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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

EMERY COUNTY (2), UTAH, a political subdivision, and STATE OF UTAH, Plaintiffs, vs. UNITED STATES OF AMERICA Defendant.	**AMENDED COMPLAINT TO QUIET TITLE** Case No. 2:12-cv-00429-CW Judge: Honorable Clark Waddoups

Emery County, Utah ("Emery County" or "County"), a Utah political subdivision, and the State of Utah ("State") (collectively referred to as "Plaintiffs") as their Amended Complaint against the Defendant United States of America ("United States"), allege as follows:

INTRODUCTION

This is an action to quiet title to certain described rights-of-way for highways, including the scope thereof, under the grant of Section 8 of the Mining Act of 1866, 14 Stat. 251, 253, later codified as Revised Statutes 2477 and as 43 U.S.C. § 932 (repealed October 21, 1976, with savings provisions recognizing validity of rights-of-way already established) (hereinafter "R.S. 2477"). For judicial convenience and ease of reference, the rights-of-way at issue herein have been divided into eight (8) geographic areas, each with approximately 11-64 roads. Each geographic area has been pleaded as a separate cause of action.

JURISDICTION AND VENUE

1. The claims asserted herein arise under the Quiet Title Act ("QTA"). 28 U.S.C. § 2409a (2006).

2. This Court has subject matter jurisdiction under 28 U.S.C. § 2409a (quiet title) and 28 U.S.C. § 1346(f) (quiet title), as this case involves Plaintiffs' claims to ownership of public highway rights-of-way crossing lands of the United States.

3. Plaintiffs claim title to the public highway rights-of-way crossing lands of the United States at issue in this case as joint undivided owners. *See* UTAH CODE ANN. §§ 72-5-302(2) (Supp. 2011) and -103(2)(b) (2004).

4. On or about May 16, 2011, the State filed a Notice of Intention to File Suit to Quiet Title to Certain Rights-of-Way in Emery County, Utah, with the Secretary of Interior over the R.S. 2477 rights-of-way that are the subject of this action. A copy of this letter is attached as Exhibit 1. This 2011 Notice of Intent supplemented the State's prior Notice of Intent regarding

R.S. 2477 sent in June 2000. A copy of this letter is attached as Exhibit 2. Thus, the State has complied with the requirement to provide notice to the head of the federal agency with jurisdiction over the lands in question 180 days prior to filing this action. 28 U.S.C. § 2409a(m).

5. Venue is proper under 28 U.S.C. § 1391(e) inasmuch as the lands at issue are located within the state of Utah.

PARTIES

6. Utah is one of the fifty sovereign states forming the United States of America, having been admitted to the Union on January 4, 1896, on an equal footing with the original states. Executive power for the State is vested in the Governor, who is responsible for seeing that the laws of Utah are faithfully executed. UTAH CONST. art. VII, § 5; UTAH CODE ANN. § 67-1-1 (2008).

7. Emery County is a political subdivision of the state of Utah, located in the south-central area of the state, and is authorized to maintain this action. UTAH CODE ANN. § 17-50-302(2) (2009).

8. Pursuant to the Utah Constitution, the State owns all property interests acquired from the United States at or after the time of statehood. UTAH CONST. art. XX. The State and the County are joint owners of R.S. 2477 rights-of-way within Emery County, Utah. UTAH CODE ANN. §§ 72-5-302(2) (Supp. 2011) and -103(2)(b) (2004); *id.* §§ 72-3-103(3) (2004) and -105(3). As an undivided joint owner of the public highway rights-of-way claimed herein, the State is duly authorized to maintain this action. *See* UTAH CONST. art. VII, § 1; *see also generally* UTAH CODE ANN. §§ 72-5-103 through -105, and 72-5-302 (Supp. 2011).

9. In this action, Plaintiffs seek to quiet title in those rights-of-way located within Emery County, Utah.

10. Defendant United States is the owner of the lands traversed and bordered by the roads and rights-of-way claimed in this action. The United States Department of the Interior ("DOI") and Bureau of Land Management ("BLM") are tasked with managing and protecting the Defendant's interests in the lands traversed and bordered by the roads and rights-of-way claimed in this action.

THE CONGRESSIONAL GRANT OF RIGHTS-OF-WAY FOR PUBLIC HIGHWAYS CROSSING PUBLIC LAND

11. R.S. 2477 provides as follows: "*And be it further enacted*, That the right of way for the construction of highways over public lands, not reserved for public uses, is hereby granted." Act of July 26, 1866, ch. 262, § 8, 14 Stat. 251, 253, codified at 43 U.S.C. § 932, repealed by Federal Land Policy Management Act of 1976 (FLPMA), Pub.L. No. 94-579 § 706(a), 90 Stat. 2743.

12. R.S. 2477 was an open congressional grant *in praesenti* of public highway rights-of-way for the benefit of miners, ranchers, homesteaders, and all other members of the public who had need to travel across public lands.

13. Acceptance and vesting of R.S. 2477 rights-of-way required no administrative formalities: no entry, no application, no license, no patent, and no deed on the federal side; no formal act of public acceptance on the part of the states or localities in whom the right was vested. *See Southern Utah Wilderness Alliance v. Bureau of Land Mgmt.*, 425 F.3d 735, 741 (10th Cir. 2005) (hereinafter "*SUWA v. BLM*"). R.S. 2477 operated as a standing offer of a right-

of-way over the public domain, and the grant may be accepted without formal action by public authorities. *Id.*

LONG-STANDING DEPARTMENT OF INTERIOR INTERPRETATION OF R.S. 2477

14. Prior to its recent adverse actions, the DOI historically recognized and agreed that state law is borrowed so as to govern the acceptance, scope, and regulatory jurisdiction of R.S. 2477 public highways.

15. Over the years, the DOI adopted numerous regulations and policies interpreting the congressional grant of R.S. 2477 rights-of-way. These regulations and policies served to ensure the DOI's compliance with its statutory duty to manage the public lands subject to valid existing rights.

16. As of and following 1939, R.S. 2477 interpretive regulations found at 43 C.F.R. § 244.55 (1939) stated:

> [R.S. 2477] becomes effective upon the construction or establishing of highways, in accordance with the State laws, over public lands not reserved for public uses. No application should be filed under said R.S. 2477 as no action on the part of the Federal Government is necessary.

17. As of and following 1963, R.S. 2477 interpretive regulations found at 43 C.F.R. § 244.58 (1963) stated:

> Grants of [R.S. 2477 rights-of-way] become effective upon the construction or establishment of highways, in accordance with the State laws, over public lands, not reserved for public uses. No application should be filed under R.S. 2477, as no action on the part of the Government is necessary.

18. As of and following 1974, R.S. 2477 interpretive regulations found at 43 C.F.R. §§ 2822.1-2 & 2822.2-1 (1974) stated:

> No application should be filed under R.S. 2477, as no action on the part of the Government is necessary. … Grants of [R.S. 2477 rights-of-way] become effective upon the construction or establishment of highways, in accordance with the State laws, over public lands, not reserved for public uses.

19. As of and following 1986, R.S. 2477 interpretive policies stated in the Bureau of Land Management Manual, R.2-229 stated:

> When public funds have been spent on the road it shall be considered a public road. When the history of the road is unknown or questionable, its existence in a condition suitable for public use is evidence that construction sufficient to cause a grant under R.S. 2477 has taken place.

20. As a matter of federal law, R.S. 2477 borrows from State law relating to acceptance (validity) and scope of such rights-of-way. *See SUWA v. BLM*, 425 F.3d 735 (10th Cir. 2005).

21. R.S. 2477 rights-of-way vested by acts of governmental entities or the public evidencing the acceptance of the right-of-way during operation of the grant.

22. R.S. 2477 rights-of-way were accepted by various acts of the local government highway authority or the public, including, but not limited to, (1) designating the road as a general public highway; (2) expending State or County funds to construct or maintain the road for general highway purposes prior to October 21, 1976; and/or (3) continually using the road as a public thoroughfare, as often as the need arose, for a continuous period of 10 years prior to October 21, 1976. *See, e.g.,* UTAH CODE ANN. § 72-5-104 (Supp. 2011).

23. Congressionally granted R.S. 2477 public highway rights-of-way are property interests, sometimes considered a species of easement. As a congressional grant of property for public purposes, the grant includes the right of use and enjoyment, and the implied or actual right to cross public land to access and use the property interest granted.

24. The scope of an R.S. 2477 right-of-way is not restricted to the beaten path of the road, which DOI now characterizes as the "disturbed width." The scope of an R.S. 2477 right-of-way includes the physical features of the right-of-way as accepted and used, and that which is reasonable and necessary to accommodate the exigencies of increasing travel. *See id.* § 72-5-104(3).

25. R.S. 2477 case law, long-standing DOI interpretation, and historical practice establish the scope of the rights-of-way claimed herein to include that which is reasonable and necessary to ensure safe travel and passage of vehicles on a two-lane road according to sound engineering practices that protect the safety of the traveling public, the features of the road, and improvements that prevent undue degradation or impairment of adjacent lands and resources.

26. Such areas along the roadway beyond the actual beaten path as are reasonable and necessary to provide safe travel on the road, including lands on which attendant accoutrements such as drainage ditches and culverts existed as of the date of the reservation of the subject lands adjacent to the road, or are reasonably and necessarily added after that date to accommodate increased travel for pre-existing uses, are part of the reasonable and necessary use of the roadway, and are therefore within the scope of each highway right-of-way. *See Sierra Club v. Hodel,* 848 F.2d 1068, 1083-84 (10th Cir. 1988).

27. Applicable law, historical practice, and sound engineering confirm that an R.S. 2477 right-of-way, as distinguished from the disturbed width of the road, includes a minimum width of 66 feet and any features, facilities, cuts, slopes, water bars, drainage runouts, and fill areas necessary to ensure a safe travel surface as reasonable and necessary under the circumstances specific to each road.

28. The congressional grant of public highway rights-of-way embodied by R.S. 2477 operated on unreserved public lands for 110 years until it was repealed on October 21, 1976, by the Federal Land Policy and Management Act of 1976 ("FLPMA"), 43 U.S.C. § 1701 *et seq.*

29. In repealing R.S. 2477, Congress preserved vested R.S. 2477 rights-of-way as valid existing rights and expressly directed the United States and its subordinate agencies (including the DOI and the BLM) to manage federal lands subject to these valid existing rights.

30. Section 701(h) of FLPMA provides as follows: "All actions by the Secretary concerned under this Act shall be subject to valid existing rights." *Id.* § 1701, note; *see also id.* § 1769(a) ("Nothing in this subchapter shall have the effect of terminating any right-of-way or right of use heretofore issued, granted or permitted.").

PLAINTIFFS' R.S. 2477 AND PUBLIC HIGHWAY RIGHTS-OF-WAY

31. Plaintiffs' R.S. 2477 and public highway rights-of-way, easements, and rights-of-entry (collectively referred to as "rights-of-way") serve the common good, benefit the public, and implement the congressional intent of facilitating safe and efficient travel across public lands. The R.S. 2477 rights-of-way granted by Congress necessarily include an implied right of access to the rights-of-way so that they may be used as public thoroughfares.

32. Emery County classifies its public highways as Class B (maintained) and Class D (lightly maintained) county roads. This classification is a matter of Utah law and is, herein, generally relevant only to the manner of acceptance of the rights-of-way for the roads. *See* UTAH CODE ANN. §§ 72-3-101 through -105 (2004) (explaining Utah's road classification system).

33. At all times relevant herein, Utah law provided that R.S. 2477 rights-of-way could be accepted by various acts of the local government highway authority or by acts of the public, including, but not limited to, (1) designating the road as a general public highway, also known as a Class B county road; *See id.* § 72-3-103 (prior law in accord); *see also id.* § 27-12-22 (1963); (2) expending State or County funds to construct or maintain a road for general highway purposes prior to October 21, 1976; and/or (3) continually using the road as a public thoroughfare, as often as the need arose, for a continuous period of 10 years prior to October 21, 1976, *see id.* § 72-5-104 (Supp. 2011) (stating that a public highway right-of way is "dedicated and abandoned to the use of the public when it has been continuously used as a public thoroughfare for a period of 10 years").

34. The R.S. 2477 rights-of-way for the Class B and D roads claimed herein were initially accepted as public highways by public use for a continuous period of at least 10 years prior to October 21, 1976, or such other date as requisite for the acceptance of a particular road and its right-of-way claimed herein.

35. The R.S. 2477 rights-of-way for the Class B and D roads may also have been accepted by Emery County's designation of these roads as county general highways and/or by Emery County's expenditure of State and County funds to construct and maintain these roads as

public highways prior to October 21, 1976, or such other date as requisite for the acceptance of a particular road and its R.S. 2477 right-of-way claimed herein.

36. Plaintiffs, by and on behalf of the public, accepted and own the R.S. 2477 rights-of-way for the roads described herein.

37. However, Emery County is the highway authority with sole jurisdiction and control of all Class B and Class D roads within its borders. UTAH CODE ANN. §§ 72-3-103(4) and -105(4) (2004). Emery County has the sole obligation to manage, construct, and maintain its Class B roads to meet general travel standards established by State law. *See id.* §72-3-103(5).

38. Prior to October 21, 1976, or such other date as is requisite for the acceptance of a particular right-of-way, Plaintiffs accepted R.S. 2477 rights-of-way for the roads claimed herein on unreserved public lands.

39. In addition to the public lands of the United States, some of the roads claimed in this action have segments that access and cross land now or formerly owned by the State of Utah and the Utah School and Institutional Trust Land Administration (sometimes collectively referred to as "SITLA").

40. In those instances where the roads and rights-of-way cross lands formerly in SITLA ownership, Plaintiffs' rights-of-way claimed herein were accepted and perfected as valid existing rights-of-way through the facts set forth herein, prior to the United States' ownership of the subject lands. Title of the United States is subject to these valid existing rights as a matter of law. 43 U.S.C. § 1701, note (2006); cf. UTAH CODE ANN. § 53C-4-203(2) (2009) (stating that patents for SITLA lands are subject to any valid existing easement or public right-of-way"). In

each cause of action set forth below, Plaintiffs' claimed rights-of-way include those granted pursuant to R.S. 2477 and established under law as valid existing rights on the land at issue.

41. The course, existence, and location of the rights-of-way and roads that cross private and SITLA land have not been challenged and are not at issue in this action. This action seeks to quiet title to the rights-of-way crossing the lands of the United States.

42. Plaintiffs' vested public highway rights-of-way for the roads claimed herein continue as valid existing rights until formally abandoned by Plaintiffs. *See* UTAH CODE ANN. §§ 72-5-105(1) and -305 (Supp. 2011).

43. Plaintiffs have not abandoned the rights-of-way for any of the roads claimed in this action.

AREA DESCRIPTIONS

44. In order to better organize the rights-of-way included in this amended complaint to fit within Utah's transportation system, the roads have been divided into Eight Areas: (1) Dutch Flat Area, (2) Ferron Canyon Area, (3) Green River Cutoff Area, (4) Long Street Area, (5) Red Canyon Area, (6) San Rafael River Area, (7) Saucer Basin Area, and (8) Wild Horse Area (collectively, the "Eight Areas").

45. The roads within each of the Eight Areas are important links in Plaintiffs' transportation system. These roads connect communities and provide access to natural resources, other roads, and areas of scenic, recreational, and historic value.

46. As important links in Plaintiffs' transportation systems, clear title to the rights-of-way that underlie these roads is of the upmost importance to Plaintiffs and the general public.

47. The Dutch Flat Area is located in west-central Emery County and is shown on Exhibit 3, attached hereto and incorporated herein.

48. The Dutch Flat Area includes the following roads—listed by Common Road Name and County Unique Number: (1) South Sand Bench Loop & Spur Road, 708; (2) Wilsonville Road, 421; (3) Emery TV Tower Road, 805; (4) Dutch Flat & Salt Wash Spur Road, 705; (5) Red Point Spur Road, 918; (6) Miller's Canyon/Willow Springs Road, 912; (7) Molen Seep Wash Road, 706; (8) East Molen Seep Wash Road, 707; (9) Muddy Spur Road, 917; (10) Ferron Old Dump, 722; (11) Soda Spur Road, 610; (12) Clawson/Paradise Road, 605; (13) Black Spur Road, 914; (14) Cowboy Mine Road, 915; (15) Old Jensen Ranch Road, 413; (16) 2400 East Ferron, 608; (17) Clawson Bench Cutoff, 414; (18) Hunter/Price Road, 426, (19) Moore Old State Highway, 801; (20) 3406-A Road; (21) 3491-B Road; (22) 3498-A Road; (23) 3513-A Road; (24) 3515-A Road; (25) 3517-A Road; (26) 3619A Road; (27) 3627 Road; (28) 3631 Road; (29) 3631-A Road; (30) 3631-B Road; (31) 708-A Road; (32) 708-B Road; (33) 708-C Road; (34) Canyon Pond/Bass Pond, 3609; (35) Cedar Ridge Loop Road, 3586; (36) Cedar Ridge Ranch Loop Road, 3576, (37) Coal Wash, 3642A-4; (38) Coal Wash Dugway, 3624A-1; (39) Coal Wash to Wood Hollow, 3517; (40) Devil's Racetrack Road, 3619; (41) Dry Wash Spur Road, 3595; (42) Dry Wash /Cedar Ridge Ranch, 3572; (43) East Sand Bench North, 3514; (44) East Sand Bench South, 3513; (45) Emery TV/Rochester, 3580; (46) Ferron Reef Cutoff Road, 3502; (47) Fuller Bottom, 3416; (48) Locomotive Point, 3630-A; (49) Lone Tree Reservoir, 3604; (50) Molen Reef, 3592; (51) North Reef Spur, 3573; (52) North Salt Wash to Fuller Bot, 3516; (53) Orchard Draw, 3630; (54) Salt Wash Spur; 3518; (55) Salt Wash to Fuller Bottom,

3515; (56) Sand Bench, 3498; (57) Secret Mesa, 3773; (58) South Sand Res. Spur, 3512; (59) South Sand Reservoir, 3406; (60) Twin Ponds Road, 3603; (61) Upper South Salt Wash, 3610; (62) Wickiup Loop Road, 3627A, (63) Wood Hollow Across Eagle Canyon, 3614; and (64) Yellow Seep, 3491.

49. The Ferron Canyon Area is located in northwest Emery County and is shown on Exhibit 4, attached hereto and incorporated herein.

50. The Ferron Canyon Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Cottonwood Canyon Road, 506; (2) Des Bee Dove Road, 416; (3) Emery/Link Canyon Road, 905; (4) Ferron Canyon Road, 701; (5) Johnson Bench Road, 511; (6) Link Canyon Road, 911; (7) Muddy Canyon Road, 806; (8) Old Ferron Dugway Road, 720; (9) Rock Canyon Flat Road, 604; (10) Rock Canyon Road, 603; and (11) South Canal Road, 322.

51. The Green River Cutoff Area is located in north-central Emery County and is shown on Exhibit 5, attached hereto and incorporated herein.

52. The Green River Cutoff Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Airport Cleveland Road, 212; (2) Buffalo Bench Road, 330; (3) Buffalo Hollow Road, 333; (4) Buffalo Hollow Spur, 334; (5) Cleveland/Cedar Mountain Road, 206; (6) Desert Lake Loop, 110; (7) Desert Lake/Lawrence Tan Seeps Road, 215; (8) Dinosaur Quarry & Flat Top Road, 216; (9) Green River Cutoff, 401; (10) Hambrick Bottoms Road, 404; (11) Jimmy Staker Road, 109; (12) Lawrence/Cleveland Road, 328; (13) Little Cedar Mountain Road, 403; (14) Lower Cedar Mountain Road, 335; (15) Marsh Flat Road.

128; (16) Marsing Spur, 124; (17) Marsing/Desert Lake Road, 114; (18) Miller Creek Road, 120; (19) Mounds and Wellington Road, 118; (20) North Ditch Road, 108; (21) North Elmo Highway, 101; (22) North Railroad Road, 119; (23) Peterson Spur, 107; (24) Potter Spur, 213; (25) Price River Road, 115; (26) Red Seep Road, 402; (27) Silvagni Ranch Road, 127; (28) South Flat Bus Loop, 201; (29) Staker to U-10, 105; (30) Von Fail Road, 122; (31) F11 Road; (32) 3269 Road; (33) 3270 Road; (34) 3272 Road; (35) 3278 Road; (36) 3286 Road; (37) 3286-A Road; (38) 3289 Road; (39) 3290 Road; (40) 3290-A Road; (41) 3423 Road; (42) 3431 Road; (43) Bull Hollow Road, 3260; (44) Bull Hollow/Buckhorn Reservoir Road, 3259; (45) Cedar Hollow Road, 3256; (46) Cedar Mt./Dinosaur Road, 3262; (47) Dinosaur Bottoms Spur Road, 3263-A; (48) Dinosaur Bottoms Spur " Road, 3263 (49) f03 Road; (50) Jackass Flat Cutoff Road, 3254; (51) MK Tunnels Road, f05; (52) Red Seep/Buckhorn Reservoir Road, 3258; (53) Victor Junction South Road, 3092; and (54) XX Road, 3255.

53. The Long Street Area is located in northeast Emery County and is shown on Exhibit 6, attached hereto and incorporated herein.

54. The Long Street Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Green River Motocross Road, 1003; (2) Horse Canyon/Coon Springs Road, 125; (3) Lila Canyon Road, 126; (4) Long Street, 1001; (5) Woodside & Lower Price River Road, 129; (6) 3143-A Road; (7) 3143-B Road; (8) 3143-C Road; (9) 3331-A Road; (10) 3331-E Road; (11) Beckwith Plateau Road, 129A; (12) Lila Canyon Tramway Road, 3146; (13) Lower Range Creek Road, 3331-C; (14) Range Creek Road, 3152; and (15); Turtle Canyon Road, 3143.

55. The Red Canyon Area is located in southwest Emery County and is shown on Exhibit 7, attached hereto and incorporated herein.

56. The Red Canyon Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Albrech Reservoir Road, 922; (2) Family Butte Road, 1024; (3) George's Draw Road, 336; (4) Hanni Mine Road, 1020; (5) Home Base Cutoff Road, 341; (6) Kimball Draw/Cat Canyon Road, 927; (7) Last Chance Wash Cutoff Road, 925; (8) Little Black Mountain Spur Road, 926; (9) Red Canyon Loop Road, 1019; (10) Sand Cave Spring Road, 924; (11) Sinbad Well Road, 340; (12) Tomsich Mountain Spur Road, 1021; (13) Lower Last Chance Loop Road, 920 (14) Upper Last Chance Road, 921; (15) Willow Springs Wash to I-70 Road, 923; (16) 3763 Road; (17) 3764-B Road; (18) 3780-B Road; (19) Link Flat Spurs Road, 3782; (20) 3786-A Road; (21) 3786-B Road; (22) 3899-A Road; (23) 3899-B Road; (24) 3905-B Road; (25) 3906-B Road; (26) 922-A Road; (27) 922-B Road; (28) 922-C Road; (29) 9999a Road; (30) Copper Globe Landing Strip Road, 3778; (31) Corral Canyon Spring Road, 3999; (32) Eagle Canyon Road, 3788; (33) Earls Draw Road, 9999; (34) Earls Draw Spur Road, 3828; (35) Justensen Flats East Road, 3774; (36) Link Flat Spur Road, 3780; (37) Moroni Slopes/Chimney Canyon Road, 4000; (38) Oil Well Bench Spur Road, 3992; (39) Road Hollow Road, 3787; (40) Rods Valley Road, 3786; (41) Saddle Horse Cutoff Road, 3625; (42) Saddle Horse Cutoff Extension Road, 3625-A; (43) Seger's Hole Loop Road, 3899-C; (44) South Cedar Mountain Road, 3889; (45) Slaughter Slopes Reservoir Road, 3905; and (46) Last Chance Well Cutoff Road, 3997.

57. The San Rafael River Area is located in central Emery County and is shown on Exhibit 8, attached hereto and incorporated herein.

58. The San Rafael River Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Box Flat Road, 410 (2) Buckmaster Road, 1032; (3) Four Corners Mine Road, 1029; (4) Johanson Cabin Road, 327; (5) Lawrence/Tan Seeps Road, 332; (6) Lawrence/Tan Seeps/Wedge Road, 406; (7) Lower Wedge & Spurs Road, 407; (8) San Rafael River Road, 320; (9) Smith Camp Road, 1030; (10) Trail Spring Road, 1031; (11) Wedge Road, 405; (12) 3519 Road; (13) 3534 Road; (14) 3550-A Road; (15) 3652-A Road; (16) 3652-B Road; (17) Black Dragon/Hatt Ranch Road, 3669A; (18) Box Flat Road, 3535; (19) Calf Mesa Road, 3527; (20) Cane Wash Road, 627B; (21) Drowned Hole Road, 3653; (22) f02 Road; (23) Jerry's Flat Loop Road, 3647-A; (24) Limestone Bench Cutoff Road, 3624-C; (25) Limestone Bench Spur Road, 3528-A; (26) Lockhart Box Road, 3536; (27) Oil Well Draw Overlook Road, 3637; (28) Prickly Pear Road, 3451; (29) Smith CBN to GR Cut off Road, 3459; (30) Trail Spring Road, 3553; (31) Upper Oil Well Draw Road, 3639; (32) Wedge Over Look Road, 3520; and (33) West Wedge Road, 3417.

59. The Saucer Basin Area is located in southeast Emery County and is shown on Exhibit 9, attached hereto and incorporated herein.

60. The Saucer Basin Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Acerson Mine Road, 1027; (2) Chaffin Ranch Road, 1048; (3) Dugout Creek Road, 1046; (4) Gilson Butte Well Road, 1023; (5) Green River Airport Road, 1009; (6) Green River Old State Highway, 1007; (7) Keg Knoll Road, 1026; (8) Lookout

Point Loop Road, 1025; (9) Lower San Rafael Road, 1010; (10) Moonshine Spring Road, 1044; (11) Nine Mile Reservoir Road, 1043; (12) Sand Road, 1049; (13) Saucer Basin Road, 1011; (14) Spring Canyon Landing Field Road, 1047; (15) Spring Canyon Road, 1045; (16) 3946-A Road; (17) 3946-B Road; (18) 3946-C Road; (19) 3946-D Road; (20) 3946-E Road; (21) 3946-F Road; (22) 3946-G Road; (23) 3946-H Road; (24) 3949 Road; (25) 3952-A Road; (26) 3952-B Road; (27) 3952-C Road; (28) 3952-D Road; (29) 3978 Road; (30) 4066-A Road; (31) 4069a Road; (32) Gilson/Rattlesnake Butte Road, 4037; (33) Hatt Ranch/SR River Road, 3691; (34) Keg Knoll Road, 4066; (35) Keg Spring Canyon Road, 3984; (36) Lookout Point Road, 3982; (37) Moonshine/Saucer Basin Wells Road, 4060; (38) San Rafael Valley Spur Road, 3843; (39) SR-24/Dugout Spring Road, 3952; (40) The Spur Road, 4069; and (41) Green River Overlook Road, 1042.

61. The Wild Horse Area is located in south-central Emery County and is shown on Exhibit 10, attached hereto and incorporated herein.

62. The Wild Horse Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Big Wild Horse Spur Road, 1017; (2) Buckskin Spring Road, 1018; (3) Chute Canyon Road, 1016; (4) Goblin Valley Road, 1014; (5) Hatt Ranch Bypass Road, 1028; (6) North Temple Wash Road, 1015; (7) Taylor Flat Cutoff Road, 1033; (8) Temple Junction/Hidden Splendor Road, 1012; (9) Wild Horse/Muddy River Road, 1013; (10) 3660 Road; (11) 3662 Road; (12) 3663 Road; (13) 3842-A Road; (14) 3842-B Road; (15) 3915-A Road; (16) 3915-C Road; (17) 3917-A Road; (18) 3920-B Road; (19) 3920-C Road; (20) 3920-D Road; (21) Baptist Draw Road, 3917; (22) Baptist Draw Air Strip Road, 3917-C exten;

(23) Cliff Dweller Flat Road, 3661; (24) Home Base Road, 3829; (25) Hyde Draw Loop Road, 3659; (26) Lone Man Butte Road, 3827; (27) Lower Reef Lost Spring Road, 3942; (28) Molly's Castle Road, 4031; (29) Muddy Creek Road, 3014; (30) North Ernie Canyon Spur Road, 3833; (31) North Temple Wash Road, 3924; (32) Red Draw Road, 3648; (33) Straight Wash Road, 3859; (34) Twin Knolls Road, 3826; and (35) Upper Little Wild Horse Road, 3920.

63. The surveyed centerline of the above-named roads in the Eight Areas are displayed, respectively, as Exhibits 12-310, attached hereto and incorporated herein. Each centerline was plotted using NAD83 mapping grade Global Positioning Survey ("GPS") data collected by Plaintiffs. This centerline data has been verified, confirmed by on the ground inspection, referenced to historic aerial photography, and overlaid upon United States Geological Survey ("USGS") topographic maps.

64. The information and documentation relevant to the above Eight Areas was collected by personnel of the State and the County and compiled pursuant to Utah law. *See* UTAH CODE ANN. §§ 72-5-309 and -310.

65. Within each cause of action set forth below, the right-of-way is shown by map, description, and by reference to verified GPS data plotted on maps showing the United States Public Land Survey System ("PLSS") aliquot parts of each section, township, and range crossed by the right-of-way.

66. The USGS 7.5- and 15-minute quadrangle maps covering Emery County evidence the existence, use, and acceptance of the rights-of-way in this action prior to 1976. See Exhibit 11 for detailed map information.

67. As a matter of historical practice within the agencies of the United States, rights-of-way crossing federal lands are granted, recognized, and acknowledged by reference to PLSS aliquot parts. That is, the United States and its agencies grant, recognize, and acknowledge rights-of-way on federal lands by reference to PLSS aliquot parts and not by metes and bounds.

68. With more precision than a PLSS aliquot part description, Plaintiffs have also provided maps and a GPS data description of the location and centerline course of the roads crossing the rights-of-way claimed herein. The precision in these descriptions exceeds that which has been historically recognized by the United States as sufficient to describe and confirm rights-of-way crossing its lands.

69. Notwithstanding the diligent precision and particularity pleaded herein, each and every right-of-way and road claimed herein exists, is to be decided, and is to be established by the course, location, and historical existence of the right-of-way on the ground as has been accepted, used, and enjoyed by, for, and on behalf of the public, including deviations in course recognized by law as being reasonable and necessary.

70. This action seeks to quiet title only to those portions of the rights-of-way and roads claimed herein and described in the GPS data, attached hereto as Exhibits 12-310, crossing public lands under the jurisdiction of the DOI. As stated earlier, the course, existence, and location of the segments of the rights-of-way and roads crossing private and SITLA lands are not at issue, are not contested, and are not claimed herein.

71. The segments of roads, if any, crossing United States land managed by federal agencies other than BLM and DOI are not at issue in this amended complaint. Plaintiffs,

however, do not concede that the segments are not R.S. 2477 rights-of-way and reserve the right to bring a future quiet title action on these segments.

THE CASE OR CONTROVERSY

A. The Case or Controversy over Disputed Title to Roads over R.S. 2477 Rights-of-Way

72. Emery County encompasses approximately 4,500 square miles of land. Approximately 80 % of the land within the County is federal land.

73. Due to the vast expanse of federal land in Emery County, R.S. 2477 provides the sole legal basis for Emery County to claim title to many of the rights-of-way that serve as roads and public highways in the county. All such roads that exist over R.S. 2477 rights-of-way and that are at issue in this suit were authorized, established, constructed, or accepted as R.S. 2477 rights-of-way on unreserved lands prior to October 21, 1976, or have vested as public highways, easements, and valid existing rights by law as set forth in the facts below.

74. The roads over R.S. 2477 rights-of-way have long served the common good by providing a safe and efficient transportation system within Emery County. Some of the roads over R.S. 2477 rights-of-way in this action predate Utah's statehood in 1896.

75. The roads over R.S. 2477 rights-of-way described in this Amended Complaint connect roads in the County and in adjacent counties and are integral components of the State of Utah and County's transportation systems.

76. The roads over R.S. 2477 rights-of-way have long served the vital function of linking communities, business operations, private land, and SITLA land and were historically

established and constructed to facilitate settlement, commerce, and general public access to public lands and communities.

77. The roads over R.S. 2477 rights-of-way claimed herein are important because, in many instances, there are no alternative routes to serve the public's transportation needs.

78. For decades, and in some instances a century, Plaintiffs and the public have benefitted from the quiet and peaceful enjoyment of the roads over R.S. 2477 rights-of-way. In 1976, Congress enacted FLPMA, and R.S. 2477 ceased as a means whereby states and counties could acquire new rights-of-way over public lands. Any and all R.S. 2477 rights-of-way and easements then existing were grandfathered and preserved by Congress as valid and existing rights.

79. Accordingly, Congress directed the agencies of the United States to manage federal public lands subject to the valid existing rights of the State of Utah and its counties, including their R.S. 2477 rights-of-way.

80. Historically, the County, federal land managers, ranchers, mineral resource developers, and other members of the public generally cooperated in the construction, maintenance and use of the roads over R.S. 2477 rights-of-way in furtherance of the common good and without specific concern regarding legal ownership.

81. Without any change in FLPMA or other federal law, the DOI and its agencies recently have engaged in efforts to impair or entirely deprive the State of Utah, Emery County, and the public of the use of their vested rights to roads over R.S. 2477 rights-of-way. In so doing, DOI has abrogated its duty to manage public lands subject to valid existing rights.

82. DOI's recent actions have sparked numerous lawsuits and conflicts across the West, including this lawsuit.

B. <u>The Quiet Title Act is the Proper Mechanism for Quieting Title to Plaintiffs' Claimed Rights-of Way in this Case</u>

83. Under the Quiet Title Act, 28 U.S.C. § 2409a, the only prerequisite for a party bringing suit against the United States to quiet title in and to land or property interests is that the aggrieved party have a "reasonable awareness" that the United States claims some interest adverse to the claims of that party.

84. Under Article III of the Constitution, an aggrieved party has standing to bring a Quiet Title Act claim if the party suffers adverse economic effects as a result of uncertainty regarding legal ownership of a right-of-way.

85. An adverse economic effect constitutes injury in fact and results from unresolved questions of land ownership.

86. The State of Utah and Emery County have suffered and are continuing to suffer economic injury from uncertainty regarding legal ownership of the roads over R.S. 2477 rights-of-way at issue in this case.

87. The confusion regarding the existence, location, scope, and ownership of roads over R.S. 2477 rights-of-way at issue in this case has created dangerous lapses in road maintenance, uncertainty regarding future road funding, and economic injuries to the State of Utah and Emery County which only resolution by the Court can redress.

88. The Quiet Title Act was enacted at the suggestion of then-United States Attorney General, who explained that such suits were necessary for

> a plaintiff whose title to land was continually being subjected to litigation in the law courts. [Such a plaintiff] could bring a suit to quiet title in a court of equity in order to obtain an adjudication on title and relief against further suits. Similarly, one who feared that an outstanding deed or other interest might cause a claim to be presented in the future could maintain a suit to remove a cloud on title.

H.R. REP. NO. 92-1559, at 4 (1972), *reprinted in* 1972 U.S.C.C.A.N. 4547, 4551, 1972 WL 12541, 4.

89. The Attorney General also specifically highlighted the cases in which the QTA is applicable, including "in boundary disputes between the United States and owners of adjacent property. The quieting of title where the plaintiff claims an estate less than a fee simple-- an easement or the title to minerals-- is likewise included in the terms of the proposed statute." *Id.* at 5.

90. Once the federal government has formally asserted a claim to an interest in land in which a state government also claims an interest, a state government is entitled to treat the land as "real property in which the United States claims an interest." Additionally, once the United States claims an interest in land, that claim is sufficient to cloud title and operates as a present cloud on title for as long as the United States retains authority to assert its claim.

91. The United States has taken several actions that constitute their "claim of interest" in the rights-of-way at issue, as explained in detail below. Therefore, a cloud on title exists with respect to each of the rights-of-way claimed herein and the Quiet Title Act is the proper mechanism for adjudicating and quieting title.

92. A court of equity has jurisdiction both to prevent the casting of a cloud on title to property and to remove an existing cloud.

93. To eliminate a cloud on title arising out of the United States' asserted claim, and to unilaterally destroy jurisdiction of any such a claim, the United States may file a disclaimer under section (e) of the QTA, which provides that

> If the United States disclaims all interest in the real property or interest therein adverse to the plaintiff at any time prior to the actual commencement of the trial, which disclaimer is confirmed by order of the court, the jurisdiction of the district court shall cease unless it has jurisdiction of the civil action or suit on ground other than and independent of the authority conferred by section 1346(f) of this title.

94. On June 15, 2000, the State of Utah sent a Notice of Intent to Sue ("2000 NOI") to the Secretary of the Interior indicating its intent to file suit to quiet title to roads over R.S. 2477 rights-of-way throughout Utah. Along with the NOI, the State included maps depicting the claimed roads in each county.

95. After filing the 2000 NOI, and between 2006 and 2011, the State of Utah recorded all Class B roads in the State, including those in Emery County. The recording documents included legal descriptions of the roads, maps, affidavits of historical use, and other identifying information regarding the claimed roads over the R.S. 2477 rights-of-way.

96. The State filed the recording documents with the BLM.

97. In response, the BLM failed and refused to recognize any of the R.S. 2477 rights-of-way in any administrative proceeding or to issue any non-binding determination with respect to any of the roads over R.S. 2477 rights-of-way.

98. In 2011, the State of Utah amended and sent to Secretary Salazar a second set of NOIs ("2011 NOIs")—one NOI for each County that claims roads over R.S. 2477 rights-of-way

in the State. The 2011 NOIs provided County-specific, detailed information regarding those roads.

99. The 2011 NOIs also included detailed county maps, legal descriptions of each road, and affidavits of witnesses attesting to the location and use of the R.S. 2477 rights-of-way at issue in Emery County.

100. The DOI has failed to file a disclaimer of interest with respect to the 2000 NOI, 2011 NOIs, or the claims of the State of Utah and Emery County with respect to the roads over R.S. 2477 rights-of-way at issue herein.

101. Because the DOI has failed to respond to the claims asserted by the State of Utah and Emery County, the ownership, existence, scope, and location of the roads over the R.S. 2477 rights-of-way claimed by the State of Utah and Emery County remain in dispute.

C. The Specific Case or Controversy Caused by The Department of Interior's Actions Adverse to All of Plaintiffs' Claimed Rights-of-Way in this Case

102. In 1996, Southern Utah Wilderness Alliance ("SUWA") commenced an action initially against BLM and San Juan County, a Utah county, to require BLM to take action against San Juan County to prevent certain grading activities by the County. *See generally SUWA v. BLM*, 425 F.3d 735 (10th Cir. 2005).

103. Kane and Garfield Counties, also counties in the State of Utah, were ultimately added as defendants for grading activities undertaken in those counties.

104. BLM cross-claimed against San Juan, Garfield, and Kane counties for trespass in grading some of the county roads crossing public lands.

105. In doing so, BLM claimed that regardless of any vested R.S. 2477 right-of-way, the counties could not regulate or maintain their roads without prior authorization from the BLM.

106. The district court rejected this argument and held that the existence of an R.S. 2477 right-of-way was key to resolution of the trespass claims. *See id.* at 743.

107. In response, BLM prevailed upon the district court to allow BLM to determine whether, in the first instance, the Counties owned an R.S. 2477 right-of-way for any of the roads graded. *See id.*

108. In 2005, after nine years of litigation, BLM's preemptive claim to the right to determine the existence of the Counties' R.S. 2477 rights-of-way was wholly rejected, as were the legal standards BLM asked the district court to adopt. *See id.* at 757.

109. The Tenth Circuit confirmed that the "holder" of an R.S. 2477 right-of-way may conduct routine road maintenance without prior approval of the BLM. *See id.* at 745.

110. In light of *SUWA v. BLM*, the DOI concluded that the "interim departmental policy on R.S. 2477, issued in 1997, must be revised." March 22, 2006 Memorandum from Secretary of Interior, Departmental Implementation of *Southern Utah Wilderness Alliance v. Bureau of Land Management,* 425 F.3d 735 (10th Cir. 2005); Revocation of January 22, 1997, Interim Policy; Revocation of December 7, 1988 Policy (2006 DOI Memo).

111. In the 2006 DOI Memo, the DOI acknowledged, that

> Although R.S. 2477 was repealed nearly 30 years ago, controversies continue to arise about the existence and scope of the rights-of-way it granted. R.S. 2477 has been subject to inconsistent judicial and administrative interpretations through its history. Because R.S. 2477 did not require that the rights-of-way be recorded or otherwise documented, it is often difficult for

> Federal land managers, State, local and tribal governments and public land users to know which right-of-way claims are valid, where they are located and how they may be used.

Id. at 2.

112. The 2006 DOI Memo included an "Attachment- Guidelines for Implementation of *SUWA v. BLM* Principles" (DOI Guidelines).

113. The DOI Guidelines, issued pursuant to the authority of the Secretary of the DOI, direct as follows:

> As the *SUWA v. BLM* court noted, ultimately deciding who holds legal title to an interest in real property, including an R.S. 2477 right-of-way, 'is a judicial, not an executive function.' 425 F.3d at 753. Thus if a claimant seeks a definitive, binding determination of its R.S. 2477 rights, it must file a claim under the Quiet Title Act, 28 U.S.C. § 2409a.

Id. at 6.

114. The DOI Guidelines further direct that the BLM should gather information and "decide 'on a preponderance of the evidence standard' if it supports the existence of a right-of-way under State law in effect prior to the repeal of R.S. 2477." *Id.*

115. The DOI Guidelines specify that

> The inclusion of a highway in a State, county or other local road system is strong evidence of acceptance of the federal grant of a right-of-way, as is the expenditure of money for construction or maintenance. In some States, official action may even be determinative. These facts may also be helpful in determining whether the claimed right-of-way was public in nature.

Id. at 9.

116. On March 22, 2006, in connection with the issuance of the 2006 DOI Memo, the DOI drafted and issued its own press release entitled "Interior Department Announces Guidelines to Implement Court Decision on R.S. 2477." ("DOI Press Release").

117. The DOI Press Release stated the following:

> R.S. 2477 granted rights-of-way for public use across federal land prior to 1976, when Congress repealed the law. Congress specified that any valid R.S. 2477 rights-of-way existing at the time of the repeal would continue in effect. **This has resulted in considerable doubt as to whether counties or the federal government own certain roads on federal lands.**

Id. (emphasis added).

118. The DOI Press Release further acknowledged and recognized that, "[i]n *SUWA v. BLM*, the 10th Circuit clarified that only courts could finally determine the ownership issue, but that federal agencies are permitted to develop a process to analyze claims for administrative purposes." *Id.*

119. The DOI Press Release further acknowledged and stated that "where a claimant seeks a binding determination of a claimed right-of-way, the claimant may file a quiet title action. A court would then make a determination." *Id.*

120. The 2006 DOI Memo also terminated a Memorandum of Understanding dated April 9, 2003 between the Department of Interior and the State of Utah regarding an acknowledgement process for R.S. 2477 rights-of-way (the "MOU").

121. According to a DOI Press Release dated April 9, 2003 and prepared by a spokesperson for the DOI, the MOU recognized "the uncertainty about existing rights-of-way

claims on federal land … and [was negotiated to establish] … a process to resolve many of the long-standing disputes over Revised Statute 2477 (R.S. 2477) existing rights-of-way in Utah."

122. The DOI April 9, 2003 Press Release quoted DOI Secretary, Gale Norton, who acknowledged that "[i]t's time to move forward and, by working collaboratively with the state of Utah, we are able to resolve a long-disputed issue that may otherwise have lead [sic] to costly and lengthy litigation."

123. The MOU provided that DOI would implement a "State and County Road Acknowledgment Process" to "acknowledge the existence of certain R.S. 2477 rights-of-way on [BLM] land within the State of Utah," and outlined the process DOI was to use to make such acknowledgments.

124. The MOU implicitly, and the DOI April 9, 2003 Press Release explicitly, recognized that there were continuing controversies regarding the ownership, existence, location, and scope of R.S. 2477 rights-of-way.

