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SUPERIOR COURT OF WASHINGTON, COUNTY OF SAN JUAN

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

NO. 15-2-05069-0

v.

**REPLY DECLARATION OF
JAMES GUARD TO
PLAINTIFFS' RESPONSIVE
PLEADINGS**

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

I, James Guard, 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. I am a Board member of the Mount Dallas Association, one of the Defendants in this lawsuit. I am a past president of the Association and was instrumental in its formation in 1989. I have spent hundreds of hours working on the roads and have been a member of the Road Committee since the inception of the Association in 1989. My wife, Mary Guard and I, also Defendants in this lawsuit, own one tax parcel of land on Mt. Dallas, which we access via Rockledge Road and Mount Dallas Road.

2. In order to see the dollar differential between the Welker Legal Use Method and the Mt. Dallas Association's Actual Use Method, I have included as Exhibit A, a spreadsheet entitled "Total Mt Dallas Road Assessments" which shows the amount each tax parcel owner

1 would pay for 2016 assessments. This methodology utilizes the Association's Actual Use
2 Method (road area traversed to access one's property) as specified in the Association's RMA
3 (AFN 2016- 0302026). The entire spreadsheet reflects the 2016 approved budget that includes
4 \$21,000.00 in Road Reserves for the eventual repaving of the Mt Dallas Road (4th column from
5 the left) and the equally shared projected expenses of \$5,100.00 which equate to \$60.71/ tax
6 parcel. The last column shows the total expenses for each tax parcel for 2016.
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8 3. The second spreadsheet entitled "Welker Legal Use Method" (Exhibit B) shows
9 how fees are assessed using the Welker's method of calculating area based upon each parcel's
10 access easement. The road areas and percentages come straight from Bob Wilson's March 4,
11 2016 Declaration in Support of Plaintiff's Motion for Summary Judgment, Exhibit C. The
12 Welker spreadsheet satisfies the same 2016 budget figure of \$26,100.00 and shows the total
13 amount assessed to each parcel in the left column. Note that the Welker's have not reduced
14 assessments for undeveloped lots (i.e. undeveloped parcels pay the same as developed) and they
15 have not specifically addressed the allocation of yearly costs the Association currently bears such
16 as insurance, weed whacking and other expenses which benefit all property owners equally.
17

18 4. Nor have they addressed additional costs which they will likely bear if they are
19 successful in this lawsuit. In the past, the Welkers have often expressed a preference for a
20 professional management company and/or a full time bookkeeping service instead of a volunteer
21 board. Because the vast majority of property owners are not in favor of the Welker's methods
22 and would never serve on a Welker board anyway, it's very probable that those additional
23 expenses will be implemented (if the Welkers prevail), and those costs could become a further
24 financial burden to all of the tax parcels in the neighborhood.
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27 5. The third spreadsheet (Exhibit C) is a summary that concisely shows the
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1 differences between the two methodologies. The largest and most obvious discrepancy is that all
2 undeveloped parcels pay considerably more in the Welker Legal Use Method. In turn, developed
3 lots pay more in the Association's Actual Use Method. The Association's RMA tries to reflect
4 the less frequent usage of the owners of undeveloped parcels by discounting undeveloped parcels
5 by 75%. This is exactly as it should be. Full time residents and developed properties use the
6 road more and they should pay more.
7

8 6. There are subtle differences as well. All the problems with the Legal Use Method
9 that I pointed out in my Declaration in Response to Plaintiffs' Motion for Partial Summary
10 Judgment still hold: 32 properties must pay for road area they do not traverse, the Legal Use
11 Method can be easily changed and manipulated, the end point used for all the area calculations is
12 an arbitrary point and does not include the last 195' of paved road, thus making all the
13 calculations inaccurate, the end of the 58585 easement has been rescinded and has been
14 misrepresented in Exhibit B of Bob Wilson's Declaration, etc. All of these problems still exist
15 and so, I must restate everything included in my Declaration in Response to Plaintiff's Motion
16 for Partial Summary Judgment. The Legal Use Method is unfair because assessments are not
17 based upon the actual road area used, and they do not reflect frequency of use.
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20 7. By not dealing with how to assess undeveloped lots and by not addressing
21 equally shared costs such as insurance and week whacking, the Welker's have drawn out and
22 prolonged this legal process. Without a full allocation method, they have made the decision
23 making process convoluted, and they have made it difficult to compare the various
24 methodologies. How can allocation be determined if the Association has presented a complete
25 methodology while the Welkers have only offered a partial solution? Even stripping down the
26 Association's Actual Use method and the Welker's Actual Use method for the repaving of the
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1 Main Road only, there are enormous discrepancies. Considering the fact that both methods use
 2 the same San Juan Survey data, the two should be very close in Reserve Fund assessment dollars.
 3 However, they are not. The following table shows six examples of adjoining, side by side
 4 properties at the beginning, the middle and the end of the road. The first of each pair is
 5 developed; the second is undeveloped:
 6

