traversed by the last 11 tax parcels is 145,728. At each access point of Mt. Dallas Road, the number of properties decreased depends on how many properties are left who traverse the remaining section of the road.

<u>EXHIBIT B</u> demonstrates this method as described below. The dollar amounts are used as examples only, both for reserves and administrative costs.

Column 1 shows the property owners' names. This also changes the Welker lot from two to one reflecting their lot merger in December 2015.

Column 2 identifies each tax parcel number that is considered to have an easement access from West Side Road up Mt. Dallas Road to its' access point.

Column 3 identifies each tax parcel as developed or undeveloped. This can readily be changed as a property becomes developed or otherwise changed in the future.

Column 4 shows the square footage of the area up Mt. Dallas Road to the end of the chip sealed point of 145,728 which is documented in Exhibit A. Note that the Plaintiffs most recent spreadsheet from Robert Wilson of San Juan Surveying only shows 144,152 which is approximately 1,576 square feet or approximately 200 lineal feet short of the actual chip-sealed area of the road and different from his previous survey total of 145,728. As the Mt. Dallas reserve assessments are collected for the total chip-sealed area of Mt. Dallas Road, this additional square footage is important and should not be left out. This additional square footage of chip sealed area is assessed only to those property owners who traverse it to get to the access point of their property. It appears that the Plaintiffs are desirous of not continuing to administer maintenance of this last - to them – disputed section of Mt. Dallas Road.

Columns 5 and 6 show the calculation of reserve assessments, based on whether a property is developed or undeveloped; on the area traversed to their access point of their property and based on an estimated total amount of \$21,000 needed per year for the next chip-seal in 2019. This amount will change if the estimated total needed changes or if not all property owners pay their share of reserves for this year. Then the balance estimated to be needed would be added to the next years reserve assessment to be split between all owners on a proportional basis.

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Column 7 shows the billable square feet of each property as the area traversed to their access point goes up Mt. Dallas Road. The calculated number is either 100% or 25% depending on whether the property is developed or undeveloped.

Column 8 shows the individual parcel assessment based on whether it is developed or undeveloped.

Column 9 shows the percentage of individual parcel assessments of the assessment amounts in column 8.

Column 10 shows the equal allocation of the various administration and fire wise costs assessed to each property.

Column 11 shows the total assessment for each property.

approved by a vote of a majority of property owners. The Plaintiffs' have from time to time had issues with what they construe as unfair allocation of administrative and Fire Wise costs to all properties equally. This method has been approved by more than 76% of property owners. Insurance has been mentioned as something that the Plaintiffs feel is simply the responsibility of each side road. However, we were informed by our insurance company that if each side road had to get its own insurance policy, that instead of the current less than \$800 the Association pays to insure approximately 6 miles of the Mt. Dallas Road System, the cost would be a minimum of \$500 for many of the side roads and Mt. Dallas Road plus some additional based on the length of each road. That would be at least \$7,000 and not the less than \$800 that is currently invoiced by the insurance company.

It appears the Plaintiffs would like all the administrative costs to be allocated on a proportional basis as well as the reserve for Mt. Dallas Road. That has been inferred by them or their legal representation in past correspondence or legal documents that have been filed. This would mean that a postage stamp would cost more for those who live near the end Mt. Dallas Road than for those who have property at the beginning. That is not fair or equitable. By having the Association be the managing entity and the RMA as the legal document governing the management, a huge benefit occurs with the economy of scale. The rationale for assessing equally for Fire Wise expenses has a basis in that if a fire started anywhere on the mountain, and

that fire generally goes uphill, that all properties would ultimately benefit for having weeds kept in control thereby potentially saving lives, structures and woodlands.

11. The Association has received assessment payments with a 79% participation rate for all of the 84 parcels owners in the Mt. Dallas Road System for the year 2015. This additional data along with the joinder participation shows that a majority of Mt. Dallas property owners are in agreement with what Mt. Dallas Association is doing.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED THIS 11 day of April 2016.

Signed at Friday Harbor, Washington.