125. The MOU recitals included background of the R.S. 2477 disputes and highlighted—as the existence of the ongoing issues and disputes between the State of Utah and the federal government:

a. In a Report to Congress prepared in June of 1993, the Department of the Interior explained that unresolved conflicts over the status of rights-of-way created pursuant to Revised Statute 2477 were creating a continuing cloud on Federal agencies' ability to manage federal lands.

b. On August 7, 2002, a bipartisan group of eight western governors wrote urging the Department of the Interior to "bring finality to R.S. 2477 disputes in a cooperative manner."

c. On July 16, 2002, the National Association of Counties adopted a resolution urging the Department of the Interior to adopt a policy approach to R.S. 2477 rights-of-way that would allow counties to maintain historical rights-of-way across federally managed lands.

d. Disputes involving R.S. 2477 rights-of-way have generated numerous expensive and inconclusive federal court lawsuits that have left numerous questions concerning the ownership status of R.S. 2477 rights-of-way unresolved; and the high cost of this litigation has made it difficult for states and counties to assert their rights and for conservation groups to assert their interests.

e. The Department of the Interior has traditionally approached R.S. 2477 issues by trying to define the precise legal limits of the original statutory grant.

f. Most of the asserted R.S. 2477 rights-of-way that actually have been part of western states inventoried and maintained transportation infrastructure since before the enactment of the Federal Land Policy and Management Act (FLPMA) in 1976 satisfy the statutory requirements of "construction" and "highway" under almost any interpretation of those statutory terms.

g. The State of Utah has many R.S. 2477 claims, and on June 14, 2000, sent to the Secretary of the Interior a Notice of Intention to File Suit under 28 U.S.C.§2409a(m) to quiet the title to those claims.

h. The roads in which the State of Utah and Utah counties assert claims include many roads of continuing importance to rural transportation.

i. Rights-of-way granted under R.S. 2477 are vested property rights that cannot be eliminated or diminished without due process. However, the statutory grant of the rights-of-way did not require the issuance of an identifying record, such as a patent. The resulting uncertainty surrounding the identity and scope of R.S. 2477 rights-of-way has created unnecessary difficulties in federal, state and local transportation and land use planning decisions.

j. The State of Utah and Utah counties have spent considerable time and substantial resources to gather information about road claims and are prepared, if necessary, to litigate those claims.

k. Federal, state and local land managers and environmental advocacy organizations have all demonstrated a desire to put disputes surrounding R.S. 2477 to rest and move toward an approach to land management that emphasizes cooperation.

126. The termination of the MOU in 2003 once again made certain that R.S. 2477 rights-of-way in Utah would remain undetermined and in disputed status. That is, title would remain clouded.

127. With the termination of the MOU and in an attempt to resolve the ongoing dispute, beginning in 2006 and continuing through 2011, the State of Utah sent documentation of recordation to the BLM of each road that had been recorded in county recorder offices throughout Utah. These recorded roads were filed with the BLM on all Class B roads in Emery County.

128. The BLM failed to evaluate the recordation documents and refused to recognize any road in Emery County as a valid R.S. 2477 right-of-way. The BLM also failed to process any non-binding determinations.

129. On May 26, 2006, as directed by the 2006 DOI Memo, BLM issued IM No. 2006-161. *See Consultation on Proposed Improvements to R.S. 2477 Rights-of-way.*

130. IM No. 2006-161 described the process BLM was to follow when working on roads with "holders" of R.S. 2477 rights-of-way. BLM was to engage in

> consultation with the holder of an R.S. 2477 right-of-way (ROW), when the holder proposes to undertake any construction or improvement (collectively improvement), beyond routine maintenance, on any portion of the ROW crossing lands administered by the BLM.

Id.

131. IM No. 2006-161 did not define a "holder" of an R.S. 2477 right-of-way.

132. IM No. 2006-161 "[e]xpire[d]: 09/30/2007." *Id*.

133. On August 8, 2008, BLM issued IM No. 2008-175 which "clarifies and supplements the information set forth in IM No. 2006-161, and hereby replaces it." *Id.*

134. IM No. 2008-175 defines "holder" as

> (1) a state or political subdivision of a state that holds an R.S. 2477 ROW, as adjudicated by a Federal court, or (2) a state or political subdivision of a state claiming to have an R.S. 2477 ROW that has been recognized by the BLM in an administrative nonbinding determination (NBD).

Id.

135. IM No. 2008-175 states as follows:

> **Policy/Action**: Before the consultation process described in this IM may occur, the validity of an asserted ROW established under R.S. 2477 must have been adjudicated by a Federal court or recognized by the BLM in an NBD. IM No. 2006-159 (dated May 26, 2006), describes the process for the BLM to follow if it chooses to process an NBD on an asserted R.S. 2477 ROW.

Id.

136. IM No. 2008-175 further states that

> [i]f the validity of an asserted R.S. 2477 ROW has not been adjudicated as valid by a Federal court or recognized as valid by the BLM in an NBD, the entity asserting that it is the holder of the ROW may not undertake any improvement on the ROW. When an entity undertakes an improvement without such adjudication or NBD and, thus, has not been found to be a holder, the BLM may deem the action a trespass or take other appropriate action to protect the public lands and resources.

Id.

137. IM No. 2008-175 "[e]xpire[d]: 09/30/2009." *Id.*

138. It is the custom and practice of BLM to continue to act in accordance with the directives of an IM, including IM No. 2008-175, after its stated expiration date until the issuance of a supplement or replacement IM.

139. The DOI continues to act in accordance with the directives states in IM No. 2008-175. On August 8, 2008, BLM also issued IM No. 2008-174 entitled "Road Maintenance Agreements, " which provides that

> . . . under the principles set forth in *SUWA v. BLM*, the holder of an R.S. 2477 that has been adjudicated in Federal Court or recognized by the BLM in an administrative nonbinding determination may undertake routine maintenance on the ROW without first consulting with the BLM regarding such activities.

Id.

140. IM No. 2008-174 "[e]xpire[d]: 9/30/2009." *Id.*

141. The DOI continues to act in accordance with the directives stated in IM No. 2008-174.

142. A Federal Court has not adjudicated either the State of Utah or Emery County to be a "holder" of any of the R.S. 2477 rights-of-way claimed by the Plaintiffs herein.

143. The R.S. 2477 rights-of-way claimed by Plaintiffs herein have not been recognized by the BLM in an administrative non-binding determination.

144. IM Nos. 2008-175 and 174 are regulations issued by the BLM and the DOI that prohibit routine maintenance on R.S. 2477 rights-of-way that have not been adjudicated or recognized by the BLM in a nonbinding determination.

145. Because there has been no adjudication or recognition of the R.S. 2477 rights-of-way at issue in this case, neither the State of Utah nor Emery County are "holders" as defined by the BLM and are, therefore, prohibited by the regulations of the BLM from performing routine maintenance on the R.S. 2477 rights-of-way at issue herein.

146. IM No. 2008-175 and 174 contradict the holding of *SUWA v. BLM* and violate the rights of the State of Utah and Emery County specifically recognized therein.

147. IM No. 2008-175 also references the BLM "2800 series Manual/Handbook." (The "BLM Manual") which—in its glossary of terms—defines "holder" as "any entity to whom the BLM has issued a ROW grant."

148. Because the State of Utah and Emery County are not "holders" as defined by the BLM, they have only two options: (1) fail to maintain the roads over R.S. 2477 rights-of-way, thus creating dangerous driving conditions, or (2) perform routine maintenance at their own risk, subjecting themselves to possible trespass actions by BLM.

149. Additionally, without a determination of their ownership rights or status as "holders," the State of Utah and Emery County, are unable to make budgetary and economic determinations regarding those roads that can be routinely maintained.

150. Certain roads become impassable and dangerous without maintenance.

151. The BLM Manual also provides as follows:

> As to grants issued on or before October 21, 1976, under then existing statutory authority, this manual/handbook/IM series applies to the extent that it does not diminish or reduce any rights conferred by the grant or the statute under which they were issued. Where there is a reduction, the grant or enabling statute will apply instead of the manual.

BLM Manual 2801.6.C.

152. The BLM Manual states the general policy of BLM:

> G. Prior Authorizations/Existing Uses. Such uses should be serialized and noted to the public land records for informational purposes.
>
> 1. Pre-FLPMA. Recognize as an authorized use, any ROW facility constructed on public land on or before October 21, 1976, under the authority of any act repealed as to future authorization by FLPMA. No further authorization is required by the holder for the following:
>
> a. ***
>
> b. A ROW for a public highway constructed on public land under R.S. 2477 (43 U.S.C. 932, repealed 1976).

BLM Manual 2801.8.G.1.b.

153. The BLM Manual further states:

> A. Types. The pre-FLPMA ROW laws consist of two types:
>
> 1. Discretionary. Those where the Secretary decided whether to issue a ROW, and
>
> 2. Ministerial. Those that were granted by the Congressional Act and the Secretary had no more than a ministerial duty. It is this type of pre-FLPMA ROW with which we are most concerned.
>
> B. Regulations. Prior and current regulations shall be utilized to the extent they do not impair the rights of the holder. Regulations involving procedures such as abandonment and termination activities or methods of review of proposed major maintenance or reconstruction generally do not impair rights so long as the BLM acts promptly.

BLM Manual 2809.20, Special Considerations.

154. The BLM Manual further states:

> .21 R.S. 2477, Highway ROW. This is an 1866 Act (14 Stat. 253) granting the ROW for the construction of highways over public land not reserved for a public use. No action by the Secretary was involved in the grant, although there have been occasions where the Secretary had opened otherwise unavailable land to the operation of R.S. 2477.
>
> ***
>
> 6. Reasonable Regulations [governing ROWs] are those which do not:
>
> a. Impair rights the holder had under the pre-FLPMA law and regulations in effect at the time of the ROW grant, or
>
> b. Increase the holder's liability for past conduct, or
>
> c. Impose new duties to transactions already completed.

BLM Manual 2809.21.A.6, Special Considerations.

155. The BLM Manual further states:

> 1. FLPMA ROW. Because the legally binding determination of whether a R.S.2477 ROW exists is a judicial one, the BLM should encourage and assist claimants to obtain a ROW pursuant to FLPMA or similar authority

BLM Manual 2809.21.B.1, Special Considerations.

156. The actions of BLM and DOI as alleged herein violate the stated policy of the BLM as set forth in the BLM Manual.

157. On February 20, 2009, DOI Acting Director Ron Wenker issued a Memorandum ("Wenker Memo") to all BLM State Directors stating that, "[p]ending further review and direction from the Secretary, the Bureau of Land Management has been directed not to process or review any claims under R.S. 2477, including the use of the disclaimer rule."

158. No notice, explanation, publication, fact finding or opportunity for comment or hearing was given with regard to the policy announced by the Wenker Memo.

159. The Wenker Memo stated that the "interim step" outlined therein was "designed to preserve the status quo and is not a final policy decision on R.S. 2477 Claims." However, since the issuance of the Wenker Memo in February of 2009, the policy stated therein has been followed by the BLM.

160. In accordance with the Wenker Memo, with the exception of a legal action being commenced by the State of Utah or a County of the State of Utah, the federal government has not reviewed or processed any claims under R.S. 2477 since February 2009.

161. DOI's actions also have recently sparked numerous public highway lawsuits across the western states. DOI solicitors and BLM managers have decided that Plaintiffs have no rights, title, or interest in these public highways crossing federal land unless and until Plaintiffs' rights-of-way are adjudicated in court.

162. Emery County is the local highway regulatory authority and has the right to manage and regulate its roads, including the right to adopt ordinances regulating all forms of public motor vehicle travel on its roads. *See* UTAH CODE ANN. § 17-50-309 (2009).

163. Emery County is the highway authority with jurisdiction of county roads and is statutorily authorized to place numbering signs, markers, and traffic control signs along its roads. *See* UTAH CODE ANN. §§ 41-6a-208(1) and -102(63) (2010). "[I]nstalling, maintaining, repairing and replacing road signs" is statutorily defined "maintenance" within the County's lawful governmental authority. *See* UTAH CODE ANN. § 72-5-301(5)(p) & (s) (2004).

164. DOI officials have admitted that the DOI is regulating the roads at issue in this lawsuit as DOI roads, and that DOI is responsible for the roads until Plaintiffs' title is confirmed.

165. Despite the DOI's claims, it refuses to pay to maintain the roads or clear snow from them.

166. The BLM, in particular, has refused to use its own funds to repair and maintain the roads and has ignored the widespread public safety hazards directly caused by its recent claim to own the rights-of-way over the roads.

167. Plaintiffs are informed and believe that BLM has significantly reduced the number of instances it grades roads each year in the State of Utah and Emery County.

168. Plaintiffs are further informed and believe that BLM has significantly reduced the number of road miles graded and maintained by the BLM in the State of Utah and every year since the passage of FLPMA.

169. Since 2005, the DOI has denied that Plaintiffs have any rights, title, or interest to any road crossing federal land unless and until Plaintiffs have first proven their ownership in court, including the roads in this case.

170. Plaintiffs must confirm their title to the roads in this case so that the County can safely maintain these roads as part of its public highway transportation system and regulate and maintain them as county roads.

171. Certain roads have fallen into disrepair without Emery County's maintenance; and both the public and BLM employees have complained of safety hazards, precipitous headcutting, washboards, and entire washouts on many of the roads in this case.

172. Upon confirmation of Plaintiffs' title, the County will immediately resume routine maintenance, repair, and management of any relevant roads.

173. After taking the adverse actions complained of herein, the DOI has stated that the door is wide open for Plaintiffs to come to court to prove their claims and establish their rights.

174. In fact, the BLM's State Director recently testified that it is time to have Plaintiffs' rights-of-way decided.

175. In November of 2005, Kane County filed suit against the DOI (and BLM) under the Administrative Procedures Act, 5 U.S.C. § 551 et seq., and challenged the transportation provisions of the Monument Plan as being arbitrary and capricious. *See Kane County v. Kempthorne*, 495 F. Supp. 1143 (D. Utah 2007), *aff'd* 562 F.3d 1077 (10th Cir. 2009) ("Monument lawsuit").

176. Kane County claimed that the DOI could not restrict, manage, or close Kane County's public highways until after DOI first determined that its actions would not impair Kane County's valid existing rights in its R.S. 2477 public highway rights-of-way. *See Id*.

177. In response, the DOI argued that Kane County lacked standing and could not claim any injury in fact relating to any R.S. 2477 right-of-way until after it had first quieted title to each right-of-way.

178. As expressly stated by the DOI, Kane County had nothing more than "unproven" assertions, not vested R.S. 2477 rights-of-way within the Monument. *See id.*

179. The Court agreed and held that as a matter of sequence, Kane County must quiet title to its rights-of-way before it could challenge DOI's road management actions. *See id.*

180. Although the Tenth Circuit vacated the ruling on the ground that plaintiffs lacked standing, the underlying analysis went unaddressed.

181. The ongoing controversy caused by the DOI will be resolved by this Court's order quieting title to the rights-of-way for the roads claimed herein.

182. On or about February 17, 2012, as a result of the above concerns, the State of Utah, through the Public Lands Policy Coordinator, Kathleen Clarke, sent a letter to Juan Palma, the Utah State Director of the BLM.

183. This letter notified the BLM that the State and Counties would begin maintenance and repair on Class B and D roads statewide and that this maintenance would include, as needed, going outside the disturbed width of roads, but within the statutory right-of-way under Utah law of 66 feet for class D roads and 100 feet for class B roads.

184. On March 1, 2012, Larry Jensen, Department of Interior Regional Solicitor, wrote a letter seeking clarification of the State and Counties position on certain aspects of the letter and stating that

> some activities described in the letter— i.e., "widening and straightening of various road segments" and the collection of fill material from outside the disturbed area **but within the right-of-way**"–fall, in my opinion, squarely within the 10th Circuit's definition of "improvement" or "construction," and are the types of activities on which consultation is required before the State and the Counties can proceed. (Emphasis added).

185. In April 2012, Utah State BLM Director Juan Palma delivered a draft of a letter to Utah Public Lands Policy Coordinator Kathleen Clarke in which he stated that the BLM did not

concede that Utah could undertake the actions detailed in its letter without prior consultation with the BLM.

186. The DOI's actions have clouded Plaintiffs' title to their R.S. 2477 rights-of-way for the roads claimed herein and constitute claims adverse to Plaintiffs' interests.

187. The DOI's deliberate actions have created legal liability for Emery County, clouded Plaintiffs' title to these rights-of-way, impaired Emery County's regulatory authority, and placed the traveling public at risk.

188. During the last twelve years, the actions of the United States and its agencies have clouded Plaintiffs' title and created a case or controversy regarding Plaintiffs' rights of ownership, maintenance, and regulation of the public highway rights-of-way claimed herein.

189. The BLM refused to acknowledge Plaintiffs' right, title, and interest in these R.S. 2477 rights-of-way in the Price RMP, and the BLM directed the State and County to first prove their title in Court before the BLM would reevaluate its travel plan.

190. In response to Emery County's claims of ownership of these rights-of-way, the RMP finalized by the BLM covering Emery County provides that the RMP does not alter or extinguish any valid R.S. 2477 rights that the County or individuals may have, or their right to assert and protect R.S. 2477 rights, and to challenge in Federal court or other appropriate venue any restrictions that they believe are inconsistent with their rights. *Id*.

191. The BLM has refused to acknowledge any right, title or interest of Emery County in the rights-of-way for these roads until this Court quiets title to the rights-of-way.

192. The BLM's actions in implementing and enforcing the Price RMP's transportation decisions and the subsequent road closures have excluded Emery County from the peaceful enjoyment and regulatory authority of each of the roads pleaded herein and clouded title to all roads in the area subject to the Travel Management Plan.

193. Despite the State of Utah and Emery County's diligent efforts to work with the BLM to resolve numerous road management needs, the BLM wholly refuses to acknowledge the State and County's right, title, and interest in each of the roads until confirmed by this Court.

194. Furthermore the United States and its agencies' actions have impeded Emery County's ability to undertake construction and maintenance on the roads that exist over the rights-of-way claimed herein.

195. Pursuant to the Quiet Title Act, Plaintiffs are entitled to confirm their ownership of the rights-of-way claimed herein to ensure that State and County funds are spent to regulate and maintain Plaintiffs' public highways and to define the relative parties' rights, title, and interest to avoid future trespass actions.

196. Plaintiffs are further entitled to confirm their ownership of the rights-of-way claimed herein to ensure that the United States and its agencies will change their current practices and comply with their statutory obligation to administer federal lands subject to Plaintiffs' valid existing rights.

FIRST CAUSE OF ACTION – QUIET TITLE
DUTCH FLAT AREA

197. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

198. The Dutch Flat Area is located in west-central Emery County in the central region of Utah.

199. The Dutch Flat Area includes the following roads—listed by Common Road Name and County Unique Number: (1) South Sand Bench Loop & Spur Road, 708; (2) Wilsonville Road, 421; (3) Emery TV Tower Road, 805; (4) Dutch Flat & Salt Wash Spur Road, 705; (5) Red Point Spur Road, 918; (6) Miller's Canyon/Willow Springs Road, 912; (7) Molen Seep Wash Road, 706; (8) East Molen Seep Wash Road, 707; (9) Muddy Spur Road, 917; (10) Ferron Old Dump, 722; (11) Soda Spur Road, 610; (12) Clawson/Paradise Road, 605; (13) Black Spur Road, 914; (14) Cowboy Mine Road, 915; (15) Old Jensen Ranch Road, 413; (16) 2400 East Ferron, 608; (17) Clawson Bench Cutoff, 414; (18) Hunter/Price Road, 426, (19) Moore Old State Highway, 801; (20) 3406-A Road; (21) 3491-B Road; (22) 3498-A Road; (23) 3513-A Road; (24) 3515-A Road; (25) 3517-A Road; (26) 3619A Road; (27) 3627 Road; (28) 3631 Road; (29) 3631-A Road; (30) 3631-B Road; (31) 708-A Road; (32) 708-B Road; (33) 708-C Road; (34) Canyon Pond/Bass Pond, 3609; (35) Cedar Ridge Loop Road, 3586; (36) Cedar Ridge Ranch Loop Road, 3576, (37) Coal Wash, 3642A-4; (38) Coal Wash Dugway, 3624A-1; (39) Coal Wash to Wood Hollow, 3517; (40) Devil's Racetrack Road, 3619; (41) Dry Wash Spur Road, 3595; (42) Dry Wash /Cedar Ridge Ranch, 3572; (43) East Sand Bench North, 3514; (44) East Sand Bench South, 3513; (45) Emery TV/Rochester, 3580; (46) Ferron Reef Cutoff Road, 3502; (47) Fuller Bottom, 3416; (48) Locomotive Point, 3630-A; (49) Lone Tree Reservoir, 3604; (50) Molen Reef, 3592; (51) North Reef Spur, 3573; (52) North Salt Wash to Fuller Bot, 3516; (53) Orchard Draw, 3630; (54) Salt Wash Spur; 3518; (55) Salt Wash to Fuller Bottom,

3515; (56) Sand Bench, 3498; (57) Secret Mesa, 3773; (58) South Sand Res. Spur, 3512; (59) South Sand Reservoir, 3406; (60) Twin Ponds Road, 3603; (61) Upper South Salt Wash, 3610; (62) Wickiup Loop Road, 3627A, (63) Wood Hollow Across Eagle Canyon, 3614; and (64) Yellow Seep, 3491.

200. Each right-of-way claimed in the Dutch Flat Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

201. All rights-of-way claimed in the Dutch Flat Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

202. All rights-of-way claimed in the Dutch Flat Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

203. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United

States.

South Sand Bench Loop & Spur Road, 708

204. The South Sand Bench Loop & Spur Road is designated as county road number 708 and SGID road identification number RD080515 and is more or less 6.25 miles long.

205. Exhibit 12 (attached hereto and incorporated herein) contains certain information pertaining to the South Sand Bench Loop & Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

206. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Sand Bench Loop & Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 12. The South Sand Bench Loop & Spur Road includes the segment of road specifically set forth in Exhibit 12 and as exists on the ground.

Acceptance of the South Sand Bench Loop & Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

207. The South Sand Bench Loop & Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

208. Aerial photography from 1976 and 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the South Sand Bench Loop & Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

209. The South Sand Bench Loop & Spur Road appears the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

210. The County confirmed its acceptance of the South Sand Bench Loop & Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Sand Bench Loop & Spur Road using public funds pursuant to the County's governmental right and authority.

211. Witnesses with personal knowledge of the history of the South Sand Bench Loop & Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

212. Currently known reputation in the community is that the South Sand Bench Loop & Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

213. Public motor vehicle use of the South Sand Bench Loop & Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

214. The South Sand Bench Loop & Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

215. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Sand Bench Loop & Spur Road.

216. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Sand Bench Loop & Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wilsonville Road, 421

217. The Wilsonville Road is designated as county road number 421 and SGID road identification number RD080475 and is more or less 5.92 miles long.

218. Exhibit 13 (attached hereto and incorporated herein) contains certain information pertaining to the Wilsonville Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

219. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wilsonville Road solely as it crosses United States public land as included and specifically described in Exhibit 13. The Wilsonville Road includes the segment of road specifically set forth in Exhibit 13 and as exists on the ground.

Acceptance of the Wilsonville Road R.S. 2477 Right-of-way Prior to October 21, 1976.

220. The Wilsonville Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

221. Aerial photography from 1976 and 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Wilsonville Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

222. The Wilsonville Road appears on the Castle Dale (1925) 15 minute quadrangle map and the Hadden Holes (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

223. The County confirmed its acceptance of the Wilsonville Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wilsonville Road using public funds pursuant to the County's governmental right and authority.

224. Witnesses with personal knowledge of the history of the Wilsonville Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

225. Currently known reputation in the community is that the Wilsonville Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

226. Public motor vehicle use of the Wilsonville Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

227. The Wilsonville Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

228. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wilsonville Road.

229. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wilsonville Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Emery TV Tower Road, 805

230. The Emery TV Tower Road is designated as county road number 805 and SGID road identification number RD080537 and is more or less 1.79 miles long.

231. Exhibit 14 (attached hereto and incorporated herein) contains certain information pertaining to the Emery TV Tower Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list;

and a complete centerline description of the road.

232. In this action, the State and County seek to quiet title to the public highway right-of-way for the Emery TV Tower Road solely as it crosses United States public land as included and specifically described in Exhibit 14. The Emery TV Tower Road includes the segment of road specifically set forth in Exhibit 14 and as exists on the ground.

Acceptance of the Emery TV Tower Road R.S. 2477 Right-of-way Prior to October 21, 1976.

233. The Emery TV Tower Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

234. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Emery TV Tower Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

235. The Emery TV Tower Road appears on The Emery East (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

236. The County confirmed its acceptance of the Emery TV Tower Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Emery TV Tower Road using public funds pursuant to the County's governmental right and authority.

237. Witnesses with personal knowledge of the history of the Emery TV Tower Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

238. Currently known reputation in the community is that the Emery TV Tower Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

239. Public motor vehicle use of the Emery TV Tower Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

240. The Emery TV Tower Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

241. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Emery TV Tower Road.

242. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Emery TV Tower Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dutch Flat & Salt Wash Spur Road, 705

243. The Dutch Flat & Salt Wash Spur Road is designated as county road number 705

and SGID road identification number RD080512 and is more or less 11.41 miles long.

244. Exhibit 15 (attached hereto and incorporated herein) contains certain information pertaining to the Dutch Flat & Salt Wash Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

245. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dutch Flat & Salt Wash Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 15. The Dutch Flat & Salt Wash Spur Road includes the segment of road specifically set forth in Exhibit 15 and as exists on the ground.

Acceptance of the Dutch Flat & Salt Wash Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

246. The Dutch Flat & Salt Wash Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

247. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Dutch Flat & Salt Wash Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

248. The Dutch Flat & Salt Wash Spur Road appears on the Castle Dale (1925) USGS 15 minute quadrangle map and the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

249. The County confirmed its acceptance of the Dutch Flat & Salt Wash Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dutch Flat & Salt Wash Spur Road using public funds pursuant to the County's governmental right and authority.

250. Witnesses with personal knowledge of the history of the Dutch Flat & Salt Wash Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

251. Currently known reputation in the community is that the Dutch Flat & Salt Wash Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

252. Public motor vehicle use of the Dutch Flat & Salt Wash Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

253. The Dutch Flat & Salt Wash Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

254. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dutch Flat & Salt Wash Spur

Road.

255. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dutch Flat & Salt Wash Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Point Spur Road, 918

256. The Red Point Spur Road is designated as county road number 918 and SGID road identification number RD080556 and is more or less 1.35 miles long.

257. Exhibit 16 (attached hereto and incorporated herein) contains certain information pertaining to the Red Point Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

258. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Point Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 16. The Red Point Spur Road includes the segment of road specifically set forth in Exhibit 16 and as exists on the ground.

Acceptance of the Red Point Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

259. The Red Point Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

260. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Red Point Spur Road as a public highway located on the

land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

261. The Red Point Spur Road appears on the Mesa Butte (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

262. The County confirmed its acceptance of the Red Point Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Point Spur Road using public funds pursuant to the County's governmental right and authority.

263. Witnesses with personal knowledge of the history of the Red Point Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

264. Currently known reputation in the community is that the Red Point Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

265. Public motor vehicle use of the Red Point Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

266. The Red Point Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

267. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Point Spur Road.

268. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Point Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Miller's Canyon/Willow Springs Road, 912

269. The Miller's Canyon/Willow Springs Road is designated as county road number 912 and SGID road identification number RD080550 and is more or less 16.61 miles long.

270. Exhibit 17 (attached hereto and incorporated herein) contains certain information pertaining to the Miller's Canyon/Willow Springs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

271. In this action, the State and County seek to quiet title to the public highway right-of-way for the Miller's Canyon/Willow Springs Road solely as it crosses United States public land as included and specifically described in Exhibit 17. The Miller's Canyon/Willow Springs Road includes the segment of road specifically set forth in Exhibit 17 and as exists on the ground.

Acceptance of the Miller's Canyon/Willow Springs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

272. The Miller's Canyon/Willow Springs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

273. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Miller's Canyon/Willow Springs Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

274. The Miller's Canyon/Willow Springs Road appears on the Mesa Butte (1968), the Emery East (1968), and the Mussentuchit Flat (1969) USGS 7.5 minute quadrangle maps, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

275. The County confirmed its acceptance of the Miller's Canyon/Willow Springs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Miller's Canyon/Willow Springs Road using public funds pursuant to the County's governmental right and authority.

276. Witnesses with personal knowledge of the history of the Miller's Canyon/Willow Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

277. Currently known reputation in the community is that the Miller's Canyon/Willow Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

278. Public motor vehicle use of the Miller's Canyon/Willow Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

279. The Miller's Canyon/Willow Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

280. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Miller's Canyon/Willow Springs Road.

281. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Miller's Canyon/Willow Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Molen Seep Wash Road, 706

282. The Molen Seep Wash Road is designated as county road number 706 and SGID road identification number RD080513 and is more or less 3.30 miles long.

283. Exhibit 18 (attached hereto and incorporated herein) contains certain information

pertaining to the Molen Seep Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

284. In this action, the State and County seek to quiet title to the public highway right-of-way for the Molen Seep Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 18. The Molen Seep Wash Road includes the segment of road specifically set forth in Exhibit 18 and as exists on the ground.

Acceptance of the Molen Seep Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

285. The Molen Seep Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

286. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Molen Seep Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

287. The Molen Seep Wash Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Molen Seep Wash Road using public funds pursuant to the County's governmental right and authority.

288. Witnesses with personal knowledge of the history of the Molen Seep Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

289. Currently known reputation in the community is that the Molen Seep Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

290. Public motor vehicle use of the Molen Seep Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

291. The Molen Seep Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

292. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Molen Seep Wash Road.

293. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Molen Seep Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Molen Seep Wash Road, 707

294. The East Molen Seep Wash Road is designated as county road number 707 and SGID road identification number RD080514 and is more or less 2.05 miles long.

295. Exhibit 19 (attached hereto and incorporated herein) contains certain information

pertaining to the East Molen Seep Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

296. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Molen Seep Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 19. The East Molen Seep Wash Road includes the segment of road specifically set forth in Exhibit 19 and as exists on the ground.

Acceptance of the East Molen Seep Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

297. The East Molen Seep Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

298. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the East Molen Seep Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

299. The East Molen Seep Wash Road appears on the the Castle Dale (1925) USGS15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

300. The County confirmed its acceptance of the East Molen Seep Wash Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Molen Seep Wash Road using public funds

pursuant to the County's governmental right and authority.

301. Witnesses with personal knowledge of the history of the East Molen Seep Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

302. Currently known reputation in the community is that the East Molen Seep Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

303. Public motor vehicle use of the East Molen Seep Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

304. The East Molen Seep Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

305. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Molen Seep Wash Road.

306. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Molen Seep Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Muddy Spur Road, 917

307. The Muddy Spur Road is designated as county road number 917 and SGID road identification number RD080555 and is more or less 0.44 miles long.

308. Exhibit 20 (attached hereto and incorporated herein) contains certain information pertaining to the Muddy Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

309. In this action, the State and County seek to quiet title to the public highway right-of-way for the Muddy Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 20. The Muddy Spur Road includes the segment of road specifically set forth in Exhibit 20 and as exists on the ground.

Acceptance of the Muddy Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

310. The Muddy Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

311. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Muddy Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

312. The Muddy Spur Road appears on the the Mesa Butte (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

313. The County confirmed its acceptance of the Muddy Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Muddy Spur Road using public funds pursuant to the County's governmental right and authority.

314. Witnesses with personal knowledge of the history of the Muddy Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

315. Currently known reputation in the community is that the Muddy Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

316. Public motor vehicle use of the Muddy Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

317. The Muddy Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

318. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Muddy Spur Road.

319. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Muddy Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Ferron Old Dump Road, 722

320. The Ferron Old Dump Road is designated as county road number 722 and SGID road identification number RD080530 and is more or less 2.92 miles long.

321. Exhibit 21 (attached hereto and incorporated herein) contains certain information pertaining to the Ferron Old Dump Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

322. In this action, the State and County seek to quiet title to the public highway right-of-way for the Ferron Old Dump Road solely as it crosses United States public land as included and specifically described in Exhibit 21. The Ferron Old Dump Road includes the segment of road specifically set forth in Exhibit 21 and as exists on the ground.

Acceptance of the Ferron Old Dump Road R.S. 2477 Right-of-way Prior to October 21, 1976.

323. The Ferron Old Dump Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

324. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Ferron Old Dump Road as a public highway located on the

land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

325. The Ferron Old Dump Road appears on the Ferron (1979) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

326. The Ferron Old Dump Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Ferron Old Dump Road using public funds pursuant to the County's governmental right and authority.

327. Witnesses with personal knowledge of the history of the Ferron Old Dump Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

328. Currently known reputation in the community is that the Ferron Old Dump Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

329. Public motor vehicle use of the Ferron Old Dump Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

330. The Ferron Old Dump Road traverses a valid and perfected R.S. 2477 public

highway right-of-way as described herein.

331. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Ferron Old Dump Road.

332. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Ferron Old Dump Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Soda Spur Road, 610

333. The Soda Spur Road is designated as county road number 610 and SGID road identification number RD080503 and is more or less 1.71 miles long.

334. Exhibit 22 (attached hereto and incorporated herein) contains certain information pertaining to the Soda Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

335. In this action, the State and County seek to quiet title to the public highway right-of-way for the Soda Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 22. The Soda Spur Road includes the segment of road specifically set forth in Exhibit 22 and as exists on the ground.

Acceptance of the Soda Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

336. The Soda Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

337. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Soda Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

338. The County confirmed its acceptance of the Soda Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Soda Spur Road using public funds pursuant to the County's governmental right and authority.

339. Witnesses with personal knowledge of the history of the Soda Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

340. Currently known reputation in the community is that the Soda Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

341. Public motor vehicle use of the Soda Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

342. The Soda Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

343. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Soda Spur Road.

344. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Soda Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Clawson/Paradise Road, 605

345. The Clawson/Paradise Road is designated as county road number 605 and SGID road identification number RD080498 and is more or less 4.87 miles long.

346. Exhibit 23 (attached hereto and incorporated herein) contains certain information pertaining to the Clawson/Paradise Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

347. In this action, the State and County seek to quiet title to the public highway right-of-way for the Clawson/Paradise Road solely as it crosses United States public land as included and specifically described in Exhibit 23. The Clawson/Paradise Road includes the segment of road specifically set forth in Exhibit 23 and as exists on the ground.

Acceptance of the Clawson/Paradise Road R.S. 2477 Right-of-way Prior to October 21, 1976.

348. The Clawson/Paradise Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

349. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Clawson/Paradise Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

350. The Clawson/Paradise Road appears on the Castle Dale (1925) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

351. The County confirmed its acceptance of the Clawson/Paradise Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Clawson/Paradise Road using public funds pursuant to the County's governmental right and authority.

352. Witnesses with personal knowledge of the history of the Clawson/Paradise Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

353. Currently known reputation in the community is that the Clawson/Paradise Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

354. Public motor vehicle use of the Clawson/Paradise Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

355. The Clawson/Paradise Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

356. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Clawson/Paradise Road.

357. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Clawson/Paradise Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Black Spur Road, 914

358. The Black Spur Road is designated as county road number 914 and SGID road identification number RD080552 and is more or less 0.28 miles long.

359. Exhibit 24 (attached hereto and incorporated herein) contains certain information pertaining to the Black Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

360. In this action, the State and County seek to quiet title to the public highway right-of-way for the Black Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 24. The Black Spur Road includes the segment of road specifically set forth in Exhibit 24 and as exists on the ground.

Acceptance of the Black Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

361. The Black Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

362. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Black Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

363. The Black Spur Road appears on the Emery East (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

364. The County confirmed its acceptance of the Black Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Black Spur Road using public funds pursuant to the County's governmental right and authority.

365. Witnesses with personal knowledge of the history of the Black Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

366. Currently known reputation in the community is that the Black Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

367. Public motor vehicle use of the Black Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

368. The Black Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

369. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Black Spur Road.

370. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Black Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cowboy Mine Road, 915

371. The Cowboy Mine Road is designated as county road number 915 and SGID road identification number RD080553 and is more or less 2.97 miles long.

372. Exhibit 25 (attached hereto and incorporated herein) contains certain information

pertaining to the Cowboy Mine Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

373. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cowboy Mine Road solely as it crosses United States public land as included and specifically described in Exhibit 25. The Cowboy Mine Road includes the segment of road specifically set forth in Exhibit 25 and as exists on the ground.

Acceptance of the Cowboy Mine Road R.S. 2477 Right-of-way Prior to October 21, 1976.

374. The Cowboy Mine Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

375. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Cowboy Mine Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

376. The Cowboy Mine Road appears on the Emery East (1968) and Mesa Butte (1968) USGS 7.5 minute quadrangle maps, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

377. The County confirmed its acceptance of the Cowboy Mine Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cowboy Mine Road using public funds pursuant to the County's

governmental right and authority.

378. Witnesses with personal knowledge of the history of the Cowboy Mine Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

379. Currently known reputation in the community is that the Cowboy Mine Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

380. Public motor vehicle use of the Cowboy Mine Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

381. The Cowboy Mine Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

382. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cowboy Mine Road.

383. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cowboy Mine Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Old Jensen Ranch Road, 413

384. The Old Jensen Ranch Road is designated as county road number 413 and SGID road identification number RD080467 and is more or less 1.14 miles long.

385. Exhibit 26 (attached hereto and incorporated herein) contains certain information pertaining to the Old Jensen Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

386. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old Jensen Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 26. The Old Jensen Ranch Road includes the segment of road specifically set forth in Exhibit 26 and as exists on the ground.

Acceptance of the Old Jensen Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

387. The Old Jensen Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

388. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Old Jensen Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

389. The Old Jensen Ranch Road appears on the Hadden Holes (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

390. The County confirmed its acceptance of the Old Jensen Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Old Jensen Ranch Road using public funds pursuant to the County's governmental right and authority.

391. Witnesses with personal knowledge of the history of the Old Jensen Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

392. Currently known reputation in the community is that the Old Jensen Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

393. Public motor vehicle use of the Old Jensen Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

394. The Old Jensen Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

395. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Old Jensen Ranch Road.

396. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old Jensen Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2400 East Ferron Road, 608

397. The 2400 East Ferron Road is designated as county road number 608 and SGID road identification number RD080501 and is more or less 2.58 miles long.

398. Exhibit 27 (attached hereto and incorporated herein) contains certain information pertaining to the 2400 East Ferron Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

399. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2400 East Ferron Road solely as it crosses United States public land as included and specifically described in Exhibit 27. The 2400 East Ferron Road includes the segment of road specifically set forth in Exhibit 27 and as exists on the ground.

Acceptance of the 2400 East Ferron Road R.S. 2477 Right-of-way Prior to October 21, 1976.

400. The 2400 East Ferron Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

401. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 2400 East Ferron Road as a public highway located on the

land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

402. The 2400 East Ferron Road appears on the Castle Dale (1925) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

403. The County confirmed its acceptance of the 2400 East Ferron Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2400 East Ferron Road using public funds pursuant to the County's governmental right and authority.

404. Witnesses with personal knowledge of the history of the 2400 East Ferron Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

405. Currently known reputation in the community is that the 2400 East Ferron Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

406. Public motor vehicle use of the 2400 East Ferron Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

407. The 2400 East Ferron Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

408. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2400 East Ferron Road.

409. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2400 East Ferron Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Clawson Bench Cutoff, 414

410. The Clawson Bench Cutoff is designated as county road number 414 and SGID road identification number RD080468 and is more or less 1.44 miles long.

411. Exhibit 28 (attached hereto and incorporated herein) contains certain information pertaining to the Clawson Bench Cutoff including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

412. In this action, the State and County seek to quiet title to the public highway right-of-way for the Clawson Bench Cutoff solely as it crosses United States public land as included and specifically described in Exhibit 28. The Clawson Bench Cutoff includes the segment of road specifically set forth in Exhibit 28 and as exists on the ground.

Acceptance of the Clawson Bench Cutoff R.S. 2477 Right-of-way Prior to October 21, 1976.

413. The Clawson Bench Cutoff has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

414. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Clawson Bench Cutoff as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

415. The County confirmed its acceptance of the Clawson Bench Cutoff by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Clawson Bench Cutoff using public funds pursuant to the County's governmental right and authority.

416. Witnesses with personal knowledge of the history of the Clawson Bench Cutoff confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

417. Currently known reputation in the community is that the Clawson Bench Cutoff has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

418. Public motor vehicle use of the Clawson Bench Cutoff as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

419. The Clawson Bench Cutoff traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

420. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Clawson Bench Cutoff.

421. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Clawson Bench Cutoff on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hunter/Price Road, 426

422. The Hunter/Price Road is designated as county road number 426 and SGID road identification number RD080480 and is more or less 3.46 miles long.

423. Exhibit 29 (attached hereto and incorporated herein) contains certain information pertaining to the Hunter/Price Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

424. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hunter/Price Road solely as it crosses United States public land as included and specifically described in Exhibit 29. The Hunter/Price Road includes the segment of road

specifically set forth in Exhibit 29 and as exists on the ground.

Acceptance of the Hunter/Price Road R.S. 2477 Right-of-way Prior to October 21, 1976.

425. The Hunter/Price Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

426. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hunter/Price Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

427. The Hunter/Price Road appears on the Castle Dale (1925) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

428. The County confirmed its acceptance of the Hunter/Price Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hunter/Price Road using public funds pursuant to the County's governmental right and authority.

429. Witnesses with personal knowledge of the history of the Hunter/Price Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

430. Currently known reputation in the community is that the Hunter/Price Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

431. Public motor vehicle use of the Hunter/Price Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

432. The Hunter/Price Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

433. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hunter/Price Road.

434. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hunter/Price Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Moore Old State Highway, 801

435. The Moore Old State Highway is designated as county road number 801 and SGID road identification number RD080533 and is more or less 4.49 miles long.

436. Exhibit 30 (attached hereto and incorporated herein) contains certain information pertaining to the Moore Old State Highway including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list;

and a complete centerline description of the road.

437. In this action, the State and County seek to quiet title to the public highway right-of-way for the Moore Old State Highway solely as it crosses United States public land as included and specifically described in Exhibit 30. The Moore Old State Highway includes the segment of road specifically set forth in Exhibit 30 and as exists on the ground.

Acceptance of the Moore Old State Highway R.S. 2477 Right-of-way Prior to October 21, 1976.

438. The Moore Old State Highway has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

439. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Moore Old State Highway as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

440. The Moore Old State Highway appears on the Emery East (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

441. The County confirmed its acceptance of the Moore Old State Highway by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Moore Old State Highway using public funds pursuant to the County's governmental right and authority.

442. Witnesses with personal knowledge of the history of the Moore Old State

Highway confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

443. Currently known reputation in the community is that the Moore Old State Highway has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

444. Public motor vehicle use of the Moore Old State Highway as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

445. The Moore Old State Highway traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

446. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Moore Old State Highway.

447. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Moore Old State Highway on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3406-A Road

448. The 3406-A Road is designated as county road number 3406-A and SGID road

identification number RD080179 and is more or less 2.87 miles long.

449. Exhibit 31 (attached hereto and incorporated herein) contains certain information pertaining to the 3406-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

450. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3406-A Road solely as it crosses United States public land as included and specifically described in Exhibit 31. The 3406-A Road includes the segment of road specifically set forth in Exhibit 31 and as exists on the ground.

Acceptance of the 3406-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

451. The 3406-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

452. The 3406-A Road appears on the Hadden Holes (1969) and Horn Silver Gulch (1969) USGS 7.5 minute quadrangle maps, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

453. The County confirmed its acceptance of the 3406-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3406-A Road pursuant to the County's governmental right and authority.

454. Witnesses with personal knowledge of the history of the 3406-A Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

455. Currently known reputation in the community is that the 3406-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

456. Public motor vehicle use of the 3406-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

457. The 3406-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

458. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3406-A Road.

459. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3406-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3491-B Road

460. The 3491-B Road is designated as county road number 3491-B and SGID road identification number RD080199 and is more or less 1.36 miles long.

461. Exhibit 32 (attached hereto and incorporated herein) contains certain information

pertaining to the 3491-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

462. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3491-B Road solely as it crosses United States public land as included and specifically described in Exhibit 32. The 3491-B Road includes the segment of road specifically set forth in Exhibit 32 and as exists on the ground.

Acceptance of the 3491-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

463. The 3491-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

464. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3491-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

465. The 3491-B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3491-B Road pursuant to the County's governmental right and authority.

466. Witnesses with personal knowledge of the history of the 3491-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

467. Currently known reputation in the community is that the 3491-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

468. Public motor vehicle use of the 3491-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

469. The 3491-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

470. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3491-B Road.

471. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3491-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3498-A Road

472. The 3498-A Road is designated as county road number 3498-A and SGID road identification number RD080201 and is more or less 1.34 miles long.

473. Exhibit 33 (attached hereto and incorporated herein) contains certain information pertaining to the 3498-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

474. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3498-A Road solely as it crosses United States public land as included and specifically described in Exhibit 33. The 3498-A Road includes the segment of road specifically set forth in Exhibit 33 and as exists on the ground.

Acceptance of the 3498-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

475. The 3498-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

476. The 3498-A Road appears on the Castle Dale (1925) 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

477. The County confirmed its acceptance of the 3498-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3498-A Road pursuant to the County's governmental right and authority.

478. Witnesses with personal knowledge of the history of the 3498-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

479. Currently known reputation in the community is that the 3498-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10

years prior to October 21, 1976, and continuing to the present.

480. Public motor vehicle use of the 3498-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

481. The 3498-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

482. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3498-A Road.

483. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3498-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3513-A Road

484. The 3513-A Road is designated as county road number 3513-A and SGID road identification number RD080207 and is more or less 0.87 miles long.

485. Exhibit 34 (attached hereto and incorporated herein) contains certain information pertaining to the 3513-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

486. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 3513-A Road solely as it crosses United States public land as included and specifically described in Exhibit 34. The 3513-A Road includes the segment of road specifically set forth in Exhibit 34 and as exists on the ground.

Acceptance of the 3513-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

487. The 3513-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

488. The 3513-A Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

489. The County confirmed its acceptance of the 3513-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3513-A Road pursuant to the County's governmental right and authority.

490. Witnesses with personal knowledge of the history of the 3513-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

491. Currently known reputation in the community is that the 3513-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

492. Public motor vehicle use of the 3513-A Road as a public thoroughfare traversing

unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

493. The 3513-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

494. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3513-A Road.

495. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3513-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3515-A Road

496. The 3515-A Road is designated as county road number 3515-A and SGID road identification number RD080210 and is more or less 5.16 miles long.

497. Exhibit 35 (attached hereto and incorporated herein) contains certain information pertaining to the 3515-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

498. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3515-A Road solely as it crosses United States public land as included and specifically described in Exhibit 35. The 3515-A Road includes the segment of road specifically

set forth in Exhibit 35 and as exists on the ground.