7 **MAIN ROAD RESERVES - \$21,000.00**

MDA ACTUAL USE				<u>Welker ACTUAL USE</u>	
Name	%	\$	Dev/Undevl	%	\$
Albert	.3255	\$68.36	D	.202	\$42.42
Security Prop	.0814	17.09	U	.202	42.42
McAlary	2.262	475.02	D	1.403	294.63
McAlary	.5655	118.76	U	1.403	294.63
Schilling	3.3166	696.48	D	2.035	427.35
Gero	.8291	174.12	U	2.035	\$27.35

14 Because the two actual use methods use the same San Juan Survey data, one would think the
 15 assessment results would be very close, but as you can see, there are large differences between
 16 the two. This is because the Welkers have not addressed and included the undeveloped parcel
 17 issue. The Association's Actual Use method is straightforward, totally understandable and fair.
 18 For a given parcel the square footage of use is calculated. That parcel's square footage is then
 19 divided by the sum of all the 84 parcel's square footages to result in a percentage of road utilized
 20 for that given parcel. If the lot is undeveloped, that lot's percentage is then multiplied by .25.
 21 The final percentage is multiplied by the \$21,000.00 budgeted reserve figure. The Welker's
 22 would like the Court to support their Legal Use method when they have left out one important
 23 factor – whether a lot is fully developed or undeveloped. It's like trying to judge a soup when all
 24 the ingredients are not in the pot, and it misrepresents the assessments for every lot.
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28 8. At this point, I am more optimistic than ever that this lawsuit can be soon settled.

1 The Association has spent hundreds of hours creating a well thought out and comprehensive
2 RMA with very broad community support. We have talked to our neighbors, conducted surveys,
3 sent out petitions and asked what the owners want. We have solicited the advice of three
4 attorneys, all of whom thought our RMA was reasonable, fair and equitable. In contrast, the
5 Welkers have changed tacks innumerable times and presented endless arguments, piles of copies
6 and references to court cases which supposedly support each of their new positions. Their
7 positions are constantly changing and shifting. All they have done in the past year is to dictate
8 terms. They haven't asked the community how it wants to see the road managed. That is
9 actually quite understandable. They can't ask the community because the reality is the Welkers
10 have very minimal neighborhood support. They can only dictate and try to bury us with a
11 complex array of legal terms and piles of paper that are meaningless to most of us. I seriously
12 doubt that the Welkers can get many people to sign their RMA. This lawsuit has become
13 frivolous. Things were pretty good on Mt. Dallas before this lawsuit. The stack of paperwork
14 created for this second Summary Judgment is ludicrous. The money spent could certainly have
15 been better utilized for a fresh coat or two of chipseal. Please respect what the majority of the
16 residents desire and use the Mt. Dallas RMA as a stepping stone to reunite our community.
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21 I declare under penalty of perjury under the laws of the State of Washington that the foregoing is
22 true and correct.