Sandra Hawley, Treasurer
Mount Dallas Association

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to turnout at bottom of Mt Dallas	tom of Mt Dallas		,		1727			
291 to beginning of Gerhardstein lot	ierhardstein lot		14.5					
381 to no name road bottom	bottom		14.5	4219.50				
51 to Gerhardstein driveway	Iriveway	877	14.5	-,	12,717	14444	14304	
227 to end of Gerhardstein lot	İstein lot	928	14.5	739.50	740		-	
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90 to end of Twoomey lot	y lot	7709	13.6	489.60	2,666	34159	34763	
403 to Bienvenu driveway	vay	7764	13.0	1724.00				
10 to Bienvenu not driveway	iveway	19/7	13.6	5480.80	6,705	40864	41850	
171 to end of Bienvenu	171 to end of Bienvenu lot & beginning of Ballor lot	2771	13.6	136.00				
213 to beginning of Larkspur	kspur		13.6	2325.60				
327 from Larkspur to Di	327 from Larkspur to Durhack skid trail Mt Dallas	3155	13.6	2896.80	5,358	46223	07474	
150 to beginning of Roberts lot	ierts lot		13.6	4447.20				
38 to Roberts driveway	1		13.6	2040.00				
30 to end of Roberts lot	1	3670	13.6	516.80	7,004	53227	54036	
300 to Trout Lake road			13.6	408.00			00000	
130 to beginning of Henneman/Graham lot	neman/Graham lot	4000	13.6	4080.00		57715		
681 to Henneman first driveway driveway	riveway driveway		13.6	1768.00			Ī	
16 to Henneman 2nd driveway (Graham?)	riveway (Graham?)	4811	13.6	9261.60	15,518	68744	22209	
497 to beginning of Welker lot	ker lot	4827	13.6	217.60	218		missing	
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Exhibit A page 1