Acceptance of the 3515-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

499. The 3515-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

500. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3515-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

501. The 3515-A Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

502. The County confirmed its acceptance of the 3515-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3515-A Road pursuant to the County's governmental right and authority.

503. Witnesses with personal knowledge of the history of the 3515-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

504. Currently known reputation in the community is that the 3515-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10

years prior to October 21, 1976, and continuing to the present.

505. Public motor vehicle use of the 3515-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

506. The 3515-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

507. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3515-A Road.

508. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3515-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3517-A Road, 1000

509. The 3517-A Road is designated as county road number 3517-A and SGID road identification number RD080213 and is more or less 3.73 miles long.

510. Exhibit 36 (attached hereto and incorporated herein) contains certain information pertaining to the 3517-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

511. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 3517-A Road solely as it crosses United States public land as included and specifically described in Exhibit 36. The 3517-A Road includes the segment of road specifically set forth in Exhibit 36 and as exists on the ground.

Acceptance of the 3517-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

512. The 3517-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

513. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3517-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

514. The 3517-A Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

515. The 3517-A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3517-A Road pursuant to the County's governmental right and authority.

516. Witnesses with personal knowledge of the history of the 3517-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

517. Currently known reputation in the community is that the 3517-A Road has been

open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

518. Public motor vehicle use of the 3517-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

519. The 3517-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

520. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3517-A Road.

521. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3517-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3619A Road

522. The 3619A Road is designated as county road number 3619A and SGID road identification number RD080263 and is more or less 6.12 miles long.

523. Exhibit 37 (attached hereto and incorporated herein) contains certain information pertaining to the 3619A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

524. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3619A Road solely as it crosses United States public land as included and specifically described in Exhibit 37. The 3619A Road includes the segment of road specifically set forth in Exhibit 37 and as exists on the ground.

Acceptance of the 3619A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

525. The 3619A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

526. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3619A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

527. The 3619A Road appears on the Blocks (1953) USGS 7.5 minute quadrangle map and the San Rafael Knob (1952) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

528. The County confirmed its acceptance of the 3619A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3619A Road pursuant to the County's governmental right and authority.

529. Witnesses with personal knowledge of the history of the 3619A Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

530. Currently known reputation in the community is that the 3619A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

531. Public motor vehicle use of the 3619A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

532. The 3619A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

533. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3619A Road.

534. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3619A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3627 Road

535. The 3627 Road is designated as county road number 3627 and SGID road identification number RD080275 and is more or less 6.09 miles long.

536. Exhibit 38 (attached hereto and incorporated herein) contains certain information

pertaining to the 3627 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

537. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3627 Road solely as it crosses United States public land as included and specifically described in Exhibit 38. The 3627 Road includes the segment of road specifically set forth in Exhibit 38 and as exists on the ground.

Acceptance of the 3627 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

538. The 3627 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

539. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3627 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

540. The 3627 Road appears on the Blocks (1953), Wickiup (1953), and Twin Knolls (1953) USGS 7.5 minute quadrangle maps, and the San Rafael Knob (1952) and Wickiup (1954) USGS 15 minute quadrangle maps, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

541. The County confirmed its acceptance of the 3627 Road by 1975 when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the 3627 Road pursuant to the County's governmental right and authority.

542. Witnesses with personal knowledge of the history of the 3627 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

543. Currently known reputation in the community is that the 3627 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

544. Public motor vehicle use of the 3627 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

545. The 3627 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

546. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3627 Road.

547. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3627 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3631 Road

548. The 3631 Road is designated as county road number 3631 and SGID road identification number RD080283 and is more or less 0.01 miles long.

549. Exhibit 39 (attached hereto and incorporated herein) contains certain information pertaining to the 3631 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

550. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3631 Road solely as it crosses United States public land as included and specifically described in Exhibit 39. The 3631 Road includes the segment of road specifically set forth in Exhibit 39 and as exists on the ground.

Acceptance of the 3631 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

551. The 3631 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

552. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3631 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

553. The 3631 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3631 Road pursuant to the County's governmental

right and authority.

554. Witnesses with personal knowledge of the history of the 3631 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

555. Currently known reputation in the community is that the 3631 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

556. Public motor vehicle use of the 3631 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

557. The 3631 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

558. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3631 Road.

559. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3631 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3631-A Road

560. The 3631-A Road is designated as county road number 3631-A and SGID road

identification number RD080613 and is more or less 0.08 miles long.

561. Exhibit 40 (attached hereto and incorporated herein) contains certain information pertaining to the 3631-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

562. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3631-A Road solely as it crosses United States public land as included and specifically described in Exhibit 40. The 3631-A Road includes the segment of road specifically set forth in Exhibit 40 and as exists on the ground.

Acceptance of the 3631-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

563. The 3631-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

564. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3631-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

565. The 3631-A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3631-A Road pursuant to the County's governmental right and authority.

566. Witnesses with personal knowledge of the history of the 3631-A Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

567. Currently known reputation in the community is that the 3631-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

568. Public motor vehicle use of the 3631-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

569. The 3631-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

570. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3631-A Road.

571. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3631-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3631-B Road

572. The 3631-B Road is designated as county road number 3631-B and SGID road identification number RD080284 and is more or less 6.28 miles long.

573. Exhibit 41 (attached hereto and incorporated herein) contains certain information

pertaining to the 3631-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

574. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3631-B Road solely as it crosses United States public land as included and specifically described in Exhibit 41. The 3631-B Road includes the segment of road specifically set forth in Exhibit 41 and as exists on the ground.

Acceptance of the 3631-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

575. The 3631-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

576. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3631-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

577. The 3631-B Road was accepted as a County highway at least 10 year prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3631-B Road pursuant to the County's governmental right and authority.

578. Witnesses with personal knowledge of the history of the 3631-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

579. Currently known reputation in the community is that the 3631-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

580. Public motor vehicle use of the 3631-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

581. The 3631-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

582. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3631-B Road.

583. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3631-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

708-A Road

584. The 708-A Road is designated as county road number 708-A and SGID road identification number RD080516 and is more or less 5.17 miles long.

585. Exhibit 42 (attached hereto and incorporated herein) contains certain information pertaining to the 708-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

586. In this action, the State and County seek to quiet title to the public highway right-of-way for the 708-A Road solely as it crosses United States public land as included and specifically described in Exhibit 42. The 708-A Road includes the segment of road specifically set forth in Exhibit 42 and as exists on the ground.

Acceptance of the 708-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

587. The 708-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

588. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 708-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

589. The 708-A Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

590. The County confirmed its acceptance of the 708-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 708-A Road pursuant to the County's governmental right and authority.

591. Witnesses with personal knowledge of the history of the 708-A Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

592. Currently known reputation in the community is that the 708-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

593. Public motor vehicle use of the 708-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

594. The 708-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

595. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 708-A Road.

596. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 708-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

708-B Road

597. The 708-B Road is designated as county road number 708-B and SGID road identification number RD080517 and is more or less 0.96 miles long.

598. Exhibit 43 (attached hereto and incorporated herein) contains certain information

pertaining to the 708-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

599. In this action, the State and County seek to quiet title to the public highway right-of-way for the 708-B Road solely as it crosses United States public land as included and specifically described in Exhibit 43. The 708-B Road includes the segment of road specifically set forth in Exhibit 43 and as exists on the ground.

Acceptance of the 708-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

600. The 708-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

601. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 708-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

602. The 708-B Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

603. The County confirmed its acceptance of the 708-B Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 708-B Road pursuant to the County's governmental right and

authority.

604. Witnesses with personal knowledge of the history of the 708-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

605. Currently known reputation in the community is that the 708-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

606. Public motor vehicle use of the 708-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

607. The 708-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

608. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 708-B Road.

609. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 708-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

708-C Road

610. The 708-C Road is designated as county road number 708-C and SGID road

identification number RD080518 and is more or less 2.83 miles long.

611. Exhibit 44 (attached hereto and incorporated herein) contains certain information pertaining to the 708-C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

612. In this action, the State and County seek to quiet title to the public highway right-of-way for the 708-C Road solely as it crosses United States public land as included and specifically described in Exhibit 44. The 708-C Road includes the segment of road specifically set forth in Exhibit 44 and as exists on the ground.

Acceptance of the 708-C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

613. The 708-C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

614. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 708-C Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

615. The 708-C Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

616. The County confirmed its acceptance of the 708-C Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 708-C Road pursuant to the County's governmental right and authority.

617. Witnesses with personal knowledge of the history of the 708-C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

618. Currently known reputation in the community is that the 708-C Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

619. Public motor vehicle use of the 708-C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

620. The 708-C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

621. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 708-C Road.

622. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 708-C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Canyon Pond/Bass Pond Road, 3609

623. The Canyon Pond/Bass Pond Road is designated as county road number 3609 and SGID road identification number RD080257 and is more or less 1.17 miles long.

624. Exhibit 45 (attached hereto and incorporated herein) contains certain information pertaining to the Canyon Pond/Bass Pond Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

625. In this action, the State and County seek to quiet title to the public highway right-of-way for the Canyon Pond/Bass Pond Road solely as it crosses United States public land as included and specifically described in Exhibit 45. The Canyon Pond/Bass Pond Road includes the segment of road specifically set forth in Exhibit 45 and as exists on the ground.

Acceptance of the Canyon Pond/Bass Pond Road R.S. 2477 Right-of-way Prior to October 21, 1976.

626. The Canyon Pond/Bass Pond Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

627. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Canyon Pond/Bass Pond Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

628. The Canyon Pond/Bass Pond Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Canyon Pond/Bass Pond Road

pursuant to the County's governmental right and authority.

629. Witnesses with personal knowledge of the history of the Canyon Pond/Bass Pond Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

630. Currently known reputation in the community is that the Canyon Pond/Bass Pond Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

631. Public motor vehicle use of the Canyon Pond/Bass Pond Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

632. The Canyon Pond/Bass Pond Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

633. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Canyon Pond/Bass Pond Road.

634. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Canyon Pond/Bass Pond Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cedar Ridge Loop Road, 3586

635. The Cedar Ridge Loop Road is designated as county road number 3586 and SGID road identification number RD080240 and is more or less 3.45 miles long.

636. Exhibit 46 (attached hereto and incorporated herein) contains certain information pertaining to the Cedar Ridge Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

637. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cedar Ridge Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 46. The Cedar Ridge Loop Road includes the segment of road specifically set forth in Exhibit 46 and as exists on the ground.

Acceptance of the Cedar Ridge Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

638. The Cedar Ridge Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

639. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Cedar Ridge Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

640. The Cedar Ridge Loop Road appears on the Emery East (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

641. The County confirmed its acceptance of the Cedar Ridge Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cedar Ridge Loop Road pursuant to the County's governmental right and authority.

642. Witnesses with personal knowledge of the history of the Cedar Ridge Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

643. Currently known reputation in the community is that the Cedar Ridge Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

644. Public motor vehicle use of the Cedar Ridge Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

645. The Cedar Ridge Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

646. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cedar Ridge Loop Road.

647. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cedar Ridge Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cedar Ridge Ranch Loop Road, 3576

648. The Cedar Ridge Ranch Loop Road is designated as county road number 3576 and SGID road identification number RD080238 and is more or less 2.70 miles long.

649. Exhibit 47 (attached hereto and incorporated herein) contains certain information pertaining to the Cedar Ridge Ranch Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

650. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cedar Ridge Ranch Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 47. The Cedar Ridge Ranch Loop Road includes the segment of road specifically set forth in Exhibit 47 and as exists on the ground.

Acceptance of the Cedar Ridge Ranch Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

651. The Cedar Ridge Ranch Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

652. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Cedar Ridge Ranch Loop Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

653. The Cedar Ridge Ranch Loop Road appears on the Emery East (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

654. The County confirmed its acceptance of the Cedar Ridge Ranch Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cedar Ridge Ranch Loop Road pursuant to the County's governmental right and authority.

655. Witnesses with personal knowledge of the history of the Cedar Ridge Ranch Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

656. Currently known reputation in the community is that the Cedar Ridge Ranch Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

657. Public motor vehicle use of the Cedar Ridge Ranch Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

658. The Cedar Ridge Ranch Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

659. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cedar Ridge Ranch Loop Road.

660. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cedar Ridge Ranch Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Coal Wash Road, 3624A-4

661. The Coal Wash Road is designated as county road number 3624A-4 and SGID road identification number RD080271 and is more or less 5.15 miles long.

662. Exhibit 48 (attached hereto and incorporated herein) contains certain information pertaining to the Coal Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

663. In this action, the State and County seek to quiet title to the public highway right-of-way for the Coal Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 48. The Coal Wash Road includes the segment of road specifically set forth in Exhibit 48 and as exists on the ground.

Acceptance of the Coal Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

664. The Coal Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

665. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Coal Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

666. The Coal Wash Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Coal Wash Road pursuant to the County's governmental right and authority.

667. Witnesses with personal knowledge of the history of the Coal Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

668. Currently known reputation in the community is that the Coal Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

669. Public motor vehicle use of the Coal Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

670. The Coal Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

671. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Coal Wash Road.

672. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Coal Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Coal Wash Dugway Road, 3624A-1

673. The Coal Wash Dugway Road is designated as county road number 3624A-1 and SGID road identification number RD080268 and is more or less 0.75 miles long.

674. Exhibit 49 (attached hereto and incorporated herein) contains certain information pertaining to the Coal Wash Dugway Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

675. In this action, the State and County seek to quiet title to the public highway right-of-way for the Coal Wash Dugway Road solely as it crosses United States public land as included and specifically described in Exhibit 49. The Coal Wash Dugway Road includes the segment of road specifically set forth in Exhibit 49 and as exists on the ground.

Acceptance of the Coal Wash Dugway Road R.S. 2477 Right-of-way Prior to October 21, 1976.

676. The Coal Wash Dugway Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

677. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Coal Wash Dugway Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

678. The Coal Wash Dugway Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Coal Wash Dugway Road pursuant to the County's governmental right and authority.

679. Witnesses with personal knowledge of the history of the Coal Wash Dugway Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

680. Currently known reputation in the community is that the Coal Wash Dugway Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

681. Public motor vehicle use of the Coal Wash Dugway Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of

an R.S. 2477 public highway right-of-way underlying this road.

682. The Coal Wash Dugway Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

683. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Coal Wash Dugway Road.

684. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Coal Wash Dugway Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Coal Wash to Wood Hollow Road, 3517

685. The Coal Wash to Wood Hollow Road is designated as county road number 3517and SGID road identification number RD080212 and is more or less 2.55 miles long.

686. Exhibit 50 (attached hereto and incorporated herein) contains certain information pertaining to the Coal Wash to Wood Hollow Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

687. In this action, the State and County seek to quiet title to the public highway right-of-way for the Coal Wash to Wood Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 50. The Coal Wash to Wood Hollow Road includes the segment of road specifically set forth in Exhibit 50 and as exists on the ground.

Acceptance of the Coal Wash to Wood Hollow Road R.S. 2477 Right-of-way Prior to October 21, 1976.

688. The Coal Wash to Wood Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

689. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Coal Wash to Wood Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

690. The Coal Wash to Wood Hollow Road was accepted as a County highway at least 10 years prior to October 21, 1976. County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Coal Wash to Wood Hollow Road pursuant to the County's governmental right and authority.

691. Witnesses with personal knowledge of the history of the Coal Wash to Wood Hollow Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

692. Currently known reputation in the community is that the Coal Wash to Wood Hollow Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

693. Public motor vehicle use of the Coal Wash to Wood Hollow Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or

necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

694. The Coal Wash to Wood Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

695. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Coal Wash to Wood Hollow Road.

696. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Coal Wash to Wood Hollow Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Devil's Racetrack Road, 3619

697. The Devil's Racetrack Road is designated as county road number 3619 and SGID road identification number RD080262 and is more or less 3.19 miles long.

698. Exhibit 51 (attached hereto and incorporated herein) contains certain information pertaining to the Devil's Racetrack Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

699. In this action, the State and County seek to quiet title to the public highway right-of-way for the Devil's Racetrack Road solely as it crosses United States public land as included

and specifically described in Exhibit 51. The Devil's Racetrack Road includes the segment of road specifically set forth in Exhibit 51 and as exists on the ground.

Acceptance of the Devil's Racetrack Road R.S. 2477 Right-of-way Prior to October 21, 1976.

700. The Devil's Racetrack Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

701. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Devil's Racetrack Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

702. The Devil's Racetrack Road appears on the San Rafael Knob (1953) and The Blocks (1953) USGS 7.5 minute quadrangle maps, and the San Rafael Knob (1952) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

703. The County confirmed its acceptance of the Devil's Racetrack Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Devil's Racetrack Road pursuant to the County's governmental right and authority.

704. Witnesses with personal knowledge of the history of the Devil's Racetrack Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

705. Currently known reputation in the community is that the Devil's Racetrack Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

706. Public motor vehicle use of the Devil's Racetrack Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

707. The Devil's Racetrack Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

708. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Devil's Racetrack Road.

709. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Devil's Racetrack Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dry Wash Spur Road, 3595

710. The Dry Wash Spur Road is designated as county road number 3595 and SGID road identification number RD080246 and is more or less 2.58 miles long.

711. Exhibit 52 (attached hereto and incorporated herein) contains certain information

pertaining to the Dry Wash Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

712. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dry Wash Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 52. The Dry Wash Spur Road includes the segment of road specifically set forth in Exhibit 52 and as exists on the ground.

Acceptance of the Dry Wash Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

713. The Dry Wash Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

714. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dry Wash Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

715. The Dry Wash Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dry Wash Spur Road pursuant to the County's governmental right and authority.

716. Witnesses with personal knowledge of the history of the Dry Wash Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

717. Currently known reputation in the community is that the Dry Wash Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

718. Public motor vehicle use of the Dry Wash Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

719. The Dry Wash Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

720. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dry Wash Spur Road.

721. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dry Wash Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dry Wash/Cedar Ridge Ranch Road, 3572

722. The Dry Wash/Cedar Ridge Ranch Road is designated as county road number 3572 and SGID road identification number RD080236 and is more or less 1.24 miles long.

723. Exhibit 53 (attached hereto and incorporated herein) contains certain information

pertaining to the Dry Wash/Cedar Ridge Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

724. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dry Wash/Cedar Ridge Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 53. The Dry Wash/Cedar Ridge Ranch Road includes the segment of road specifically set forth in Exhibit 53 and as exists on the ground.

Acceptance of the Dry Wash/Cedar Ridge Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

725. The Dry Wash/Cedar Ridge Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

726. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dry Wash/Cedar Ridge Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

727. The Dry Wash/Cedar Ridge Ranch Road appears on the Emery East (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

728. The County confirmed its acceptance of the Dry Wash/Cedar Ridge Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dry Wash/Cedar Ridge Ranch Road pursuant to the

County's governmental right and authority.

729. Witnesses with personal knowledge of the history of the Dry Wash/Cedar Ridge Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

730. Currently known reputation in the community is that the Dry Wash/Cedar Ridge Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

731. Public motor vehicle use of the Dry Wash/Cedar Ridge Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

732. The Dry Wash/Cedar Ridge Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

733. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dry Wash/Cedar Ridge Ranch Road.

734. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dry Wash/Cedar Ridge Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and

enjoyment of this road.

East Sand Bench North Road, 3514

735. The East Sand Bench North Road is designated as county road number 3514 and SGID road identification number RD080208 and is more or less 1.38 miles long.

736. Exhibit 54 (attached hereto and incorporated herein) contains certain information pertaining to the East Sand Bench North Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

737. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Sand Bench North Road solely as it crosses United States public land as included and specifically described in Exhibit 54. The East Sand Bench North Road includes the segment of road specifically set forth in Exhibit 54 and as exists on the ground.

Acceptance of the East Sand Bench North Road R.S. 2477 Right-of-way Prior to October 21, 1976.

738. The East Sand Bench North Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

739. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the East Sand Bench North Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

740. The East Sand Bench North Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-

way underlying this road. *See* Exhibit 11 for more detailed map information.

741. The County confirmed its acceptance of the East Sand Bench North Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Sand Bench North Road pursuant to the County's governmental right and authority.

742. Witnesses with personal knowledge of the history of the East Sand Bench North Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

743. Currently known reputation in the community is that the East Sand Bench North Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

744. Public motor vehicle use of the East Sand Bench North Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

745. The East Sand Bench North Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

746. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the East Sand Bench North Road.

747. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Sand Bench North Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Sand Bench South Road, 3513

748. The East Sand Bench South Road is designated as county road number 3513 and SGID road identification number RD080206 and is more or less 5.01 miles long.

749. Exhibit 55 (attached hereto and incorporated herein) contains certain information pertaining to the East Sand Bench South Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

750. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Sand Bench South Road solely as it crosses United States public land as included and specifically described in Exhibit 55. The East Sand Bench South Road includes the segment of road specifically set forth in Exhibit 55 and as exists on the ground.

Acceptance of the East Sand Bench South Road R.S. 2477 Right-of-way Prior to October 21, 1976.

751. The East Sand Bench South Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

752. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the East Sand Bench South Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

753. The East Sand Bench South Road appears on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

754. The County confirmed its acceptance of the East Sand Bench South Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Sand Bench South Road pursuant to the County's governmental right and authority.

755. Witnesses with personal knowledge of the history of the East Sand Bench South Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

756. Currently known reputation in the community is that the East Sand Bench South Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

757. Public motor vehicle use of the East Sand Bench South Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

758. The East Sand Bench South Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

759. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Sand Bench South Road.

760. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Sand Bench South Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Emery TV/Rochester Road, 3580

761. The Emery TV/Rochester Road is designated as county road number 3580 and SGID road identification number RD080239 and is more or less 2.12 miles long.

762. Exhibit 56 (attached hereto and incorporated herein) contains certain information pertaining to the Emery TV/Rochester Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

763. In this action, the State and County seek to quiet title to the public highway right-of-way for the Emery TV/Rochester Road solely as it crosses United States public land as included and specifically described in Exhibit 56. The Emery TV/Rochester Road includes the segment of road specifically set forth in Exhibit 56 and as exists on the ground.

Acceptance of the Emery TV/Rochester Road R.S. 2477 Right-of-way Prior to October 21, 1976.

764. The Emery TV/Rochester Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

765. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Emery TV/Rochester Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

766. The Emery TV/Rochester Road appears on the Emery East (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

767. The Emery TV/Rochester Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Emery TV/Rochester Road pursuant to the County's governmental right and authority.

768. Witnesses with personal knowledge of the history of the Emery TV/Rochester Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

769. Currently known reputation in the community is that the Emery TV/Rochester Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

770. Public motor vehicle use of the Emery TV/Rochester Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

771. The Emery TV/Rochester Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

772. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Emery TV/Rochester Road.

773. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Emery TV/Rochester Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Ferron Reef Cutoff Road, 3502

774. The Ferron Reef Cutoff Road is designated as county road number 3502 and SGID road identification number RD080202and is more or less 4.35 miles long.

775. Exhibit 57 (attached hereto and incorporated herein) contains certain information pertaining to the Ferron Reef Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

776. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Ferron Reef Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 57. The Ferron Reef Cutoff Road includes the segment of road specifically set forth in Exhibit 57 and as exists on the ground.

Acceptance of the Ferron Reef Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

777. The Ferron Reef Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

778. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Ferron Reef Cutoff Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

779. The Ferron Reef Cutoff Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Ferron Reef Cutoff Road pursuant to the County's governmental right and authority.

780. Witnesses with personal knowledge of the history of the Ferron Reef Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

781. Currently known reputation in the community is that the Ferron Reef Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

782. Public motor vehicle use of the Ferron Reef Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

783. The Ferron Reef Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

784. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Ferron Reef Cutoff Road.

785. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Ferron Reef Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Fuller Bottom Road, 3416

786. The Fuller Bottom Road is designated as county road number 3416 and SGID road identification number RD080182 and is more or less 5.30 miles long.

787. Exhibit 58 (attached hereto and incorporated herein) contains certain information pertaining to the Fuller Bottom Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

788. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Fuller Bottom Road solely as it crosses United States public land as included and specifically described in Exhibit 58. The Fuller Bottom Road includes the segment of road specifically set forth in Exhibit 58 and as exists on the ground.

Acceptance of the Fuller Bottom Road R.S. 2477 Right-of-way Prior to October 21, 1976.

789. The Fuller Bottom Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

790. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Fuller Bottom Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

791. The Fuller Bottom Road appears on the Buckhorn Reservoir (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

792. The County confirmed its acceptance of the Fuller Bottom Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Fuller Bottom Road pursuant to the County's governmental right and authority.

793. Witnesses with personal knowledge of the history of the Fuller Bottom Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

794. Currently known reputation in the community is that the Fuller Bottom Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

795. Public motor vehicle use of the Fuller Bottom Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

796. The Fuller Bottom Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

797. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Fuller Bottom Road.

798. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Fuller Bottom Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Locomotive Point Road, 3630-A

799. The Locomotive Point Road is designated as county road number 3630-A and SGID road identification number RD080279 and is more or less 2.00 miles long.

800. Exhibit 59 (attached hereto and incorporated herein) contains certain information

pertaining to the Locomotive Point Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

801. In this action, the State and County seek to quiet title to the public highway right-of-way for the Locomotive Point Road solely as it crosses United States public land as included and specifically described in Exhibit 59. The Locomotive Point Road includes the segment of road specifically set forth in Exhibit 59 and as exists on the ground.

Acceptance of the Locomotive Point Road R.S. 2477 Right-of-way Prior to October 21, 1976.

802. The Locomotive Point Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

803. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Locomotive Point Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

804. The Locomotive Point Road appears on The Blocks (1953) USGS 7.5 minute quadrangle map and the San Rafael Knob (1952) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

805. The County confirmed its acceptance of the Locomotive Point Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Locomotive Point Road pursuant to the County's governmental right and authority.

806. Witnesses with personal knowledge of the history of the Locomotive Point Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

807. Currently known reputation in the community is that the Locomotive Point Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

808. Public motor vehicle use of the Locomotive Point Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

809. The Locomotive Point Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

810. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Locomotive Point Road.

811. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Locomotive Point Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment

of this road.

Lone Tree Reservoir Road, 3604

812. The Lone Tree Reservoir Road is designated as county road number 3604 and SGID road identification number RD080256 and is more or less 1.70 miles long.

813. Exhibit 60 (attached hereto and incorporated herein) contains certain information pertaining to the Lone Tree Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

814. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lone Tree Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 60. The Lone Tree Reservoir Road includes the segment of road specifically set forth in Exhibit 60 and as exists on the ground.

Acceptance of the Lone Tree Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

815. The Lone Tree Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

816. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lone Tree Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

817. The appearance of the Lone Tree Reservoir Road on the Short Canyon (1953) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-

way underlying this road. *See* Exhibit 11 for more detailed map information.

818. The Lone Tree Reservoir Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lone Tree Reservoir Road pursuant to the County's governmental right and authority.

819. Witnesses with personal knowledge of the history of the Lone Tree Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

820. Currently known reputation in the community is that the Lone Tree Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

821. Public motor vehicle use of the Lone Tree Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

822. The Lone Tree Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

823. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lone Tree Reservoir Road.

824. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lone Tree Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Molen Reef Road, 3592

825. The Molen Reef Road is designated as county road number 3592 and SGID road identification number RD080243 and is more or less 1.94 miles long.

826. Exhibit 61 (attached hereto and incorporated herein) contains certain information pertaining to the Molen Reef Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

827. In this action, the State and County seek to quiet title to the public highway right-of-way for the Molen Reef Road solely as it crosses United States public land as included and specifically described in Exhibit 61. The Molen Reef Road includes the segment of road specifically set forth in Exhibit 61 and as exists on the ground.

Acceptance of the Molen Reef Road R.S. 2477 Right-of-way Prior to October 21, 1976.

828. The Molen Reef Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

829. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Molen Reef Road as a public highway located on the land

at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

830. The Molen Reef Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Molen Reef Road pursuant to the County's governmental right and authority.

831. Witnesses with personal knowledge of the history of the Molen Reef Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

832. Currently known reputation in the community is that the Molen Reef Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

833. Public motor vehicle use of the Molen Reef Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

834. The Molen Reef Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

835. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Molen Reef Road.

836. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Molen Reef Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Reef Spur Road, 3573

837. The North Reef Spur Road is designated as county road number 3573 and SGID road identification number RD080237 and is more or less 3.29 miles long.

838. Exhibit 62 (attached hereto and incorporated herein) contains certain information pertaining to the North Reef Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

839. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Reef Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 62. The North Reef Spur Road includes the segment of road specifically set forth in Exhibit 62 and as exists on the ground.

Acceptance of the North Reef Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

840. The North Reef Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

841. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North Reef Spur Road as a public highway located on the

land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

842. The appearance of the North Reef Spur Road on the Emery East (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

843. The County confirmed its acceptance of the North Reef Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Reef Spur Road pursuant to the County's governmental right and authority.

844. Witnesses with personal knowledge of the history of the North Reef Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

845. Currently known reputation in the community is that the North Reef Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

846. Public motor vehicle use of the North Reef Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

847. The North Reef Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

848. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Reef Spur Road.

849. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Reef Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Salt Wash to Fuller Bot Road, 3516

850. The North Salt Wash to Fuller Bot Road is designated as county road number 3516 and SGID road identification number RD080211 and is more or less 8.28 miles long.

851. Exhibit 63 (attached hereto and incorporated herein) contains certain information pertaining to the North Salt Wash to Fuller Bot Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

852. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Salt Wash to Fuller Bot Road solely as it crosses United States public land as included and specifically described in Exhibit 63. The North Salt Wash to Fuller Bot Road includes the segment of road specifically set forth in Exhibit 63 and as exists on the ground.

Acceptance of the North Salt Wash to Fuller Bot Road R.S. 2477 Right-of-way Prior to October 21, 1976.

853. The North Salt Wash to Fuller Bot Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

854. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the North Salt Wash to Fuller Bot Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

855. The appearance of the North Salt Wash to Fuller Bot Road on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

856. The County confirmed its acceptance of the North Salt Wash to Fuller Bot Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Salt Wash to Fuller Bot Road pursuant to the County's governmental right and authority.

857. Witnesses with personal knowledge of the history of the North Salt Wash to Fuller Bot Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

858. Currently known reputation in the community is that the North Salt Wash to

Fuller Bot Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

859. Public motor vehicle use of the North Salt Wash to Fuller Bot Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

860. The North Salt Wash to Fuller Bot Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

861. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Salt Wash to Fuller Bot Road.

862. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Salt Wash to Fuller Bot Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Orchard Draw Road, 3630

863. The Orchard Draw Road is designated as county road number 3630 and SGID road identification number RD080278 and is more or less 1.02 miles long.

864. Exhibit 64 (attached hereto and incorporated herein) contains certain information pertaining to the Orchard Draw Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

865. In this action, the State and County seek to quiet title to the public highway right-of-way for the Orchard Draw Road solely as it crosses United States public land as included and specifically described in Exhibit 64. The Orchard Draw Road includes the segment of road specifically set forth in Exhibit 64 and as exists on the ground.

Acceptance of the Orchard Draw Road R.S. 2477 Right-of-way Prior to October 21, 1976.

866. The Orchard Draw Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

867. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Orchard Draw Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

868. The Orchard Draw Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Orchard Draw Road pursuant to the County's governmental right and authority.

869. Witnesses with personal knowledge of the history of the Orchard Draw Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

870. Currently known reputation in the community is that the Orchard Draw Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

871. Public motor vehicle use of the Orchard Draw Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

872. The Orchard Draw Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

873. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Orchard Draw Road.

874. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Orchard Draw Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Salt Wash Spur Road, 3518

875. The Salt Wash Spur Road is designated as county road number 3518 and SGID road identification number RD080214 and is more or less 2.13 miles long.

876. Exhibit 65 (attached hereto and incorporated herein) contains certain information pertaining to the Salt Wash Spur Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

877. In this action, the State and County seek to quiet title to the public highway right-of-way for the Salt Wash Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 65. The Salt Wash Spur Road includes the segment of road specifically set forth in Exhibit 65 and as exists on the ground.

Acceptance of the Salt Wash Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

878. The Salt Wash Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

879. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Salt Wash Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

880. The appearance of the Salt Wash Spur Road on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

881. The Salt Wash Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Salt Wash Spur Road pursuant to the County's governmental right and authority.

882. Witnesses with personal knowledge of the history of the Salt Wash Spur Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

883. Currently known reputation in the community is that the Salt Wash Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

884. Public motor vehicle use of the Salt Wash Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

885. The Salt Wash Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

886. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Salt Wash Spur Road.

887. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Salt Wash Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Salt Wash to Fuller Bottom Road, 3515

888. The Salt Wash to Fuller Bottom Road is designated as county road number

3515and SGID road identification number RD080209 and is more or less 1.61 miles long.

889. Exhibit 66 (attached hereto and incorporated herein) contains certain information pertaining to the Salt Wash to Fuller Bottom Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

890. In this action, the State and County seek to quiet title to the public highway right-of-way for the Salt Wash to Fuller Bottom Road solely as it crosses United States public land as included and specifically described in Exhibit 66. The Salt Wash to Fuller Bottom Road includes the segment of road specifically set forth in Exhibit 66 and as exists on the ground.

Acceptance of the Salt Wash to Fuller Bottom Road R.S. 2477 Right-of-way Prior to October 21, 1976.

891. The Salt Wash to Fuller Bottom Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

892. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Salt Wash to Fuller Bottom Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

893. The appearance of the Salt Wash to Fuller Bottom Road on the Horn Silver Gulch (1960) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

894. The County confirmed its acceptance of the Salt Wash to Fuller Bottom Road by 1975, when it designated and accepted the road as a County highway on the County's general

highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Salt Wash to Fuller Bottom Road pursuant to the County's governmental right and authority.

895. Witnesses with personal knowledge of the history of the Salt Wash to Fuller Bottom Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

896. Currently known reputation in the community is that the Salt Wash to Fuller Bottom Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

897. Public motor vehicle use of the Salt Wash to Fuller Bottom Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

898. The Salt Wash to Fuller Bottom Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

899. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Salt Wash to Fuller Bottom Road.

900. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Salt Wash to Fuller Bottom Road on lands owned by the United States as

described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sand Bench Road, 3498

901. The Sand Bench Road is designated as county road number 3498 and SGID road identification number RD080200 and is more or less 7.48 miles long.

902. Exhibit 67 (attached hereto and incorporated herein) contains certain information pertaining to the Sand Bench Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

903. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sand Bench Road solely as it crosses United States public land as included and specifically described in Exhibit 67. The Sand Bench Road includes the segment of road specifically set forth in Exhibit 67 and as exists on the ground.

Acceptance of the Sand Bench Road R.S. 2477 Right-of-way Prior to October 21, 1976.

904. The Sand Bench Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

905. The appearance of the Sand Bench Road on the Short Canyon (1953) USGS 7.5 minute quadrangle map and the Castle Dale (1925) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

906. The County confirmed its acceptance of the Sand Bench Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sand Bench Road pursuant to the County's governmental right and authority.

907. Witnesses with personal knowledge of the history of the Sand Bench Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

908. Currently known reputation in the community is that the Sand Bench Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

909. Public motor vehicle use of the Sand Bench Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

910. The Sand Bench Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

911. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sand Bench Road.

912. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Sand Bench Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Secret Mesa Road, 3773

913. The Secret Mesa Road is designated as county road number 3773 and SGID road identification number RD080331 and is more or less 1.97 miles long.

914. Exhibit 68 (attached hereto and incorporated herein) contains certain information pertaining to the Secret Mesa Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

915. In this action, the State and County seek to quiet title to the public highway right-of-way for the Secret Mesa Road solely as it crosses United States public land as included and specifically described in Exhibit 68. The Secret Mesa Road includes the segment of road specifically set forth in Exhibit 68 and as exists on the ground.

Acceptance of the Secret Mesa Road R.S. 2477 Right-of-way Prior to October 21, 1976.

916. The Secret Mesa Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

917. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Secret Mesa Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

918. The Secret Mesa Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Secret Mesa Road pursuant to the County's governmental right and authority.

919. Witnesses with personal knowledge of the history of the Secret Mesa Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

920. Currently known reputation in the community is that the Secret Mesa Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

921. Public motor vehicle use of the Secret Mesa Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

922. The Secret Mesa Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

923. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Secret Mesa Road.

924. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Secret Mesa Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Sand Reservoir Spur Road, 3512

925. The South Sand Reservoir Spur Road is designated as county road number 3512 and SGID road identification number RD080205 and is more or less 0.77 miles long.

926. Exhibit 69 (attached hereto and incorporated herein) contains certain information pertaining to the South Sand Reservoir Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

927. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Sand Reservoir Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 69. The South Sand Reservoir Spur Road includes the segment of road specifically set forth in Exhibit 69 and as exists on the ground.

Acceptance of the South Sand Reservoir Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

928. The South Sand Reservoir Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

929. The appearance of the South Sand Reservoir Spur Road on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

930. The County confirmed its acceptance of the South Sand Reservoir Spur Road by

1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Sand Reservoir Spur Road pursuant to the County's governmental right and authority.

931. Witnesses with personal knowledge of the history of the South Sand Reservoir Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

932. Currently known reputation in the community is that the South Sand Reservoir Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

933. Public motor vehicle use of the South Sand Reservoir Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

934. The South Sand Reservoir Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

935. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Sand Reservoir Spur Road.

936. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the South Sand Reservoir Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Sand Reservoir Road, 3406

937. The South Sand Reservoir Road is designated as county road number 3406 and SGID road identification number RD080178 and is more or less 0.73 miles long.

938. Exhibit 70 (attached hereto and incorporated herein) contains certain information pertaining to the South Sand Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

939. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Sand Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 70. The South Sand Reservoir Road includes the segment of road specifically set forth in Exhibit 70 and as exists on the ground.

Acceptance of the South Sand Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

940. The South Sand Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

941. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the South Sand Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

942. The appearance of the South Sand Reservoir Road on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

943. The County confirmed its acceptance of the South Sand Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Sand Reservoir Road pursuant to the County's governmental right and authority.

944. Witnesses with personal knowledge of the history of the South Sand Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

945. Currently known reputation in the community is that the South Sand Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

946. Public motor vehicle use of the South Sand Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

947. The South Sand Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

948. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Sand Reservoir Road.

949. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Sand Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Twin Ponds Road, 3603

950. The Twin Ponds Road is designated as county road number 3603 and SGID road identification number RD080255 and is more or less 2.97 miles long.

951. Exhibit 71 (attached hereto and incorporated herein) contains certain information pertaining to the Twin Ponds Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

952. In this action, the State and County seek to quiet title to the public highway right-of-way for the Twin Ponds Road solely as it crosses United States public land as included and specifically described in Exhibit 71. The Twin Ponds Road includes the segment of road specifically set forth in Exhibit 71 and as exists on the ground.

Acceptance of the Twin Ponds Road R.S. 2477 Right-of-way Prior to October 21, 1976.

953. The Twin Ponds Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

954. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Twin Ponds Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

955. The appearance of the Twin Ponds Road on the Short Canyon (1953) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

956. The Twin Ponds Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Twin Ponds Road pursuant to the County's governmental right and authority.

957. Witnesses with personal knowledge of the history of the Twin Ponds Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

958. Currently known reputation in the community is that the Twin Ponds Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

959. Public motor vehicle use of the Twin Ponds Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

960. The Twin Ponds Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

961. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Twin Ponds Road.

962. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Twin Ponds Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper South Salt Wash Road, 3610

963. The Upper South Salt Wash Road is designated as county road number 3610 and SGID road identification number RD080258 and is more or less 6.05 miles long.

964. Exhibit 72 (attached hereto and incorporated herein) contains certain information pertaining to the Upper South Salt Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

965. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper South Salt Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 72. The Upper South Salt Wash Road includes the segment of road specifically set forth in Exhibit 72 and as exists on the ground.

Acceptance of the Upper South Salt Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

966. The Upper South Salt Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

967. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Upper South Salt Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

968. The Upper South Salt Wash Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Upper South Salt Wash Road pursuant to the County's governmental right and authority.

969. Witnesses with personal knowledge of the history of the Upper South Salt Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

970. Currently known reputation in the community is that the Upper South Salt Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

971. Public motor vehicle use of the Upper South Salt Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of

an R.S. 2477 public highway right-of-way underlying this road.

972. The Upper South Salt Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

973. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper South Salt Wash Road.

974. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper South Salt Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wickiup Loop Road, 3627A

975. The Wickiup Loop Road is designated as county road number 3627A and SGID road identification number RD080597 and is more or less 3.52 miles long.

976. Exhibit 73 (attached hereto and incorporated herein) contains certain information pertaining to the Wickiup Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

977. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wickiup Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 73. The Wickiup Loop Road includes the segment of road specifically set forth in Exhibit 73 and as exists on the ground.

Acceptance of the Wickiup Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

978. The Wickiup Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

979. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Wickiup Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

980. The Wickiup Loop Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wickiup Loop Road pursuant to the County's governmental right and authority.

981. Witnesses with personal knowledge of the history of the Wickiup Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

982. Currently known reputation in the community is that the Wickiup Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

983. Public motor vehicle use of the Wickiup Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

984. The Wickiup Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

985. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wickiup Loop Road.

986. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wickiup Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wood Hollow Across Eagle Canyon Road, 3614

987. The Wood Hollow Across Eagle Canyon Road is designated as county road number 3614 and SGID road identification number RD080260 and is more or less 4.28 miles long.

988. Exhibit 74 (attached hereto and incorporated herein) contains certain information pertaining to the Wood Hollow Across Eagle Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

989. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wood Hollow Across Eagle Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 74. The Wood Hollow Across Eagle

Canyon Road includes the segment of road specifically set forth in Exhibit 74 and as exists on the ground.

Acceptance of the Wood Hollow Across Eagle Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

990. The Wood Hollow Across Eagle Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

991. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Wood Hollow Across Eagle Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

992. The Wood Hollow Across Eagle Canyon Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wood Hollow Across Eagle Canyon Road pursuant to the County's governmental right and authority.

993. Witnesses with personal knowledge of the history of the Wood Hollow Across Eagle Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

994. Currently known reputation in the community is that the Wood Hollow Across Eagle Canyon Road has been open for all to come and go as they please, whenever convenient or

necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

995. Public motor vehicle use of the Wood Hollow Across Eagle Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

996. The Wood Hollow Across Eagle Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

997. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wood Hollow Across Eagle Canyon Road.

998. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wood Hollow Across Eagle Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Yellow Seep Road, 3491

999. The Yellow Seep Road is designated as county road number 3491and SGID road identification number RD080197 and is more or less 2.36 miles long.

1000. Exhibit 75 (attached hereto and incorporated herein) contains certain information pertaining to the Yellow Seep Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

1001. In this action, the State and County seek to quiet title to the public highway right-of-way for the Yellow Seep Road solely as it crosses United States public land as included and specifically described in Exhibit 75. The Yellow Seep Road includes the segment of road specifically set forth in Exhibit 75 and as exists on the ground.

Acceptance of the Yellow Seep Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1002. The Yellow Seep Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1003. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Yellow Seep Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1004. The appearance of the Yellow Seep Road on the Horn Silver Gulch (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1005. The Yellow Seep Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Yellow Seep Road pursuant to the County's governmental right and authority.

1006. Witnesses with personal knowledge of the history of the Yellow Seep Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1007. Currently known reputation in the community is that the Yellow Seep Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1008. Public motor vehicle use of the Yellow Seep Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1009. The Yellow Seep Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1010. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Yellow Seep Road.

1011. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Yellow Seep Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SECOND CAUSE OF ACTION – QUIET TITLE
FERRON CANYON AREA

1012. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1013. The Ferron Canyon Area is located in northwestern Emery County in the central region of Utah.

1014. The Ferron Canyon Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Cottonwood Canyon Road, 506; (2) Des Bee Dove Road, 416; (3) Emery/Link Canyon Road, 905; (4) Ferron Canyon Road, 701; (5) Johnson Bench Road, 511; (6) Link Canyon Road, 911; (7) Muddy Canyon Road, 806; (8) Old Ferron Dugway Road, 720; (9) Rock Canyon Flat Road, 604; (10) Rock Canyon Road, 603; and (11) South Canal Road, 322.

1015. Each right-of-way claimed in the Ferron Canyon Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

1016. All rights-of-way claimed in the Ferron Canyon Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1017. All rights-of-way claimed in the Ferron Canyon Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public

highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1018. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Cottonwood Canyon Road, 506

1019. The Cottonwood Canyon Road is designated as county road number 506 and SGID road identification number RD080486 and is more or less 3.69 miles long.

1020. Exhibit 76 (attached hereto and incorporated herein) contains certain information pertaining to the Cottonwood Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1021. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cottonwood Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 76. The Cottonwood Canyon Road includes the segment of road specifically set forth in Exhibit 76 and as exists on the ground.

Acceptance of the Cottonwood Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1022. The Cottonwood Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1023. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Cottonwood Canyon Road as a public highway located on

the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1024. The appearance of the Cottonwood Canyon Road on the Mahogany Point (1979) USGS 7.5 minute quadrangle map and the Hiawatha (1923) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1025. The County confirmed its acceptance of the Cottonwood Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cottonwood Canyon Road using public funds pursuant to the County's governmental right and authority.

1026. Witnesses with personal knowledge of the history of the Cottonwood Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1027. Currently known reputation in the community is that the Cottonwood Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1028. Public motor vehicle use of the Cottonwood Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of

an R.S. 2477 public highway right-of-way underlying this road.

1029. The Cottonwood Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1030. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cottonwood Canyon Road.

1031. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cottonwood Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Des Bee Dove Road, 416

1032. The Des Bee Dove Road is designated as county road number 416 and SGID road identification number RD080470 and is more or less 6.61 miles long.

1033. Exhibit 77 (attached hereto and incorporated herein) contains certain information pertaining to the Des Bee Dove Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1034. In this action, the State and County seek to quiet title to the public highway right-of-way for the Des Bee Dove Road solely as it crosses United States public land as included and specifically described in Exhibit 77. The Des Bee Dove Road includes the segment of road specifically set forth in Exhibit 77 and as exists on the ground.