23
24 DATED THIS 10TH day of APRIL 2016 ~~2015~~ JG

25
26 James Guard
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EXHIBIT A

Total Mt Dallas Road Assessment Utilizing Actual Use Method & Based on SJ Survey Results July 29, 2015											
				Per 2015	25%	100%	Road Reserves			\$5,100	
				Survey of	X	X	Individual	Individual	Shared		
41	Undeveloped Parcels			MD Rd	Sq Ft	Sq Ft	Total	Parcel	Parcel	Equal per TPN	Total
43	Developed Parcels	Tax Parcel		Cumm	for	for	Billable	Assessment	Assessment	Adm &	Assessment
84	Total Parcels (U + D)	Number		Sq Ft	UnDvlpd	Dvlpd	Sq Ft	\$	%	FireWise	
1	Albert	451414002	D	14,304		14,304	14,304	68.36	0.3255%	60.71	129.08
2	Dearfield	451332002	D	14,304		14,304	14,304	68.36	0.3255%	60.71	129.08
3	Security Prop (Lot #1)	451332001	U	14,304	3,576		3,576	17.09	0.0814%	60.71	77.81
4	Gerhardstein	451414004	U	15,184	3,796		3,796	18.14	0.0864%	60.71	78.86
5	SJ Preservation Tr	451414003	U	21,245	5,311		5,311	25.38	0.1209%	60.71	86.10
6	Haberman	451414005	U	24,971	6,243		6,243	29.84	0.1421%	60.71	90.55
7	Swin (Lot #1)	451414001	D	27,734		27,734	27,734	132.55	0.6312%	60.71	193.26
8	Swin (Lot #2)	451411002	U	27,734	6,934		6,934	33.14	0.1578%	60.71	93.85
9	Swin (Lot #3)	451411003	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
10	Silverstein	451411001	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
11	Tauscher/Hawley	451144004	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
12	Sabin/Troutman	451144003	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
13	Fritz	451144001	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
14	Davis (Lot #1)	451144002	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
15	Lagerquist	451141003	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
16	Sheppard	451141001	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
17	Navratil	451142001	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
18	Kroesche	451142002	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
19	Padilla	451141002	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
20	Boyd	451113007	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
21	Francis (Lot #1)	451114001	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
22	Francis (Lot #2)	451114004	U	32,076	8,019		8,019	38.33	0.1825%	60.71	99.04
23	Blackmer	451113005	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
24	Severson	451113002	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
25	Davis (Lot #2)	451113001	D	32,076		32,076	32,076	153.30	0.7300%	60.71	214.02
26	Twoomey	451322002	D	34,763		34,763	34,763	166.14	0.7912%	60.71	226.86
27	Bienvenu/Anderson	451322003	D	41,850		41,850	41,850	200.01	0.9524%	60.71	260.73
28	Bailor	451323001	D	47,470		47,470	47,470	226.87	1.0803%	60.71	287.59
29	Schumey	451323003	U	47,470	11,868		11,868	56.72	0.2701%	60.71	117.43
30	Pryzbylski	451324002	D	47,470		47,470	47,470	226.87	1.0803%	60.71	287.59
31	Kaufman	451323004	D	47,470		47,470	47,470	226.87	1.0803%	60.71	287.59
32	Whalen	451332003	D	47,470		47,470	47,470	226.87	1.0803%	60.71	287.59
33	Gimlett	451332004	D	47,470		47,470	47,470	226.87	1.0803%	60.71	287.59
34	Roberts (Lot #1)	451322001	U	54,036	13,509		13,509	64.56	0.3074%	60.71	125.28
35	Roberts (Lot #2)	451322004	U	54,036	13,509		13,509	64.56	0.3074%	60.71	125.28
36	Henneman	451324002	D	69,766		69,766	69,766	333.43	1.5878%	60.71	394.15
37	Graham	451324004	U	69,984	17,496		17,496	83.62	0.3982%	60.71	144.33
38	Welker	451324005	D	79,040		79,040	79,040	377.76	1.7988%	60.71	438.47
39	Casey	451313003	D	79,040		79,040	79,040	377.76	1.7988%	60.71	438.47
40	Duggins/Dethier	451313001	D	79,040		79,040	79,040	377.76	1.7988%	60.71	438.47
41	Chapman/Johnson	451313002	U	79,040	19,760		19,760	94.44	0.4497%	60.71	155.15
42	Gero (Lot #1)	451331001	D	82,542		82,542	82,542	394.49	1.8785%	60.71	455.21
43	Auth	451331002	D	89,555		89,555	89,555	428.01	2.0381%	60.71	488.72
44	Meyerott/Bryant	451331003	D	92,077		92,077	92,077	440.06	2.0955%	60.71	500.78
45	Keeler (Lot #1)	451331005	U	98,111	24,528		24,528	117.23	0.5582%	60.71	177.94
46	McAlary (Lot #1)	451342001	D	99,393		99,393	99,393	475.03	2.2620%	60.71	535.74
47	McAlary (Lot #2)	451342002	U	99,393	24,848		24,848	118.76	0.5655%	60.71	179.47
48	Liebman (Lot #1)	451342003	U	101,196	25,299		25,299	120.91	0.5758%	60.71	181.63
49	Liebman (Lot #2)	451342004	U	101,196	25,299		25,299	120.91	0.5758%	60.71	181.63
50	Keeler (Lot #2)	451334008	U	112,055	28,014		28,014	133.89	0.6376%	60.71	194.60
51	Keeler (Lot #3)	451334009	U	112,055	28,014		28,014	133.89	0.6376%	60.71	194.60
52	Keeler (Lot #4)	451334010	D	112,055		112,055	112,055	535.54	2.5502%	60.71	596.26
53	Keeler (Lot #5)	451334011	U	112,055	28,014		28,014	133.89	0.6376%	60.71	194.60
54	Rath (Lot #1)	451334002	D	123,359		123,359	123,359	589.57	2.8075%	60.71	650.28
55	Hohenlohe (Lot #1)	451343005	D	127,248		127,248	127,248	608.16	2.8960%	60.71	668.87
56	Hohenlohe (Lot #2)	451343004	U	127,248	31,812		31,812	152.04	0.7240%	60.71	212.75
57	Moss Trust	451344002	U	127,248	31,812		31,812	152.04	0.7240%	60.71	212.75
58	Hill (Lot #1)	452412001	D	127,248		127,248	127,248	608.16	2.8960%	60.71	668.87
59	Guard	452411001	D	127,248		127,248	127,248	608.16	2.8960%	60.71	668.87
60	Borys (Raab)	451343006	D	127,248		127,248	127,248	608.16	2.8960%	60.71	668.87
61	Keeler (Lot #6)	451343001	U	127,248	31,812		31,812	152.04	0.7240%	60.71	212.75