78 to Nighthawk	5368	12.8	.8 563.20	6 975	75007		
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128 from Auth driveway to beginning of Meverott lot	6260	12.8	8 2905.60	6,464	87304	1	
39 Meyerott 1st driveway		12.8	3 1638.40		L	00000	
91 Meyerott well	6427	12.8		2138			
268 to end of Meyerott lot heginning of Kodin Lin	6518	12.8	1			92077	
102 Keeler driveway		12.8			/nans		
beginning of Lighman	6888	12.8		F 001	2000		
68 Tumac		12.8			95343	98111	
107 Liebman driveway Mt Dallas	6669	12.8		1 421	0000		
180 end of Liebman lot beginning of Bonus Jak	7106	12.8	-		50/05	99393	
388 to telephone box		12.8			20133	101196	
109 end of Borys lot beginning of Hohanka lot #1	7674	12.8	L		405,400		
149 to Sunridge		12.8	1395.20		103403		
461 end of Hohenloe lot #1 heginning of tick .	7932	12.8	1907 20	10 573	00000		
405 Windridge & beginning of Bath lot #1		12.8	5900 80	C/C'OT	T08/06	112055	
277 end of Rath lot #1 & Rockledge hadington 6:	8798	10.3	4171.50	10.07	440170		
340 midpoint of Rath lot #2	9075	10.3	2853 10	2000	116//8	123359	
102 end of Hill lot #1	9415	10.3	3502.00	2 502	121631	127248	
238 end of Rath lot #2 Hill lot #24-i-		10.3	1050 60	20010	172133	missing	130,750
207 midpoint of Rath lot #3	9755	10.3	2451 40	2 500			
207 end of Rath lot #3 heginning of All.	9962	10.3	2132 10	20040	1	134612	
171 Allen driveway residence		103	2122 40	7,132	130767	missing	136,744
30 Stormridge	10340	10.0	12C4 20				
99 and of Allow Lat 1.	10370	10.0	1/61.30	3,893	134661	140503	
192 Crawford drivers	0.00	10.5	309.00	309	134970	141128	
97 linnar no see	10661	10.3	1019.70				-
when no name road, end of chipseal	10000	10.3	1977.60	2,997	137967	144152	
	OCOOT	10.3	2029.10	2,029	139996	145728	
10858 Total linear feet from West Side Road to end of chipseal per GIS		+	139.996 1	130 006			
Additional lineal measurements past end of chinearlood Mt. D. II.		-		OCC ICC			
91 from upper no name road to beginning of Eichler lot							
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窗	EXHIBIT B - Total Mt Dallas Road Assessi		ample	Utilizing Act	ual Use M	ethod & B	ased on SI S	urvey Resu	nent Example Utilizing Actual Use Method & Based on SI Survey Results July 29, 2015		
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	\$21,000		1	2015	25% at	25% and 100%		Ros	Road Reserves	\$5,100	
I	T		1	SI Survey	25%	300%	Dev & Undev	Individual	Individual	Shared	
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-	Albert	451414002	O	14,304	- Serpende transferre prompte de pro-	14,304	14,304	68.36	0.3255%	60.71	129.08
7	Dearfield	451332002	O	14,304		14,304	14,304	68.36	0.3255%	60.71	129.08
m	Security Prop (Lot #1.)	451332001	ח	14,304	3,576		3,576	17.09	0.0814%	60.71	77.81
4	Gerhardstein	451414004	ם	15,184	3,796		3,796	18.14	0.0864%	60.71	78.86
5	SJ Preservation Tr	451414003	n	21,245	5,311		5,311	25.38	0.1209%	60.71	86.10
9		451414005	D	24,971	6,243		6,243	29.84	0.1421%	60.71	90.55
1	Swin (Lot #1)	451414001	۵	27,734		27,734	27,734	132.55	0.6312%	60.71	193.26
8	Swin (Lot #2)	451411002	ם	27,734	6,934		6,934	33.14	0.1578%	12.09	93.85
6	Swin (Lot #3)	451411003	5	32,076	8,019		8,019	38,33	0.1825%	60.71	99.04
10		451411001	5	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
7	Tauscher/Hawley	451144004	۵	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
77		451144003		32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
13		451144001	۵	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
14	Ì	451144002	۵	32,076		32,076	32,076	153.30	0.7300%	12.09	214.02
15		451141003	5	32,076	8,019		8,019	38,33	0.1825%	12.09	99.04
16		451141001	۵	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
17		451142001	5	32,076	8,019		8,019	38.33	0.1825%	12.09	99.04
18		451142002	5	32,076	8,019		8,019	38.33	0.1825%	17.09	99.04
2		451141002	5	32,076	8,019		8,019	38.33	0.1825%	17.09	99.04
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77		451114001	5	32,076	8,019		8,019	38.33	0.1825%	17.09	99.04
77		451114004	5	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
23		451113005	٥	32,076		32,076	32,076	153.30	0.7300%	17.09	214.02
24		451113002	٥	32,076		32,076	32,076	153.30	0.7300%	17.09	214.02
25		451113001	۵	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
56		451322002	0	34,763	-	34,763	34,763	166.14	0.7912%	17.09	226.86
27		451322003	۵	41,850		41,850	41,850	200.01	0.9524%	17.09	260.73
78		451323001	٥	47,470		47,470	47,470	226.87	1.0803%	60.71	287.59
52	1	451323003	5	47,470	11,868		11,868	56.72	0.2701%	60.71	117.43
8	1	451324002	۵	47,470		47,470	47,470	226.87	1.0803%	12.09	287.59
31	T	451323004	۵	47,470		47,470	47,470	226.87	1.0803%	17.09	287.59
32		451332003	٥	47,470		47,470	47,470	226.87	1.0803%	17.09	287.59
ee .		451332004	٥	47,470		47,470	47,470	226.87	1.0803%	12.09	287.59
*	-	451322001	5	54,036	13,509		13,509	64.56	0.3074%	12.09	125.28
£,	_	451322004	5	54,036	13,509	i i	13,509	64.56	0.3074%	60.71	125.28
98		451324002	٥	99,769		99,766	99,766	333.43	1.5878%	12.09	394.15
37		451324004	5	69,984	17,496		17,496	83.62	0.3982%	17.09	144.33
38		451324005		79,040		79,040		377.76		60.71	438.47
m':	1	451313003		79,040		79,040		377.76		60.71	438.47
3	Jouggins/Demier	451313001		1040/6/	I	79,040	79,040	377.76	1.7988%	17.09	438.47