Acceptance of the Des Bee Dove Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1035. The Des Bee Dove Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1036. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Des Bee Dove Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1037. The appearance of the Des Bee Dove Road on the Red Point (1979) USGS 7.5 minute quadrangle map, and the Castle Dale (1925) and Hiawatha (1923) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1038. The County confirmed its acceptance of the Des Bee Dove Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Des Bee Dove Road using public funds pursuant to the County's governmental right and authority.

1039. Witnesses with personal knowledge of the history of the Des Bee Dove Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1040. Currently known reputation in the community is that the Des Bee Dove Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1041. Public motor vehicle use of the Des Bee Dove Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1042. The Des Bee Dove Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1043. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Des Bee Dove Road.

1044. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Des Bee Dove Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Emery/Link Canyon Road, 905

1045. The Emery/Link Canyon Road is designated as county road number 905 and SGID road identification number RD080543 and is more or less 0.69 miles long.

1046. Exhibit 78 (attached hereto and incorporated herein) contains certain information pertaining to the Emery/Link Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list;

and a complete centerline description of the road.

1047. In this action, the State and County seek to quiet title to the public highway right-of-way for the Emery/Link Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 78. The Emery/Link Canyon Road includes the segment of road specifically set forth in Exhibit 78 and as exists on the ground.

Acceptance of the Emery/Link Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1048. The Emery/Link Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1049. Aerial photography from 1976 the historical use, existence, and acceptance of the right-of-way for the Emery/Link Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1050. The appearance of the Emery/Link Canyon Road on the Emery West (1968) USGS 7.5 minute quadrangle map and the Accord Lakes (1957) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1051. The County confirmed its acceptance of the Emery/Link Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Emery/Link Canyon Road using public funds pursuant to the County's governmental right and authority.

1052. Witnesses with personal knowledge of the history of the Emery/Link Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1053. Currently known reputation in the community is that the Emery/Link Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1054. Public motor vehicle use of the Emery/Link Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1055. The Emery/Link Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1056. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Emery/Link Canyon Road.

1057. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Emery/Link Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Ferron Canyon Road, 701

1058. The Ferron Canyon Road is designated as county road number 701 and SGID road identification number RD080509 and is more or less 12.99 miles long.

1059. Exhibit 79 (attached hereto and incorporated herein) contains certain information pertaining to the Ferron Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1060. In this action, the State and County seek to quiet title to the public highway right-of-way for the Ferron Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 79. The Ferron Canyon Road includes the segment of road specifically set forth in Exhibit 79 and as exists on the ground.

Acceptance of the Ferron Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1061. The Ferron Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1062. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Ferron Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1063. The appearance of the Ferron Canyon Road on Ferron Canyon (1966), Flagstaff Peak (1966), and Ferron (1979) USGS 7.5 minute quadrangle maps, and the Castle Dale (1925) USGS 15 minute quadrangle map, evidences the existence, use, and acceptance of the right-of-

way underlying this road. *See* Exhibit 11 for more detailed map information.

1064. The County confirmed its acceptance of the Ferron Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Ferron Canyon Road using public funds pursuant to the County's governmental right and authority.

1065. Witnesses with personal knowledge of the history of the Ferron Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1066. Currently known reputation in the community is that the Ferron Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1067. Public motor vehicle use of the Ferron Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1068. The Ferron Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1069. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Ferron Canyon Road.

1070. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Ferron Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Johnson Bench Road, 511

1071. The Johnson Bench Road is designated as county road number 511 and SGID road identification number RD080490 and is more or less 2.73 miles long.

1072. Exhibit 80 (attached hereto and incorporated herein) contains certain information pertaining to the Johnson Bench Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1073. In this action, the State and County seek to quiet title to the public highway right-of-way for the Johnson Bench Road solely as it crosses United States public land as included and specifically described in Exhibit 80. The Johnson Bench Road includes the segment of road specifically set forth in Exhibit 80 and as exists on the ground.

Acceptance of the Johnson Bench Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1074. The Johnson Bench Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1075. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Johnson Bench Road as a public highway located on the

land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1076. The appearance of the Johnson Bench Road on the Castle Dale (1925) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1077. The County confirmed its acceptance of the Johnson Bench Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Johnson Bench Road using public funds pursuant to the County's governmental right and authority.

1078. Witnesses with personal knowledge of the history of the Johnson Bench Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1079. Currently known reputation in the community is that the Johnson Bench Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1080. Public motor vehicle use of the Johnson Bench Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1081. The Johnson Bench Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1082. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Johnson Bench Road.

1083. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Johnson Bench Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Link Canyon Road, 911

1084. The Link Canyon Road is designated as county road number 911 and SGID road identification number RD080549 and is more or less 3.25 miles long.

1085. Exhibit 81 (attached hereto and incorporated herein) contains certain information pertaining to the Link Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1086. In this action, the State and County seek to quiet title to the public highway right-of-way for the Link Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 81. The Link Canyon Road includes the segment of road specifically set forth in Exhibit 81 and as exists on the ground.

Acceptance of the Link Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1087. The Link Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1088. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Link Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1089. The appearance of the Link Canyon Road on the Emery West (1968) USGS 7.5 minute quadrangle map and the Accord Lakes (1957) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1090. The County confirmed its acceptance of the Link Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Link Canyon Road using public funds pursuant to the County's governmental right and authority.

1091. Witnesses with personal knowledge of the history of the Link Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1092. Currently known reputation in the community is that the Link Canyon Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1093. Public motor vehicle use of the Link Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1094. The Link Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1095. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Link Canyon Road.

1096. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Link Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Muddy Canyon Road, 806

1097. The Muddy Canyon Road is designated as county road number 806 and SGID road identification number RD080538 and is more or less 4.14 miles long.

1098. Exhibit 82 (attached hereto and incorporated herein) contains certain information pertaining to the Muddy Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

1099. In this action, the State and County seek to quiet title to the public highway right-of-way for the Muddy Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 82. The Muddy Canyon Road includes the segment of road specifically set forth in Exhibit 82 and as exists on the ground.

Acceptance of the Muddy Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1100. The Muddy Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1101. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Muddy Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1102. The appearance of the Muddy Canyon Road on the Emery East (1968) and Emery West (1968) USGS 7.5 minute quadrangle maps, and the Accord Lakes (1957) USGS 15 minute quadrangle map, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1103. The County confirmed its acceptance of the Muddy Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Muddy Canyon Road using public funds pursuant to the County's governmental right and authority.

1104. Witnesses with personal knowledge of the history of the Muddy Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1105. Currently known reputation in the community is that the Muddy Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1106. Public motor vehicle use of the Muddy Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1107. The Muddy Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1108. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Muddy Canyon Road.

1109. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Muddy Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Old Ferron Dugway Road, 720

1110. The Old Ferron Dugway Road is designated as county road number 720 and SGID road identification number RD080529 and is more or less 1.56 miles long.

1111. Exhibit 83 (attached hereto and incorporated herein) contains certain information pertaining to the Old Ferron Dugway Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1112. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old Ferron Dugway Road solely as it crosses United States public land as included and specifically described in Exhibit 83. The Old Ferron Dugway Road includes the segment of road specifically set forth in Exhibit 83 and as exists on the ground.

Acceptance of the Old Ferron Dugway Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1113. The Old Ferron Dugway Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1114. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Old Ferron Dugway Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1115. The appearance of the Old Ferron Dugway Road on the Ferron (1979) USGS 7.5 minute quadrangle map and the Castle Dale (1925) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for

more detailed map information.

1116. The County confirmed its acceptance of the Old Ferron Dugway Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Old Ferron Dugway Road using public funds pursuant to the County's governmental right and authority.

1117. Witnesses with personal knowledge of the history of the Old Ferron Dugway Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1118. Currently known reputation in the community is that the Old Ferron Dugway Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1119. Public motor vehicle use of the Old Ferron Dugway Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1120. The Old Ferron Dugway Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1121. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Old Ferron Dugway Road.

1122. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old Ferron Dugway Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Rock Canyon Flat Road, 604

1123. The Rock Canyon Flat Road is designated as county road number 604 and SGID road identification number RD080497 and is more or less 3.30 miles long.

1124. Exhibit 84 (attached hereto and incorporated herein) contains certain information pertaining to the Rock Canyon Flat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1125. In this action, the State and County seek to quiet title to the public highway right-of-way for the Rock Canyon Flat Road solely as it crosses United States public land as included and specifically described in Exhibit 84. The Rock Canyon Flat Road includes the segment of road specifically set forth in Exhibit 84 and as exists on the ground.

Acceptance of the Rock Canyon Flat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1126. The Rock Canyon Flat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1127. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Rock Canyon Flat Road as a public highway located on

the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1128. The appearance of the Rock Canyon Flat Road the Castle Dale (1925) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1129. The County confirmed its acceptance of the Rock Canyon Flat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Rock Canyon Flat Road using public funds pursuant to the County's governmental right and authority.

1130. Witnesses with personal knowledge of the history of the Rock Canyon Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1131. Currently known reputation in the community is that the Rock Canyon Flat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1132. Public motor vehicle use of the Rock Canyon Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1133. The Rock Canyon Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1134. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Rock Canyon Flat Road.

1135. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rock Canyon Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Rock Canyon Road, 603

1136. The Rock Canyon Road is designated as county road number 603 and SGID road identification number RD080496 and is more or less 5.00 miles long.

1137. Exhibit 85 (attached hereto and incorporated herein) contains certain information pertaining to the Rock Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1138. In this action, the State and County seek to quiet title to the public highway right-of-way for the Rock Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 85. The Rock Canyon Road includes the segment of road specifically set forth in Exhibit 85 and as exists on the ground.

Acceptance of the Rock Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1139. The Rock Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1140. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Rock Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1141. The appearance of the Rock Canyon Road on The Cap (1979) USGS 7.5 minute quadrangle map and the Castle Dale (1925) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1142. The County confirmed its acceptance of the Rock Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Rock Canyon Road using public funds pursuant to the County's governmental right and authority.

1143. Witnesses with personal knowledge of the history of the Rock Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1144. Currently known reputation in the community is that the Rock Canyon Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1145. Public motor vehicle use of the Rock Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1146. The Rock Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1147. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Rock Canyon Road.

1148. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rock Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Canal Road, 322

1149. The South Canal Road is designated as county road number 322and SGID road identification number RD080131 and is more or less 3.88 miles long.

1150. Exhibit 86 (attached hereto and incorporated herein) contains certain information pertaining to the South Canal Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

1151. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Canal Road solely as it crosses United States public land as included and specifically described in Exhibit 86. The South Canal Road includes the segment of road specifically set forth in Exhibit 86 and as exists on the ground.

Acceptance of the South Canal Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1152. The South Canal Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1153. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the South Canal Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1154. The appearance of the South Canal Road on the Huntington (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1155. The County confirmed its acceptance of the South Canal Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Canal Road using public funds pursuant to the County's governmental right and authority.

1156. Witnesses with personal knowledge of the history of the South Canal Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1157. Currently known reputation in the community is that the South Canal Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1158. Public motor vehicle use of the South Canal Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1159. The South Canal Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1160. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Canal Road.

1161. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Canal Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

THIRD CAUSE OF ACTION – QUIET TITLE
GREEN RIVER CUTOFF AREA

1162. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1163. The Green River Cutoff Area is located in north-central Emery County in the central region of Utah.

1164. The Green River Cutoff Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Airport Cleveland Road, 212; (2) Buffalo Bench Road, 330; (3) Buffalo Hollow Road, 333; (4) Buffalo Hollow Spur, 334; (5) Cleveland/Cedar Mountain Road, 206; (6) Desert Lake Loop, 110; (7) Desert Lake/Lawrence Tan Seeps Road, 215; (8) Dinosaur Quarry & Flat Top Road, 216; (9) Green River Cutoff, 401; (10) Hambrick Bottoms Road, 404; (11) Jimmy Staker Road, 109; (12) Lawrence/Cleveland Road, 328; (13) Little Cedar Mountain Road, 403; (14) Lower Cedar Mountain Road, 335; (15) Marsh Flat Road. 128; (16) Marsing Spur, 124; (17) Marsing/Desert Lake Road, 114; (18) Miller Creek Road, 120; (19) Mounds and Wellington Road, 118; (20) North Ditch Road, 108; (21) North Elmo Highway, 101; (22) North Railroad Road, 119; (23) Peterson Spur, 107; (24) Potter Spur, 213; (25) Price River Road, 115; (26) Red Seep Road, 402; (27) Silvagni Ranch Road, 127; (28) South Flat Bus Loop, 201; (29) Staker to U-10, 105; (30) Von Fail Road, 122; (31) F11 Road; (32) 3269 Road; (33) 3270 Road; (34) 3272 Road; (35) 3278 Road; (36) 3286 Road; (37) 3286-A Road; (38) 3289 Road; (39) 3290 Road; (40) 3290-A Road; (41) 3423 Road; (42) 3431 Road; (43) Bull Hollow Road, 3260; (44) Bull Hollow/Buckhorn Reservoir Road, 3259; (45) Cedar Hollow Road, 3256; (46) Cedar Mt./Dinosaur Road, 3262; (47) Dinosaur Bottoms Spur Road, 3263-A; (48) Dinosaur Bottoms Spur " Road, 3263 (49) f03 Road; (50) Jackass Flat Cutoff Road, 3254; (51) MK Tunnels Road, f05; (52) Red Seep/Buckhorn Reservoir Road, 3258; (53) Victor Junction South Road, 3092; and (54) XX Road, 3255.

1165. Each right-of-way claimed in the Green River Cutoff Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

1166. All rights-of-way claimed in the Green River Cutoff Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1167. All rights-of-way claimed in the Green River Cutoff Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1168. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Airport Cleveland Road, 212

1169. The Airport Cleveland Road is designated as county road number 212 and SGID road identification number RD080095 and is more or less 3.48 miles long.

1170. Exhibit 87 (attached hereto and incorporated herein) contains certain information pertaining to the Airport Cleveland Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1171. In this action, the State and County seek to quiet title to the public highway right-of-way for the Airport Cleveland Road solely as it crosses United States public land as included and specifically described in Exhibit 87. The Airport Cleveland Road includes the segment of road specifically set forth in Exhibit 87 and as exists on the ground.

Acceptance of the Airport Cleveland Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1172. The Airport Cleveland Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1173. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Airport Cleveland Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1174. The appearance of the Airport Cleveland Road on the Huntington (1969) and the Cleveland (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1175. The County confirmed its acceptance of the Airport Cleveland Road by 1975, when it designated and accepted the road as a County highway on the County's general highway

map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Airport Cleveland Road using public funds pursuant to the County's governmental right and authority.

1176. Witnesses with personal knowledge of the history of the Airport Cleveland Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1177. Currently known reputation in the community is that the Airport Cleveland Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1178. Public motor vehicle use of the Airport Cleveland Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1179. The Airport Cleveland Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1180. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Airport Cleveland Road.

1181. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Airport Cleveland Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Buffalo Bench Road, 330

1182. The Buffalo Bench Road is designated as county road number 330 and SGID road identification number RD080161 and is more or less 4.13 miles long.

1183. Exhibit 88 (attached hereto and incorporated herein) contains certain information pertaining to the Buffalo Bench Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1184. In this action, the State and County seek to quiet title to the public highway right-of-way for the Buffalo Bench Road solely as it crosses United States public land as included and specifically described in Exhibit 88. The Buffalo Bench Road includes the segment of road specifically set forth in Exhibit 88 and as exists on the ground.

Acceptance of the Buffalo Bench Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1185. The Buffalo Bench Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1186. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Buffalo Bench Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1187. The appearance of the Buffalo Bench Road on the Huntington (1969) USGS 7.5

minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1188. The County confirmed its acceptance of the Buffalo Bench Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Buffalo Bench Road using public funds pursuant to the County's governmental right and authority.

1189. Witnesses with personal knowledge of the history of the Buffalo Bench Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1190. Currently known reputation in the community is that the Buffalo Bench Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1191. Public motor vehicle use of the Buffalo Bench Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1192. The Buffalo Bench Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1193. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Buffalo Bench Road.

1194. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Buffalo Bench Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Buffalo Hollow Road, 333

1195. The Buffalo Hollow Road is designated as county road number 333 and SGID road identification number RD080165 and is more or less 1.70 miles long.

1196. Exhibit 89 (attached hereto and incorporated herein) contains certain information pertaining to the Buffalo Hollow Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1197. In this action, the State and County seek to quiet title to the public highway right-of-way for the Buffalo Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 89. The Buffalo Hollow Road includes the segment of road specifically set forth in Exhibit 89 and as exists on the ground.

Acceptance of the Buffalo Hollow Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1198. The Buffalo Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1199. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Buffalo Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1200. The appearance of the Buffalo Hollow Road on the Huntington (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1201. The County confirmed its acceptance of the Buffalo Hollow Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Buffalo Hollow Road using public funds pursuant to the County's governmental right and authority.

1202. Witnesses with personal knowledge of the history of the Buffalo Hollow Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1203. Currently known reputation in the community is that the Buffalo Hollow Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1204. Public motor vehicle use of the Buffalo Hollow Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1205. The Buffalo Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1206. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Buffalo Hollow Road.

1207. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Buffalo Hollow Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Buffalo Hollow Spur Road, 334

1208. The Buffalo Hollow Spur Road is designated as county road number 334and SGID road identification number RD080171 and is more or less 0.21 miles long.

1209. Exhibit 90 (attached hereto and incorporated herein) contains certain information pertaining to the Buffalo Hollow Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1210. In this action, the State and County seek to quiet title to the public highway right-of-way for the Buffalo Hollow Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 90. The Buffalo Hollow Spur Road includes the

segment of road specifically set forth in Exhibit 90 and as exists on the ground.

Acceptance of the Buffalo Hollow Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1211. The Buffalo Hollow Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1212. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Buffalo Hollow Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1213. The appearance of the Buffalo Hollow Spur Road on the Huntington (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1214. The County confirmed its acceptance of the Buffalo Hollow Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Buffalo Hollow Spur Road using public funds pursuant to the County's governmental right and authority.

1215. Witnesses with personal knowledge of the history of the Buffalo Hollow Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1216. Currently known reputation in the community is that the Buffalo Hollow Spur

Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1217. Public motor vehicle use of the Buffalo Hollow Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1218. The Buffalo Hollow Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1219. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Buffalo Hollow Spur Road.

1220. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Buffalo Hollow Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cleveland/Cedar Mountain Road, 206

1221. The Cleveland/Cedar Mountain Road is designated as county road number 206 and SGID road identification number RD080091 and is more or less 20.82 miles long.

1222. Exhibit 91 (attached hereto and incorporated herein) contains certain information pertaining to the Cleveland/Cedar Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership

list; and a complete centerline description of the road.

1223. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cleveland/Cedar Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 91. The Cleveland/Cedar Mountain Road includes the segment of road specifically set forth in Exhibit 91 and as exists on the ground.

Acceptance of the Cleveland/Cedar Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1224. The Cleveland/Cedar Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1225. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cleveland/Cedar Mountain Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1226. The appearance of the Cleveland/Cedar Mountain Road on the Chimney Rock (1969), Bob Hill Knoll (1969), Cow Flats (1969), and Cleveland (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1227. The County confirmed its acceptance of the Cleveland/Cedar Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cleveland/Cedar Mountain Road using public funds pursuant to the County's governmental right and authority.

1228. Witnesses with personal knowledge of the history of the Cleveland/Cedar Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1229. Currently known reputation in the community is that the Cleveland/Cedar Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1230. Public motor vehicle use of the Cleveland/Cedar Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1231. The Cleveland/Cedar Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1232. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cleveland/Cedar Mountain Road.

1233. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cleveland/Cedar Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Desert Lake Loop Road, 110

1234. The Desert Lake Loop Road is designated as county road number 110 and SGID road identification number RD080054 and is more or less 3.74 miles long.

1235. Exhibit 92 (attached hereto and incorporated herein) contains certain information pertaining to the Desert Lake Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1236. In this action, the State and County seek to quiet title to the public highway right-of-way for the Desert Lake Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 92. The Desert Lake Loop Road includes the segment of road specifically set forth in Exhibit 92 and as exists on the ground.

Acceptance of the Desert Lake Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1237. The Desert Lake Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1238. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Desert Lake Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1239. The appearance of the Desert Lake Loop Road on the Cleveland (1969), Olsen Reservoir (1969), and Elmo (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed

map information.

1240. The County confirmed its acceptance of the Desert Lake Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Desert Lake Loop Road using public funds pursuant to the County's governmental right and authority.

1241. Witnesses with personal knowledge of the history of the Desert Lake Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1242. Currently known reputation in the community is that the Desert Lake Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1243. Public motor vehicle use of the Desert Lake Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1244. The Desert Lake Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1245. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Desert Lake Loop Road.

1246. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Desert Lake Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Desert Lake/Lawrence Tan Seeps Road, 215

1247. The Desert Lake/Lawrence Tan Seeps Road is designated as county road number 215 and SGID road identification number RD080098 and is more or less 7.72 miles long.

1248. Exhibit 93 (attached hereto and incorporated herein) contains certain information pertaining to the Desert Lake/Lawrence Tan Seeps Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1249. In this action, the State and County seek to quiet title to the public highway right-of-way for the Desert Lake/Lawrence Tan Seeps Road solely as it crosses United States public land as included and specifically described in Exhibit 93. The Desert Lake/Lawrence Tan Seeps Road includes the segment of road specifically set forth in Exhibit 93 and as exists on the ground.

Acceptance of the Desert Lake/Lawrence Tan Seeps Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1250. The Desert Lake/Lawrence Tan Seeps Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1251. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Desert Lake/Lawrence Tan Seeps Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1252. The appearance of the Desert Lake/Lawrence Tan Seeps Road on the Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1253. The County confirmed its acceptance of the Desert Lake/Lawrence Tan Seeps Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Desert Lake/Lawrence Tan Seeps Road using public funds pursuant to the County's governmental right and authority.

1254. Witnesses with personal knowledge of the history of the Desert Lake/Lawrence Tan Seeps Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1255. Currently known reputation in the community is that the Desert Lake/Lawrence Tan Seeps Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1256. Public motor vehicle use of the Desert Lake/Lawrence Tan Seeps Road as a

public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1257. The Desert Lake/Lawrence Tan Seeps Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1258. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Desert Lake/Lawrence Tan Seeps Road.

1259. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Desert Lake/Lawrence Tan Seeps Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dinosaur Quarry & Flat Top Road, 216

1260. The Dinosaur Quarry & Flat Top Road is designated as county road number 216 and SGID road identification number RD080099 and is more or less 18.94 miles long.

1261. Exhibit 94 (attached hereto and incorporated herein) contains certain information pertaining to the Dinosaur Quarry & Flat Top Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1262. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Dinosaur Quarry & Flat Top Road solely as it crosses United States public land as included and specifically described in Exhibit 94. The Dinosaur Quarry & Flat Top Road includes the segment of road specifically set forth in Exhibit 94 and as exists on the ground.

Acceptance of the Dinosaur Quarry & Flat Top Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1263. The Dinosaur Quarry & Flat Top Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1264. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Dinosaur Quarry & Flat Top Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1265. The appearance of the Dinosaur Quarry & Flat Top Road on the Cleveland (1969), Cow Flats (1969), and Flattop Mountain (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1266. The County confirmed its acceptance of the Dinosaur Quarry & Flat Top Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dinosaur Quarry & Flat Top Road using public funds pursuant to the County's governmental right and authority.

1267. Witnesses with personal knowledge of the history of the Dinosaur Quarry & Flat

Top Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1268. Currently known reputation in the community is that the Dinosaur Quarry & Flat Top Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1269. Public motor vehicle use of the Dinosaur Quarry & Flat Top Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1270. The Dinosaur Quarry & Flat Top Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1271. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dinosaur Quarry & Flat Top Road.

1272. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dinosaur Quarry & Flat Top Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Green River Cutoff Road, 401

1273. The Green River Cutoff Road is designated as county road number 401and SGID road identification number RD080443 and is more or less 43.71 miles long.

1274. Exhibit 95 (attached hereto and incorporated herein) contains certain information pertaining to the Green River Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1275. In this action, the State and County seek to quiet title to the public highway right-of-way for the Green River Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 95. The Green River Cutoff Road includes the segment of road specifically set forth in Exhibit 95 and as exists on the ground.

Acceptance of the Green River Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1276. The Green River Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1277. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Green River Cutoff Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1278. The appearance of the Green River Cutoff Road on the Hadden Holes (1969), Buckhorn Reservoir (1969), Bob Hill Knoll (1969), Chimney Rock (1969), Dry Mesa (1969), and Cliff (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance

of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1279. The County confirmed its acceptance of the Green River Cutoff Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Green River Cutoff Road using public funds pursuant to the County's governmental right and authority.

1280. Witnesses with personal knowledge of the history of the Green River Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1281. Currently known reputation in the community is that the Green River Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1282. Public motor vehicle use of the Green River Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1283. The Green River Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1284. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Green River Cutoff Road.

1285. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Green River Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hambrick Bottoms Road, 404

1286. The Hambrick Bottoms Road is designated as county road number 404and SGID road identification number RD080449 and is more or less 5.51 miles long.

1287. Exhibit 96 (attached hereto and incorporated herein) contains certain information pertaining to the Hambrick Bottoms Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1288. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hambrick Bottoms Road solely as it crosses United States public land as included and specifically described in Exhibit 96. The Hambrick Bottoms Road includes the segment of road specifically set forth in Exhibit 96 and as exists on the ground.

Acceptance of the Hambrick Bottoms Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1289. The Hambrick Bottoms Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1290. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Hambrick Bottoms Road as a public highway located

on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1291. The appearance of the Hambrick Bottoms Road on the Buckhorn Reservoir (1969) and Hadden Holes (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1292. The County confirmed its acceptance of the Hambrick Bottoms Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hambrick Bottoms Road using public funds pursuant to the County's governmental right and authority.

1293. Witnesses with personal knowledge of the history of the Hambrick Bottoms Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1294. Currently known reputation in the community is that the Hambrick Bottoms Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1295. Public motor vehicle use of the Hambrick Bottoms Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

1296. The Hambrick Bottoms Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1297. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hambrick Bottoms Road.

1298. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hambrick Bottoms Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jimmy Staker Road, 109

1299. The Jimmy Staker Road is designated as county road number 109 and SGID road identification number RD080053 and is more or less 1.03 miles long.

1300. Exhibit 97 (attached hereto and incorporated herein) contains certain information pertaining to the Jimmy Staker Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1301. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jimmy Staker Road solely as it crosses United States public land as included and specifically described in Exhibit 97. The Jimmy Staker Road includes the segment of road specifically set forth in Exhibit 97 and as exists on the ground.

Acceptance of the Jimmy Staker Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1302. The Jimmy Staker Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1303. The appearance of the Jimmy Staker Road on the Elmo (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1304. The County confirmed its acceptance of the Jimmy Staker Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Jimmy Staker Road using public funds pursuant to the County's governmental right and authority.

1305. Witnesses with personal knowledge of the history of the Jimmy Staker Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1306. Currently known reputation in the community is that the Jimmy Staker Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1307. Public motor vehicle use of the Jimmy Staker Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

1308. The Jimmy Staker Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1309. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Jimmy Staker Road.

1310. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jimmy Staker Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lawrence/Cleveland Road, 328

1311. The Lawrence/Cleveland Road is designated as county road number 328 and SGID road identification number RD080154 and is more or less 4.58 miles long.

1312. Exhibit 98 (attached hereto and incorporated herein) contains certain information pertaining to the Lawrence/Cleveland Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1313. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lawrence/Cleveland Road solely as it crosses United States public land as included and specifically described in Exhibit 98. The Lawrence/Cleveland Road includes the segment of road specifically set forth in Exhibit 98 and as exists on the ground.

Acceptance of the Lawrence/Cleveland Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1314. The Lawrence/Cleveland Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1315. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lawrence/Cleveland Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1316. The appearance of the Lawrence/Cleveland Road on the Huntington (1969) and Cleveland (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1317. The County confirmed its acceptance of the Lawrence/Cleveland Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lawrence/Cleveland Road using public funds pursuant to the County's governmental right and authority.

1318. Witnesses with personal knowledge of the history of the Lawrence/Cleveland Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1319. Currently known reputation in the community is that the Lawrence/Cleveland

Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1320. Public motor vehicle use of the Lawrence/Cleveland Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1321. The Lawrence/Cleveland Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1322. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lawrence/Cleveland Road.

1323. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lawrence/Cleveland Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Little Cedar Mountain Road, 403

1324. The Little Cedar Mountain Road is designated as county road number 403 and SGID road identification number RD080445 and is more or less 3.64 miles long.

1325. Exhibit 99 (attached hereto and incorporated herein) contains certain information pertaining to the Little Cedar Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership

list; and a complete centerline description of the road.

1326. In this action, the State and County seek to quiet title to the public highway right-of-way for the Little Cedar Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 99. The Little Cedar Mountain Road includes the segment of road specifically set forth in Exhibit 99 and as exists on the ground.

Acceptance of the Little Cedar Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1327. The Little Cedar Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1328. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Little Cedar Mountain Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1329. The appearance of the Little Cedar Mountain Road on the Buckhorn Reservoir (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1330. The Little Cedar Mountain Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Little Cedar Mountain Road using public funds pursuant to the County's governmental right and authority.

1331. Witnesses with personal knowledge of the history of the Little Cedar Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1332. Currently known reputation in the community is that the Little Cedar Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1333. Public motor vehicle use of the Little Cedar Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1334. The Little Cedar Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1335. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Little Cedar Mountain Road.

1336. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Little Cedar Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower Cedar Mountain Road, 335

1337. The Lower Cedar Mountain Road is designated as county road number 335 and SGID road identification number RD080172 and is more or less 5.79 miles long.

1338. Exhibit 100 (attached hereto and incorporated herein) contains certain information pertaining to the Lower Cedar Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1339. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower Cedar Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 100. The Lower Cedar Mountain Road includes the segment of road specifically set forth in Exhibit 100 and as exists on the ground.

Acceptance of the Lower Cedar Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1340. The Lower Cedar Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1341. The appearance of the Lower Cedar Mountain Road on the Buckhorn Reservoir (1969) and Bob Hill Knoll (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1342. The County confirmed its acceptance of the Lower Cedar Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower Cedar Mountain Road using public funds pursuant to the County's governmental right and authority.

1343. Witnesses with personal knowledge of the history of the Lower Cedar Mountain

Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1344. Currently known reputation in the community is that the Lower Cedar Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1345. Public motor vehicle use of the Lower Cedar Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1346. The Lower Cedar Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1347. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower Cedar Mountain Road.

1348. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lower Cedar Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Marsh Flat Road, 128

1349. The Marsh Flat Road is designated as county road number 128 and SGID road

identification number RD080082 and is more or less 4.24 miles long.

1350. Exhibit 101 (attached hereto and incorporated herein) contains certain information pertaining to the Marsh Flat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1351. In this action, the State and County seek to quiet title to the public highway right-of-way for the Marsh Flat Road solely as it crosses United States public land as included and specifically described in Exhibit 101. The Marsh Flat Road includes the segment of road specifically set forth in Exhibit 101 and as exists on the ground.

Acceptance of the Marsh Flat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1352. The Marsh Flat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1353. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Marsh Flat Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1354. The County confirmed its acceptance of the Marsh Flat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Marsh Flat Road using public funds pursuant to the County's governmental right and authority.

1355. Witnesses with personal knowledge of the history of the Marsh Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1356. Currently known reputation in the community is that the Marsh Flat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1357. Public motor vehicle use of the Marsh Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1358. The Marsh Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1359. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Marsh Flat Road.

1360. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Marsh Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Marsing Spur Road, 124

1361. The Marsing Spur Road is designated as county road number 124 and SGID road

identification number RD080076 and is more or less 1.37 miles long.

1362. Exhibit 102 (attached hereto and incorporated herein) contains certain information pertaining to the Marsing Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1363. In this action, the State and County seek to quiet title to the public highway right-of-way for the Marsing Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 102. The Marsing Spur Road includes the segment of road specifically set forth in Exhibit 102 and as exists on the ground.

Acceptance of the Marsing Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1364. The Marsing Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1365. The appearance of the Marsing Spur Road on the Elmo (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1366. The County confirmed its acceptance of the Marsing Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Marsing Spur Road using public funds pursuant to the County's governmental right and authority.

1367. Witnesses with personal knowledge of the history of the Marsing Spur Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1368. Currently known reputation in the community is that the Marsing Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1369. Public motor vehicle use of the Marsing Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1370. The Marsing Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1371. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Marsing Spur Road.

1372. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Marsing Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Marsing/Desert Lake Road, 114

1373. The Marsing/Desert Lake Road is designated as county road number 114 and

SGID road identification number RD080066 and is more or less 9.30 miles long.

1374. Exhibit 103 (attached hereto and incorporated herein) contains certain information pertaining to the Marsing/Desert Lake Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1375. In this action, the State and County seek to quiet title to the public highway right-of-way for the Marsing/Desert Lake Road solely as it crosses United States public land as included and specifically described in Exhibit 103. The Marsing/Desert Lake Road includes the segment of road specifically set forth in Exhibit 103 and as exists on the ground.

Acceptance of the Marsing/Desert Lake Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1376. The Marsing/Desert Lake Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1377. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Marsing/Desert Lake Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1378. The appearance of the Marsing/Desert Lake Road on the Olsen Reservoir (1969) and Elmo (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1379. The County confirmed its acceptance of the Marsing/Desert Lake Road by 1975,

when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Marsing/Desert Lake Road using public funds pursuant to the County's governmental right and authority.

1380. Witnesses with personal knowledge of the history of the Marsing/Desert Lake Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1381. Currently known reputation in the community is that the Marsing/Desert Lake Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1382. Public motor vehicle use of the Marsing/Desert Lake Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1383. The Marsing/Desert Lake Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1384. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Marsing/Desert Lake Road.

1385. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Marsing/Desert Lake Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Miller Creek Road, 120

1386. The Miller Creek Road is designated as county road number 120 and SGID road identification number RD080072and is more or less 5.54 miles long.

1387. Exhibit 104 (attached hereto and incorporated herein) contains certain information pertaining to the Miller Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1388. In this action, the State and County seek to quiet title to the public highway right-of-way for the Miller Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 104. The Miller Creek Road includes the segment of road specifically set forth in Exhibit 104 and as exists on the ground.

Acceptance of the Miller Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1389. The Miller Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1390. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Miller Creek Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1391. The appearance of the Miller Creek Road on the Elmo (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1392. The County confirmed its acceptance of the Miller Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Miller Creek Road using public funds pursuant to the County's governmental right and authority.

1393. Witnesses with personal knowledge of the history of the Miller Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1394. Currently known reputation in the community is that the Miller Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1395. Public motor vehicle use of the Miller Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1396. The Miller Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1397. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Miller Creek Road.

1398. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Miller Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Mounds and Wellington Road, 118

1399. The Mounds and Wellington Road is designated as county road number 118 and SGID road identification number RD080070 and is more or less 3.17 miles long.

1400. Exhibit 105 (attached hereto and incorporated herein) contains certain information pertaining to the Mounds and Wellington Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1401. In this action, the State and County seek to quiet title to the public highway right-of-way for the Mounds and Wellington Road solely as it crosses United States public land as included and specifically described in Exhibit 105. The Mounds and Wellington Road includes the segment of road specifically set forth in Exhibit 105 and as exists on the ground.

Acceptance of the Mounds and Wellington Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1402. The Mounds and Wellington Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1403. The appearance of the Mounds and Wellington Road on the Mounds (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1404. The County confirmed its acceptance of the Mounds and Wellington Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Mounds and Wellington Road using public funds pursuant to the County's governmental right and authority.

1405. Witnesses with personal knowledge of the history of the Mounds and Wellington Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1406. Currently known reputation in the community is that the Mounds and Wellington Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1407. Public motor vehicle use of the Mounds and Wellington Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1408. The Mounds and Wellington Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1409. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Mounds and Wellington Road.

1410. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Mounds and Wellington Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Ditch Road, 108

1411. The North Ditch Road is designated as county road number 108 and SGID road identification number RD080052 and is more or less 1.95 miles long.

1412. Exhibit 106 (attached hereto and incorporated herein) contains certain information pertaining to the North Ditch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1413. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Ditch Road solely as it crosses United States public land as included and specifically described in Exhibit 106. The North Ditch Road includes the segment of road specifically set forth in Exhibit 106 and as exists on the ground.

Acceptance of the North Ditch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1414. The North Ditch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1415. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the North Ditch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1416. The appearance of the North Ditch Road the Elmo (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1417. The County confirmed its acceptance of the North Ditch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Ditch Road using public funds pursuant to the County's governmental right and authority.

1418. Witnesses with personal knowledge of the history of the North Ditch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1419. Currently known reputation in the community is that the North Ditch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1420. Public motor vehicle use of the North Ditch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1421. The North Ditch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1422. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Ditch Road.

1423. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Ditch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Elmo Highway, 101

1424. The North Elmo Highway is designated as county road number 101 and SGID road identification number RD080012 and is more or less 2.80 miles long.

1425. Exhibit 107 (attached hereto and incorporated herein) contains certain information pertaining to the North Elmo Highway including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1426. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Elmo Highway solely as it crosses United States public land as included and specifically described in Exhibit 107. The North Elmo Highway includes the segment of

road specifically set forth in Exhibit 107 and as exists on the ground.

Acceptance of the North Elmo Highway R.S. 2477 Right-of-way Prior to October 21, 1976.

1427. The North Elmo Highway has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1428. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the North Elmo Highway as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1429. The appearance of the North Elmo Highway on the Elmo (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1430. The County confirmed its acceptance of the North Elmo Highway by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Elmo Highway using public funds pursuant to the County's governmental right and authority.

1431. Witnesses with personal knowledge of the history of the North Elmo Highway confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1432. Currently known reputation in the community is that the North Elmo Highway

has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1433. Public motor vehicle use of the North Elmo Highway as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1434. The North Elmo Highway traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1435. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Elmo Highway.

1436. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Elmo Highway on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Railroad Road, 119

1437. The North Railroad Road is designated as county road number 119 and SGID road identification number RD080071 and is more or less 1.11 miles long.

1438. Exhibit 108 (attached hereto and incorporated herein) contains certain information pertaining to the North Railroad Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

1439. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Railroad Road solely as it crosses United States public land as included and specifically described in Exhibit 108. The North Railroad Road includes the segment of road specifically set forth in Exhibit 108 and as exists on the ground.

Acceptance of the North Railroad Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1440. The North Railroad Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1441. The appearance of the North Railroad Road on the Mounds (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1442. The County confirmed its acceptance of the North Railroad Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Railroad Road using public funds pursuant to the County's governmental right and authority.

1443. Witnesses with personal knowledge of the history of the North Railroad Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1444. Currently known reputation in the community is that the North Railroad Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1445. Public motor vehicle use of the North Railroad Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1446. The North Railroad Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1447. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Railroad Road.

1448. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Railroad Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Peterson Spur Road, 107

1449. The Peterson Spur Road is designated as county road number 107 and SGID road identification number RD080051 and is more or less 1.18 miles long.

1450. Exhibit 109 (attached hereto and incorporated herein) contains certain information pertaining to the Peterson Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

1451. In this action, the State and County seek to quiet title to the public highway right-of-way for the Peterson Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 109. The Peterson Spur Road includes the segment of road specifically set forth in Exhibit 109 and as exists on the ground.

Acceptance of the Peterson Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1452. The Peterson Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1453. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Peterson Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1454. The appearance of the Peterson Spur Road on the Elmo (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1455. The County confirmed its acceptance of the Peterson Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Peterson Spur Road using public funds pursuant to the County's governmental right and authority.

1456. Witnesses with personal knowledge of the history of the Peterson Spur Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1457. Currently known reputation in the community is that the Peterson Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1458. Public motor vehicle use of the Peterson Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1459. The Peterson Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1460. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Peterson Spur Road.

1461. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Peterson Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Potter Spur Road, 213

1462. The Potter Spur Road is designated as county road number 213 and SGID road

identification number RD080096 and is more or less 0.56 miles long.

1463. Exhibit 110 (attached hereto and incorporated herein) contains certain information pertaining to the Potter Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1464. In this action, the State and County seek to quiet title to the public highway right-of-way for the Potter Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 110. The Potter Spur Road includes the segment of road specifically set forth in Exhibit 110 and as exists on the ground.

Acceptance of the Potter Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1465. The Potter Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1466. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Potter Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1467. The appearance of the Potter Spur Road on the Huntington (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1468. The County confirmed its acceptance of the Potter Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Potter Spur Road using public funds pursuant to the County's governmental right and authority.

1469. Witnesses with personal knowledge of the history of the Potter Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1470. Currently known reputation in the community is that the Potter Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1471. Public motor vehicle use of the Potter Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1472. The Potter Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1473. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Potter Spur Road.

1474. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Potter Spur Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Price River Road, 115

1475. The Price River Road is designated as county road number 115 and SGID road identification number RD080067 and is more or less 17.42 miles long.

1476. Exhibit 111 (attached hereto and incorporated herein) contains certain information pertaining to the Price River Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1477. In this action, the State and County seek to quiet title to the public highway right-of-way for the Price River Road solely as it crosses United States public land as included and specifically described in Exhibit 111. The Price River Road includes the segment of road specifically set forth in Exhibit 111 and as exists on the ground.

Acceptance of the Price River Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1478. The Price River Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1479. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Price River Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1480. The appearance of the Price River Road on the Olsen Reservoir (1969) and

Mounds (1969) USGS 7.5 minute quadrangle maps, and the Woodside (1949) USGS 15 minute quadrangle map, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1481. The County confirmed its acceptance of the Price River Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Price River Road using public funds pursuant to the County's governmental right and authority.

1482. Witnesses with personal knowledge of the history of the Price River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1483. Currently known reputation in the community is that the Price River Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1484. Public motor vehicle use of the Price River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1485. The Price River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1486. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Price River Road.

1487. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Price River Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Seep Road, 402

1488. The Red Seep Road is designated as county road number 402 and SGID road identification number RD080444 and is more or less 2.18 miles long.

1489. Exhibit 112 (attached hereto and incorporated herein) contains certain information pertaining to the Red Seep Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1490. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Seep Road solely as it crosses United States public land as included and specifically described in Exhibit 112. The Red Seep Road includes the segment of road specifically set forth in Exhibit 112 and as exists on the ground.

Acceptance of the Red Seep Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1491. The Red Seep Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1492. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Red Seep Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1493. The appearance of the Red Seep Road on the Buckhorn Reservoir (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1494. The County confirmed its acceptance of the Red Seep Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Seep Road using public funds pursuant to the County's governmental right and authority.

1495. Witnesses with personal knowledge of the history of the Red Seep Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1496. Currently known reputation in the community is that the Red Seep Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1497. Public motor vehicle use of the Red Seep Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

1498. The Red Seep Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1499. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Seep Road.

1500. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Seep Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Silvagni Ranch Road, 127

1501. The Silvagni Ranch Road is designated as county road number 127 and SGID road identification number RD080081 and is more or less 2.67 miles long.

1502. Exhibit 113 (attached hereto and incorporated herein) contains certain information pertaining to the Silvagni Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1503. In this action, the State and County seek to quiet title to the public highway right-of-way for the Silvagni Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 113. The Silvagni Ranch Road includes the segment of road specifically set forth in Exhibit 113 and as exists on the ground.

Acceptance of the Silvagni Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1504. The Silvagni Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1505. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Silvagni Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1506. The appearance of the Silvagni Ranch on the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1507. The County confirmed its acceptance of the Silvagni Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Silvagni Ranch Road using public funds pursuant to the County's governmental right and authority.

1508. Witnesses with personal knowledge of the history of the Silvagni Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1509. Currently known reputation in the community is that the Silvagni Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1510. Public motor vehicle use of the Silvagni Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1511. The Silvagni Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1512. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Silvagni Ranch Road.

1513. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Silvagni Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Flat Bus Loop Road, 201

1514. The South Flat Bus Loop Road is designated as county road number 201 and SGID road identification number RD080085 and is more or less 6.33 miles long.

1515. Exhibit 114 (attached hereto and incorporated herein) contains certain information pertaining to the South Flat Bus Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1516. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Flat Bus Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 114. The South Flat Bus Loop Road includes the segment of road specifically set forth in Exhibit 114 and as exists on the ground.

Acceptance of the South Flat Bus Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1517. The South Flat Bus Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1518. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the South Flat Bus Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1519. The appearance of the South Flat Bus Loop Road on the Huntington (1969) and Cleveland (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1520. The County confirmed its acceptance of the South Flat Bus Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Flat Bus Loop Road using public funds pursuant to the County's governmental right and authority.

1521. Witnesses with personal knowledge of the history of the South Flat Bus Loop

Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1522. Currently known reputation in the community is that the South Flat Bus Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1523. Public motor vehicle use of the South Flat Bus Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1524. The South Flat Bus Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1525. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Flat Bus Loop Road.

1526. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Flat Bus Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Staker to U-10 Road, 105

1527. The Staker to U-10 Road is designated as county road number 105 and SGID road

identification number RD080048 and is more or less 2.45 miles long.

1528. Exhibit 115 (attached hereto and incorporated herein) contains certain information pertaining to the Staker to U-10 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1529. In this action, the State and County seek to quiet title to the public highway right-of-way for the Staker to U-10 Road solely as it crosses United States public land as included and specifically described in Exhibit 115. The Staker to U-10 Road includes the segment of road specifically set forth in Exhibit 115 and as exists on the ground.

Acceptance of the Staker to U-10 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1530. The Staker to U-10 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1531. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Staker to U-10 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1532. The appearance of the Staker to U-10 Road the Elmo (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1533. The County confirmed its acceptance of the Staker to U-10 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Staker to U-10 Road using public funds pursuant to the County's governmental right and authority.

1534. Witnesses with personal knowledge of the history of the Staker to U-10 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1535. Currently known reputation in the community is that the Staker to U-10 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1536. Public motor vehicle use of the Staker to U-10 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1537. The Staker to U-10 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1538. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Staker to U-10 Road.

1539. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Staker to U-10 Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Von Fail Road, 122

1540. The Von Fail Road is designated as county road number 122 and SGID road identification number RD080075and is more or less 0.91 miles long.