62	Erskine	451343002	D	127,248		127,248	127,248	608.16	2.8960%	60.71	668.87
63	Swanson	451343003	U	127,248	31,812		31,812	152.04	0.7240%	60.71	212.75
64	Rath (Lot #2)	452421002	U	130,750	32,688		32,688	156.22	0.7439%	60.71	216.94
65	Hill (Lot #2)	452412002	U	134,612	33,653		33,653	160.84	0.7659%	60.71	221.55
66	Allen (Lot #1)	452411002	U	134,612	33,653		33,653	160.84	0.7659%	60.71	221.55
67	Rath (Lot #3)	452421004	U	136,744	34,186		34,186	163.39	0.7780%	60.71	224.10
68	Allen (Lot #2)	452414001	D	140,503		140,503	140,503	671.51	3.1976%	60.71	732.22
69	Staunton	452414004	D	141,128		141,128	141,128	674.49	3.2119%	60.71	735.21
70	McClellan	452413004	D	141,128		141,128	141,128	674.49	3.2119%	60.71	735.21
71	Meyerott	452413002	U	141,128	35,282		35,282	168.62	0.8030%	60.71	229.34
72	Ballenger	452414002	D	141,128		141,128	141,128	674.49	3.2119%	60.71	735.21
73	Crawford	452413005	D	144,152		144,152	144,152	688.95	3.2807%	60.71	749.66
74	Widdoes (Lot #1)	452424004	D	145,728		145,728	145,728	696.48	3.3166%	60.71	757.19
75	Widdoes (Lot #2)	452424002	U	145,728	36,432		36,432	174.12	0.8291%	60.71	234.83
76	Widdoes (Lot #3)	452424001	U	145,728	36,432		36,432	174.12	0.8291%	60.71	234.83
77	Widdoes (Lot #4)	452431004	U	145,728	36,432		36,432	174.12	0.8291%	60.71	234.83
78	Security Prop (Lot #2)	452431003	U	145,728	36,432		36,432	174.12	0.8291%	60.71	234.83
79	Taylor	452431002	U	145,728	36,432		36,432	174.12	0.8291%	60.71	234.83
80	Eichler	452413006	U	145,728	36,432		36,432	174.12	0.8291%	60.71	234.83
81	Gero (Lot #2)	452442002	U	145,728	36,432		36,432	174.12	0.8291%	60.71	234.83
82	Schilling	452442001	D	145,728		145,728	145,728	696.48	3.3166%	60.71	757.19
83	Schoebel/Farrer	452442003	D	145,728		145,728	145,728	696.48	3.3166%	60.71	757.19
84	Gubelman	452442004	D	145,728		145,728	145,728	696.48	3.3166%	60.71	757.19
	Totals				901,902	3,492,047	4,393,949	21,000.00	100.00%	5,100	26,100