Exhibit B page 1

41	Chapman/Johnson	451313002	L	704		AND CONTRACTOR OF THE PERSON O		The factor of th			
42		451331001	7 6	79,040	40 19,760			50 94.44	4 0.4497%	1209	7 22 4 2 4 2 4 5 4 5 4 5 4 5 4 5 4 5 4 5
43	Auth	451331002	1	245,242	74	82,542		42 394.49			
44	Meyerott/Bryant	451331002		89,555	22	89,555					
45	-	A5122100		92,077	1	92,077	7 92,077	77 440.06			
46	McAlary (Lot #1)	AETOANON	1	98,111	11 24,528		24,528				
47	McAlary (Lot #2)	45154200.	1	99,393	-	99,393	99,393				
48	liehman (I o+ #1)	451342002		99,393	33 24,848	138	24,848	L			
9	lichman (les 40)	451342003	2	101,196	36 25,299	66	25,299	L			
1	Medical (LOC #2)	451342004	2	101,196	16 25,299	6	25 200	+			
2 5	veeler (Lot #2)	451334008	2	112,055	L	4	78014	1			181.63
7		451334009	כ	112.055	L	A	20044	-		60.71	194.60
25		451334010	٥	112.055	1			-		60.71	
53		451334011	L	112 055	+	112,055		1	2.5502%		-
54	Rath (Lot #1)	451334002	L	422.05	4TO'97			_	0.6376%		-
55	Hohenlohe (Lot #1)	451343005		123,359	0 0	123,359	123,359	9 589.57	•		
26		464545000		17,748		127,248	127,248	3 608.16			
27		400046764		127,248	8 31,812	2	31.812				
; ;		451344002	ב	127,248	8 31,812	2	21 917	1			
2 5	UIII (COT #T)	452412001	۵	127,248		127 248	137.70	+			212.75
5	Guard	452411001	۵	127.248	a	127 240		1		60.71	668,87
9	Borys (Raab)	451343006	0	127 248		121,248	-	-	2.8960%	6 60.71	668.87
19	Keeler (Lot #6)	451343001	=	277740	+	77/748		_	2.8960%	60.71	668 87
62	Erskine	451343002	0	047,124	21,812				0.7240%		27. 7.12
63	Swanson	4513/13/002	=	77175	+	127,248	127,248	608.16	2.8960%		00000
64	Rath (Lot #2)	452421002		177,748	+		31,812	152.04	0.7240%		75.000
65	Hill (Lot #2)	AE3443002	0	130,750	1		32,688		0 7439%		27772
99	Allen (Lot #1)	4524412002	0	134,612	-		33,653	L	7659%	7/70	216.94
_ 19	Rath (I or #3)	Z00TT-2C-		134,612			33,653		0 78500		771.55
1	Allen (1 ot #2)	422421004	ח	136,744	34,186		34,186		9000CF 0		221.55
Т	Chamber	452414001	۵	140,503		140,503	140 503	-	0.7780%		224.10
T	Stating	452414004	٥	141,128		141 128	141 170	TC'T /O	3.1976%	60.71	732.22
	McClellan	452413004	۵	141.128		1/1 120	141,120	1	3.2119%	17.09	735.21
_	Weyerott	452413002	כ	141.128	35 282	077/717	27,170	4	3.2119%	60.71	735.21
	Ballenger	452414002	۵	141 128	L	000 176	32,282	168.62	0.8030%	17.09	229.34
	Crawford	452413005	0	144 152		144 450	141,128	674.49	3.2119%	17.09	735.21
	Widdoes (Lot #1)	452424004	0	145,728		744,152	. 144,152	688.95	3.2807%	60.71	749.66
	Widdoes (Lot #2)	452424002	3	145 770	25 422	742//S	145,728	696.48	3.3166%	60.71	757.19
76	Widdoes (Lot #3)	452424001	=	1/15 770	+		36,432	174.12	0.8291%	60.71	734 83
1	Widdoes (Lot #4)	452431004	=	1/15 770	36 437		36,432	174.12	0.8291%	60.71	734.83
7	Security Prop (Lot #2)	452431003	1	145 738	36 430		36,432	174.12	0.8291%	60.71	234.83
2	Taylor	452431002	=	145 710	+		36,432	174.12	0.8291%	60.71	E8 76C
8	Eichler	452413006	=	145 710	+		36,432	174.12	0.8291%	60.71	28 784
81	Gero (Lot #2)	452442002	, =	143,720	30,437		36,432	174.12	0.8291%	17.09	20 400
82	Schilling	452442001		145,728	36,432		36,432	174.12	0.8291%	17.09	234.03
83	Schoebel/Farrer	AESAASOOS	2 0	145,728		145,728	145,728	696.48	3.3166%	77.00	234.83
۳	Gubelman	452442004		145,728		145,728	145,728	696.48	3.3166%	20.00	15/.19
		175114004		145,728		145,728	145,728	696.48	3 3166%	1,00	(5/.19
广	Totals		1							00.77	757.19
and a second	entropy with the property and a series of the committee of the company of the committee of	A second	1		901,902	3,492,047	4,393,949	21,000,00	100 00%	2000	
							Martin or Continues of Continues on	Total Contract of the Party of	EVONONT.	5,100	26 100

Exhibit B page 2