1541. Exhibit 116 (attached hereto and incorporated herein) contains certain information pertaining to the Von Fail Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1542. In this action, the State and County seek to quiet title to the public highway right-of-way for the Von Fail Road solely as it crosses United States public land as included and specifically described in Exhibit 116. The Von Fail Road includes the segment of road specifically set forth in Exhibit 116 and as exists on the ground.

Acceptance of the Von Fail Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1543. The Von Fail Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1544. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Von Fail Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1545. The appearance of the Von Fail Road the Elmo (1969) USGS 7.5 minute

quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1546. The County confirmed its acceptance of the Von Fail Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Von Fail Road using public funds pursuant to the County's governmental right and authority.

1547. Witnesses with personal knowledge of the history of the Von Fail Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1548. Currently known reputation in the community is that the Von Fail Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1549. Public motor vehicle use of the Von Fail Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1550. The Von Fail Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1551. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Von Fail Road.

1552. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Von Fail Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

F11 Road

1553. The F11 Road is designated as county road number F11 and SGID road identification number RD080002 and is more or less 1.34 miles long.

1554. Exhibit 117 (attached hereto and incorporated herein) contains certain information pertaining to the F11 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1555. In this action, the State and County seek to quiet title to the public highway right-of-way for the F11 Road solely as it crosses United States public land as included and specifically described in Exhibit 117. The F11 Road includes the segment of road specifically set forth in Exhibit 117 and as exists on the ground.

Acceptance of the F11 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1556. The F11 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1557. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the F11 Road as a public highway located on the land at

issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1558. The appearance of the F11 Road on the Cow Flats (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1559. The County confirmed its acceptance of the F11 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the F11 Road pursuant to the County's governmental right and authority.

1560. Witnesses with personal knowledge of the history of the F11 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1561. Currently known reputation in the community is that the F11 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1562. Public motor vehicle use of the F11 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1563. The F11 Road traverses a valid and perfected R.S. 2477 public highway right-of-

way as described herein.

1564. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the F11 Road.

1565. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the F11 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3269 Road

1566. The 3269 Road is designated as county road number 3269 and SGID road identification number RD080149 and is more or less 1.61 miles long.

1567. Exhibit 118 (attached hereto and incorporated herein) contains certain information pertaining to the 3269 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1568. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3269 Road solely as it crosses United States public land as included and specifically described in Exhibit 118. The 3269 Road includes the segment of road specifically set forth in Exhibit 118 and as exists on the ground.

Acceptance of the 3269 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1569. The 3269 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1570. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3269 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1571. The appearance of the 3269 Road on the Cow Flats (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1572. The County confirmed its acceptance of the 3269 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3269 Road pursuant to the County's governmental right and authority.

1573. Witnesses with personal knowledge of the history of the 3269 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1574. Currently known reputation in the community is that the 3269 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1575. Public motor vehicle use of the 3269 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public

highway right-of-way underlying this road.

1576. The 3269 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1577. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3269 Road.

1578. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3269 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3270 Road

1579. The 3270 Road is designated as county road number 3270 and SGID road identification number RD080151 and is more or less 1.46 miles long.

1580. Exhibit 119 (attached hereto and incorporated herein) contains certain information pertaining to the 3270 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1581. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3270 Road solely as it crosses United States public land as included and specifically described in Exhibit 119. The 3270 Road includes the segment of road specifically set forth in Exhibit 119 and as exists on the ground.

Acceptance of the 3270 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1582. The 3270 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1583. The appearance of the 3270 Road on the Cow Flats (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1584. The County confirmed its acceptance of the 3270 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3270 Road pursuant to the County's governmental right and authority.

1585. Witnesses with personal knowledge of the history of the 3270 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1586. Currently known reputation in the community is that the 3270 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1587. Public motor vehicle use of the 3270 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1588. The 3270 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1589. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3270 Road.

1590. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3270 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3272 Road

1591. The 3272 Road is designated as county road number 3272 and SGID road identification number RD080152 and is more or less 1.60 miles long.

1592. Exhibit 120 (attached hereto and incorporated herein) contains certain information pertaining to the 3272 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1593. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3272 Road solely as it crosses United States public land as included and specifically described in Exhibit 120. The 3272 Road includes the segment of road specifically set forth in Exhibit 120 and as exists on the ground.

Acceptance of the 3272 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1594. The 3272 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1595. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3272 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1596. The appearance of the 3272 Road on the Cow Flats (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1597. The County confirmed its acceptance of the 3272 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3272 Road pursuant to the County's governmental right and authority.

1598. Witnesses with personal knowledge of the history of the 3272 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1599. Currently known reputation in the community is that the 3272 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1600. Public motor vehicle use of the 3272 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1601. The 3272 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1602. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3272 Road.

1603. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3272 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3278 Road

1604. The 3278 Road is designated as county road number 3278 and SGID road identification number RD080153 and is more or less 2.06 miles long.

1605. Exhibit 121 (attached hereto and incorporated herein) contains certain information pertaining to the 3278 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1606. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3278 Road solely as it crosses United States public land as included and

specifically described in Exhibit 121. The 3278 Road includes the segment of road specifically set forth in Exhibit 121 and as exists on the ground.

Acceptance of the 3278 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1607. The 3278 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1608. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3278 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1609. The appearance of the 3278 Road on the Cow Flats (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1610. The County confirmed its acceptance of the 3278 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3278 Road pursuant to the County's governmental right and authority.

1611. Witnesses with personal knowledge of the history of the 3278 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1612. Currently known reputation in the community is that the 3278 Road has been

open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1613. Public motor vehicle use of the 3278 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1614. The 3278 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1615. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3278 Road.

1616. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3278 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3286 Road

1617. The 3286 Road is designated as county road number 3286 and SGID road identification number RD080155 and is more or less 2.93 miles long.

1618. Exhibit 122 (attached hereto and incorporated herein) contains certain information pertaining to the 3286 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1619. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3286 Road solely as it crosses United States public land as included and specifically described in Exhibit 122. The 3286 Road includes the segment of road specifically set forth in Exhibit 122 and as exists on the ground.

Acceptance of the 3286 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1620. The 3286 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1621. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3286 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1622. The appearance of the 3286 Road on the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1623. The County confirmed its acceptance of the 3286 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3286 Road pursuant to the County's governmental right and authority.

1624. Witnesses with personal knowledge of the history of the 3286 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1625. Currently known reputation in the community is that the 3286 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1626. Public motor vehicle use of the 3286 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1627. The 3286 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1628. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3286 Road.

1629. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3286 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3286-A Road

1630. The 3286-A Road is designated as county road number 3286-A and SGID road identification number RD080156 and is more or less 1.65 miles long.

1631. Exhibit 123 (attached hereto and incorporated herein) contains certain information pertaining to the 3286-A Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1632. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3286-A Road solely as it crosses United States public land as included and specifically described in Exhibit 123. The 3286-A Road includes the segment of road specifically set forth in Exhibit 123 and as exists on the ground.

Acceptance of the 3286-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1633. The 3286-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1634. The appearance of the 3286-A Road on the Flattop Mountain (1969) USGS 7.5 minute quadrangle map and the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1635. The County confirmed its acceptance of the 3286-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3286-A Road pursuant to the County's governmental right and authority.

1636. Witnesses with personal knowledge of the history of the 3286-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1637. Currently known reputation in the community is that the 3286-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1638. Public motor vehicle use of the 3286-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1639. The 3286-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1640. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3286-A Road.

1641. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3286-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3289 Road

1642. The 3289 Road is designated as county road number 3289and SGID road identification number RD080157 and is more or less 7.25 miles long.

1643. Exhibit 124 (attached hereto and incorporated herein) contains certain information pertaining to the 3289 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

1644. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3289 Road solely as it crosses United States public land as included and specifically described in Exhibit 124. The 3289 Road includes the segment of road specifically set forth in Exhibit 124 and as exists on the ground.

Acceptance of the 3289 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1645. The 3289 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1646. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3289 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1647. The appearance of the 3289 Road on the Dry Mesa (1969) USGS 7.5 minute quadrangle map and the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1648. The County confirmed its acceptance of the 3289 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3289 Road pursuant to the County's governmental right and authority.

1649. Witnesses with personal knowledge of the history of the 3289 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1650. Currently known reputation in the community is that the 3289 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1651. Public motor vehicle use of the 3289 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1652. The 3289 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1653. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3289 Road.

1654. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3289 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3290 Road

1655. The 3290 Road is designated as county road number 3290 and SGID road identification number RD080159 and is more or less 1.70 miles long.

1656. Exhibit 125 (attached hereto and incorporated herein) contains certain information pertaining to the 3290 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1657. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3290 Road solely as it crosses United States public land as included and specifically described in Exhibit 125. The 3290 Road includes the segment of road specifically set forth in Exhibit 125 and as exists on the ground.

Acceptance of the 3290 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1658. The 3290 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1659. The appearance of the 3290 Road on the Flattop Mountain (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1660. The County confirmed its acceptance of the 3290 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3290 Road pursuant to the County's governmental right and authority.

1661. Witnesses with personal knowledge of the history of the 3290 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1662. Currently known reputation in the community is that the 3290 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1663. Public motor vehicle use of the 3290 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1664. The 3290 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1665. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3290 Road.

1666. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3290 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3290-A Road

1667. The 3290-A Road is designated as county road number 3290-A and SGID road identification number RD080160 and is more or less 0.67 miles long.

1668. Exhibit 126 (attached hereto and incorporated herein) contains certain information pertaining to the 3290-A Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1669. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3290-A Road solely as it crosses United States public land as included and specifically described in Exhibit 126. The 3290-A Road includes the segment of road specifically set forth in Exhibit 126 and as exists on the ground.

Acceptance of the 3290-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1670. The 3290-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1671. The appearance of the 3290-A Road on the Flattop Mountain (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1672. The County confirmed its acceptance of the 3290-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3290-A Road pursuant to the County's governmental right and authority.

1673. Witnesses with personal knowledge of the history of the 3290-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1674. Currently known reputation in the community is that the 3290-A Road has been

open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1675. Public motor vehicle use of the 3290-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1676. The 3290-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1677. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3290-A Road.

1678. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3290-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3423 Road

1679. The 3423 Road is designated as county road number 3423 and SGID road identification number RD080184 and is more or less 1.81 miles long.

1680. Exhibit 127 (attached hereto and incorporated herein) contains certain information pertaining to the 3423 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1681. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3423 Road solely as it crosses United States public land as included and specifically described in Exhibit 127. The 3423 Road includes the segment of road specifically set forth in Exhibit 127 and as exists on the ground.

Acceptance of the 3423 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1682. The 3423 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1683. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3423 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1684. The appearance of the 3423 Road on the Bob Hill Kno11 (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1685. The County confirmed its acceptance of the 3423 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3423 Road pursuant to the County's governmental right and authority.

1686. Witnesses with personal knowledge of the history of the 3423 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1687. Currently known reputation in the community is that the 3423 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1688. Public motor vehicle use of the 3423 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1689. The 3423 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1690. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3423 Road.

1691. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3423 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3431 Road

1692. The 3431 Road is designated as county road number 3431 and SGID road identification number RD080185 and is more or less 1.20 miles long.

1693. Exhibit 128 (attached hereto and incorporated herein) contains certain information pertaining to the 3431 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1694. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3431 Road solely as it crosses United States public land as included and specifically described in Exhibit 128. The 3431 Road includes the segment of road specifically set forth in Exhibit 128 and as exists on the ground.

Acceptance of the 3431 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1695. The 3431 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1696. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3431 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1697. The appearance of the 3431 Road on the Bob Hill Knoll (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1698. The County confirmed its acceptance of the 3431 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3431 Road pursuant to the County's governmental right and authority.

1699. Witnesses with personal knowledge of the history of the 3431 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1700. Currently known reputation in the community is that the 3431 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1701. Public motor vehicle use of the 3431 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1702. The 3431 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1703. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3431 Road.

1704. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3431 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bull Hollow Road, 3260

1705. The Bull Hollow Road is designated as county road number 3260 and SGID road identification number RD080145 and is more or less 0.81 miles long.

1706. Exhibit 129 (attached hereto and incorporated herein) contains certain information pertaining to the Bull Hollow Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1707. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bull Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 129. The Bull Hollow Road includes the segment of road specifically set forth in Exhibit 129 and as exists on the ground.

Acceptance of the Bull Hollow Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1708. The Bull Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1709. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Bull Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1710. The appearance of the Bull Hollow Road on the Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1711. The County confirmed its acceptance of the Bull Hollow Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Bull Hollow Road pursuant to the County's governmental right and authority.

1712. Witnesses with personal knowledge of the history of the Bull Hollow Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1713. Currently known reputation in the community is that the Bull Hollow Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1714. Public motor vehicle use of the Bull Hollow Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1715. The Bull Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1716. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bull Hollow Road.

1717. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bull Hollow Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this

road.

Bull Hollow/Buckhorn Reservoir Road, 3259

1718. The Bull Hollow/Buckhorn Reservoir Road is designated as county road number 3259 and SGID road identification number RD080143 and is more or less 3.12 miles long.

1719. Exhibit 130 (attached hereto and incorporated herein) contains certain information pertaining to the Bull Hollow/Buckhorn Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1720. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bull Hollow/Buckhorn Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 130. The Bull Hollow/Buckhorn Reservoir Road includes the segment of road specifically set forth in Exhibit 130 and as exists on the ground.

Acceptance of the Bull Hollow/Buckhorn Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1721. The Bull Hollow/Buckhorn Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1722. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Bull Hollow/Buckhorn Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1723. The appearance of the Bull Hollow/Buckhorn Reservoir Road on the Buckhorn Reservoir (1969) and Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1724. The County confirmed its acceptance of the Bull Hollow/Buckhorn Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Bull Hollow/Buckhorn Reservoir Road pursuant to the County's governmental right and authority.

1725. Witnesses with personal knowledge of the history of the Bull Hollow/Buckhorn Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1726. Currently known reputation in the community is that the Bull Hollow/Buckhorn Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1727. Public motor vehicle use of the Bull Hollow/Buckhorn Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1728. The Bull Hollow/Buckhorn Reservoir Road traverses a valid and perfected R.S.

2477 public highway right-of-way as described herein.

1729. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bull Hollow/Buckhorn Reservoir Road.

1730. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bull Hollow/Buckhorn Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cedar Hollow Road, 3256

1731. The Cedar Hollow Road is designated as county road number 3256 and SGID road identification number RD080141 and is more or less 5.54 miles long.

1732. Exhibit 131 (attached hereto and incorporated herein) contains certain information pertaining to the Cedar Hollow Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1733. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cedar Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 131. The Cedar Hollow Road includes the segment of road specifically set forth in Exhibit 131 and as exists on the ground.

Acceptance of the Cedar Hollow Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1734. The Cedar Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1735. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cedar Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1736. The appearance of the Cedar Hollow Road on the Cleveland (1969), Hadden Holes (1969), and Buckhorn Reservoir (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1737. The County confirmed its acceptance of the Cedar Hollow Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cedar Hollow Road pursuant to the County's governmental right and authority.

1738. Witnesses with personal knowledge of the history of the Cedar Hollow Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1739. Currently known reputation in the community is that the Cedar Hollow Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1740. Public motor vehicle use of the Cedar Hollow Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1741. The Cedar Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1742. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cedar Hollow Road.

1743. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cedar Hollow Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cedar Mountain/Dinosaur Road, 3262

1744. The Cedar Mountain/Dinosaur Road is designated as county road number 3262 and SGID road identification number RD080146 and is more or less 3.08 miles long.

1745. Exhibit 132 (attached hereto and incorporated herein) contains certain information pertaining to the Cedar Mountain/Dinosaur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership

list; and a complete centerline description of the road.

1746. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cedar Mountain/Dinosaur Road solely as it crosses United States public land as included and specifically described in Exhibit 132. The Cedar Mountain/Dinosaur Road includes the segment of road specifically set forth in Exhibit 132 and as exists on the ground.

Acceptance of the Cedar Mountain/Dinosaur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1747. The Cedar Mountain/Dinosaur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1748. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cedar Mountain/Dinosaur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1749. The appearance of the Cedar Mountain/Dinosaur Road on the Cow Flats (1969) and Cleveland (1969) USGS 7.5 minute quadrangle map the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1750. The County confirmed its acceptance of the Cedar Mountain/Dinosaur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cedar Mountain/Dinosaur Road pursuant to the County's governmental right and authority.

1751. Witnesses with personal knowledge of the history of the Cedar

Mountain/Dinosaur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1752. Currently known reputation in the community is that the Cedar Mountain/Dinosaur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1753. Public motor vehicle use of the Cedar Mountain/Dinosaur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1754. The Cedar Mountain/Dinosaur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1755. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cedar Mountain/Dinosaur Road.

1756. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cedar Mountain/Dinosaur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dinosaur Bottoms Spur Road, 3263-A

1757. The Dinosaur Bottoms Spur Road is designated as county road number 3263-A and SGID road identification number RD080148 and is more or less 0.96 miles long.

1758. Exhibit 133 (attached hereto and incorporated herein) contains certain information pertaining to the Dinosaur Bottoms Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1759. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dinosaur Bottoms Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 133. The Dinosaur Bottoms Spur Road includes the segment of road specifically set forth in Exhibit 133 and as exists on the ground.

Acceptance of the Dinosaur Bottoms Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1760. The Dinosaur Bottoms Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1761. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Dinosaur Bottoms Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1762. The appearance of the Dinosaur Bottoms Spur Road on the Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1763. The Dinosaur Bottoms Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dinosaur Bottoms Spur Road pursuant to the County's governmental right and authority.

1764. Witnesses with personal knowledge of the history of the Dinosaur Bottoms Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1765. Currently known reputation in the community is that the Dinosaur Bottoms Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1766. Public motor vehicle use of the Dinosaur Bottoms Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1767. The Dinosaur Bottoms Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1768. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dinosaur Bottoms Spur Road.

1769. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Dinosaur Bottoms Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dinosaur Bottoms Spur " Road, 3263

1770. The Dinosaur Bottoms Spur " Road is designated as county road number 3263 and SGID road identification number RD080147 and is more or less 1.73 miles long.

1771. Exhibit 134 (attached hereto and incorporated herein) contains certain information pertaining to the Dinosaur Bottoms Spur " Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1772. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dinosaur Bottoms Spur " Road solely as it crosses United States public land as included and specifically described in Exhibit 134. The Dinosaur Bottoms Spur " Road includes the segment of road specifically set forth in Exhibit 134 and as exists on the ground.

Acceptance of the Dinosaur Bottoms Spur " Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1773. The Dinosaur Bottoms Spur " Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1774. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Dinosaur Bottoms Spur " Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1775. The appearance of the Dinosaur Bottoms Spur " Road on the Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1776. The Dinosaur Bottoms Spur " Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dinosaur Bottoms Spur " Road pursuant to the County's governmental right and authority.

1777. Witnesses with personal knowledge of the history of the Dinosaur Bottoms Spur " Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1778. Currently known reputation in the community is that the Dinosaur Bottoms Spur " Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1779. Public motor vehicle use of the Dinosaur Bottoms Spur " Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1780. The Dinosaur Bottoms Spur " Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1781. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dinosaur Bottoms Spur " Road.

1782. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dinosaur Bottoms Spur " Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

f03 Road

1783. The f03 Road is designated as county road number f03 and SGID road identification number RD080581 and is more or less 1.05 miles long.

1784. Exhibit 135 (attached hereto and incorporated herein) contains certain information pertaining to the f03 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1785. In this action, the State and County seek to quiet title to the public highway right-of-way for the f03 Road solely as it crosses United States public land as included and specifically described in Exhibit 135. The f03 Road includes the segment of road specifically set forth in Exhibit 135 and as exists on the ground.

Acceptance of the f03 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1786. The f03 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1787. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the f03 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1788. The appearance of the f03 Road on the Chimney Rock (1969) USGS 7.5 minute quadrangle map the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1789. The County confirmed its acceptance of the f03 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the F03 Road pursuant to the County's governmental right and authority.

1790. Witnesses with personal knowledge of the history of the f03 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1791. Currently known reputation in the community is that the f03 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1792. Public motor vehicle use of the f03 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1793. The f03 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1794. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the f03 Road.

1795. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the f03 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jackass Flat Cutoff Road, 3254

1796. The Jackass Flat Cutoff Road is designated as county road number 3254 and SGID road identification number RD080139 and is more or less 2.05 miles long.

1797. Exhibit 136 (attached hereto and incorporated herein) contains certain information pertaining to the Jackass Flat Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1798. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jackass Flat Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 136. The Jackass Flat Cutoff Road includes the segment of road specifically set forth in Exhibit 136 and as exists on the ground.

Acceptance of the Jackass Flat Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1799. The Jackass Flat Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1800. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Jackass Flat Cutoff Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1801. The appearance of the Jackass Flat Cutoff Road on the Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1802. The Jackass Flat Cutoff Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Jackass Flat Cutoff Road pursuant to the County's governmental right and authority.

1803. Witnesses with personal knowledge of the history of the Jackass Flat Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1804. Currently known reputation in the community is that the Jackass Flat Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1805. Public motor vehicle use of the Jackass Flat Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1806. The Jackass Flat Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1807. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Jackass Flat Cutoff Road.

1808. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jackass Flat Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

MK Tunnels Road, f05

1809. The MK Tunnels Road is designated as county road number f05and SGID road identification number RD080583 and is more or less 1.20 miles long.

1810. Exhibit 137 (attached hereto and incorporated herein) contains certain information pertaining to the MK Tunnels Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1811. In this action, the State and County seek to quiet title to the public highway right-

of-way for the MK Tunnels Road solely as it crosses United States public land as included and specifically described in Exhibit 137. The MK Tunnels Road includes the segment of road specifically set forth in Exhibit 137 and as exists on the ground.

Acceptance of the MK Tunnels Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1812. The MK Tunnels Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1813. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the MK Tunnels Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1814. The appearance of the MK Tunnels Road on the Bob Hill Knoll (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1815. The County confirmed its acceptance of the MK Tunnels Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the MK Tunnels Road pursuant to the County's governmental right and authority.

1816. Witnesses with personal knowledge of the history of the MK Tunnels Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

1817. Currently known reputation in the community is that the MK Tunnels Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1818. Public motor vehicle use of the MK Tunnels Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1819. The MK Tunnels Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1820. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the MK Tunnels Road.

1821. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the MK Tunnels Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Seep/Buckhorn Reservoir Road, 3258

1822. The Red Seep/Buckhorn Reservoir Road is designated as county road number 3258 and SGID road identification number RD080142 and is more or less 2.73 miles long.

1823. Exhibit 138 (attached hereto and incorporated herein) contains certain information

pertaining to the Red Seep/Buckhorn Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1824. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Seep/Buckhorn Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 138. The Red Seep/Buckhorn Reservoir Road includes the segment of road specifically set forth in Exhibit 138 and as exists on the ground.

Acceptance of the Red Seep/Buckhorn Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1825. The Red Seep/Buckhorn Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1826. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Red Seep/Buckhorn Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1827. The appearance of the Red Seep/Buckhorn Reservoir Road on the Buckhorn Reservoir (1969) and Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1828. The County confirmed its acceptance of the Red Seep/Buckhorn Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general

highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Seep/Buckhorn Reservoir Road pursuant to the County's governmental right and authority.

1829. Witnesses with personal knowledge of the history of the Red Seep/Buckhorn Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1830. Currently known reputation in the community is that the Red Seep/Buckhorn Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1831. Public motor vehicle use of the Red Seep/Buckhorn Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1832. The Red Seep/Buckhorn Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1833. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Seep/Buckhorn Reservoir Road.

1834. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Red Seep/Buckhorn Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Victor Junction South Road, 3092

1835. The Victor Junction South Road is designated as county road number 3092and SGID road identification number RD080114 and is more or less 2.20 miles long.

1836. Exhibit 139 (attached hereto and incorporated herein) contains certain information pertaining to the Victor Junction South Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1837. In this action, the State and County seek to quiet title to the public highway right-of-way for the Victor Junction South Road solely as it crosses United States public land as included and specifically described in Exhibit 139. The Victor Junction South Road includes the segment of road specifically set forth in Exhibit 139 and as exists on the ground.

Acceptance of the Victor Junction South Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1838. The Victor Junction South Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1839. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Victor Junction South Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1840. The appearance of the Victor Junction South Road on the Cow Flats (1969) and Olsen Reservoir (1969) USGS 7.5 minute quadrangle maps evodences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1841. The County confirmed its acceptance of the Victor Junction South Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Victor Junction South Road pursuant to the County's governmental right and authority.

1842. Witnesses with personal knowledge of the history of the Victor Junction South Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1843. Currently known reputation in the community is that the Victor Junction South Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1844. Public motor vehicle use of the Victor Junction South Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1845. The Victor Junction South Road traverses a valid and perfected R.S. 2477 public

highway right-of-way as described herein.

1846. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Victor Junction South Road.

1847. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Victor Junction South Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

XX Road, 3255

1848. The XX Road is designated as county road number 3255and SGID road identification number RD080140 and is more or less 2.65 miles long.

1849. Exhibit 140 (attached hereto and incorporated herein) contains certain information pertaining to the XX Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1850. In this action, the State and County seek to quiet title to the public highway right-of-way for the XX Road solely as it crosses United States public land as included and specifically described in Exhibit 140. The XX Road includes the segment of road specifically set forth in Exhibit 140 and as exists on the ground.

Acceptance of the XX Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1851. The XX Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1852. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the XX Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1853. The appearance of the XX Road on the Cleveland (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1854. The XX Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the XX Road pursuant to the County's governmental right and authority.

1855. Witnesses with personal knowledge of the history of the XX Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1856. Currently known reputation in the community is that the XX Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1857. Public motor vehicle use of the XX Road as a public thoroughfare traversing

unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1858. The XX Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1859. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the XX Road.

1860. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the XX Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

FOURTH CAUSE OF ACTION – QUIET TITLE
LONG STREET AREA

1861. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1862. The Long Street Area is located in northeastern Emery County in the central region of Utah.

1863. The Long Street Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Green River Motocross Road, 1003; (2) Horse Canyon/Coon Springs Road, 125; (3) Lila Canyon Road, 126; (4) Long Street, 1001; (5) Woodside & Lower Price River Road, 129; (6) 3143-A Road; (7) 3143-B Road; (8) 3143-C Road; (9) 3331-A Road; (10) 3331-E Road; (11) Beckwith Plateau Road, 129A; (12) Lila

Canyon Tramway Road, 3146; (13) Lower Range Creek Road, 3331-C; (14) Range Creek Road, 3152; and (15); Turtle Canyon Road, 3143.

1864. Each right-of-way claimed in the Long Street Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

1865. All rights-of-way claimed in the Long Street Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1866. All rights-of-way claimed in the Long Street Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1867. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Green River Motocross Road, 1003

1868. The Green River Motocross Road is designated as county road number 1003 and SGID road identification number RD080006 and is more or less 1.93 miles long.

1869. Exhibit 141 (attached hereto and incorporated herein) contains certain information pertaining to the Green River Motocross Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1870. In this action, the State and County seek to quiet title to the public highway right-of-way for the Green River Motocross Road solely as it crosses United States public land as included and specifically described in Exhibit 141. The Green River Motocross Road includes the segment of road specifically set forth in Exhibit 141 and as exists on the ground.

Acceptance of the Green River Motocross Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1871. The Green River Motocross Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1872. The appearance of the Green River Motocross Road on the Gunnison Butte (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1873. The County confirmed its acceptance of the Green River Motocross Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Green River Motocross Road using public funds

pursuant to the County's governmental right and authority.

1874. Witnesses with personal knowledge of the history of the Green River Motocross Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1875. Currently known reputation in the community is that the Green River Motocross Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1876. Public motor vehicle use of the Green River Motocross Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1877. The Green River Motocross Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1878. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Green River Motocross Road.

1879. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Green River Motocross Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Horse Canyon/Coon Springs Road, 125

1880. The Horse Canyon/Coon Springs Road is designated as county road number 125 and SGID road identification number RD080078 and is more or less 11.14 miles long.

1881. Exhibit 142 (attached hereto and incorporated herein) contains certain information pertaining to the Horse Canyon/Coon Springs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1882. In this action, the State and County seek to quiet title to the public highway right-of-way for the Horse Canyon/Coon Springs Road solely as it crosses United States public land as included and specifically described in Exhibit 142. The Horse Canyon/Coon Springs Road includes the segment of road specifically set forth in Exhibit 142 and as exists on the ground.

Acceptance of the Horse Canyon/Coon Springs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1883. The Horse Canyon/Coon Springs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1884. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Horse Canyon/Coon Springs Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1885. The appearance of the Horse Canyon/Coon Springs Road on the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1886. The County confirmed its acceptance of the Horse Canyon/Coon Springs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Horse Canyon/Coon Springs Road using public funds pursuant to the County's governmental right and authority.

1887. Witnesses with personal knowledge of the history of the Horse Canyon/Coon Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1888. Currently known reputation in the community is that the Horse Canyon/Coon Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1889. Public motor vehicle use of the Horse Canyon/Coon Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1890. The Horse Canyon/Coon Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1891. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Horse Canyon/Coon Springs

Road.

1892. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Horse Canyon/Coon Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lila Canyon Road, 126

1893. The Lila Canyon Road is designated as county road number 126 and SGID road identification number RD080080 and is more or less 2.71 miles long.

1894. Exhibit 143 (attached hereto and incorporated herein) contains certain information pertaining to the Lila Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1895. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lila Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 143. The Lila Canyon Road includes the segment of road specifically set forth in Exhibit 143 and as exists on the ground.

Acceptance of the Lila Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1896. The Lila Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1897. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lila Canyon Road as a public highway located on the land

at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1898. The appearance of the Lila Canyon Road on the Woodside (1949) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1899. The County confirmed its acceptance of the Lila Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lila Canyon Road using public funds pursuant to the County's governmental right and authority.

1900. Witnesses with personal knowledge of the history of the Lila Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1901. Currently known reputation in the community is that the Lila Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1902. Public motor vehicle use of the Lila Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1903. The Lila Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1904. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lila Canyon Road.

1905. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lila Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Long Street Road, 1001

1906. The Long Street Road is designated as county road number 1001 and SGID road identification number RD080004 and is more or less 7.53 miles long.

1907. Exhibit 144 (attached hereto and incorporated herein) contains certain information pertaining to the Long Street Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1908. In this action, the State and County seek to quiet title to the public highway right-of-way for the Long Street Road solely as it crosses United States public land as included and specifically described in Exhibit 144. The Long Street Road includes the segment of road specifically set forth in Exhibit 144 and as exists on the ground.

Acceptance of the Long Street Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1909. The Long Street Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1910. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Long Street Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1911. The appearance of the Long Street Road on the Gunnison Butte (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1912. The County confirmed its acceptance of the Long Street Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Long Street Road using public funds pursuant to the County's governmental right and authority.

1913. Witnesses with personal knowledge of the history of the Long Street Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1914. Currently known reputation in the community is that the Long Street Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1915. Public motor vehicle use of the Long Street Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1916. The Long Street Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1917. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Long Street Road.

1918. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Long Street Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Woodside & Lower Price River Road, 129

1919. The Woodside & Lower Price River Road is designated as county road number 129 and SGID road identification number RD080083 and is more or less 5.12 miles long.

1920. Exhibit 145 (attached hereto and incorporated herein) contains certain information pertaining to the Woodside & Lower Price River Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1921. In this action, the State and County seek to quiet title to the public highway right-of-way for the Woodside & Lower Price River Road solely as it crosses United States public land as included and specifically described in Exhibit 145. The Woodside & Lower Price River Road includes the segment of road specifically set forth in Exhibit 145 and as exists on the ground.

Acceptance of the Woodside & Lower Price River Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1922. The Woodside & Lower Price River Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1923. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Woodside & Lower Price River Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1924. The appearance of the Woodside & Lower Price River Road on the Cliff (1969) USGS 7.5 minute quadrangle map and the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1925. The County confirmed its acceptance of the Woodside & Lower Price River Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Woodside & Lower Price River Road using public funds pursuant to the County's governmental right and authority.

1926. Witnesses with personal knowledge of the history of the Woodside & Lower Price River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1927. Currently known reputation in the community is that the Woodside & Lower Price River Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1928. Public motor vehicle use of the Woodside & Lower Price River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1929. The Woodside & Lower Price River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1930. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Woodside & Lower Price River Road.

1931. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Woodside & Lower Price River Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3143-A Road

1932. The 3143-A Road is designated as county road number 3143-A and SGID road identification number RD080120 and is more or less 1.75 miles long.

1933. Exhibit 146 (attached hereto and incorporated herein) contains certain information pertaining to the 3143-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1934. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3143-A Road solely as it crosses United States public land as included and specifically described in Exhibit 146. The 3143-A Road includes the segment of road specifically set forth in Exhibit 146 and as exists on the ground.

Acceptance of the 3143-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1935. The 3143-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1936. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3143-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1937. The appearance of the 3143-A Road on the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1938. The County confirmed its acceptance of the 3143-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3143-A Road pursuant to the County's governmental right and authority.

1939. Witnesses with personal knowledge of the history of the 3143-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1940. Currently known reputation in the community is that the 3143-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1941. Public motor vehicle use of the 3143-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1942. The 3143-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1943. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3143-A Road.

1944. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the 3143-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3143-B Road

1945. The 3143-B Road is designated as county road number 3143-B and SGID road identification number RD080121 and is more or less 5.84 miles long.

1946. Exhibit 147 (attached hereto and incorporated herein) contains certain information pertaining to the 3143-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1947. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3143-B Road solely as it crosses United States public land as included and specifically described in Exhibit 147. The 3143-B Road includes the segment of road specifically set forth in Exhibit 147 and as exists on the ground.

Acceptance of the 3143-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1948. The 3143-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1949. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3143-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1950. The appearance of the 3143-B Road on the Woodside (1949) USGS 15 minute

quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1951. The County confirmed its acceptance of the 3143-B Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3143-B Road pursuant to the County's governmental right and authority.

1952. Witnesses with personal knowledge of the history of the 3143-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1953. Currently known reputation in the community is that the 3143-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1954. Public motor vehicle use of the 3143-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1955. The 3143-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1956. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the 3143-B Road.

1957. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3143-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3143-C Road

1958. The 3143-C Road is designated as county road number 3143-C and SGID road identification number RD080122 and is more or less 4.64 miles long.

1959. Exhibit 148 (attached hereto and incorporated herein) contains certain information pertaining to the 3143-C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1960. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3143-C Road solely as it crosses United States public land as included and specifically described in Exhibit 148. The 3143-C Road includes the segment of road specifically set forth in Exhibit 148 and as exists on the ground.

Acceptance of the 3143-C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1961. The 3143-C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1962. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3143-C Road as a public highway located on the land at

issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1963. The appearance of the 3143-C Road on the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1964. The County confirmed its acceptance of the 3143-C Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3143-C Road pursuant to the County's governmental right and authority.

1965. Witnesses with personal knowledge of the history of the 3143-C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1966. Currently known reputation in the community is that the 3143-C Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1967. Public motor vehicle use of the 3143-C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1968. The 3143-C Road traverses a valid and perfected R.S. 2477 public highway right-

of-way as described herein.

1969. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3143-C Road.

1970. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3143-C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3331-A Road

1971. The 3331-A Road is designated as county road number 3331-A and SGID road identification number RD080166 and is more or less 1.36 miles long.

1972. Exhibit 149 (attached hereto and incorporated herein) contains certain information pertaining to the 3331-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1973. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3331-A Road solely as it crosses United States public land as included and specifically described in Exhibit 149. The 3331-A Road includes the segment of road specifically set forth in Exhibit 149 and as exists on the ground.

Acceptance of the 3331-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1974. The 3331-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1975. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3331-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1976. The appearance of the 3331-A Road on the Range Creek (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1977. The County confirmed its acceptance of the 3331-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3331-A Road pursuant to the County's governmental right and authority.

1978. Witnesses with personal knowledge of the history of the 3331-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1979. Currently known reputation in the community is that the 3331-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1980. Public motor vehicle use of the 3331-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public

highway right-of-way underlying this road.

1981. The 3331-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1982. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3331-A Road.

1983. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3331-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3331-E Road

1984. The 3331-E Road is designated as county road number 3331-E and SGID road identification number RD080170 and is more or less 10.93 miles long.

1985. Exhibit 150 (attached hereto and incorporated herein) contains certain information pertaining to the 3331-E Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1986. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3331-E Road solely as it crosses United States public land as included and specifically described in Exhibit 150. The 3331-E Road includes the segment of road specifically set forth in Exhibit 150 and as exists on the ground.

Acceptance of the 3331-E Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1987. The 3331-E Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1988. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3331-E Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1989. The appearance of the 3331-E Road the Range Creek (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

1990. The County confirmed its acceptance of the 3331-E Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3331-E Road pursuant to the County's governmental right and authority.

1991. Witnesses with personal knowledge of the history of the 3331-E Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1992. Currently known reputation in the community is that the 3331-E Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1993. Public motor vehicle use of the 3331-E Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1994. The 3331-E Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1995. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3331-E Road.

1996. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3331-E Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Beckwith Plateau Road, 129A

1997. The Beckwith Plateau Road is designated as county road number 129A and SGID road identification number RD080598 and is more or less 18.86 miles long.

1998. Exhibit 151 (attached hereto and incorporated herein) contains certain information pertaining to the Beckwith Plateau Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1999. In this action, the State and County seek to quiet title to the public highway right-of-way for the Beckwith Plateau Road solely as it crosses United States public land as included

and specifically described in Exhibit 151. The Beckwith Plateau Road includes the segment of road specifically set forth in Exhibit 151 and as exists on the ground.

Acceptance of the Beckwith Plateau Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2000. The Beckwith Plateau Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2001. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Beckwith Plateau Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2002. The Beckwith Plateau Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Beckwith Plateau Road pursuant to the County's governmental right and authority.

2003. Witnesses with personal knowledge of the history of the Beckwith Plateau Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2004. Currently known reputation in the community is that the Beckwith Plateau Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2005. Public motor vehicle use of the Beckwith Plateau Road as a public thoroughfare

traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2006. The Beckwith Plateau Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2007. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Beckwith Plateau Road.

2008. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Beckwith Plateau Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lila Canyon Tramway Road, 3146

2009. The Lila Canyon Tramway Road is designated as county road number 3146 and SGID road identification number RD080600 and is more or less 2.29 miles long.

2010. Exhibit 152 (attached hereto and incorporated herein) contains certain information pertaining to the Lila Canyon Tramway Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2011. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lila Canyon Tramway Road solely as it crosses United States public land as

included and specifically described in Exhibit 152. The Lila Canyon Tramway Road includes the segment of road specifically set forth in Exhibit 152 and as exists on the ground.

Acceptance of the Lila Canyon Tramway Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2012. The Lila Canyon Tramway Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2013. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lila Canyon Tramway Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2014. The appearance of the Lila Canyon Tramway Road on the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2015. The County confirmed its acceptance of the Lila Canyon Tramway Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lila Canyon Tramway Road pursuant to the County's governmental right and authority.

2016. Witnesses with personal knowledge of the history of the Lila Canyon Tramway Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2017. Currently known reputation in the community is that the Lila Canyon Tramway Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2018. Public motor vehicle use of the Lila Canyon Tramway Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2019. The Lila Canyon Tramway Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2020. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lila Canyon Tramway Road.

2021. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lila Canyon Tramway Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower Range Creek Road, 3331-C

2022. The Lower Range Creek Road is designated as county road number 3331-C and SGID road identification number RD080168 and is more or less 2.41 miles long.

2023. Exhibit 153 (attached hereto and incorporated herein) contains certain information pertaining to the Lower Range Creek Road including: a map depicting the road; township, range

and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2024. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower Range Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 153. The Lower Range Creek Road includes the segment of road specifically set forth in Exhibit 153 and as exists on the ground.

Acceptance of the Lower Range Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2025. The Lower Range Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2026. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lower Range Creek Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2027. The appearance of the Lower Range Creek Road on the Range Creek (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2028. The County confirmed its acceptance of the Lower Range Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower Range Creek Road pursuant to the County's governmental right and authority.

2029. Witnesses with personal knowledge of the history of the Lower Range Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2030. Currently known reputation in the community is that the Lower Range Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2031. Public motor vehicle use of the Lower Range Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2032. The Lower Range Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2033. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower Range Creek Road.

2034. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lower Range Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Range Creek Road, 3152

2035. The Range Creek Road is designated as county road number 3152 and SGID road identification number RD080124 and is more or less 13.97 miles long.

2036. Exhibit 154 (attached hereto and incorporated herein) contains certain information pertaining to the Range Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2037. In this action, the State and County seek to quiet title to the public highway right-of-way for the Range Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 154. The Range Creek Road includes the segment of road specifically set forth in Exhibit 154 and as exists on the ground.

Acceptance of the Range Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2038. The Range Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2039. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Range Creek Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2040. The appearance of the Range Creek Road on the Range Creek (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2041. The County confirmed its acceptance of the Range Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Range Creek Road pursuant to the County's governmental right and authority.

2042. Witnesses with personal knowledge of the history of the Range Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2043. Currently known reputation in the community is that the Range Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2044. Public motor vehicle use of the Range Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2045. The Range Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2046. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Range Creek Road.

2047. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Range Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Turtle Canyon Road, 3143

2048. The Turtle Canyon Road is designated as county road number 3143 and SGID road identification number RD080119 and is more or less 0.73 miles long.

2049. Exhibit 155 (attached hereto and incorporated herein) contains certain information pertaining to the Turtle Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2050. In this action, the State and County seek to quiet title to the public highway right-of-way for the Turtle Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 155. The Turtle Canyon Road includes the segment of road specifically set forth in Exhibit 155 and as exists on the ground.

Acceptance of the Turtle Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2051. The Turtle Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2052. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Turtle Canyon Road as a public highway located on the

land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2053. The appearance of the Turtle Canyon Road on the Woodside (1949) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2054. The County confirmed its acceptance of the Turtle Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Turtle Canyon Road pursuant to the County's governmental right and authority.

2055. Witnesses with personal knowledge of the history of the Turtle Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2056. Currently known reputation in the community is that the Turtle Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2057. Public motor vehicle use of the Turtle Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2058. The Turtle Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2059. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Turtle Canyon Road.

2060. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Turtle Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

FIFTH CAUSE OF ACTION – QUIET TITLE
RED CANYON AREA

2061. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2062. The Red Canyon Area is located in southwestern Emery County in the central region of Utah.

2063. The Red Canyon Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Albrech Reservoir Road, 922; (2) Family Butte Road, 1024; (3) George's Draw Road, 336; (4) Hanni Mine Road, 1020; (5) Home Base Cutoff Road, 341; (6) Kimball Draw/Cat Canyon Road, 927; (7) Last Chance Wash Cutoff Road, 925; (8) Little Black Mountain Spur Road, 926; (9) Red Canyon Loop Road, 1019; (10) Sand Cave Spring Road, 924; (11) Sinbad Well Road, 340; (12) Tomsich Mountain Spur Road, 1021; (13) Lower Last Chance Loop Road, 920 (14) Upper Last Chance Road, 921; (15) Willow Springs Wash to I-70 Road, 923; (16) 3763 Road; (17) 3764-B Road; (18) 3780-B Road; (19)

Link Flat Spurs Road, 3782; (20) 3786-A Road; (21) 3786-B Road; (22) 3899-A Road; (23) 3899-B Road; (24) 3905-B Road; (25) 3906-B Road; (26) 922-A Road; (27) 922-B Road; (28) 922-C Road; (29) 9999a Road; (30) Copper Globe Landing Strip Road, 3778; (31) Corral Canyon Spring Road, 3999; (32) Eagle Canyon Road, 3788; (33) Earls Draw Road, 9999; (34) Earls Draw Spur Road, 3828; (35) Justensen Flats East Road, 3774; (36) Link Flat Spur Road, 3780; (37) Moroni Slopes/Chimney Canyon Road, 4000; (38) Oil Well Bench Spur Road, 3992; (39) Road Hollow Road, 3787; (40) Rods Valley Road, 3786; (41) Saddle Horse Cutoff Road, 3625; (42) Saddle Horse Cutoff Extension Road, 3625-A; (43) Seger's Hole Loop Road, 3899-C; (44) South Cedar Mountain Road, 3889; (45) Slaughter Slopes Reservoir Road, 3905; and (46) Last Chance Well Cutoff Road, 3997.

2064. Each right-of-way claimed in the Red Canyon Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

2065. All rights-of-way claimed in the Red Canyon Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

2066. All rights-of-way claimed in the Red Canyon Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water

bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

2067. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Albrech Reservoir Road, 922

2068. The Albrech Reservoir Road is designated as county road number 922 and SGID road identification number RD080560 and is more or less 1.01 miles long.

2069. Exhibit 156 (attached hereto and incorporated herein) contains certain information pertaining to the Albrech Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2070. In this action, the State and County seek to quiet title to the public highway right-of-way for the Albrech Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 156. The Albrech Reservoir Road includes the segment of road specifically set forth in Exhibit 156 and as exists on the ground.

Acceptance of the Albrech Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2071. The Albrech Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2072. The appearance of the Albrech Reservoir Road on the Willow Springs (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2073. The County confirmed its acceptance of the Albrech Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Albrech Reservoir Road using public funds pursuant to the County's governmental right and authority.

2074. Witnesses with personal knowledge of the history of the Albrech Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2075. Currently known reputation in the community is that the Albrech Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2076. Public motor vehicle use of the Albrech Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2077. The Albrech Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2078. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Albrech Reservoir Road.

2079. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Albrech Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Family Butte Road, 1024

2080. The Family Butte Road is designated as county road number 1024 and SGID road identification number RD080027and is more or less 6.57 miles long.

2081. Exhibit 157 (attached hereto and incorporated herein) contains certain information pertaining to the Family Butte Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2082. In this action, the State and County seek to quiet title to the public highway right-of-way for the Family Butte Road solely as it crosses United States public land as included and specifically described in Exhibit 157. The Family Butte Road includes the segment of road specifically set forth in Exhibit 157 and as exists on the ground.