EXHIBIT B

40	Duggins/Dethier	451313001	79,040	1.082	282.40
41	Chapman/Johnson	451313002	79,040	1.082	282.40
42	Gero (Lot #1)	451331001	86,317	1.182	308.50
43	Auth	451331002	98,346	1.346	351.31
44	Meyerott/Bryant	451331003	98,346	1.346	351.31
45	Keeler (Lot #1)	451331005	98,346	1.346	351.31
46	McAlary (Lot #1)	451342001	99,393	1.361	355.22
47	McAlary (Lot #2)	451342002	99,393	1.361	355.22
48	Liebman (Lot #1)	451342003	99,393	1.361	355.22
49	Liebman (Lot #2)	451342004	99,393	1.361	355.22
50	Keeler (Lot #2)	451334008	112,055	1.534	400.37
51	Keeler (Lot #3)	451334009	112,055	1.534	400.37
52	Keeler (Lot #4)	451334010	112,055	1.534	400.37
53	Keeler (Lot #5)	451334011	112,055	1.534	400.37
54	Rath (Lot #1)	451334002	144,152	1.974	515.21
55	Hohenlohe (Lot #1)	451343005	144,152	1.974	515.21
56	Hohenlohe (Lot #2)	451343004	127,248	1.742	454.66
57	Moss Trust	451344002	127,248	1.742	454.66
58	Hill (Lot #1)	452412001	144,152	1.974	515.21
59	Guard	452411001	134,612	1.843	481.02
60	Borys (Raab)	451343006	127,248	1.742	454.66
61	Keeler (Lot #6)	451343001	127,248	1.742	454.66
62	Erskine	451343002	127,248	1.742	454.66
63	Swanson	451343003	127,248	1.742	454.66
64	Rath (Lot #2)	452421002	144,152	1.974	515.21
65	Hill (Lot #2)	452412002	144,152	1.974	515.21
66	Allen (Lot #1)	452411002	134,612	1.843	481.02
67	Rath (Lot #3)	452421004	144,152	1.974	515.21
68	Allen (Lot #2)	452414001	144,152	1.974	515.21
69	Staunton	452414004	144,152	1.974	515.21
70	McClellan	452413004	144,152	1.974	515.21
71	Meyerott	452413002	144,152	1.974	515.21
72	Ballenger	452414002	144,152	1.974	515.21
73	Crawford	452413005	144,152	1.974	515.21
74	Widdoes (Lot #1)	452424004	144,152	1.974	515.21
75	Widdoes (Lot #2)	452424002	144,152	1.974	515.21
76	Widdoes (Lot #3)	452424001	144,152	1.974	515.21
77	Widdoes (Lot #4)	452431004	144,152	1.974	515.21
78	Security Prop (Lot #2)	452431003	144,152	1.974	515.21
79	Taylor	452431002	144,152	1.974	515.21
80	Eichler	452413006	144,152	1.974	515.21
81	Gero (Lot #2)	452442002	144,152	1.974	515.21
82	Schilling	452442001	144,152	1.974	515.21
83	Schoebel/Farrer	452442003	144,152	1.974	515.21
84	Gubelman	452442004	144,152	1.974	515.21
	Totals		7,304,000	100.007	26,101.83