Acceptance of the Family Butte Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2083. The Family Butte Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2084. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Family Butte Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2085. The appearance of the Family Butte Road on the San Rafael Knob (1953)USGS 7.5 minute quadrangle map and San Rafael Knob(1952) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2086. The County confirmed its acceptance of the Family Butte Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Family Butte Road using public funds pursuant to the County's governmental right and authority.

2087. Witnesses with personal knowledge of the history of the Family Butte Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2088. Currently known reputation in the community is that the Family Butte Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2089. Public motor vehicle use of the Family Butte Road as a public thoroughfare

traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2090. The Family Butte Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2091. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Family Butte Road.

2092. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Family Butte Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

George's Draw Road, 336

2093. The George's Draw Road is designated as county road number 336 and SGID road identification number RD080173 and is more or less 2.08 miles long.

2094. Exhibit 158 (attached hereto and incorporated herein) contains certain information pertaining to the George's Draw Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2095. In this action, the State and County seek to quiet title to the public highway right-of-way for the George's Draw Road solely as it crosses United States public land as included and

specifically described in Exhibit 158. The George's Draw Road includes the segment of road specifically set forth in Exhibit 158 and as exists on the ground.

Acceptance of the George's Draw Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2096. The George's Draw Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2097. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the George's Draw Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2098. The appearance of the George's Draw Road on the San Rafael Knob (1953) and Twin Knolls (1953) USGS 7.5 minute quadrangle maps, and the San Rafael Knob (1952) and The Wickiup (1954) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2099. The County confirmed its acceptance of the George's Draw Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the George's Draw Road using public funds pursuant to the County's governmental right and authority.

2100. Witnesses with personal knowledge of the history of the George's Draw Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2101. Currently known reputation in the community is that the George's Draw Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2102. Public motor vehicle use of the George's Draw Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2103. The George's Draw Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2104. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the George's Draw Road.

2105. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the George's Draw Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hanni Mine Road, 1020

2106. The Hanni Mine Road is designated as county road number 1020 and SGID road identification number RD080024 and is more or less 0.95 miles long.

2107. Exhibit 159 (attached hereto and incorporated herein) contains certain information pertaining to the Hanni Mine Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2108. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hanni Mine Road solely as it crosses United States public land as included and specifically described in Exhibit 159. The Hanni Mine Road includes the segment of road specifically set forth in Exhibit 159 and as exists on the ground.

Acceptance of the Hanni Mine Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2109. The Hanni Mine Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2110. The appearance of the Hanni Mine Road on the Copper Globe (1953) and Tomsich Butte (1953) USGS 7.5 minute quadrangle maps, and the San Rafael Knob (1952) and Wild Horse (1952) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2111. The County confirmed its acceptance of the Hanni Mine Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hanni Mine Road using public funds pursuant to the County's governmental right and authority.

2112. Witnesses with personal knowledge of the history of the Hanni Mine Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2113. Currently known reputation in the community is that the Hanni Mine Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2114. Public motor vehicle use of the Hanni Mine Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2115. The Hanni Mine Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2116. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hanni Mine Road.

2117. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hanni Mine Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Home Base Cutoff Road, 341

2118. The Home Base Cutoff Road is designated as county road number 341 and SGID road identification number RD080181 and is more or less 1.79 miles long.

2119. Exhibit 160 (attached hereto and incorporated herein) contains certain information pertaining to the Home Base Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2120. In this action, the State and County seek to quiet title to the public highway right-of-way for the Home Base Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 160. The Home Base Cutoff Road includes the segment of road specifically set forth in Exhibit 160 and as exists on the ground.

Acceptance of the Home Base Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2121. The Home Base Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2122. The appearance of the Home Base Cutoff Road on the Twin Knolls (1953) USGS 7.5 minute quadrangle map and The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2123. The County confirmed its acceptance of the Home Base Cutoff Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Home Base Cutoff Road using public funds pursuant to the County's governmental right and authority.

2124. Witnesses with personal knowledge of the history of the Home Base Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2125. Currently known reputation in the community is that the Home Base Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2126. Public motor vehicle use of the Home Base Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2127. The Home Base Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2128. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Home Base Cutoff Road.

2129. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Home Base Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment

of this road.

Kimball Draw/Cat Canyon Road, 927

2130. The Kimball Draw/Cat Canyon Road is designated as county road number 927 and SGID road identification number RD080571 and is more or less 7.88 miles long.

2131. Exhibit 161 (attached hereto and incorporated herein) contains certain information pertaining to the Kimball Draw/Cat Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2132. In this action, the State and County seek to quiet title to the public highway right-of-way for the Kimball Draw/Cat Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 161. The Kimball Draw/Cat Canyon Road includes the segment of road specifically set forth in Exhibit 161 and as exists on the ground.

Acceptance of the Kimball Draw/Cat Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2133. The Kimball Draw/Cat Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2134. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Kimball Draw/Cat Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2135. The County confirmed its acceptance of the Kimball Draw/Cat Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general

highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Kimball Draw/Cat Canyon Road using public funds pursuant to the County's governmental right and authority.

2136. Witnesses with personal knowledge of the history of the Kimball Draw/Cat Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2137. Currently known reputation in the community is that the Kimball Draw/Cat Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2138. Public motor vehicle use of the Kimball Draw/Cat Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2139. The Kimball Draw/Cat Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2140. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Kimball Draw/Cat Canyon Road.

2141. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Kimball Draw/Cat Canyon Road on lands owned by the United States as

described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Last Chance Wash Cutoff Road, 925

2142. The Last Chance Wash Cutoff Road is designated as county road number 925 and SGID road identification number RD080568 and is more or less 7.80 miles long.

2143. Exhibit 162 (attached hereto and incorporated herein) contains certain information pertaining to the Last Chance Wash Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2144. In this action, the State and County seek to quiet title to the public highway right-of-way for the Last Chance Wash Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 162. The Last Chance Wash Cutoff Road includes the segment of road specifically set forth in Exhibit 162 and as exists on the ground.

Acceptance of the Last Chance Wash Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2145. The Last Chance Wash Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2146. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Last Chance Wash Cutoff Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2147. The appearance of the Last Chance Wash Cutoff Road on the Salvation Creek

(1968), Willow Springs (1968), and Solomons Temple (1968) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2148. The County confirmed its acceptance of the Last Chance Wash Cutoff Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Last Chance Wash Cutoff Road using public funds pursuant to the County's governmental right and authority.

2149. Witnesses with personal knowledge of the history of the Last Chance Wash Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2150. Currently known reputation in the community is that the Last Chance Wash Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2151. Public motor vehicle use of the Last Chance Wash Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2152. The Last Chance Wash Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2153. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Last Chance Wash Cutoff Road.

2154. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Last Chance Wash Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Little Black Mountain Spur Road, 926

2155. The Little Black Mountain Spur Road is designated as county road number 926 and SGID road identification number RD080570 and is more or less 3.73 miles long.

2156. Exhibit 163 (attached hereto and incorporated herein) contains certain information pertaining to the Little Black Mountain Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2157. In this action, the State and County seek to quiet title to the public highway right-of-way for the Little Black Mountain Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 163. The Little Black Mountain Spur Road includes the segment of road specifically set forth in Exhibit 163 and as exists on the ground.

Acceptance of the Little Black Mountain Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2158. The Little Black Mountain Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2159. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Little Black Mountain Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2160. The appearance of the Little Black Mountain Spur Road on the Solomons Temple (1968) and Salvation Creek (1968) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2161. The County confirmed its acceptance of the Little Black Mountain Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Little Black Mountain Spur Road using public funds pursuant to the County's governmental right and authority.

2162. Witnesses with personal knowledge of the history of the Little Black Mountain Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2163. Currently known reputation in the community is that the Little Black Mountain Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2164. Public motor vehicle use of the Little Black Mountain Spur Road as a public

thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2165. The Little Black Mountain Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2166. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Little Black Mountain Spur Road.

2167. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Little Black Mountain Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Canyon Loop Road, 1019

2168. The Red Canyon Loop Road is designated as county road number 1019 and SGID road identification number RD080022 and is more or less 20.44 miles long.

2169. Exhibit 164 (attached hereto and incorporated herein) contains certain information pertaining to the Red Canyon Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2170. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Canyon Loop Road solely as it crosses United States public land as included

and specifically described in Exhibit 164. The Red Canyon Loop Road includes the segment of road specifically set forth in Exhibit 164 and as exists on the ground.

Acceptance of the Red Canyon Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2171. The Red Canyon Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2172. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Red Canyon Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2173. The appearance of the Red Canyon Loop Road on the Tomsich Butte (1953), Copper Globe (1953), and San Rafael Knob (1953) USGS 7.5 minute quadrangle maps, and the San Rafael Knob (1952) and Wild Horse (1952) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2174. The County confirmed its acceptance of the Red Canyon Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Canyon Loop Road using public funds pursuant to the County's governmental right and authority.

2175. Witnesses with personal knowledge of the history of the Red Canyon Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2176. Currently known reputation in the community is that the Red Canyon Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2177. Public motor vehicle use of the Red Canyon Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2178. The Red Canyon Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2179. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Canyon Loop Road.

2180. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Canyon Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sand Cave Spring Road, 924

2181. The Sand Cave Spring Road is designated as county road number 924 and SGID road identification number RD080567 and is more or less 2.41 miles long.

2182. Exhibit 165 (attached hereto and incorporated herein) contains certain information pertaining to the Sand Cave Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2183. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sand Cave Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 165. The Sand Cave Spring Road includes the segment of road specifically set forth in Exhibit 165 and as exists on the ground.

Acceptance of the Sand Cave Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2184. The Sand Cave Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2185. The appearance of the Sand Cave Spring Road Mussentuchit Flat (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2186. The County confirmed its acceptance of the Sand Cave Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sand Cave Spring Road using public funds pursuant to the County's governmental right and authority.

2187. Witnesses with personal knowledge of the history of the Sand Cave Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2188. Currently known reputation in the community is that the Sand Cave Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2189. Public motor vehicle use of the Sand Cave Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2190. The Sand Cave Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2191. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sand Cave Spring Road.

2192. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sand Cave Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sinbad Well Road, 340

2193. The Sinbad Well Road is designated as county road number 340 and SGID road identification number RD080177 and is more or less 2.24 miles long.

2194. Exhibit 166 (attached hereto and incorporated herein) contains certain information pertaining to the Sinbad Well Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2195. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sinbad Well Road solely as it crosses United States public land as included and specifically described in Exhibit 166. The Sinbad Well Road includes the segment of road specifically set forth in Exhibit 166 and as exists on the ground.

Acceptance of the Sinbad Well Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2196. The Sinbad Well Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2197. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Sinbad Well Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2198. The appearance of the Sinbad Well Road on the Twin Knolls (1953) USGS 7.5 minute quadrangle map and The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2199. The County confirmed its acceptance of the Sinbad Well Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sinbad Well Road using public funds pursuant to the County's governmental right and authority.

2200. Witnesses with personal knowledge of the history of the Sinbad Well Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2201. Currently known reputation in the community is that the Sinbad Well Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2202. Public motor vehicle use of the Sinbad Well Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2203. The Sinbad Well Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2204. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sinbad Well Road.

2205. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sinbad Well Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Tomsich Mountain Spur Road, 1021

2206. The Tomsich Mountain Spur Road is designated as county road number 1021 and SGID road identification number RD080025 and is more or less 0.84 miles long.

2207. Exhibit 167 (attached hereto and incorporated herein) contains certain information pertaining to the Tomsich Mountain Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2208. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tomsich Mountain Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 167. The Tomsich Mountain Spur Road includes the segment of road specifically set forth in Exhibit 167 and as exists on the ground.

Acceptance of the Tomsich Mountain Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2209. The Tomsich Mountain Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2210. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Tomsich Mountain Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2211. The appearance of the Tomsich Mountain Spur Road on the Tomsich Butte

(1953) USGS 7.5 minute quadrangle map and the Wild Horse (1952) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2212. The Tomsich Mountain Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Tomsich Mountain Spur Road using public funds pursuant to the County's governmental right and authority.

2213. Witnesses with personal knowledge of the history of the Tomsich Mountain Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2214. Currently known reputation in the community is that the Tomsich Mountain Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2215. Public motor vehicle use of the Tomsich Mountain Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2216. The Tomsich Mountain Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2217. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tomsich Mountain Spur Road.

2218. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Tomsich Mountain Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower Last Chance Loop Road, 920

2219. The Lower Last Chance Loop Road is designated as county road number 920 and SGID road identification number RD080558 and is more or less 29.48 miles long.

2220. Exhibit 168 (attached hereto and incorporated herein) contains certain information pertaining to the Lower Last Chance Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2221. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower Last Chance Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 168. The Lower Last Chance Loop Road includes the segment of road specifically set forth in Exhibit 168 and as exists on the ground.

Acceptance of the Lower Last Chance Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2222. The Lower Last Chance Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2223. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lower Last Chance Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2224. The appearance of the Lower Last Chance Loop Road on the Willow Springs (1968), Mussentuchit Flat (1969), Salvation Creek (1968), and Solomons Temple (1968) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2225. The County confirmed its acceptance of the Lower Last Chance Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower Last Chance Loop Road using public funds pursuant to the County's governmental right and authority.

2226. Witnesses with personal knowledge of the history of the Lower Last Chance Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2227. Currently known reputation in the community is that the Lower Last Chance Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2228. Public motor vehicle use of the Lower Last Chance Loop Road as a public

thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2229. The Lower Last Chance Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2230. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower Last Chance Loop Road.

2231. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lower Last Chance Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper Last Chance Road, 921

2232. The Upper Last Chance Road is designated as county road number 921 and SGID road identification number RD080559 and is more or less 4.42 miles long.

2233. Exhibit 169 (attached hereto and incorporated herein) contains certain information pertaining to the Upper Last Chance Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2234. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper Last Chance Road solely as it crosses United States public land as included

and specifically described in Exhibit 169. The Upper Last Chance Road includes the segment of road specifically set forth in Exhibit 169 and as exists on the ground.

Acceptance of the Upper Last Chance Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2235. The Upper Last Chance Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2236. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Upper Last Chance Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2237. The appearance of the Upper Last Chance Road on the Willow Springs (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2238. The County confirmed its acceptance of the Upper Last Chance Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Upper Last Chance Road using public funds pursuant to the County's governmental right and authority.

2239. Witnesses with personal knowledge of the history of the Upper Last Chance Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2240. Currently known reputation in the community is that the Upper Last Chance Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2241. Public motor vehicle use of the Upper Last Chance Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2242. The Upper Last Chance Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2243. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper Last Chance Road.

2244. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper Last Chance Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Willow Springs Wash to I-70 Road, 923

2245. The Willow Springs Wash to I-70 Road is designated as county road number 923 and SGID road identification number RD080564 and is more or less 13.50 miles long.

2246. Exhibit 170 (attached hereto and incorporated herein) contains certain information pertaining to the Willow Springs Wash to I-70 Road including: a map depicting the road;

township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2247. In this action, the State and County seek to quiet title to the public highway right-of-way for the Willow Springs Wash to I-70 Road solely as it crosses United States public land as included and specifically described in Exhibit 170. The Willow Springs Wash to I-70 Road includes the segment of road specifically set forth in Exhibit 170 and as exists on the ground.

Acceptance of the Willow Springs Wash to I-70 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2248. The Willow Springs Wash to I-70 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2249. Aerial photography from 1976confirms the historical use, existence, and acceptance of the right-of-way for the Willow Springs Wash to I-70 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2250. The appearance of the Willow Springs Wash to I-70 Road on the Mesa Butte (1968) and Mussentuchit Flat (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2251. The County confirmed its acceptance of the Willow Springs Wash to I-70 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Willow Springs Wash to I-70 Road using public

funds pursuant to the County's governmental right and authority.

2252. Witnesses with personal knowledge of the history of the Willow Springs Wash to I-70 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2253. Currently known reputation in the community is that the Willow Springs Wash to I-70 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2254. Public motor vehicle use of the Willow Springs Wash to I-70 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2255. The Willow Springs Wash to I-70 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2256. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Willow Springs Wash to I-70 Road.

2257. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Willow Springs Wash to I-70 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and

enjoyment of this road.

3763 Road

2258. The 3763 Road is designated as county road number 3673 and SGID road identification number RD080325 and is more or less 1.26 miles long.

2259. Exhibit 171 (attached hereto and incorporated herein) contains certain information pertaining to the 3763 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2260. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3763 Road solely as it crosses United States public land as included and specifically described in Exhibit 171. The 3763 Road includes the segment of road specifically set forth in Exhibit 171 and as exists on the ground.

Acceptance of the 3763 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2261. The 3763 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2262. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3763 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2263. The 3763 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the 3763 Road pursuant to the County's governmental right and authority.

2264. Witnesses with personal knowledge of the history of the 3763 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2265. Currently known reputation in the community is that the 3763 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2266. Public motor vehicle use of the 3763 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2267. The 3763 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2268. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3763 Road.

2269. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3763 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3764-B Road

2270. The 3764-B Road is designated as county road number 3764-Band SGID road identification number RD080327 and is more or less 5.98 miles long.

2271. Exhibit 172 (attached hereto and incorporated herein) contains certain information pertaining to the 3764-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2272. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3764-B Road solely as it crosses United States public land as included and specifically described in Exhibit 172. The 3764-B Road includes the segment of road specifically set forth in Exhibit 172 and as exists on the ground.

Acceptance of the 3764-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2273. The 3764-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2274. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3764-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2275. The 3764-B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3764-B Road pursuant to the County's governmental

right and authority.

2276. Witnesses with personal knowledge of the history of the 3764-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2277. Currently known reputation in the community is that the 3764-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2278. Public motor vehicle use of the 3764-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2279. The 3764-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2280. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3764-B Road.

2281. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3764-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3780-B Road

2282. The 3780-B Road is designated as county road number 3780-B and SGID road

identification number RD080346 and is more or less 1.24 miles long.

2283. Exhibit 173 (attached hereto and incorporated herein) contains certain information pertaining to the 3780-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2284. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3780-B Road solely as it crosses United States public land as included and specifically described in Exhibit 173. The 3780-B Road includes the segment of road specifically set forth in Exhibit 173 and as exists on the ground.

Acceptance of the 3780-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2285. The 3780-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2286. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3780-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2287. The 3780-B Road was accepted as a County highway at least 10 years prior to October21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3780-B Road pursuant to the County's governmental right and authority.

2288. Witnesses with personal knowledge of the history of the 3780-B Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2289. Currently known reputation in the community is that the 3780-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2290. Public motor vehicle use of the 3780-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2291. The 3780-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2292. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3780-B Road.

2293. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3780-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3782 Link Flat Spurs Road, 3782

2294. The 3782 Link Flat Spurs Road is designated as county road number 3782 and SGID road identification number RD080347 and is more or less 0.59 miles long.

2295. Exhibit 174 (attached hereto and incorporated herein) contains certain information

pertaining to the 3782 Link Flat Spurs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2296. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3782 Link Flat Spurs Road solely as it crosses United States public land as included and specifically described in Exhibit 174. The 3782 Link Flat Spurs Road includes the segment of road specifically set forth in Exhibit 174 and as exists on the ground.

Acceptance of the 3782 Link Flat Spurs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2297. The 3782 Link Flat Spurs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2298. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3782 Link Flat Spurs Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2299. The 3782 Link Flat Spurs was accepted as a County highway at least 10 years prior to October21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3782 Link Flat Spurs Road pursuant to the County's governmental right and authority.

2300. Witnesses with personal knowledge of the history of the 3782 Link Flat Spurs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

2301. Currently known reputation in the community is that the 3782 Link Flat Spurs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2302. Public motor vehicle use of the 3782 Link Flat Spurs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2303. The 3782 Link Flat Spurs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2304. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3782 Link Flat Spurs Road.

2305. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3782 Link Flat Spurs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3786-A Road

2306. The 3786-A Road is designated as county road number 3786-A and SGID road identification number RD080350 and is more or less 1.79 miles long.

2307. Exhibit 175 (attached hereto and incorporated herein) contains certain information

pertaining to the 3786-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2308. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3786-A Road solely as it crosses United States public land as included and specifically described in Exhibit 175. The 3786-A Road includes the segment of road specifically set forth in Exhibit 175 and as exists on the ground.

Acceptance of the 3786-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2309. The 3786-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2310. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3786-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2311. The appearance of the 3786-A Road on the San Rafael Knob (1953) USGS 7.5 minute quadrangle map and the San Rafael Knob(1952) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2312. The County confirmed its acceptance of the 3786-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the 3786-A Road pursuant to the County's governmental right and authority.

2313. Witnesses with personal knowledge of the history of the 3786-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2314. Currently known reputation in the community is that the 3786-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2315. Public motor vehicle use of the 3786-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2316. The 3786-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2317. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3786-A Road.

2318. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3786-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3786-B Road

2319. The 3786-B Road is designated as county road number 3786-B and SGID road identification number RD080351and is more or less 2.87 miles long.

2320. Exhibit 176 (attached hereto and incorporated herein) contains certain information pertaining to the 3786-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2321. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3786-B Road solely as it crosses United States public land as included and specifically described in Exhibit 176. The 3786-B Road includes the segment of road specifically set forth in Exhibit 176 and as exists on the ground.

Acceptance of the 3786-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2322. The 3786-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2323. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3786-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2324. The appearance of the 3786-B Road on the San Rafael Knob (1953) USGS 7.5 minute quadrangle map and the San Rafael Knob (1953) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See*

Exhibit 11 for more detailed map information.

2325. The County confirmed its acceptance of the 3786-B Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3786-B Road pursuant to the County's governmental right and authority.

2326. Witnesses with personal knowledge of the history of the 3786-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2327. Currently known reputation in the community is that the 3786-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2328. Public motor vehicle use of the 3786-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2329. The 3786-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2330. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3786-B Road.

2331. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3786-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3899-A Road

2332. The 3899-A Road is designated as county road number 3899-A and SGID road identification number RD080381 and is more or less 5.81 miles long.

2333. Exhibit 177 (attached hereto and incorporated herein) contains certain information pertaining to the 3899-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2334. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3899-A Road solely as it crosses United States public land as included and specifically described in Exhibit 177. The 3899-A Road includes the segment of road specifically set forth in Exhibit 177 and as exists on the ground.

Acceptance of the 3899-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2335. The 3899-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2336. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3899-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2337. The appearance of the 3899-A Road on the Salvation Creek (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2338. The 3899-A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3899-A Road pursuant to the County's governmental right and authority.

2339. Witnesses with personal knowledge of the history of the 3899-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2340. Currently known reputation in the community is that the 3899-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2341. Public motor vehicle use of the 3899-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2342. The 3899-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2343. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the 3899-A Road.

2344. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3899-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3899-B Road

2345. The 3899-B Road is designated as county road number 3899-B and SGID road identification number RD080382 and is more or less 0.86 miles long.

2346. Exhibit 178 (attached hereto and incorporated herein) contains certain information pertaining to the 3899-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2347. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3899-B Road solely as it crosses United States public land as included and specifically described in Exhibit 178. The 3899-B Road includes the segment of road specifically set forth in Exhibit 178 and as exists on the ground.

Acceptance of the 3899-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2348. The 3899-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2349. The appearance of the 3899-B Road on the Salvation Creek (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2350. The 3899-B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3899-B Road pursuant to the County's governmental right and authority.

2351. Witnesses with personal knowledge of the history of the 3899-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2352. Currently known reputation in the community is that the 3899-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2353. Public motor vehicle use of the 3899-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2354. The 3899-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2355. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3899-B Road.

2356. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3899-B Road on lands owned by the United States as described herein and

including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3905-B Road

2357. The 3905-B Road is designated as county road number 3905-B and SGID road identification number RD080387 and is more or less 0.88 miles long.

2358. Exhibit 179 (attached hereto and incorporated herein) contains certain information pertaining to the 3905-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2359. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3905-B Road solely as it crosses United States public land as included and specifically described in Exhibit 179. The 3905-B Road includes the segment of road specifically set forth in Exhibit 179 and as exists on the ground.

Acceptance of the 3905-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2360. The 3905-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2361. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3905-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2362. The 3905-B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the 3905-B Road pursuant to the County's governmental right and authority.

2363. Witnesses with personal knowledge of the history of the 3905-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2364. Currently known reputation in the community is that the 3905-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2365. Public motor vehicle use of the 3905-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2366. The 3905-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2367. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3905-B Road.

2368. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3905-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3906-B Road

2369. The 3906-B Road is designated as county road number 3906-B and SGID road identification number RD080389 and is more or less 0.52 miles long.

2370. Exhibit 180 (attached hereto and incorporated herein) contains certain information pertaining to the 3906-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2371. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3906-B Road solely as it crosses United States public land as included and specifically described in Exhibit 180. The 3906-B Road includes the segment of road specifically set forth in Exhibit 180 and as exists on the ground.

Acceptance of the 3906-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2372. The 3906-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2373. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3906-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2374. The 3906-B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3906-B Road pursuant to the County's governmental

right and authority.

2375. Witnesses with personal knowledge of the history of the 3906-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2376. Currently known reputation in the community is that the 3906-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2377. Public motor vehicle use of the 3906-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2378. The 3906-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2379. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3906-B Road.

2380. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3906-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

922-A Road

2381. The 922-A Road is designated as county road number 922-A and SGID road

identification number RD080561 and is more or less 0.98 miles long.

2382. Exhibit 181 (attached hereto and incorporated herein) contains certain information pertaining to the 922-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2383. In this action, the State and County seek to quiet title to the public highway right-of-way for the 922-A Road solely as it crosses United States public land as included and specifically described in Exhibit 181. The 922-A Road includes the segment of road specifically set forth in Exhibit 181 and as exists on the ground.

Acceptance of the 922-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2384. The 922-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2385. The appearance of the 922-A Road on the Willow Springs (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2386. The County confirmed its acceptance of the 922-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 922-A Road pursuant to the County's governmental right and authority.

2387. Witnesses with personal knowledge of the history of the 922-A Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2388. Currently known reputation in the community is that the 922-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2389. Public motor vehicle use of the 922-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2390. The 922-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2391. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 922-A Road.

2392. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 922-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

922-B Road

2393. The 922-B Road is designated as county road number 922-B and SGID road identification number RD080562 and is more or less 0.20 miles long.

2394. Exhibit 182 (attached hereto and incorporated herein) contains certain information

pertaining to the 922-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2395. In this action, the State and County seek to quiet title to the public highway right-of-way for the 922-B Road solely as it crosses United States public land as included and specifically described in Exhibit 182. The 922-B Road includes the segment of road specifically set forth in Exhibit 182 and as exists on the ground.

Acceptance of the 922-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2396. The 922-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2397. The appearance of the 922-B Road on the Willow Springs (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2398. The County confirmed its acceptance of the 922-B Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 922-B Road pursuant to the County's governmental right and authority.

2399. Witnesses with personal knowledge of the history of the 922-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2400. Currently known reputation in the community is that the 922-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2401. Public motor vehicle use of the 922-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2402. The 922-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2403. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 922-B Road.

2404. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 922-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

922-C Road

2405. The 922-C Road is designated as county road number 922-C and SGID road identification number RD080563 and is more or less 1.64 miles long.

2406. Exhibit 183 (attached hereto and incorporated herein) contains certain information pertaining to the 922-C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

2407. In this action, the State and County seek to quiet title to the public highway right-of-way for the 922-C Road solely as it crosses United States public land as included and specifically described in Exhibit 183. The 922-C Road includes the segment of road specifically set forth in Exhibit 183 and as exists on the ground.

Acceptance of the 922-C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2408. The 922-C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2409. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 922-C Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2410. The appearance of the 922-C Road on the Willow Springs (1968) and Mussentuchit Flat (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2411. The County confirmed its acceptance of the 922-C Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 922-C Road pursuant to the County's governmental right and authority.

2412. Witnesses with personal knowledge of the history of the 922-C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2413. Currently known reputation in the community is that the 922-C Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2414. Public motor vehicle use of the 922-C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2415. The 922-C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2416. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 922-C Road.

2417. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 922-C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

9999a Road

2418. The 9999a Road is designated as county road number 9999a and SGID road identification number RD080610 and is more or less 1.08 miles long.

2419. Exhibit 184 (attached hereto and incorporated herein) contains certain information pertaining to the 9999a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2420. In this action, the State and County seek to quiet title to the public highway right-of-way for the 9999a Road solely as it crosses United States public land as included and specifically described in Exhibit 184. The 9999a Road includes the segment of road specifically set forth in Exhibit 184 and as exists on the ground.

Acceptance of the 9999a Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2421. The 9999a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2422. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 9999a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2423. The 9999a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 9999a Road pursuant to the County's governmental right and authority.

2424. Witnesses with personal knowledge of the history of the 9999a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2425. Currently known reputation in the community is that the 9999a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2426. Public motor vehicle use of the 9999a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2427. The 9999a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2428. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 9999a Road.

2429. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 9999a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Copper Globe Landing Strip Road, 3778

2430. The Copper Globe Landing Strip Road is designated as county road number 3778 and SGID road identification number RD080599 and is more or less 3.48 miles long.

2431. Exhibit 185 (attached hereto and incorporated herein) contains certain information pertaining to the Copper Globe Landing Strip Road including: a map depicting the road;

township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2432. In this action, the State and County seek to quiet title to the public highway right-of-way for the Copper Globe Landing Strip Road solely as it crosses United States public land as included and specifically described in Exhibit 185. The Copper Globe Landing Strip Road includes the segment of road specifically set forth in Exhibit 185 and as exists on the ground.

Acceptance of the Copper Globe Landing Strip Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2433. The Copper Globe Landing Strip Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2434. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Copper Globe Landing Strip Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2435. The Copper Globe Landing Strip Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Copper Globe Landing Strip Road pursuant to the County's governmental right and authority.

2436. Witnesses with personal knowledge of the history of the Copper Globe Landing Strip Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to

October 21, 1976.

2437. Currently known reputation in the community is that the Copper Globe Landing Strip Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2438. Public motor vehicle use of the Copper Globe Landing Strip Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2439. The Copper Globe Landing Strip Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2440. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Copper Globe Landing Strip Road.

2441. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Copper Globe Landing Strip Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Corral Canyon Spring Road, 3999

2442. The Corral Canyon Spring Road is designated as county road number 3999 and SGID road identification number RD080436 and is more or less 2.84 miles long.

2443. Exhibit 186 (attached hereto and incorporated herein) contains certain information pertaining to the Corral Canyon Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2444. In this action, the State and County seek to quiet title to the public highway right-of-way for the Corral Canyon Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 186. The Corral Canyon Spring Road includes the segment of road specifically set forth in Exhibit 186 and as exists on the ground.

Acceptance of the Corral Canyon Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2445. The Corral Canyon Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2446. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Corral Canyon Spring Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2447. The Corral Canyon Spring Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Corral Canyon Spring Road pursuant to the County's governmental right and authority.

2448. Witnesses with personal knowledge of the history of the Corral Canyon Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2449. Currently known reputation in the community is that the Corral Canyon Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2450. Public motor vehicle use of the Corral Canyon Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2451. The Corral Canyon Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2452. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Corral Canyon Spring Road.

2453. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Corral Canyon Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Eagle Canyon Road, 3788

2454. The Eagle Canyon Road is designated as county road number 3788 and SGID road identification number RD080353 and is more or less 1.45 miles long.

2455. Exhibit 187 (attached hereto and incorporated herein) contains certain information pertaining to the Eagle Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2456. In this action, the State and County seek to quiet title to the public highway right-of-way for the Eagle Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 187. The Eagle Canyon Road includes the segment of road specifically set forth in Exhibit 187 and as exists on the ground.

Acceptance of the Eagle Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2457. The Eagle Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2458. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Eagle Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2459. The appearance of the Eagle Canyon Road on the San Rafael Knob (1953) USGS 7.5 minute quadrangle map and the San Rafael Knob (1952) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2460. The Eagle Canyon Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the Eagle Canyon Road pursuant to the County's governmental right and authority.

2461. Witnesses with personal knowledge of the history of the Eagle Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2462. Currently known reputation in the community is that the Eagle Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2463. Public motor vehicle use of the Eagle Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2464. The Eagle Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2465. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Eagle Canyon Road.

2466. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Eagle Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this

road.

Earls Draw Road, 9999

2467. The Earls Draw Road is designated as county road number 9999 and SGID road identification number RD080576 and is more or less 2.81 miles long.

2468. Exhibit 188 (attached hereto and incorporated herein) contains certain information pertaining to the Earls Draw Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2469. In this action, the State and County seek to quiet title to the public highway right-of-way for the Earls Draw Road solely as it crosses United States public land as included and specifically described in Exhibit 188. The Earls Draw Road includes the segment of road specifically set forth in Exhibit 188 and as exists on the ground.

Acceptance of the Earls Draw Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2470. The Earls Draw Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2471. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Earls Draw Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2472. The appearance of the Earls Draw Road on the San Rafael Knob (1953) and Twin Knolls (1953) USGS 7.5 minute quadrangle maps, and the San Rafael Knob (1952) and The

Wickiup (1954) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2473. The County confirmed its acceptance of the Earls Draw Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Earls Draw Road pursuant to the County's governmental right and authority.

2474. Witnesses with personal knowledge of the history of the Earls Draw Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2475. Currently known reputation in the community is that the Earls Draw Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2476. Public motor vehicle use of the Earls Draw Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2477. The Earls Draw Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2478. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Earls Draw Road.

2479. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Earls Draw Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Earls Draw Spur Road, 3828

2480. The Earls Draw Spur Road is designated as county road number 3828 and SGID road identification number RD080362 and is more or less 1.11 miles long.

2481. Exhibit 189 (attached hereto and incorporated herein) contains certain information pertaining to the Earls Draw Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2482. In this action, the State and County seek to quiet title to the public highway right-of-way for the Earls Draw Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 189. The Earls Draw Spur Road includes the segment of road specifically set forth in Exhibit 189 and as exists on the ground.

Acceptance of the Earls Draw Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2483. The Earls Draw Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2484. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Earls Draw Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2485. The Earls Draw Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Earls Draw Spur Road pursuant to the County's governmental right and authority.

2486. Witnesses with personal knowledge of the history of the Earls Draw Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2487. Currently known reputation in the community is that the Earls Draw Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2488. Public motor vehicle use of the Earls Draw Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2489. The Earls Draw Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2490. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Earls Draw Spur Road.

2491. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Earls Draw Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Justensen Flats East Road, 3774

2492. The Justensen Flats East Road is designated as county road number 3774 and SGID road identification number RD080333 and is more or less 1.52 miles long.

2493. Exhibit 190 (attached hereto and incorporated herein) contains certain information pertaining to the Justensen Flats East Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2494. In this action, the State and County seek to quiet title to the public highway right-of-way for the Justensen Flats East Road solely as it crosses United States public land as included and specifically described in Exhibit 190. The Justensen Flats East Road includes the segment of road specifically set forth in Exhibit 190 and as exists on the ground.

Acceptance of the Justensen Flats East Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2495. The Justensen Flats East Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2496. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Justensen Flats East Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2497. The Justensen Flats East Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Justensen Flats East Road pursuant to the County's governmental right and authority.

2498. Witnesses with personal knowledge of the history of the Justensen Flats East Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2499. Currently known reputation in the community is that the Justensen Flats East Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2500. Public motor vehicle use of the Justensen Flats East Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2501. The Justensen Flats East Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2502. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Justensen Flats East Road.

2503. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Justensen Flats East Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Link Flat Spurs Road, 3780

2504. The Link Flat Spurs Road is designated as county road number 3780 and SGID road identification number RD080344 and is more or less 1.19 miles long.

2505. Exhibit 191 (attached hereto and incorporated herein) contains certain information pertaining to the Link Flat Spurs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2506. In this action, the State and County seek to quiet title to the public highway right-of-way for the Link Flat Spurs Road solely as it crosses United States public land as included and specifically described in Exhibit 191. The Link Flat Spurs Road includes the segment of road specifically set forth in Exhibit 191 and as exists on the ground.

Acceptance of the Link Flat Spurs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2507. The Link Flat Spurs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2508. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Link Flat Spurs Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2509. The Link Flat Spurs Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Link Flat Spurs Road pursuant to the County's governmental right and authority.

2510. Witnesses with personal knowledge of the history of the Link Flat Spurs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2511. Currently known reputation in the community is that the Link Flat Spurs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2512. Public motor vehicle use of the Link Flat Spurs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2513. The Link Flat Spurs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2514. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Link Flat Spurs Road.

2515. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Link Flat Spurs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Moroni Slopes/Chimney Canyon Road, 4000

2516. The Moroni Slopes/Chimney Canyon Road is designated as county road number 4000 and SGID road identification number RD080437 and is more or less 5.43 miles long.

2517. Exhibit 192 (attached hereto and incorporated herein) contains certain information pertaining to the Moroni Slopes/Chimney Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2518. In this action, the State and County seek to quiet title to the public highway right-of-way for the Moroni Slopes/Chimney Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 192. The Moroni Slopes/Chimney Canyon Road includes the segment of road specifically set forth in Exhibit 192 and as exists on the ground.

Acceptance of the Moroni Slopes/Chimney Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2519. The Moroni Slopes/Chimney Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2520. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Moroni Slopes/Chimney Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2521. The Moroni Slopes/Chimney Canyon Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Moroni Slopes/Chimney Canyon Road pursuant to the County's governmental right and authority.

2522. Witnesses with personal knowledge of the history of the Moroni Slopes/Chimney Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2523. Currently known reputation in the community is that the Moroni Slopes/Chimney Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2524. Public motor vehicle use of the Moroni Slopes/Chimney Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or

necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2525. The Moroni Slopes/Chimney Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2526. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Moroni Slopes/Chimney Canyon Road.

2527. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Moroni Slopes/Chimney Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Oil Well Bench Spur Road, 3992

2528. The Oil Well Bench Spur Road is designated as county road number 3992 and SGID road identification number RD080433 and is more or less 1.84 miles long.

2529. Exhibit 193 (attached hereto and incorporated herein) contains certain information pertaining to the Oil Well Bench Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2530. In this action, the State and County seek to quiet title to the public highway right-of-way for the Oil Well Bench Spur Road solely as it crosses United States public land as

included and specifically described in Exhibit 193. The Oil Well Bench Spur Road includes the segment of road specifically set forth in Exhibit 193 and as exists on the ground.

Acceptance of the Oil Well Bench Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2531. The Oil Well Bench Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2532. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Oil Well Bench Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2533. The appearance of the Oil Well Bench Spur Road on the Salvation Creek (1968) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2534. The County confirmed its acceptance of the Oil Well Bench Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Oil Well Bench Spur Road pursuant to the County's governmental right and authority.

2535. Witnesses with personal knowledge of the history of the Oil Well Bench Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2536. Currently known reputation in the community is that the Oil Well Bench Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2537. Public motor vehicle use of the Oil Well Bench Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2538. The Oil Well Bench Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2539. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Oil Well Bench Spur Road.

2540. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Oil Well Bench Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Road Hollow Road, 3787

2541. The Road Hollow Road is designated as county road number 3787 and SGID road identification number RD080352and is more or less 4.99 miles long.

2542. Exhibit 194 (attached hereto and incorporated herein) contains certain information pertaining to the Road Hollow Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2543. In this action, the State and County seek to quiet title to the public highway right-of-way for the Road Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 194. The Road Hollow Road includes the segment of road specifically set forth in Exhibit 194 and as exists on the ground.

Acceptance of the Road Hollow Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2544. The Road Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2545. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Road Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2546. The appearance of the Road Hollow Road on the Twin Knolls (1953) USGS 7.5 minute quadrangle map and The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2547. The County confirmed its acceptance of the Road Hollow Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Road Hollow Road pursuant to the County's governmental right

and authority.

2548. Witnesses with personal knowledge of the history of the Road Hollow Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2549. Currently known reputation in the community is that the Road Hollow Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2550. Public motor vehicle use of the Road Hollow Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2551. The Road Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2552. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Road Hollow Road.

2553. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Road Hollow Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Rods Valley Road, 3786

2554. The Rods Valley Road is designated as county road number 3786 and SGID road identification number RD080349 and is more or less 3.61 miles long.

2555. Exhibit 195 (attached hereto and incorporated herein) contains certain information pertaining to the Rods Valley Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2556. In this action, the State and County seek to quiet title to the public highway right-of-way for the Rods Valley Road solely as it crosses United States public land as included and specifically described in Exhibit 195. The Rods Valley Road includes the segment of road specifically set forth in Exhibit 195 and as exists on the ground.

Acceptance of the Rods Valley Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2557. The Rods Valley Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2558. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Rods Valley Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2559. The appearance of the Rods Valley Road on the San Rafael Knob (1953) USGS 7.5 minute quadrangle map and the San Rafael Knob (1952) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See*

Exhibit 11 for more detailed map information.

2560. The County confirmed its acceptance of the Rods Valley Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Rods Valley Road pursuant to the County's governmental right and authority.

2561. Witnesses with personal knowledge of the history of the Rods Valley Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2562. Currently known reputation in the community is that the Rods Valley Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2563. Public motor vehicle use of the Rods Valley Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2564. The Rods Valley Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2565. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Rods Valley Road.

2566. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rods Valley Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Saddle Horse Cutoff Road, 3625

2567. The Saddle Horse Cutoff Road is designated as county road number 3625 and SGID road identification number RD080272 and is more or less 1.43 miles long.

2568. Exhibit 196 (attached hereto and incorporated herein) contains certain information pertaining to the Saddle Horse Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2569. In this action, the State and County seek to quiet title to the public highway right-of-way for the Saddle Horse Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 196. The Saddle Horse Cutoff Road includes the segment of road specifically set forth in Exhibit 196 and as exists on the ground.

Acceptance of the Saddle Horse Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2570. The Saddle Horse Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2571. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Saddle Horse Cutoff Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2572. The appearance of the Saddle Horse Cutoff Road on the Twin Knolls (1953) USGS 7.5 minute quadrangle map and The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2573. The County confirmed its acceptance of the Saddle Horse Cutoff Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Saddle Horse Cutoff Road pursuant to the County's governmental right and authority.

2574. Witnesses with personal knowledge of the history of the Saddle Horse Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2575. Currently known reputation in the community is that the Saddle Horse Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2576. Public motor vehicle use of the Saddle Horse Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of

an R.S. 2477 public highway right-of-way underlying this road.

2577. The Saddle Horse Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2578. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Saddle Horse Cutoff Road.

2579. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Saddle Horse Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Saddle Horse Cutoff Extension Road, 3625-A

2580. The Saddle Horse Cutoff Extension Road is designated as county road number 3625-A and SGID road identification number RD080273 and is more or less 0.89 miles long.

2581. Exhibit 197 (attached hereto and incorporated herein) contains certain information pertaining to the Saddle Horse Cutoff Extension Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2582. In this action, the State and County seek to quiet title to the public highway right-of-way for the Saddle Horse Cutoff Extension Road solely as it crosses United States public land as included and specifically described in Exhibit 197. The Saddle Horse Cutoff Extension Road includes the segment of road specifically set forth in Exhibit 197 and as exists on the ground.

Acceptance of the Saddle Horse Cutoff Extension Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2583. The Saddle Horse Cutoff Extension Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2584. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Saddle Horse Cutoff Extension Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2585. The appearance of the Saddle Horse Cutoff Extension Road on the Twin Knolls (1953) USGS 7.5 minute quadrangle map and The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2586. The County confirmed its acceptance of the Saddle Horse Cutoff Extension Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Saddle Horse Cutoff Extension Road pursuant to the County's governmental right and authority.

2587. Witnesses with personal knowledge of the history of the Saddle Horse Cutoff Extension Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2588. Currently known reputation in the community is that the Saddle Horse Cutoff Extension Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2589. Public motor vehicle use of the Saddle Horse Cutoff Extension Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2590. The Saddle Horse Cutoff Extension Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2591. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Saddle Horse Cutoff Extension Road.

2592. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Saddle Horse Cutoff Extension Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Seger's Hole Loop Road, 3899-C

2593. The Seger's Hole Loop Road is designated as county road number 3899-C and SGID road identification number RD080383and is more or less 5.07 miles long.

2594. Exhibit 198 (attached hereto and incorporated herein) contains certain information

pertaining to the Seger's Hole Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2595. In this action, the State and County seek to quiet title to the public highway right-of-way for the Seger's Hole Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 198. The Seger's Hole Loop Road includes the segment of road specifically set forth in Exhibit 198 and as exists on the ground.

Acceptance of the Seger's Hole Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2596. The Seger's Hole Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2597. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Seger's Hole Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2598. The appearance of the Seger's Hole Loop Road on the Salvation Creek (1968) 7.5 minute USGS quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2599. The Seger's Hole Loop Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Seger's Hole Loop Road pursuant to the County's governmental right and authority.

2600. Witnesses with personal knowledge of the history of the Seger's Hole Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2601. Currently known reputation in the community is that the Seger's Hole Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2602. Public motor vehicle use of the Seger's Hole Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2603. The Seger's Hole Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2604. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Seger's Hole Loop Road.

2605. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Seger's Hole Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Cedar Mountain Road, 3899

2606. The South Cedar Mountain Road is designated as county road number 3899 and SGID road identification number RD080380 and is more or less 8.62 miles long.

2607. Exhibit 199 (attached hereto and incorporated herein) contains certain information pertaining to the South Cedar Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2608. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Cedar Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 199. The South Cedar Mountain Road includes the segment of road specifically set forth in Exhibit 199 and as exists on the ground.

Acceptance of the South Cedar Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2609. The South Cedar Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2610. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the South Cedar Mountain Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2611. The appearance of the South Cedar Mountain Road on the Mussentuchit Flat (1969), Ireland Mesa (1953), and The Frying Pan (1951) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See*

Exhibit 11 for more detailed map information.

2612. The County confirmed its acceptance of the South Cedar Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Cedar Mountain Road pursuant to the County's governmental right and authority.

2613. Witnesses with personal knowledge of the history of the South Cedar Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2614. Currently known reputation in the community is that the South Cedar Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2615. Public motor vehicle use of the South Cedar Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2616. The South Cedar Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2617. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the South Cedar Mountain Road.

2618. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Cedar Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Slaughter Slopes Reservoir Road, 3905

2619. The Slaughter Slopes Reservoir Road is designated as county road number 3905 and SGID road identification number RD080385 and is more or less 4.63 miles long.

2620. Exhibit 200 (attached hereto and incorporated herein) contains certain information pertaining to the Slaughter Slopes Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2621. In this action, the State and County seek to quiet title to the public highway right-of-way for the Slaughter Slopes Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 200. The Slaughter Slopes Reservoir Road includes the segment of road specifically set forth in Exhibit 200 and as exists on the ground.

Acceptance of the Slaughter Slopes Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2622. The Slaughter Slopes Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2623. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Slaughter Slopes Reservoir Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2624. The Slaughter Slopes Reservoir Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Slaughter Slopes Reservoir Road pursuant to the County's governmental right and authority.

2625. Witnesses with personal knowledge of the history of the Slaughter Slopes Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2626. Currently known reputation in the community is that the Slaughter Slopes Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2627. Public motor vehicle use of the Slaughter Slopes Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2628. The Slaughter Slopes Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2629. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Slaughter Slopes Reservoir Road.

2630. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Slaughter Slopes Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Last Chance Well Cutoff Road, 3997

2631. The Last Chance Well Cutoff Road is designated as county road number 3997and SGID road identification number RD080435 and is more or less 2.51 miles long.

2632. Exhibit 201 (attached hereto and incorporated herein) contains certain information pertaining to the Last Chance Well Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2633. In this action, the State and County seek to quiet title to the public highway right-of-way for the Last Chance Well Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 201. The Last Chance Well Cutoff Road includes the segment of road specifically set forth in Exhibit 201 and as exists on the ground.

Acceptance of the Last Chance Well Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2634. The Last Chance Well Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2635. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Last Chance Well Cutoff Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2636. The Last Chance Well Cutoff Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Last Chance Well Cutoff Road pursuant to the County's governmental right and authority.

2637. Witnesses with personal knowledge of the history of the Last Chance Well Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2638. Currently known reputation in the community is that the Last Chance Well Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2639. Public motor vehicle use of the Last Chance Well Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2640. The Last Chance Well Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2641. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Last Chance Well Cutoff Road.

2642. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Last Chance Well Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SIXTH CAUSE OF ACTION – QUIET TITLE
SAN RAFAEL RIVER AREA

2643. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2644. The San Rafael River Area is located in central Emery County in the central region of Utah.

2645. The San Rafael River Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Box Flat Road, 410 (2) Buckmaster Road, 1032; (3) Four Corners Mine Road, 1029; (4) Johanson Cabin Road, 327; (5) Lawrence/Tan Seeps Road, 332; (6) Lawrence/Tan Seeps/Wedge Road, 406; (7) Lower Wedge & Spurs Road, 407; (8) San Rafael River Road, 320; (9) Smith Camp Road, 1030; (10) Trail Spring Road, 1031; (11) Wedge Road, 405; (12) 3519 Road; (13) 3534 Road; (14) 3550-A Road; (15) 3652-A Road; (16) 3652-B Road; (17) Black Dragon/Hatt Ranch Road, 3669A; (18) Box Flat Road, 3535; (19) Calf Mesa Road, 3527; (20) Cane Wash Road, 627B; (21) Drowned Hole Road, 3653; (22) f02 Road; (23) Jerry's Flat Loop Road, 3647-A; (24) Limestone Bench Cutoff Road, 3624-C; (25) Limestone Bench Spur Road, 3528-A; (26) Lockhart Box Road, 3536; (27) Oil Well Draw Overlook Road, 3637; (28) Prickly Pear Road, 3451; (29) Smith CBN

to GR Cut off Road, 3459; (30) Trail Spring Road, 3553; (31) Upper Oil Well Draw Road, 3639; (32) Wedge Over Look Road, 3520; and (33) West Wedge Road, 3417.

2646. Each right-of-way claimed in the San Rafael River Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

2647. All rights-of-way claimed in the San Rafael River Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

2648. All rights-of-way claimed in the San Rafael River Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

2649. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Box Flat Road, 410

2650. The Box Flat Road is designated as county road number 410 and SGID road identification number RD080464 and is more or less 5.81 miles long.

2651. Exhibit 202 (attached hereto and incorporated herein) contains certain information pertaining to the Box Flat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2652. In this action, the State and County seek to quiet title to the public highway right-of-way for the Box Flat Road solely as it crosses United States public land as included and specifically described in Exhibit 202. The Box Flat Road includes the segment of road specifically set forth in Exhibit 202 and as exists on the ground.

Acceptance of the Box Flat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2653. The Box Flat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2654. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Box Flat Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2655. The appearance of the Box Flat Road on the Chimney Rock (1969) and Devils Hole (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2656. The County confirmed its acceptance of the Box Flat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Box Flat Road using public funds pursuant to the County's governmental right and authority.

2657. Witnesses with personal knowledge of the history of the Box Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2658. Currently known reputation in the community is that the Box Flat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2659. Public motor vehicle use of the Box Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2660. The Box Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2661. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Box Flat Road.

2662. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Box Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Buckmaster Road, 1032

2663. The Buckmaster Road is designated as county road number 1032 and SGID road identification number RD080037 and is more or less 5.40 miles long.

2664. Exhibit 203 (attached hereto and incorporated herein) contains certain information pertaining to the Buckmaster Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2665. In this action, the State and County seek to quiet title to the public highway right-of-way for the Buckmaster Road solely as it crosses United States public land as included and specifically described in Exhibit 203. The Buckmaster Road includes the segment of road specifically set forth in Exhibit 203 and as exists on the ground.

Acceptance of the Buckmaster Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2666. The Buckmaster Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2667. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Buckmaster Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2668. The appearance of the Buckmaster Road on the Desert (1969) and Jessies Twist

(1954) USGS 7.5 minute quadrangle maps, and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2669. The County confirmed its acceptance of the Buckmaster Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Buckmaster Road using public funds pursuant to the County's governmental right and authority.

2670. Witnesses with personal knowledge of the history of the Buckmaster Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2671. Currently known reputation in the community is that the Buckmaster Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2672. Public motor vehicle use of the Buckmaster Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2673. The Buckmaster Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2674. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Buckmaster Road.

2675. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Buckmaster Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Four Corners Mine Road, 1029

2676. The Four Corners Mine Road is designated as county road number 1029 and SGID road identification number RD080033 and is more or less 11.63 miles long.

2677. Exhibit 204 (attached hereto and incorporated herein) contains certain information pertaining to the Four Corners Mine Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2678. In this action, the State and County seek to quiet title to the public highway right-of-way for the Four Corners Mine Road solely as it crosses United States public land as included and specifically described in Exhibit 204. The Four Corners Mine Road includes the segment of road specifically set forth in Exhibit 204 and as exists on the ground.

Acceptance of the Four Corners Mine Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2679. The Four Corners Mine Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2680. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Four Corners Mine Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2681. The appearance of the Four Corners Mine Road on the Green River (1954) and Jessies Twist (1954) USGS 7.5 minute quadrangle maps, and the Tidewell Bottoms (1954) and Green River (1954) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2682. The County confirmed its acceptance of the Four Corners Mine Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Four Corners Mine Road using public funds pursuant to the County's governmental right and authority.

2683. Witnesses with personal knowledge of the history of the Four Corners Mine Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2684. Currently known reputation in the community is that the Four Corners Mine Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2685. Public motor vehicle use of the Four Corners Mine Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2686. The Four Corners Mine Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2687. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Four Corners Mine Road.

2688. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Four Corners Mine Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Johanson Cabin Road, 327

2689. The Johanson Cabin Road is designated as county road number 327 and SGID road identification number RD080150 and is more or less 0.79 miles long.

2690. Exhibit 205 (attached hereto and incorporated herein) contains certain information pertaining to the Johanson Cabin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2691. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Johanson Cabin Road solely as it crosses United States public land as included and specifically described in Exhibit 205. The Johanson Cabin Road includes the segment of road specifically set forth in Exhibit 205 and as exists on the ground.

Acceptance of the Johanson Cabin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2692. The Johanson Cabin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2693. The County confirmed its acceptance of the Johanson Cabin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Johanson Cabin Road using public funds pursuant to the County's governmental right and authority.

2694. Witnesses with personal knowledge of the history of the Johanson Cabin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2695. Currently known reputation in the community is that the Johanson Cabin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2696. Public motor vehicle use of the Johanson Cabin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

2697. The Johanson Cabin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2698. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Johanson Cabin Road.

2699. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Johanson Cabin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lawrence/Tan Seeps Road, 332

2700. The Lawrence/Tan Seeps Road is designated as county road number 332 and SGID road identification number RD080163 and is more or less 54.83 miles long.

2701. Exhibit 206 (attached hereto and incorporated herein) contains certain information pertaining to the Lawrence/Tan Seeps Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2702. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lawrence/Tan Seeps Road solely as it crosses United States public land as included and specifically described in Exhibit 206. The Lawrence/Tan Seeps Road includes the segment of road specifically set forth in Exhibit 206 and as exists on the ground.

Acceptance of the Lawrence/Tan Seeps Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2703. The Lawrence/Tan Seeps Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2704. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lawrence/Tan Seeps Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2705. The appearance of the Lawrence/Tan Seeps Road on the Huntington (1969), Cleveland (1969), Buckhorn Reservoir (1969), Bob Hill Knoll (1969), Bottleneck Peak (1953), The Wickiup (1953), Drowned Hole Draw (1953), Twin Knolls (1953), and San Rafael Knob (1953) USGS 7.5 minute quadrangle maps, and the The Wickiup (1954) and San Rafael Knob (1952) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2706. The County confirmed its acceptance of the Lawrence/Tan Seeps Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lawrence/Tan Seeps Road using public funds pursuant to the County's governmental right and authority.

2707. Witnesses with personal knowledge of the history of the Lawrence/Tan Seeps Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

2708. Currently known reputation in the community is that the Lawrence/Tan Seeps Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2709. Public motor vehicle use of the Lawrence/Tan Seeps Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2710. The Lawrence/Tan Seeps Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2711. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lawrence/Tan Seeps Road.

2712. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lawrence/Tan Seeps Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lawrence/Tan Seeps/Wedge Road, 406

2713. The Lawrence/Tan Seeps/Wedge Road is designated as county road number 406 and SGID road identification number RD080451 and is more or less 1.47 miles long.

2714. Exhibit 207 (attached hereto and incorporated herein) contains certain information

pertaining to the Lawrence/Tan Seeps/Wedge Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2715. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lawrence/Tan Seeps/Wedge Road solely as it crosses United States public land as included and specifically described in Exhibit 207. The Lawrence/Tan Seeps/Wedge Road includes the segment of road specifically set forth in Exhibit 207 and as exists on the ground.

Acceptance of the Lawrence/Tan Seeps/Wedge Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2716. The Lawrence/Tan Seeps/Wedge Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2717. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lawrence/Tan Seeps/Wedge Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2718. The appearance of the Lawrence/Tan Seeps/Wedge Road on the Buckhorn Reservoir (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2719. The County confirmed its acceptance of the Lawrence/Tan Seeps/Wedge Road by 1975, when it designated and accepted the road as a County highway on the County's general

highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lawrence/Tan Seeps/Wedge Road using public funds pursuant to the County's governmental right and authority.

2720. Witnesses with personal knowledge of the history of the Lawrence/Tan Seeps/Wedge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2721. Currently known reputation in the community is that the Lawrence/Tan Seeps/Wedge Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2722. Public motor vehicle use of the Lawrence/Tan Seeps/Wedge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2723. The Lawrence/Tan Seeps/Wedge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2724. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lawrence/Tan Seeps/Wedge Road.

2725. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Lawrence/Tan Seeps/Wedge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower Wedge & Spurs Road, 407

2726. The Lower Wedge & Spurs Road is designated as county road number 407 and SGID road identification number RD080456 and is more or less 4.26 miles long.

2727. Exhibit 208 (attached hereto and incorporated herein) contains certain information pertaining to the Lower Wedge & Spurs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2728. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower Wedge & Spurs Road solely as it crosses United States public land as included and specifically described in Exhibit 208. The Lower Wedge & Spurs Road includes the segment of road specifically set forth in Exhibit 208 and as exists on the ground.

Acceptance of the Lower Wedge & Spurs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2729. The Lower Wedge & Spurs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2730. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lower Wedge & Spurs Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2731. The appearance of the Lower Wedge & Spurs Road on the Sids Mountain (1953), Buckhorn Reservoir (1969), Bob Hill Knoll (1969), and Bottleneck Peak (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2732. The County confirmed its acceptance of the Lower Wedge & Spurs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower Wedge & Spurs Road using public funds pursuant to the County's governmental right and authority.

2733. Witnesses with personal knowledge of the history of the Lower Wedge & Spurs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2734. Currently known reputation in the community is that the Lower Wedge & Spurs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2735. Public motor vehicle use of the Lower Wedge & Spurs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2736. The Lower Wedge & Spurs Road traverses a valid and perfected R.S. 2477 public

highway right-of-way as described herein.

2737. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower Wedge & Spurs Road.

2738. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lower Wedge & Spurs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

San Rafael River Road, 320

2739. The San Rafael River Road is designated as county road number 320 and SGID road identification number RD080129 and is more or less 17.4 miles long.

2740. Exhibit 209 (attached hereto and incorporated herein) contains certain information pertaining to the San Rafael River Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2741. In this action, the State and County seek to quiet title to the public highway right-of-way for the San Rafael River Road solely as it crosses United States public land as included and specifically described in Exhibit 209. The San Rafael River Road includes the segment of road specifically set forth in Exhibit 209 and as exists on the ground.

Acceptance of the San Rafael River Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2742. The San Rafael River Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2743. Aerial photography from and 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the San Rafael River Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2744. The appearance of the San Rafael River Road on the Bottleneck Peak (1953), Devils Hole (1953), and Mexican Mountain (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2745. The County confirmed its acceptance of the San Rafael River Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the San Rafael River Road using public funds pursuant to the County's governmental right and authority.

2746. Witnesses with personal knowledge of the history of the San Rafael River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2747. Currently known reputation in the community is that the San Rafael River Road

has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2748. Public motor vehicle use of the San Rafael River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2749. The San Rafael River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2750. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the San Rafael River Road.

2751. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the San Rafael River Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Smith Camp Road, 1030

2752. The Smith Camp Road is designated as county road number 1030 and SGID road identification number RD080035 and is more or less 4.70 miles long.

2753. Exhibit 210 (attached hereto and incorporated herein) contains certain information pertaining to the Smith Camp Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

2754. In this action, the State and County seek to quiet title to the public highway right-of-way for the Smith Camp Road solely as it crosses United States public land as included and specifically described in Exhibit 210. The Smith Camp Road includes the segment of road specifically set forth in Exhibit 210 and as exists on the ground.

Acceptance of the Smith Camp Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2755. The Smith Camp Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2756. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Smith Camp Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2757. The appearance of the Smith Camp Road on the Desert (1969) and Mexican Mountain (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2758. The County confirmed its acceptance of the Smith Camp Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Smith Camp Road using public funds pursuant to the County's governmental right and authority.

2759. Witnesses with personal knowledge of the history of the Smith Camp Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2760. Currently known reputation in the community is that the Smith Camp Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2761. Public motor vehicle use of the Smith Camp Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2762. The Smith Camp Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2763. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Smith Camp Road.

2764. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Smith Camp Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Trail Spring Road, 1031

2765. The Trail Spring Road is designated as county road number 1031 and SGID road identification number RD080036 and is more or less 1.6 miles long.

2766. Exhibit 211 (attached hereto and incorporated herein) contains certain information pertaining to the Trail Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2767. In this action, the State and County seek to quiet title to the public highway right-of-way for the Trail Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 211. The Trail Spring Road includes the segment of road specifically set forth in Exhibit 211 and as exists on the ground.

Acceptance of the Trail Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2768. The Trail Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2769. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Trail Spring Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2770. The appearance of the Trail Spring Road on the Desert (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2771. The County confirmed its acceptance of the Trail Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Trail Spring Road using public funds pursuant to the County's governmental right and authority.

2772. Witnesses with personal knowledge of the history of the Trail Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2773. Currently known reputation in the community is that the Trail Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2774. Public motor vehicle use of the Trail Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2775. The Trail Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2776. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Trail Spring Road.

2777. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Trail Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wedge Road, 405

2778. The Wedge Road is designated as county road number 405 and SGID road identification number RD080450 and is more or less 6.64 miles long.

2779. Exhibit 212 (attached hereto and incorporated herein) contains certain information pertaining to the Wedge Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2780. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wedge Road solely as it crosses United States public land as included and specifically described in Exhibit 212. The Wedge Road includes the segment of road specifically set forth in Exhibit 212 and as exists on the ground.

Acceptance of the Wedge Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2781. The Wedge Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2782. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Wedge Road as a public highway located on the land

at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2783. The appearance of the Wedge Road on the Buckhorn Reservoir (1969) and Sids Mountain (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2784. The County confirmed its acceptance of the Wedge Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wedge Road using public funds pursuant to the County's governmental right and authority.

2785. Witnesses with personal knowledge of the history of the Wedge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2786. Currently known reputation in the community is that the Wedge Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2787. Public motor vehicle use of the Wedge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2788. The Wedge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2789. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wedge Road.

2790. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wedge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3519 Road

2791. The 3519 Road is designated as county road number 3519 and SGID road identification number RD080215 and is more or less 1.25 miles long.

2792. Exhibit 213 (attached hereto and incorporated herein) contains certain information pertaining to the 3519 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2793. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3519 Road solely as it crosses United States public land as included and specifically described in Exhibit 213. The 3519 Road includes the segment of road specifically set forth in Exhibit 213 and as exists on the ground.

Acceptance of the 3519 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2794. The 3519 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2795. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3519 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2796. The 3519 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3519 Road pursuant to the County's governmental right and authority.

2797. Witnesses with personal knowledge of the history of the 3519 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2798. Currently known reputation in the community is that the 3519 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2799. Public motor vehicle use of the 3519 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2800. The 3519 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2801. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3519 Road.

2802. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3519 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3534 Road

2803. The 3534 Road is designated as county road number 3534 and SGID road identification number RD080223 and is more or less 1.94 miles long.

2804. Exhibit 214 (attached hereto and incorporated herein) contains certain information pertaining to the 3534 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2805. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3534 Road solely as it crosses United States public land as included and specifically described in Exhibit 214. The 3534 Road includes the segment of road specifically set forth in Exhibit 214 and as exists on the ground.

Acceptance of the 3534 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2806. The 3534 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2807. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3534 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2808. The 3534 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3534 Road pursuant to the County's governmental right and authority.

2809. Witnesses with personal knowledge of the history of the 3534 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2810. Currently known reputation in the community is that the 3534 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2811. Public motor vehicle use of the 3534 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2812. The 3534 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2813. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3534 Road.

2814. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3534 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3550-A Road

2815. The 3550-A Road is designated as county road number 3550-A and SGID road identification number RD080228 and is more or less 0.82 miles long.

2816. Exhibit 215 (attached hereto and incorporated herein) contains certain information pertaining to the 3550-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2817. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3550-A Road solely as it crosses United States public land as included and specifically described in Exhibit 215. The 3550-A Road includes the segment of road specifically set forth in Exhibit 215 and as exists on the ground.

Acceptance of the 3550-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2818. The 3550-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2819. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3550-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2820. The appearance of the 3550-A Road on the Mexican Mountain (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2821. The County confirmed its acceptance of the 3550-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3550-A Road pursuant to the County's governmental right and authority.

2822. Witnesses with personal knowledge of the history of the 3550-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2823. Currently known reputation in the community is that the 3550-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2824. Public motor vehicle use of the 3550-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2825. The 3550-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2826. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3550-A Road.

2827. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3550-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3652-A Road

2828. The 3652-A Road is designated as county road number 3652-A and SGID road identification number RD080300 and is more or less 2.42 miles long.

2829. Exhibit 216 (attached hereto and incorporated herein) contains certain information pertaining to the 3652-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2830. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3652-A Road solely as it crosses United States public land as included and

specifically described in Exhibit 216. The 3652-A Road includes the segment of road specifically set forth in Exhibit 216 and as exists on the ground.

Acceptance of the 3652-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2831. The 3652-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2832. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3652-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2833. The 3652-A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3652-A Road pursuant to the County's governmental right and authority.

2834. Witnesses with personal knowledge of the history of the 3652-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2835. Currently known reputation in the community is that the 3652-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2836. Public motor vehicle use of the 3652-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2837. The 3652-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2838. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3652-A Road.

2839. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3652-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3652-B Road

2840. The 3652-B Road is designated as county road number 3652-B and SGID road identification number RD080301 and is more or less 4.52 miles long.

2841. Exhibit 217 (attached hereto and incorporated herein) contains certain information pertaining to the 3652-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2842. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3652-B Road solely as it crosses United States public land as included and specifically described in Exhibit 217. The 3652-B Road includes the segment of road specifically set forth in Exhibit 217 and as exists on the ground.

Acceptance of the 3652-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2843. The 3652-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2844. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3652-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2845. The 3652-B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3652-B Road pursuant to the County's governmental right and authority.

2846. Witnesses with personal knowledge of the history of the 3652-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2847. Currently known reputation in the community is that the 3652-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2848. Public motor vehicle use of the 3652-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2849. The 3652-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2850. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3652-B Road.

2851. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3652-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Black Dragon/Hatt Ranch Road, 3669A

2852. The Black Dragon/Hatt Ranch Road is designated as county road number 3669A and SGID road identification number RD080293 and is more or less 14.11 miles long.

2853. Exhibit 218 (attached hereto and incorporated herein) contains certain information pertaining to the Black Dragon/Hatt Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2854. In this action, the State and County seek to quiet title to the public highway right-of-way for the Black Dragon/Hatt Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 218. The Black Dragon/Hatt Ranch Road includes the segment of road specifically set forth in Exhibit 218 and as exists on the ground.

Acceptance of the Black Dragon/Hatt Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2855. The Black Dragon/Hatt Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2856. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Black Dragon/Hatt Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2857. The appearance of the Black Dragon/Hatt Ranch Road on the Drowned Hole Draw (1953) USGS 7.5 minute quadrangle map and TheWickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2858. The Black Dragon/Hatt Ranch Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Black Dragon/Hatt Ranch Road pursuant to the County's governmental right and authority.

2859. Witnesses with personal knowledge of the history of the Black Dragon/Hatt Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2860. Currently known reputation in the community is that the Black Dragon/Hatt Ranch Road has been open for all to come and go as they please, whenever convenient or

necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2861. Public motor vehicle use of the Black Dragon/Hatt Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2862. The Black Dragon/Hatt Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2863. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Black Dragon/Hatt Ranch Road.

2864. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Black Dragon/Hatt Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Box Flat Road, 3535

2865. The Box Flat Road is designated as county road number 3535 and SGID road identification number RD080224 and is more or less 1.78 miles long.

2866. Exhibit 219 (attached hereto and incorporated herein) contains certain information pertaining to the Box Flat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2867. In this action, the State and County seek to quiet title to the public highway right-of-way for the Box Flat Road solely as it crosses United States public land as included and specifically described in Exhibit 219. The Box Flat Road includes the segment of road specifically set forth in Exhibit 219 and as exists on the ground.

Acceptance of the Box Flat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2868. The Box Flat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2869. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Box Flat Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2870. The appearance of the Box Flat Road on the Devils Hole (1953) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2871. The County confirmed its acceptance of the Box Flat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Box Flat Road pursuant to the County's governmental right and authority.

2872. Witnesses with personal knowledge of the history of the Box Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2873. Currently known reputation in the community is that the Box Flat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2874. Public motor vehicle use of the Box Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2875. The Box Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2876. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Box Flat Road.

2877. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Box Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Calf Mesa Road, 3527

2878. The Calf Mesa Road is designated as county road number 3527 and SGID road identification number RD080579 and is more or less 4.87 miles long.

2879. Exhibit 220 (attached hereto and incorporated herein) contains certain information pertaining to the Calf Mesa Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2880. In this action, the State and County seek to quiet title to the public highway right-of-way for the Calf Mesa Road solely as it crosses United States public land as included and specifically described in Exhibit 220. The Calf Mesa Road includes the segment of road specifically set forth in Exhibit 220 and as exists on the ground.

Acceptance of the Calf Mesa Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2881. The Calf Mesa Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2882. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Calf Mesa Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2883. The Calf Mesa Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Calf Mesa Road pursuant to the County's governmental right and authority.

2884. Witnesses with personal knowledge of the history of the Calf Mesa Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2885. Currently known reputation in the community is that the Calf Mesa Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2886. Public motor vehicle use of the Calf Mesa Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2887. The Calf Mesa Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2888. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Calf Mesa Road.

2889. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Calf Mesa Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cane Wash Road, 627B

2890. The Cane Wash Road is designated as county road number 627B and SGID road identification number RD080508 and is more or less 16.35 miles long.

2891. Exhibit 221 (attached hereto and incorporated herein) contains certain information pertaining to the Cane Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

2892. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cane Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 221. The Cane Wash Road includes the segment of road specifically set forth in Exhibit 221 and as exists on the ground.

Acceptance of the Cane Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2893. The Cane Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2894. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cane Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2895. The appearance of the Cane Wash Road on the Bottleneck Mountain (1953) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2896. The County confirmed its acceptance of the Cane Wash Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cane Wash Road pursuant to the County's governmental right and authority.

2897. Witnesses with personal knowledge of the history of the Cane Wash Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2898. Currently known reputation in the community is that the Cane Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2899. Public motor vehicle use of the Cane Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2900. The Cane Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2901. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cane Wash Road.

2902. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cane Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Drowned Hole Road, 3653

2903. The Drowned Hole Road is designated as county road number 3653 and SGID

road identification number RD080302 and is more or less 1.75 miles long.

2904. Exhibit 222 (attached hereto and incorporated herein) contains certain information pertaining to the Drowned Hole Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2905. In this action, the State and County seek to quiet title to the public highway right-of-way for the Drowned Hole Road solely as it crosses United States public land as included and specifically described in Exhibit 222. The Drowned Hole Road includes the segment of road specifically set forth in Exhibit 222 and as exists on the ground.

Acceptance of the Drowned Hole Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2906. The Drowned Hole Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2907. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Drowned Hole Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2908. The Drowned Hole Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Drowned Hole Road pursuant to the County's governmental right and authority.

2909. Witnesses with personal knowledge of the history of the Drowned Hole Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2910. Currently known reputation in the community is that the Drowned Hole Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2911. Public motor vehicle use of the Drowned Hole Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2912. The Drowned Hole Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2913. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Drowned Hole Road.

2914. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Drowned Hole Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

F02 Road

2915. The F02 Road is designated as county road number f02and SGID road

identification number RD080580 and is more or less 2.57 miles long.

2916. Exhibit 223 (attached hereto and incorporated herein) contains certain information pertaining to the F02 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2917. In this action, the State and County seek to quiet title to the public highway right-of-way for the F02 Road solely as it crosses United States public land as included and specifically described in Exhibit 223. The F02 Road includes the segment of road specifically set forth in Exhibit 223 and as exists on the ground.

Acceptance of the F02 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2918. The F02 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2919. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the F02 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2920. The appearance of the F02 Road on the Desert (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2921. The County confirmed its acceptance of the F02 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the F02 Road pursuant to the County's governmental right and authority.

2922. Witnesses with personal knowledge of the history of the F02 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2923. Currently known reputation in the community is that the F02 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2924. Public motor vehicle use of the F02 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2925. The F02 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2926. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the F02 Road.

2927. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the F02 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jerry's Flat Loop Road, 3647-A

2928. The Jerry's Flat Loop Road is designated as county road number 3647-A and SGID road identification number RD080606 and is more or less 2.78 miles long.

2929. Exhibit 224 (attached hereto and incorporated herein) contains certain information pertaining to the Jerry's Flat Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2930. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jerry's Flat Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 224. The Jerry's Flat Loop Road includes the segment of road specifically set forth in Exhibit 224 and as exists on the ground.

Acceptance of the Jerry's Flat Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2931. The Jerry's Flat Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2932. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Jerry's Flat Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2933. The appearance of the Jerry's Flat Loop Road on the Drowned Hole Draw (1953) USGS 7.5 minute quadrangle map and TheWickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See*

Exhibit 11 for more detailed map information.

2934. The County confirmed its acceptance of the Jerry's Flat Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Jerry's Flat Loop Road pursuant to the County's governmental right and authority.

2935. Witnesses with personal knowledge of the history of the Jerry's Flat Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2936. Currently known reputation in the community is that the Jerry's Flat Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2937. Public motor vehicle use of the Jerry's Flat Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2938. The Jerry's Flat Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2939. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Jerry's Flat Loop Road.

2940. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jerry's Flat Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Limestone Bench Cutoff Road, 3624-C

2941. The Limestone Bench Cutoff Road is designated as county road number 3624-C and SGID road identification number RD080267 and is more or less 6.21 miles long.

2942. Exhibit 225 (attached hereto and incorporated herein) contains certain information pertaining to the Limestone Bench Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2943. In this action, the State and County seek to quiet title to the public highway right-of-way for the Limestone Bench Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 225. The Limestone Bench Cutoff Road includes the segment of road specifically set forth in Exhibit 225 and as exists on the ground.

Acceptance of the Limestone Bench Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2944. The Limestone Bench Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2945. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Limestone Bench Cutoff Road as a public highway located

on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2946. The Limestone Bench Cutoff Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Limestone Bench Cutoff Road pursuant to the County's governmental right and authority.

2947. Witnesses with personal knowledge of the history of the Limestone Bench Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2948. Currently known reputation in the community is that the Limestone Bench Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2949. Public motor vehicle use of the Limestone Bench Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2950. The Limestone Bench Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2951. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Limestone Bench Cutoff Road.

2952. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Limestone Bench Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Limestone Bench Spur Road, 3528-A

2953. The Limestone Bench Spur Road is designated as county road number 3528-A and SGID road identification number RD080219 and is more or less 2.57 miles long.

2954. Exhibit 226 (attached hereto and incorporated herein) contains certain information pertaining to the Limestone Bench Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2955. In this action, the State and County seek to quiet title to the public highway right-of-way for the Limestone Bench Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 226. The Limestone Bench Spur Road includes the segment of road specifically set forth in Exhibit 226 and as exists on the ground.

Acceptance of the Limestone Bench Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2956. The Limestone Bench Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2957. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Limestone Bench Spur Road as a public highway located

on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2958. The Limestone Bench Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Limestone Bench Spur Road pursuant to the County's governmental right and authority.

2959. Witnesses with personal knowledge of the history of the Limestone Bench Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2960. Currently known reputation in the community is that the Limestone Bench Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2961. Public motor vehicle use of the Limestone Bench Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2962. The Limestone Bench Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2963. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Limestone Bench Spur Road.

2964. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Limestone Bench Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lockhart Box Road, 3536

2965. The Lockhart Box Road is designated as county road number 3536 and SGID road identification number RD080225 and is more or less 6.82 miles long.

2966. Exhibit 227 (attached hereto and incorporated herein) contains certain information pertaining to the Lockhart Box Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2967. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lockhart Box Road solely as it crosses United States public land as included and specifically described in Exhibit 227. The Lockhart Box Road includes the segment of road specifically set forth in Exhibit 227 and as exists on the ground.

Acceptance of the Lockhart Box Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2968. The Lockhart Box Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2969. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lockhart Box Road as a public highway located on the

land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2970. The Lockhart Box Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lockhart Box Road pursuant to the County's governmental right and authority.

2971. Witnesses with personal knowledge of the history of the Lockhart Box Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2972. Currently known reputation in the community is that the Lockhart Box Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2973. Public motor vehicle use of the Lockhart Box Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2974. The Lockhart Box Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2975. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Lockhart Box Road.

2976. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lockhart Box Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Oil Well Draw Overlook Road, 3637

2977. The Oil Well Draw Overlook Road is designated as county road number 3637 and SGID road identification number RD080287 and is more or less 3.61 miles long.

2978. Exhibit 228 (attached hereto and incorporated herein) contains certain information pertaining to the Oil Well Draw Overlook Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2979. In this action, the State and County seek to quiet title to the public highway right-of-way for the Oil Well Draw Overlook Road solely as it crosses United States public land as included and specifically described in Exhibit 228. The Oil Well Draw Overlook Road includes the segment of road specifically set forth in Exhibit 228 and as exists on the ground.

Acceptance of the Oil Well Draw Overlook Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2980. The Oil Well Draw Overlook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2981. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Oil Well Draw Overlook Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2982. The Oil Well Draw Overlook Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Oil Well Draw Overlook Road pursuant to the County's governmental right and authority.

2983. Witnesses with personal knowledge of the history of the Oil Well Draw Overlook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2984. Currently known reputation in the community is that the Oil Well Draw Overlook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2985. Public motor vehicle use of the Oil Well Draw Overlook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2986. The Oil Well Draw Overlook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2987. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Oil Well Draw Overlook Road.

2988. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Oil Well Draw Overlook Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Prickly Pear Road, 3451

2989. The Prickly Pear Road is designated as county road number 3451 and SGID road identification number RD080191 and is more or less 5.96 miles long.

2990. Exhibit 229 (attached hereto and incorporated herein) contains certain information pertaining to the Prickly Pear Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2991. In this action, the State and County seek to quiet title to the public highway right-of-way for the Prickly Pear Road solely as it crosses United States public land as included and specifically described in Exhibit 229. The Prickly Pear Road includes the segment of road specifically set forth in Exhibit 229 and as exists on the ground.

Acceptance of the Prickly Pear Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2992. The Prickly Pear Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2993. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Prickly Pear Road as a public highway located on the land

at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2994. The appearance of the Prickly Pear Road on the Devils Hole (1953) and Chimney Rock (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

2995. The County confirmed its acceptance of the Prickly Pear Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Prickly Pear Road pursuant to the County's governmental right and authority.

2996. Witnesses with personal knowledge of the history of the Prickly Pear Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2997. Currently known reputation in the community is that the Prickly Pear Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2998. Public motor vehicle use of the Prickly Pear Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2999. The Prickly Pear Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3000. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Prickly Pear Road.

3001. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Prickly Pear Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Smith CBN to GR Cut off Road, 3459

3002. The Smith CBN to GR Cut off Road is designated as county road number 3459 and SGID road identification number RD080194 and is more or less 12.68 miles long.

3003. Exhibit 230 (attached hereto and incorporated herein) contains certain information pertaining to the Smith BBN to GR Cut Off Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3004. In this action, the State and County seek to quiet title to the public highway right-of-way for the Smith CBN to GR Cut off Road solely as it crosses United States public land as included and specifically described in Exhibit 230. The Smith CBN to GR Cut off Road includes the segment of road specifically set forth in Exhibit 230 and as exists on the ground.

Acceptance of the Smith CBN to GR Cut off Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3005. The Smith CBN to GR Cut off Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3006. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Smith CBN to GR Cut off Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3007. The appearance of the Smith CBN to GR Cut off Road on the Dry Mesa (1969) and Mexican Mountain (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3008. The County confirmed its acceptance of the Smith CBN to GR Cut off Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Smith CBN to GR Cut off Road pursuant to the County's governmental right and authority.

3009. Witnesses with personal knowledge of the history of the Smith CBN to GR Cut off Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3010. Currently known reputation in the community is that the Smith CBN to GR Cut

off Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3011. Public motor vehicle use of the Smith CBN to GR Cut off Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3012. The Smith CBN to GR Cut off Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3013. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Smith CBN to GR Cut off Road.

3014. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Smith CBN to GR Cut off Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Trail Spring Road, 3553

3015. The Trail Spring Road is designated as county road number 3553 and SGID road identification number RD080234 and is more or less 3.46 miles long.

3016. Exhibit 231 (attached hereto and incorporated herein) contains certain information pertaining to the Trail Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

3017. In this action, the State and County seek to quiet title to the public highway right-of-way for the Trail Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 231. The Trail Spring Road includes the segment of road specifically set forth in Exhibit 231 and as exists on the ground.

Acceptance of the Trail Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3018. The Trail Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3019. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Trail Spring Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3020. The appearance of the Trail Spring Road on the Desert (1969) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3021. The County confirmed its acceptance of the Trail Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Trail Spring Road pursuant to the County's governmental right and authority.

3022. Witnesses with personal knowledge of the history of the Trail Spring Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3023. Currently known reputation in the community is that the Trail Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3024. Public motor vehicle use of the Trail Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3025. The Trail Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3026. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Trail Spring Road.

3027. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Trail Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper Oil Well Draw Road, 3639

3028. The Upper Oil Well Draw Road is designated as county road number 3639 and

SGID road identification number RD080288 and is more or less 0.58 miles long.

3029. Exhibit 232 (attached hereto and incorporated herein) contains certain information pertaining to the Upper Oil Well Draw Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3030. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper Oil Well Draw Road solely as it crosses United States public land as included and specifically described in Exhibit 232. The Upper Oil Well Draw Road includes the segment of road specifically set forth in Exhibit 232 and as exists on the ground.

Acceptance of the Upper Oil Well Draw Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3031. The Upper Oil Well Draw Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3032. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Upper Oil Well Draw Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3033. The Upper Oil Well Draw Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Upper Oil Well Draw Road pursuant to the County's governmental right and authority.

3034. Witnesses with personal knowledge of the history of the Upper Oil Well Draw

Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3035. Currently known reputation in the community is that the Upper Oil Well Draw Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3036. Public motor vehicle use of the Upper Oil Well Draw Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3037. The Upper Oil Well Draw Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3038. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper Oil Well Draw Road.

3039. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper Oil Well Draw Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wedge Over Look Road, 3520

3040. The Wedge Over Look Road is designated as county road number 3520 and SGID

road identification number RD080216 and is more or less 3.56 miles long.

3041. Exhibit 233 (attached hereto and incorporated herein) contains certain information pertaining to the Wedge Over Look Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3042. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wedge Over Look Road solely as it crosses United States public land as included and specifically described in Exhibit 233. The Wedge Over Look Road includes the segment of road specifically set forth in Exhibit 233 and as exists on the ground.

Acceptance of the Wedge Over Look Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3043. The Wedge Over Look Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3044. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Wedge Over Look Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3045. The appearance of the Wedge Over Look Road on the Sids Mountain (1953) and Bottleneck Peak (1953) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3046. The County confirmed its acceptance of the Wedge Over Look Road by 1975,

when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wedge Over Look Road pursuant to the County's governmental right and authority.

3047. Witnesses with personal knowledge of the history of the Wedge Over Look Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3048. Currently known reputation in the community is that the Wedge Over Look Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3049. Public motor vehicle use of the Wedge Over Look Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3050. The Wedge Over Look Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3051. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wedge Over Look Road.

3052. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Wedge Over Look Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

West Wedge Road, 3417

3053. The West Wedge Road is designated as county road number 3417 and SGID road identification number RD080183 and is more or less 6.24 miles long.

3054. Exhibit 234 (attached hereto and incorporated herein) contains certain information pertaining to the West Wedge Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3055. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Wedge Road solely as it crosses United States public land as included and specifically described in Exhibit 234. The West Wedge Road includes the segment of road specifically set forth in Exhibit 234 and as exists on the ground.

Acceptance of the West Wedge Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3056. The West Wedge Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3057. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the West Wedge Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3058. The appearance of the West Wedge Road on the Sids Mountain (1953) and Buckhorn Reservoir (1969) USGS 7.5 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3059. The West Wedge Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Wedge Road pursuant to the County's governmental right and authority.

3060. Witnesses with personal knowledge of the history of the West Wedge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3061. Currently known reputation in the community is that the West Wedge Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3062. Public motor vehicle use of the West Wedge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3063. The West Wedge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3064. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the West Wedge Road.

3065. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West Wedge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SEVENTH CAUSE OF ACTION – QUIET TITLE
SAUCER BASIN AREA

3066. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

3067. The Saucer Basin Area is located in southeastern Emery County in the central region of Utah.

3068. The Saucer Basin Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Acerson Mine Road, 1027; (2) Chaffin Ranch Road, 1048; (3) Dugout Creek Road, 1046; (4) Gilson Butte Well Road, 1023; (5) Green River Airport Road, 1009; (6) Green River Old State Highway, 1007; (7) Keg Knoll Road, 1026; (8) Lookout Point Loop Road, 1025; (9) Lower San Rafael Road, 1010; (10) Moonshine Spring Road, 1044; (11) Nine Mile Reservoir Road, 1043; (12) Sand Road, 1049; (13) Saucer Basin Road, 1011; (14) Spring Canyon Landing Field Road, 1047; (15) Spring Canyon Road, 1045; (16) 3946-A Road; (17) 3946-B Road; (18) 3946-C Road; (19) 3946-D Road; (20) 3946-E Road; (21) 3946-F Road; (22) 3946-G Road; (23) 3946-H Road; (24) 3949 Road; (25) 3952-A Road; (26) 3952-B Road; (27) 3952-C Road; (28) 3952-D Road; (29) 3978 Road; (30) 4066-A Road;

(31) 4069a Road; (32) Gilson/Rattlesnake Butte Road, 4037; (33) Hatt Ranch/SR River Road, 3691; (34) Keg Knoll Road, 4066; (35) Keg Spring Canyon Road, 3984; (36) Lookout Point Road, 3982; (37) Moonshine/Saucer Basin Wells Road, 4060; (38) San Rafael Valley Spur Road, 3843; (39) SR-24/Dugout Spring Road, 3952; (40) The Spur Road, 4069; and (41) Green River Overlook Road, 1042.

3069. Each right-of-way claimed in the Saucer Basin Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

3070. All rights-of-way claimed in the Saucer Basin Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

3071. All rights-of-way claimed in the Saucer Basin Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

3072. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the

entire length and course of all roads as described herein, on public lands owned by the United States.

Acerson Mine Road, 1027

3073. The Acerson Mine Road is designated as county road number 1027 and SGID road identification number RD080030 and is more or less 2.18 miles long.

3074. Exhibit 235 (attached hereto and incorporated herein) contains certain information pertaining to the Acerson Mine Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3075. In this action, the State and County seek to quiet title to the public highway right-of-way for the Acerson Mine Road solely as it crosses United States public land as included and specifically described in Exhibit 235. The Acerson Mine Road includes the segment of road specifically set forth in Exhibit 235 and as exists on the ground.

Acceptance of the Acerson Mine Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3076. The Acerson Mine Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3077. The appearance of the Acerson Mine Road on the Horse Bench West (1954) USGS 7.5 minute quadrangle map and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3078. The County confirmed its acceptance of the Acerson Mine Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Acerson Mine Road using public funds pursuant to the County's governmental right and authority.

3079. Witnesses with personal knowledge of the history of the Acerson Mine Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3080. Currently known reputation in the community is that the Acerson Mine Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3081. Public motor vehicle use of the Acerson Mine Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3082. The Acerson Mine Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3083. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Acerson Mine Road.

3084. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Acerson Mine Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Chaffin Ranch Road, 1048

3085. The Chaffin Ranch Road is designated as county road number 1048 and SGID road identification number RD080046 and is more or less 0.99 miles long.

3086. Exhibit 236 (attached hereto and incorporated herein) contains certain information pertaining to the Chaffin Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3087. In this action, the State and County seek to quiet title to the public highway right-of-way for the Chaffin Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 236. The Chaffin Ranch Road includes the segment of road specifically set forth in Exhibit 236 and as exists on the ground.

Acceptance of the Chaffin Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3088. The Chaffin Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3089. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Chaffin Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3090. The appearance of the Chaffin Ranch Road the Horse Bench East (1954) USGS 7.5 minute quadrangle map and the Green River (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3091. The County confirmed its acceptance of the Chaffin Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Chaffin Ranch Road using public funds pursuant to the County's governmental right and authority.

3092. Witnesses with personal knowledge of the history of the Chaffin Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3093. Currently known reputation in the community is that the Chaffin Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3094. Public motor vehicle use of the Chaffin Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3095. The Chaffin Ranch Road traverses a valid and perfected R.S. 2477 public

highway right-of-way as described herein.

3096. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Chaffin Ranch Road.

3097. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Chaffin Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dugout Creek Road, 1046

3098. The Dugout Creek Road is designated as county road number 1046 and SGID road identification number RD080044 and is more or less 8.19 miles long.

3099. Exhibit 237 (attached hereto and incorporated herein) contains certain information pertaining to the Dugout Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3100. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dugout Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 237. The Dugout Creek Road includes the segment of road specifically set forth in Exhibit 237 and as exists on the ground.

Acceptance of the Dugout Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3101. The Dugout Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3102. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dugout Creek Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3103. The appearance of the Dugout Creek Road on the Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3104. The Dugout Creek Road was accepted as a County Highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dugout Creek Road using public funds pursuant to the County's governmental right and authority.

3105. Witnesses with personal knowledge of the history of the Dugout Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3106. Currently known reputation in the community is that the Dugout Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3107. Public motor vehicle use of the Dugout Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3108. The Dugout Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3109. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dugout Creek Road.

3110. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dugout Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Gilson Butte Well Road, 1023

3111. The Gilson Butte Well Road is designated as county road number 1023 and SGID road identification number RD080026 and is more or less 2.04 miles long.

3112. Exhibit 238 (attached hereto and incorporated herein) contains certain information pertaining to the Gilson Butte Well Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3113. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Gilson Butte Well Road solely as it crosses United States public land as included and specifically described in Exhibit 238. The Gilson Butte Well Road includes the segment of road specifically set forth in Exhibit 238 and as exists on the ground.

Acceptance of the Gilson Butte Well Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3114. The Gilson Butte Well Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3115. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Gilson Butte Well Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3116. The Gilson Butte Well Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Gilson Butte Well Road using public funds pursuant to the County's governmental right and authority.

3117. Witnesses with personal knowledge of the history of the Gilson Butte Well Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3118. Currently known reputation in the community is that the Gilson Butte Well Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3119. Public motor vehicle use of the Gilson Butte Well Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3120. The Gilson Butte Well Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3121. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Gilson Butte Well Road.

3122. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Gilson Butte Well Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Green River Airport Road, 1009

3123. The Green River Airport Road is designated as county road number 1009 and SGID road identification number RD080011 and is more or less 1.47 miles long.