EXHIBIT C

Calculation of Difference between Actual & Legal

	Undeveloped Parcels = U	Tax Parcel	MDA	Welker	Total		Difference	
	Developed Parcels = D	Number	Actual	Legal	Difference		Dev	Undev
1	Albert	451414002	129.08	51.16	77.92	D	77.92	
2	Dearfield	451332002	129.08	51.16	77.92	D	77.92	
3	Security Prop (Lot #1)	451332001	77.81	51.16	26.65	U		26.65
4	Gerhardstein	451414004	78.86	101.01	-22.15	U		-22.15
5	SJ Preservation Tr	451414003	86.10	101.01	-14.91	U		-14.91
6	Haberman	451414005	90.55	101.01	-10.46	U		-10.46
7	Swin (Lot #1)	451414001	193.26	101.01	92.26	D	92.26	
8	Swin (Lot #2)	451411002	93.85	122.41	-28.56	U		-28.56
9	Swin (Lot #3)	451411003	99.04	122.41	-23.37	U		-23.37
10	Silverstein	451411001	99.04	114.58	-15.54	U		-15.54
11	Tauscher/Hawley	451144004	214.02	114.58	99.44	D	99.44	
12	Sabin/Troutman	451144003	214.02	114.58	99.44	D	99.44	
13	Fritz	451144001	214.02	114.58	99.44	D	99.44	
14	Davis (Lot #1)	451144002	214.02	114.58	99.44	D	99.44	
15	Lagerquist	451141003	99.04	114.58	-15.54	U		-15.54
16	Sheppard	451141001	214.02	114.58	99.44	D	99.44	
17	Navratil	451142001	99.04	114.58	-15.54	U		-15.54
18	Kroesche	451142002	99.04	114.58	-15.54	U		-15.54
19	Padilla	451141002	99.04	114.58	-15.54	U		-15.54
20	Boyd	451113007	214.02	114.58	99.44	D	99.44	
21	Francis (Lot #1)	451114001	99.04	114.58	-15.54	U		-15.54
22	Francis (Lot #2)	451114004	99.04	114.58	-15.54	U		-15.54
23	Blackmer	451113005	214.02	114.58	99.44	D	99.44	
24	Severson	451113002	214.02	114.58	99.44	D	99.44	
25	Davis (Lot #2)	451113001	214.02	114.58	99.44	D	99.44	
26	Twoomey	451322002	226.86	130.24	96.62	D	96.62	
27	Bienvenu/Anderson	451322003	260.73	157.64	103.08	D	103.08	
28	Bailor	451323001	287.59	193.14	94.45	D	94.45	
29	Schumey	451323003	117.43	193.14	-75.71	U		-75.71
30	Pryzbylski	451324002	287.59	193.14	94.45	D	94.45	
31	Kaufman	451323004	287.59	193.14	94.45	D	94.45	
32	Whalen	451332003	287.59	193.14	94.45	D	94.45	
33	Gimlett	451332004	287.59	193.14	94.45	D	94.45	
34	Roberts (Lot #1)	451322001	125.28	193.14	-67.86	U		-67.86
35	Roberts (Lot #2)	451322004	125.28	193.14	-67.86	U		-67.86
36	Henneman	451324002	394.15	275.09	119.05	D	119.05	
37	Graham	451324004	144.33	293.10	-148.77	U		-148.77
38	Welker	451324005	438.47	293.10	145.37	D	145.37	
39	Casey	451313003	438.47	282.40	156.07	D	156.07	
40	Duggins/Dethier	451313001	438.47	282.40	156.07	D	156.07	
41	Chapman/Johnson	451313002	155.15	282.40	-127.25	U		-127.25
42	Gero (Lot #1)	451331001	455.21	308.50	146.71	D	146.71	
43	Auth	451331002	488.72	351.31	137.42	D	137.42	
44	Meyerott/Bryant	451331003	500.78	351.31	149.47	D	149.47	
45	Keeler (Lot #1)	451331005	177.94	351.31	-173.37	U		-173.37
46	McAlary (Lot #1)	451342001	535.74	355.22	180.52	D	180.52	
47	McAlary (Lot #2)	451342002	179.47	355.22	-175.75	U		-175.75
48	Liebman (Lot #1)	451342003	181.63	355.22	-173.60	U		-173.60
49	Liebman (Lot #2)	451342004	181.63	355.22	-173.60	U		-173.60
50	Keeler (Lot #2)	451334008	194.60	400.37	-205.77	U		-205.77
51	Keeler (Lot #3)	451334009	194.60	400.37	-205.77	U		-205.77
52	Keeler (Lot #4)	451334010	596.26	400.37	195.88	D	195.88	
53	Keeler (Lot #5)	451334011	194.60	400.37	-205.77	U		-205.77
54	Rath (Lot #1)	451334002	650.28	515.21	135.07	D	135.07	
55	Hohenlohe (Lot #1)	451343005	668.87	515.21	153.66	D	153.66	
56	Hohenlohe (Lot #2)	451343004	212.75	454.66	-241.91	U		-241.91
57	Moss Trust	451344002	212.75	454.66	-241.91	U		-241.91