3124. Exhibit 239 (attached hereto and incorporated herein) contains certain information pertaining to the Green River Airport Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3125. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Green River Airport Road solely as it crosses United States public land as included and specifically described in Exhibit 239. The Green River Airport Road includes the segment of road specifically set forth in Exhibit 239 and as exists on the ground.

Acceptance of the Green River Airport Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3126. The Green River Airport Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3127. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Green River Airport Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3128. The County confirmed its acceptance of the Green River Airport Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Green River Airport Road using public funds pursuant to the County's governmental right and authority.

3129. Witnesses with personal knowledge of the history of the Green River Airport Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3130. Currently known reputation in the community is that the Green River Airport Road has been open for all to come and go as they please, whenever convenient or necessary, for

more than 10 years prior to October 21, 1976, and continuing to the present.

3131. Public motor vehicle use of the Green River Airport Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3132. The Green River Airport Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3133. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Green River Airport Road.

3134. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Green River Airport Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Green River Old State Highway, 1007

3135. The Green River Old State Highway is designated as county road number 1007 and SGID road identification number RD080009 and is more or less 14.62 miles long.

3136. Exhibit 240 (attached hereto and incorporated herein) contains certain information pertaining to the Green River Old State Highway including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3137. In this action, the State and County seek to quiet title to the public highway right-of-way for the Green River Old State Highway solely as it crosses United States public land as included and specifically described in Exhibit 240. The Green River Old State Highway includes the segment of road specifically set forth in Exhibit 240 and as exists on the ground.

Acceptance of the Green River Old State Highway R.S. 2477 Right-of-way Prior to October 21, 1976.

3138. The Green River Old State Highway has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3139. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Green River Old State Highway as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3140. The appearance of the Green River Old State Highway on the Green River (1954),Horse Bench West (1954), and Jessies Twist (1954) USGS 7.5 minute quadrangle maps, and the Tidewell Bottoms (1954) and Green River (1954) USGS 15 minute quadrangle mapss evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3141. The County confirmed its acceptance of the Green River Old State Highway by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Green River Old State Highway using public funds pursuant to the County's governmental right and authority.

3142. Witnesses with personal knowledge of the history of the Green River Old State Highway confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3143. Currently known reputation in the community is that the Green River Old State Highway has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3144. Public motor vehicle use of the Green River Old State Highway as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3145. The Green River Old State Highway traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3146. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Green River Old State Highway.

3147. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Green River Old State Highway on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Keg Knoll Road, 1026

3148. The Keg Knoll Road is designated as county road number 1026 and SGID road identification number RD080029 and is more or less 2.06 miles long.

3149. Exhibit 241 (attached hereto and incorporated herein) contains certain information pertaining to the Keg Knoll Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3150. In this action, the State and County seek to quiet title to the public highway right-of-way for the Keg Knoll Road solely as it crosses United States public land as included and specifically described in Exhibit 241. The Keg Knoll Road includes the segment of road specifically set forth in Exhibit 241 and as exists on the ground.

Acceptance of the Keg Knoll Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3151. The Keg Knoll Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3152. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Keg Knoll Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3153. The appearance of the Keg Knoll Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3154. The County confirmed its acceptance of the Keg Knoll Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Keg Knoll Road using public funds pursuant to the County's governmental right and authority.

3155. Witnesses with personal knowledge of the history of the Keg Knoll Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3156. Currently known reputation in the community is that the Keg Knoll Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3157. Public motor vehicle use of the Keg Knoll Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3158. The Keg Knoll Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3159. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Keg Knoll Road.

3160. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Keg Knoll Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lookout Point Loop Road, 1025

3161. The Lookout Point Loop Road is designated as county road number 1025 and SGID road identification number RD080028 and is more or less 4.68 miles long.

3162. Exhibit 242 (attached hereto and incorporated herein) contains certain information pertaining to the Lookout Point Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3163. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lookout Point Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 242. The Lookout Point Loop Road includes the segment of road specifically set forth in Exhibit 242 and as exists on the ground.

Acceptance of the Lookout Point Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3164. The Lookout Point Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3165. The appearance of the Lookout Point Loop Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3166. The County confirmed its acceptance of the Lookout Point Loop Road by 1975,

when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lookout Point Loop Road using public funds pursuant to the County's governmental right and authority.

3167. Witnesses with personal knowledge of the history of the Lookout Point Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3168. Currently known reputation in the community is that the Lookout Point Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3169. Public motor vehicle use of the Lookout Point Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3170. The Lookout Point Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3171. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lookout Point Loop Road.

3172. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Lookout Point Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower San Rafael Road, 1010

3173. The Lower San Rafael Road is designated as county road number 1010 and SGID road identification number RD080013 and is more or less 57.31 miles long.

3174. Exhibit 243 (attached hereto and incorporated herein) contains certain information pertaining to the Lower San Rafael Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3175. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower San Rafael Road solely as it crosses United States public land as included and specifically described in Exhibit 243. The Lower San Rafael Road includes the segment of road specifically set forth in Exhibit 243 and as exists on the ground.

Acceptance of the Lower San Rafael Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3176. The Lower San Rafael Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3177. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lower San Rafael Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3178. The appearance of the Lower San Rafael Road on the Green River (1954), Horse Bench East (1954), and Gilson Butte (1953) USGS 7.5 minute quadrangle maps, and the Bowknot Bend (1963), Green River (1954), The Flattops (1963) and Tempie Mountain (1953) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3179. The County confirmed its acceptance of the Lower San Rafael Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower San Rafael Road using public funds pursuant to the County's governmental right and authority.

3180. Witnesses with personal knowledge of the history of the Lower San Rafael Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3181. Currently known reputation in the community is that the Lower San Rafael Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3182. Public motor vehicle use of the Lower San Rafael Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3183. The Lower San Rafael Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3184. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower San Rafael Road.

3185. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lower San Rafael Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Moonshine Spring Road, 1044

3186. The Moonshine Spring Road is designated as county road number 1044 and SGID road identification number RD080042 and is more or less 6.13 miles long.

3187. Exhibit 244 (attached hereto and incorporated herein) contains certain information pertaining to the Moonshine Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3188. In this action, the State and County seek to quiet title to the public highway right-of-way for the Moonshine Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 244. The Moonshine Spring Road includes the segment of road specifically set forth in Exhibit 244 and as exists on the ground.

Acceptance of the Moonshine Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3189. The Moonshine Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3190. The appearance of the Moonshine Spring Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3191. The County confirmed its acceptance of the Moonshine Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Moonshine Spring Road using public funds pursuant to the County's governmental right and authority.

3192. Witnesses with personal knowledge of the history of the Moonshine Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3193. Currently known reputation in the community is that the Moonshine Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3194. Public motor vehicle use of the Moonshine Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

3195. The Moonshine Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3196. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Moonshine Spring Road.

3197. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Moonshine Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Nine Mile Reservoir Road, 1043

3198. The Nine Mile Reservoir Road is designated as county road number 1043 and SGID road identification number RD080041 and is more or less 5.99 miles long.

3199. Exhibit 245 (attached hereto and incorporated herein) contains certain information pertaining to the Nine Mile Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3200. In this action, the State and County seek to quiet title to the public highway right-of-way for the Nine Mile Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 245. The Nine Mile Reservoir Road includes the segment of road specifically set forth in Exhibit 245 and as exists on the ground.

Acceptance of the Nine Mile Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3201. The Nine Mile Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3202. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Nine Mile Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3203. The appearance of the Nine Mile Reservoir Road on the Jessies Twist (1954) and Horse Bench West (1954) USGS 7.5 minute quadrangle maps, and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3204. The County confirmed its acceptance of the Nine Mile Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Nine Mile Reservoir Road using public funds pursuant to the County's governmental right and authority.

3205. Witnesses with personal knowledge of the history of the Nine Mile Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3206. Currently known reputation in the community is that the Nine Mile Reservoir

Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3207. Public motor vehicle use of the Nine Mile Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3208. The Nine Mile Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3209. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Nine Mile Reservoir Road.

3210. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Nine Mile Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sand Road, 1049

3211. The Sand Road is designated as county road number 1049 and SGID road identification number RD080047 and is more or less 3.58 miles long.

3212. Exhibit 246 (attached hereto and incorporated herein) contains certain information pertaining to the Sand Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

3213. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sand Road solely as it crosses United States public land as included and specifically described in Exhibit 246. The Sand Road includes the segment of road specifically set forth in Exhibit 246 and as exists on the ground.

Acceptance of the Sand Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3214. The Sand Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3215. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Sand Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3216. The appearance of the Sand Road on the Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3217. The County confirmed its acceptance of the Sand Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sand Road using public funds pursuant to the County's governmental right and authority.

3218. Witnesses with personal knowledge of the history of the Sand Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3219. Currently known reputation in the community is that the Sand Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3220. Public motor vehicle use of the Sand Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3221. The Sand Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3222. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sand Road.

3223. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sand Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Saucer Basin Road, 1011

3224. The Saucer Basin Road is designated as county road number 1011 and SGID road identification number RD080014 and is more or less 22.93 miles long.

3225. Exhibit 247 (attached hereto and incorporated herein) contains certain information

pertaining to the Saucer Basin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3226. In this action, the State and County seek to quiet title to the public highway right-of-way for the Saucer Basin Road solely as it crosses United States public land as included and specifically described in Exhibit 247. The Saucer Basin Road includes the segment of road specifically set forth in Exhibit 247 and as exists on the ground.

Acceptance of the Saucer Basin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3227. The Saucer Basin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3228. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Saucer Basin Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3229. The appearance of the Saucer Basin Road on The Flattops (1963), and Bowknot Bend (1963) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3230. The County confirmed its acceptance of the Saucer Basin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Saucer Basin Road using public funds pursuant to the County's

governmental right and authority.

3231. Witnesses with personal knowledge of the history of the Saucer Basin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3232. Currently known reputation in the community is that the Saucer Basin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3233. Public motor vehicle use of the Saucer Basin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3234. The Saucer Basin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3235. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Saucer Basin Road.

3236. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Saucer Basin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Spring Canyon Landing Field Road, 1047

3237. The Spring Canyon Landing Field Road is designated as county road number 1047 and SGID road identification number RD080045 and is more or less 4.50 miles long.

3238. Exhibit 248 (attached hereto and incorporated herein) contains certain information pertaining to the Spring Canyon Landing Field Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3239. In this action, the State and County seek to quiet title to the public highway right-of-way for the Spring Canyon Landing Field Road solely as it crosses United States public land as included and specifically described in Exhibit 248. The Spring Canyon Landing Field Road includes the segment of road specifically set forth in Exhibit 248 and as exists on the ground.

Acceptance of the Spring Canyon Landing Field Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3240. The Spring Canyon Landing Field Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3241. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Spring Canyon Landing Field Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3242. The appearance of the Spring Canyon Landing Field Road on The Flattops (1963), and Bowknot Bend (1963) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed

map information.

3243. The County confirmed its acceptance of the Spring Canyon Landing Field Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Spring Canyon Landing Field Road using public funds pursuant to the County's governmental right and authority.

3244. Witnesses with personal knowledge of the history of the Spring Canyon Landing Field Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3245. Currently known reputation in the community is that the Spring Canyon Landing Field Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3246. Public motor vehicle use of the Spring Canyon Landing Field Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3247. The Spring Canyon Landing Field Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3248. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Spring Canyon Landing Field Road.

3249. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Spring Canyon Landing Field Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Spring Canyon Road, 1045

3250. The Spring Canyon Road is designated as county road number 1045 and SGID road identification number RD080043 and is more or less 8.05 miles long.

3251. Exhibit 249 (attached hereto and incorporated herein) contains certain information pertaining to the Spring Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3252. In this action, the State and County seek to quiet title to the public highway right-of-way for the Spring Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 249. The Spring Canyon Road includes the segment of road specifically set forth in Exhibit 249 and as exists on the ground.

Acceptance of the Spring Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3253. The Spring Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3254. The appearance of the Spring Canyon Road on The Flattops (1963), and Bowknot

Bend (1963) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3255. The County confirmed its acceptance of the Spring Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Spring Canyon Road using public funds pursuant to the County's governmental right and authority.

3256. Witnesses with personal knowledge of the history of the Spring Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3257. Currently known reputation in the community is that the Spring Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3258. Public motor vehicle use of the Spring Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3259. The Spring Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3260. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Spring Canyon Road.

3261. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Spring Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-A Road

3262. The 3946-A Road is designated as county road number 3946-A and SGID road identification number RD080411 and is more or less 1.12 miles long.

3263. Exhibit 250 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3264. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-A Road solely as it crosses United States public land as included and specifically described in Exhibit 250. The 3946-A Road includes the segment of road specifically set forth in Exhibit 250 and as exists on the ground.

Acceptance of the 3946-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3265. The 3946-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3266. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3267. The appearance of the 3946-A Road on The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3268. The County confirmed its acceptance of the 3946-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3946-A Road pursuant to the County's governmental right and authority.

3269. Witnesses with personal knowledge of the history of the 3946-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3270. Currently known reputation in the community is that the 3946-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3271. Public motor vehicle use of the 3946-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public

highway right-of-way underlying this road.

3272. The 3946-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3273. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3946-A Road.

3274. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3946-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-B Road

3275. The 3946-B Road is designated as county road number 3946-B and SGID road identification number RD080412 and is more or less 0.68 miles long.

3276. Exhibit 251 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3277. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-B Road solely as it crosses United States public land as included and specifically described in Exhibit 251. The 3946-B Road includes the segment of road specifically set forth in Exhibit 251 and as exists on the ground.

Acceptance of the 3946-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3278. The 3946-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3279. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3280. The appearance of the 3946-B Road on The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3281. The County confirmed its acceptance of the 3946-B Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3946-B Road pursuant to the County's governmental right and authority.

3282. Witnesses with personal knowledge of the history of the 3946-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3283. Currently known reputation in the community is that the 3946-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3284. Public motor vehicle use of the 3946-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3285. The 3946-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3286. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3946-B Road.

3287. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3946-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-C Road

3288. The 3946-C Road is designated as county road number 3946-C and SGID road identification number RD080413 and is more or less 0.59 miles long.

3289. Exhibit 252 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3290. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-C Road solely as it crosses United States public land as included and

specifically described in Exhibit 252. The 3946-C Road includes the segment of road specifically set forth in Exhibit 252 and as exists on the ground.

Acceptance of the 3946-C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3291. The 3946-C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3292. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-C Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3293. The appearance of the 3946-C Road on the The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3294. The County confirmed its acceptance of the 3946-C Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3946-C Road pursuant to the County's governmental right and authority.

3295. Witnesses with personal knowledge of the history of the 3946-C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3296. Currently known reputation in the community is that the 3946-C Road has been

open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3297. Public motor vehicle use of the 3946-C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3298. The 3946-C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3299. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3946-C Road.

3300. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3946-C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-D Road

3301. The 3946-D Road is designated as county road number 3946-D and SGID road identification number RD080414 and is more or less 1.16 miles long.

3302. Exhibit 253 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-D Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3303. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-D Road solely as it crosses United States public land as included and specifically described in Exhibit 253. The 3946-D Road includes the segment of road specifically set forth in Exhibit 253 and as exists on the ground.

Acceptance of the 3946-D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3304. The 3946-D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3305. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-D Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3306. The appearance of the 3946-D Road on the The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3307. The County confirmed its acceptance of the 3946-D Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3946-D Road pursuant to the County's governmental right and authority.

3308. Witnesses with personal knowledge of the history of the 3946-D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3309. Currently known reputation in the community is that the 3946-D Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3310. Public motor vehicle use of the 3946-D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3311. The 3946-D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3312. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3946-D Road.

3313. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3946-D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-E Road

3314. The 3946-E Road is designated as county road number 3946-E and SGID road identification number RD080415 and is more or less 1.11 miles long.

3315. Exhibit 254 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-E Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3316. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-E Road solely as it crosses United States public land as included and specifically described in Exhibit 254. The 3946-E Road includes the segment of road specifically set forth in Exhibit 254 and as exists on the ground.

Acceptance of the 3946-E Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3317. The 3946-E Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3318. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-E Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3319. The appearance of the 3946-E Road on the The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3320. The County confirmed its acceptance of the 3946-E Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3946-E Road pursuant to the County's governmental right and authority.

3321. Witnesses with personal knowledge of the history of the 3946-E Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3322. Currently known reputation in the community is that the 3946-E Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3323. Public motor vehicle use of the 3946-E Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3324. The 3946-E Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3325. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3946-E Road.

3326. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3946-E Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-F Road

3327. The 3946-F Road is designated as county road number 3946-F and SGID road identification number RD080416 and is more or less 0.6 miles long.

3328. Exhibit 255 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-F Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3329. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-F Road solely as it crosses United States public land as included and specifically described in Exhibit 255. The 3946-F Road includes the segment of road specifically set forth in Exhibit 255 and as exists on the ground.

Acceptance of the 3946-F Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3330. The 3946-F Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3331. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-F Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3332. The appearance of the 3946-F Road on the The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3333. The County confirmed its acceptance of the 3946-F Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the 3946-F Road pursuant to the County's governmental right and authority.

3334. Witnesses with personal knowledge of the history of the 3946-F Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3335. Currently known reputation in the community is that the 3946-F Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3336. Public motor vehicle use of the 3946-F Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3337. The 3946-F Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3338. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3946-F Road.

3339. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3946-F Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-G Road

3340. The 3946-G Road is designated as county road number 3946-G and SGID road identification number RD080417 and is more or less 0.83 miles long.

3341. Exhibit 256 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-G Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3342. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-G Road solely as it crosses United States public land as included and specifically described in Exhibit 256. The 3946-G Road includes the segment of road specifically set forth in Exhibit 256 and as exists on the ground.

Acceptance of the 3946-G Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3343. The 3946-G Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3344. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-G Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3345. The appearance of the 3946-G Road on the The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3346. The County confirmed its acceptance of the 3946-G Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3946-G Road pursuant to the County's governmental right and authority.

3347. Witnesses with personal knowledge of the history of the 3946-G Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3348. Currently known reputation in the community is that the 3946-G Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3349. Public motor vehicle use of the 3946-G Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3350. The 3946-G Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3351. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3946-G Road.

3352. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the 3946-G Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3946-H Road

3353. The 3946-H Road is designated as county road number 3946-H and SGID road identification number RD080418 and is more or less 0.71 miles long.

3354. Exhibit 257 (attached hereto and incorporated herein) contains certain information pertaining to the 3946-H Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3355. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3946-H Road solely as it crosses United States public land as included and specifically described in Exhibit 257. The 3946-H Road includes the segment of road specifically set forth in Exhibit 257 and as exists on the ground.

Acceptance of the 3946-H Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3356. The 3946-H Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3357. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3946-H Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3358. The appearance of the 3946-H Road the The Flattops (1963) USGS 15 minute

quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3359. The County confirmed its acceptance of the 3946-H Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3946-H Road pursuant to the County's governmental right and authority.

3360. Witnesses with personal knowledge of the history of the 3946-H Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3361. Currently known reputation in the community is that the 3946-H Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3362. Public motor vehicle use of the 3946-H Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3363. The 3946-H Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3364. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the 3946-H Road.

3365. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3946-H Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3949 Road

3366. The 3949 Road is designated as county road number 3949 and SGID road identification number RD080608 and is more or less 4.00 miles long.

3367. Exhibit 258 (attached hereto and incorporated herein) contains certain information pertaining to the 3949 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3368. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3949 Road solely as it crosses United States public land as included and specifically described in Exhibit 258. The 3949 Road includes the segment of road specifically set forth in Exhibit 258 and as exists on the ground.

Acceptance of the 3949 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3369. The 3949 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3370. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3949 Road as a public highway located on the land at

issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3371. The 3949 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3949 Road pursuant to the County's governmental right and authority.

3372. Witnesses with personal knowledge of the history of the 3949 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3373. Currently known reputation in the community is that the 3949 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3374. Public motor vehicle use of the 3949 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3375. The 3949 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3376. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3949 Road.

3377. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3949 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3952-A Road

3378. The 3952-A Road is designated as county road number 3952-A and SGID road identification number RD080422 and is more or less 1.76 miles long.

3379. Exhibit 259 (attached hereto and incorporated herein) contains certain information pertaining to the 3952-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3380. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3952-A Road solely as it crosses United States public land as included and specifically described in Exhibit 259. The 3952-A Road includes the segment of road specifically set forth in Exhibit 259 and as exists on the ground.

Acceptance of the 3952-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3381. The 3952-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3382. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3952-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3383. The appearance of the 3952-A Road the The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3384. The County confirmed its acceptance of the 3952-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3952-A Road pursuant to the County's governmental right and authority.

3385. Witnesses with personal knowledge of the history of the 3952-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3386. Currently known reputation in the community is that the 3952-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3387. Public motor vehicle use of the 3952-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3388. The 3952-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3389. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3952-A Road.

3390. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3952-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3952-B Road

3391. The 3952-B Road is designated as county road number 3952-B and SGID road identification number RD080423 and is more or less 3.1 miles long.

3392. Exhibit 260 (attached hereto and incorporated herein) contains certain information pertaining to the 3952-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3393. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3952-B Road solely as it crosses United States public land as included and specifically described in Exhibit 260. The 3952-B Road includes the segment of road specifically set forth in Exhibit 260 and as exists on the ground.

Acceptance of the 3952-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3394. The 3952-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3395. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3952-B Road as a public highway located on the land at

issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3396. The appearance of the 3952-B Road on the The Flattops (1963) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3397. The County confirmed its acceptance of the 3952-B Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3952-B Road pursuant to the County's governmental right and authority.

3398. Witnesses with personal knowledge of the history of the 3952-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3399. Currently known reputation in the community is that the 3952-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3400. Public motor vehicle use of the 3952-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3401. The 3952-B Road traverses a valid and perfected R.S. 2477 public highway right-

of-way as described herein.

3402. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3952-B Road.

3403. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3952-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3952-C Road

3404. The 3952-C Road is designated as county road number 3952-C and SGID road identification number RD080424 and is more or less 0.51 miles long.

3405. Exhibit 261 (attached hereto and incorporated herein) contains certain information pertaining to the 3952-C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3406. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3952-C Road solely as it crosses United States public land as included and specifically described in Exhibit 261. The 3952-C Road includes the segment of road specifically set forth in Exhibit 261 and as exists on the ground.

Acceptance of the 3952-C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3407. The 3952-C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3408. The appearance of the 3952-C Road on the The Flattops (1963) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3409. The County confirmed its acceptance of the 3952-C Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3952-C Road pursuant to the County's governmental right and authority.

3410. Witnesses with personal knowledge of the history of the 3952-C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3411. Currently known reputation in the community is that the 3952-C Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3412. Public motor vehicle use of the 3952-C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3413. The 3952-C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3414. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3952-C Road.

3415. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3952-C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3952-D Road

3416. The 3952-D Road is designated as county road number 3952-D and SGID road identification number RD080425 and is more or less 7.18 miles long.

3417. Exhibit 262 (attached hereto and incorporated herein) contains certain information pertaining to the 3952-D Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3418. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3952-D Road solely as it crosses United States public land as included and specifically described in Exhibit 262. The 3952-D Road includes the segment of road specifically set forth in Exhibit 262 and as exists on the ground.

Acceptance of the 3952-D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3419. The 3952-D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3420. The appearance of the 3952-D Road on the The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this

road. *See* Exhibit 11 for more detailed map information.

3421. The County confirmed its acceptance of the 3952-D Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3952-D Road pursuant to the County's governmental right and authority.

3422. Witnesses with personal knowledge of the history of the 3952-D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3423. Currently known reputation in the community is that the 3952-D Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3424. Public motor vehicle use of the 3952-D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3425. The 3952-D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3426. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3952-D Road.

3427. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3952-D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3978 Road

3428. The 3978 Road is designated as county road number 3978 and SGID road identification number RD080428 and is more or less 1.65 miles long.

3429. Exhibit 263 (attached hereto and incorporated herein) contains certain information pertaining to the 3978 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3430. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3978 Road solely as it crosses United States public land as included and specifically described in Exhibit 263. The 3978 Road includes the segment of road specifically set forth in Exhibit 263 and as exists on the ground.

Acceptance of the 3978 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3431. The 3978 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3432. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3978 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3433. The appearance of the 3978 Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3434. The County confirmed its acceptance of the 3978 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3978 Road pursuant to the County's governmental right and authority.

3435. Witnesses with personal knowledge of the history of the 3978 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3436. Currently known reputation in the community is that the 3978 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3437. Public motor vehicle use of the 3978 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3438. The 3978 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3439. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3978 Road.

3440. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3978 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

4066-A Road

3441. The 4066-A Road is designated as county road number 4066-A and SGID road identification number RD080454 and is more or less 0.46 miles long.

3442. Exhibit 264 (attached hereto and incorporated herein) contains certain information pertaining to the 4066-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3443. In this action, the State and County seek to quiet title to the public highway right-of-way for the 4066-A Road solely as it crosses United States public land as included and specifically described in Exhibit 264. The 4066-A Road includes the segment of road specifically set forth in Exhibit 264 and as exists on the ground.

Acceptance of the 4066-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3444. The 4066-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3445. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 4066-A Road as a public highway located on the land at

issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3446. The appearance of the 4066-A Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3447. The County confirmed its acceptance of the 4066-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 4066-A Road pursuant to the County's governmental right and authority.

3448. Witnesses with personal knowledge of the history of the 4066-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3449. Currently known reputation in the community is that the 4066-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3450. Public motor vehicle use of the 4066-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3451. The 4066-A Road traverses a valid and perfected R.S. 2477 public highway right-

of-way as described herein.

3452. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 4066-A Road.

3453. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 4066-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

4069a Road

3454. The 4069a Road is designated as county road number 4069a and SGID road identification number RD080001 and is more or less 1.55 miles long.

3455. Exhibit 265 (attached hereto and incorporated herein) contains certain information pertaining to the 4069a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3456. In this action, the State and County seek to quiet title to the public highway right-of-way for the 4069a Road solely as it crosses United States public land as included and specifically described in Exhibit 265. The 4069a Road includes the segment of road specifically set forth in Exhibit 265 and as exists on the ground.

Acceptance of the 4069a Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3457. The 4069a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3458. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 4069a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3459. The 4069a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 4069a Road pursuant to the County's governmental right and authority.

3460. Witnesses with personal knowledge of the history of the 4069a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3461. Currently known reputation in the community is that the 4069a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3462. Public motor vehicle use of the 4069a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3463. The 4069a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3464. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 4069a Road.

3465. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 4069a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Gilson/Rattlesnake Butte Road, 4037

3466. The Gilson/Rattlesnake Butte Road is designated as county road number 4037 and SGID road identification number RD080448 and is more or less 1.5 miles long.

3467. Exhibit 266 (attached hereto and incorporated herein) contains certain information pertaining to the Gilson/Rattlesnake Butte Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3468. In this action, the State and County seek to quiet title to the public highway right-of-way for the Gilson/Rattlesnake Butte Road solely as it crosses United States public land as included and specifically described in Exhibit 266. The Gilson/Rattlesnake Butte Road includes the segment of road specifically set forth in Exhibit 266 and as exists on the ground.

Acceptance of the Gilson/Rattlesnake Butte Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3469. The Gilson/Rattlesnake Butte Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3470. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Gilson/Rattlesnake Butte Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3471. The Gilson/Rattlesnake Butte Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Gilson/Rattlesnake Butte Road pursuant to the County's governmental right and authority.

3472. Witnesses with personal knowledge of the history of the Gilson/Rattlesnake Butte Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3473. Currently known reputation in the community is that the Gilson/Rattlesnake Butte Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3474. Public motor vehicle use of the Gilson/Rattlesnake Butte Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3475. The Gilson/Rattlesnake Butte Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3476. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Gilson/Rattlesnake Butte Road.

3477. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Gilson/Rattlesnake Butte Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hatt Ranch/Sr River Road, 3691

3478. The Hatt Ranch/Sr River Road is designated as county road number 3691 and SGID road identification number RD080316 and is more or less 6.43 miles long.

3479. Exhibit 267 (attached hereto and incorporated herein) contains certain information pertaining to the Hatt Ranch/Sr River Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3480. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hatt Ranch/Sr River Road solely as it crosses United States public land as included and specifically described in Exhibit 267. The Hatt Ranch/Sr River Road includes the segment of road specifically set forth in Exhibit 267 and as exists on the ground.

Acceptance of the Hatt Ranch/Sr River Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3481. The Hatt Ranch/Sr River Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3482. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hatt Ranch/Sr River Road as a public highway located on

the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3483. The appearance of the Hatt Ranch/Sr River Road on the Horse Bench West (1954) USGS 7.5 minute quadrangle map and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3484. The County confirmed its acceptance of the Hatt Ranch/Sr River Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hatt Ranch/Sr River Road pursuant to the County's governmental right and authority.

3485. Witnesses with personal knowledge of the history of the Hatt Ranch/Sr River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3486. Currently known reputation in the community is that the Hatt Ranch/Sr River Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3487. Public motor vehicle use of the Hatt Ranch/Sr River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of

an R.S. 2477 public highway right-of-way underlying this road.

3488. The Hatt Ranch/Sr River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3489. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hatt Ranch/Sr River Road.

3490. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hatt Ranch/Sr River Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Keg Knoll Road, 4066

3491. The Keg Knoll Road is designated as county road number 4066 and SGID road identification number RD080453 and is more or less 2.01 miles long.

3492. Exhibit 268 (attached hereto and incorporated herein) contains certain information pertaining to the Keg Knoll Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3493. In this action, the State and County seek to quiet title to the public highway right-of-way for the Keg Knoll Road solely as it crosses United States public land as included and specifically described in Exhibit 268. The Keg Knoll Road includes the segment of road specifically set forth in Exhibit 268 and as exists on the ground.

Acceptance of the Keg Knoll Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3494. The Keg Knoll Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3495. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Keg Knoll Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3496. The appearance of the Keg Knoll Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3497. The County confirmed its acceptance of the Keg Knoll Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Keg Knoll Road pursuant to the County's governmental right and authority.

3498. Witnesses with personal knowledge of the history of the Keg Knoll Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3499. Currently known reputation in the community is that the Keg Knoll Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3500. Public motor vehicle use of the Keg Knoll Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3501. The Keg Knoll Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3502. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Keg Knoll Road.

3503. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Keg Knoll Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Keg Spring Canyon Road, 3984

3504. The Keg Spring Canyon Road is designated as county road number 3984 and SGID road identification number RD080432 and is more or less 3.27 miles long.

3505. Exhibit 269 (attached hereto and incorporated herein) contains certain information pertaining to the Keg Spring Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3506. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Keg Spring Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 269. The Keg Spring Canyon Road includes the segment of road specifically set forth in Exhibit 269 and as exists on the ground.

Acceptance of the Keg Spring Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3507. The Keg Spring Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3508. The appearance of the Keg Spring Canyon Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3509. The Keg Spring Canyon Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Keg Spring Canyon Road pursuant to the County's governmental right and authority.

3510. Witnesses with personal knowledge of the history of the Keg Spring Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3511. Currently known reputation in the community is that the Keg Spring Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3512. Public motor vehicle use of the Keg Spring Canyon Road as a public thoroughfare

traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3513. The Keg Spring Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3514. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Keg Spring Canyon Road.

3515. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Keg Spring Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lookout Point Road, 3982

3516. The Lookout Point Road is designated as county road number 3982 and SGID road identification number RD080429 and is more or less 3.14 miles long.

3517. Exhibit 270 (attached hereto and incorporated herein) contains certain information pertaining to the Lookout Point Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3518. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lookout Point Road solely as it crosses United States public land as included and

specifically described in Exhibit 270. The Lookout Point Road includes the segment of road specifically set forth in Exhibit 270 and as exists on the ground.

Acceptance of the Lookout Point Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3519. The Lookout Point Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3520. The appearance of the Lookout Point Road on the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3521. The County confirmed its acceptance of the Lookout Point Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lookout Point Road pursuant to the County's governmental right and authority.

3522. Witnesses with personal knowledge of the history of the Lookout Point Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3523. Currently known reputation in the community is that the Lookout Point Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3524. Public motor vehicle use of the Lookout Point Road as a public thoroughfare

traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3525. The Lookout Point Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3526. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lookout Point Road.

3527. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lookout Point Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Moonshine/Saucer Basin Wells Road, 4060

3528. The Moonshine/Saucer Basin Wells Road is designated as county road number 4060 and SGID road identification number RD080452 and is more or less 2.17 miles long.

3529. Exhibit 271 (attached hereto and incorporated herein) contains certain information pertaining to the Moonshine/Saucer Basin Wells Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3530. In this action, the State and County seek to quiet title to the public highway right-of-way for the Moonshine/Saucer Basin Wells Road solely as it crosses United States public land

as included and specifically described in Exhibit 271. The Moonshine/Saucer Basin Wells Road includes the segment of road specifically set forth in Exhibit 271 and as exists on the ground.

Acceptance of the Moonshine/Saucer Basin Wells Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3531. The Moonshine/Saucer Basin Wells Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3532. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Moonshine/Saucer Basin Wells Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3533. The appearance of the Moonshine/Saucer Basin Wells Road the Bowknot Bend (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3534. The County confirmed its acceptance of the Moonshine/Saucer Basin Wells Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Moonshine/Saucer Basin Wells Road pursuant to the County's governmental right and authority.

3535. Witnesses with personal knowledge of the history of the Moonshine/Saucer Basin Wells Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3536. Currently known reputation in the community is that the Moonshine/Saucer Basin Wells Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3537. Public motor vehicle use of the Moonshine/Saucer Basin Wells Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3538. The Moonshine/Saucer Basin Wells Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3539. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Moonshine/Saucer Basin Wells Road.

3540. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Moonshine/Saucer Basin Wells Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

San Rafael Valley Spur Road, 3843

3541. The San Rafael Valley Spur Road is designated as county road number 3843and SGID road identification number RD080374 and is more or less 1.13 miles long.

3542. Exhibit 272 (attached hereto and incorporated herein) contains certain information

pertaining to the San Rafael Valley Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3543. In this action, the State and County seek to quiet title to the public highway right-of-way for the San Rafael Valley Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 272. The San Rafael Valley Spur Road includes the segment of road specifically set forth in Exhibit 272 and as exists on the ground.

Acceptance of the San Rafael Valley Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3544. The San Rafael Valley Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3545. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the San Rafael Valley Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3546. The appearance of the San Rafael Valley Spur Road on the Greasewood Draw (1953) and Horse Bench West (1954) USGS 7.5 minute quadrangle maps, and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3547. The County confirmed its acceptance of the San Rafael Valley Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the San Rafael Valley Spur Road pursuant to the County's governmental right and authority

3548. Witnesses with personal knowledge of the history of the San Rafael Valley Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3549. Currently known reputation in the community is that the San Rafael Valley Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3550. Public motor vehicle use of the San Rafael Valley Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3551. The San Rafael Valley Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3552. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the San Rafael Valley Spur Road.

3553. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the San Rafael Valley Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and

enjoyment of this road.

SR-24/Dugout Spring Road, 3952

3554. The SR-24/Dugout Spring Road is designated as county road number 3952and SGID road identification number RD080421 and is more or less 0.23 miles long.

3555. Exhibit 273 (attached hereto and incorporated herein) contains certain information pertaining to the SR-24/Dugout Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3556. In this action, the State and County seek to quiet title to the public highway right-of-way for the SR-24/Dugout Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 273. The SR-24/Dugout Spring Road includes the segment of road specifically set forth in Exhibit 273 and as exists on the ground.

Acceptance of the SR-24/Dugout Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3557. The SR-24/Dugout Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3558. The appearance of the SR-24/Dugout Spring Road on The Flattops (1963) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3559. The County confirmed its acceptance of the SR-24/Dugout Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the SR-24/Dugout Spring Road pursuant to the County's governmental right and authority.

3560. Witnesses with personal knowledge of the history of the SR-24/Dugout Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3561. Currently known reputation in the community is that the SR-24/Dugout Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3562. Public motor vehicle use of the SR-24/Dugout Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3563. The SR-24/Dugout Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3564. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SR-24/Dugout Spring Road.

3565. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SR-24/Dugout Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and

enjoyment of this road.

The Spur Road, 4069

3566. The Spur Road is designated as county road number 4069and SGID road identification number RD080455 and is more or less 6.51 miles long.

3567. Exhibit 274 (attached hereto and incorporated herein) contains certain information pertaining to the Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3568. In this action, the State and County seek to quiet title to the public highway right-of-way for the Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 274. The Spur Road includes the segment of road specifically set forth in Exhibit 274 and as exists on the ground.

Acceptance of The Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3569. The Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3570. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for The Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3571. The Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Spur Road pursuant to the County's governmental right and authority.

3572. Witnesses with personal knowledge of the history of the Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3573. Currently known reputation in the community is that the Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3574. Public motor vehicle use of the Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3575. The Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3576. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Spur Road.

3577. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Green River Overlook Road, 1042

3578. The Green River Overlook Road is designated as county road number 1042 and SGID road identification number RD080040 and is more or less 1.40 miles long.

3579. Exhibit 275 (attached hereto and incorporated herein) contains certain information pertaining to the Green River Overlook Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3580. In this action, the State and County seek to quiet title to the public highway right-of-way for the Green River Overlook Road solely as it crosses United States public land as included and specifically described in Exhibit 275. The Green River Overlook Road includes the segment of road specifically set forth in Exhibit 275 and as exists on the ground.

Acceptance of the Green River Overlook Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3581. The Green River Overlook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3582. The appearance of the Green River Overlook Road on the Green River (1954) USGS 7.5 minute quadrangle map and the Green River (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3583. The County confirmed its acceptance of the Green River Overlook Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Green River Overlook Road using public funds pursuant to the County's governmental right and authority.

3584. Witnesses with personal knowledge of the history of the Green River Overlook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3585. Currently known reputation in the community is that the Green River Overlook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3586. Public motor vehicle use of the Green River Overlook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3587. The Green River Overlook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3588. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Green River Overlook Road.

3589. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Green River Overlook Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and

enjoyment of this road.

EIGHTH CAUSE OF ACTION – QUIET TITLE
WILD HORSE AREA

3590. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

3591. The Wild Horse Area is located in south-central Emery County in the central region of Utah.

3592. The Wild Horse Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Big Wild Horse Spur Road, 1017; (2) Buckskin Spring Road, 1018; (3) Chute Canyon Road, 1016; (4) Goblin Valley Road, 1014; (5) Hatt Ranch Bypass Road, 1028; (6) North Temple Wash Road, 1015; (7) Taylor Flat Cutoff Road, 1033; (8) Temple Junction/Hidden Splendor Road, 1012; (9) Wild Horse/Muddy River Road, 1013; (10) 3660 Road; (11) 3662 Road; (12) 3663 Road; (13) 3842-A Road; (14) 3842-B Road; (15) 3915-A Road; (16) 3915-C Road; (17) 3917-A Road; (18) 3920-B Road; (19) 3920-C Road; (20) 3920-D Road; (21) Baptist Draw Road, 3917; (22) Baptist Draw Air Strip Road, 3917-C exten; (23) Cliff Dweller Flat Road, 3661; (24) Home Base Road, 3829; (25) Hyde Draw Loop Road, 3659; (26) Lone Man Butte Road, 3827; (27) Lower Reef Lost Spring Road, 3942; (28) Molly's Castle Road, 4031; (29) Muddy Creek Road, 3014; (30) North Ernie Canyon Spur Road, 3833; (31) North Temple Wash Road, 3924; (32) Red Draw Road, 3648; (33) Straight Wash Road, 3859; (34) Twin Knolls Road, 3826; and (35) Upper Little Wild Horse Road, 3920.

3593. Each right-of-way claimed in the Wild Horse Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering,

cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

3594. All rights-of-way claimed in the Wild Horse Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

3595. All rights-of-way claimed in the Wild Horse Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

3596. Prior to October 21, 1976, the State of Utah, Emery County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Big Wild Horse Spur Road, 1017

3597. The Big Wild Horse Spur Road is designated as county road number 1017 and SGID road identification number RD080020 and is more or less 1.56 miles long.

3598. Exhibit 276 (attached hereto and incorporated herein) contains certain information pertaining to the Big Wild Horse Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list;

and a complete centerline description of the road.

3599. In this action, the State and County seek to quiet title to the public highway right-of-way for the Big Wild Horse Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 276. The Big Wild Horse Spur Road includes the segment of road specifically set forth in Exhibit 276 and as exists on the ground.

Acceptance of the Big Wild Horse Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3600. The Big Wild Horse Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3601. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Big Wild Horse Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3602. The County confirmed its acceptance of the Big Wild Horse Spur Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Big Wild Horse Spur Road using public funds pursuant to the County's governmental right and authority.

3603. Witnesses with personal knowledge of the history of the Big Wild Horse Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3604. Currently known reputation in the community is that the Big Wild Horse Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3605. Public motor vehicle use of the Big Wild Horse Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3606. The Big Wild Horse Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3607. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Big Wild Horse Spur Road.

3608. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Big Wild Horse Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Buckskin Spring Road, 1018

3609. The Buckskin Spring Road is designated as county road number 1018 and SGID road identification number RD080021 and is more or less 0.19 miles long.

3610. Exhibit 277 (attached hereto and incorporated herein) contains certain information pertaining to the Buckskin Spring Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3611. In this action, the State and County seek to quiet title to the public highway right-of-way for the Buckskin Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 277. The Buckskin Spring Road includes the segment of road specifically set forth in Exhibit 277 and as exists on the ground.

Acceptance of the Buckskin Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3612. The Buckskin Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3613. The County confirmed its acceptance of the Buckskin Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Buckskin Spring Road using public funds pursuant to the County's governmental right and authority.

3614. Witnesses with personal knowledge of the history of the Buckskin Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3615. Currently known reputation in the community is that the Buckskin Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3616. Public motor vehicle use of the Buckskin Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3617. The Buckskin Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3618. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Buckskin Spring Road.

3619. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Buckskin Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Chute Canyon Road, 1016

3620. The Chute Canyon Road is designated as county road number 1016 and SGID road identification number RD080019 and is more or less 6.65 miles long.

3621. Exhibit 278 (attached hereto and incorporated herein) contains certain information pertaining to the Chute Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3622. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Chute Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 278. The Chute Canyon Road includes the segment of road specifically set forth in Exhibit 278 and as exists on the ground.

Acceptance of the Chute Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3623. The Chute Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3624. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Chute Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3625. The appearance of the Chute Canyon Road on the Horse Valley (1953), and Temple Mountain (1953) USGS 7.5 minute quadrangle maps, and the Wild Horse (1952) and Tempie Mountain (1953) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3626. The County confirmed its acceptance of the Chute Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Chute Canyon Road using public funds pursuant to the County's governmental right and authority.

3627. Witnesses with personal knowledge of the history of the Chute Canyon Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3628. Currently known reputation in the community is that the Chute Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3629. Public motor vehicle use of the Chute Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3630. The Chute Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3631. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Chute Canyon Road.

3632. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Chute Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Goblin Valley Road, 1014

3633. The Goblin Valley Road is designated as county road number 1014 and SGID

road identification number RD080017 and is more or less 6.04 miles long.

3634. Exhibit 279 (attached hereto and incorporated herein) contains certain information pertaining to the Goblin Valley Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3635. In this action, the State and County seek to quiet title to the public highway right-of-way for the Goblin Valley Road solely as it crosses United States public land as included and specifically described in Exhibit 279. The Goblin Valley Road includes the segment of road specifically set forth in Exhibit 279 and as exists on the ground.

Acceptance of the Goblin Valley Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3636. The Goblin Valley Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3637. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Goblin Valley Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3638. The appearance of the Goblin Valley Road on the Goblin Valley (1953), and Temple Mountain (1953) USGS 7.5 minute quadrangle maps and Tempie Mountain (1953) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3639. The County confirmed its acceptance of the Goblin Valley Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. *See* UTAH CODE ANN. § 72-3-103(4) (2009). The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Goblin Valley Road using public funds pursuant to the County's governmental right and authority.

3640. Witnesses with personal knowledge of the history of the Goblin Valley Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3641. Currently known reputation in the community is that the Goblin Valley Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3642. Public motor vehicle use of the Goblin Valley Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3643. The Goblin Valley Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3644. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Goblin Valley Road.

3645. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Goblin Valley Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hatt Ranch Bypass Road, 1028

3646. The Hatt Ranch Bypass Road is designated as county road number 1028 and SGID road identification number RD080031 and is more or less 11.28 miles long.

3647. Exhibit 280 (attached hereto and incorporated herein) contains certain information pertaining to the Hatt Ranch Bypass Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3648. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hatt Ranch Bypass Road solely as it crosses United States public land as included and specifically described in Exhibit 280. The Hatt Ranch Bypass Road includes the segment of road specifically set forth in Exhibit 280 and as exists on the ground.

Acceptance of the Hatt Ranch Bypass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3649. The Hatt Ranch Bypass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3650. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hatt Ranch Bypass Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3651. The appearance of the Hatt Ranch Bypass Road on the Spotted Wolf Canyon (1953) and Greasewood Draw (1953) USGS 7.5 minute quadrangle maps, and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3652. The County confirmed its acceptance of the Hatt Ranch Bypass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hatt Ranch Bypass Road using public funds pursuant to the County's governmental right and authority.

3653. Witnesses with personal knowledge of the history of the Hatt Ranch Bypass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3654. Currently known reputation in the community is that the Hatt Ranch Bypass Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3655. Public motor vehicle use of the Hatt Ranch Bypass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3656. The Hatt Ranch Bypass Road traverses a valid and perfected R.S. 2477 public

highway right-of-way as described herein.

3657. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hatt Ranch Bypass Road.

3658. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hatt Ranch Bypass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Temple Wash Road, 1015

3659. The North Temple Wash Road is designated as county road number 1015 and SGID road identification number RD080018 and is more or less 3.99 miles long.

3660. Exhibit 281 (attached hereto and incorporated herein) contains certain information pertaining to the North Temple Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3661. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Temple Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 281. The North Temple Wash Road includes the segment of road specifically set forth in Exhibit 281 and as exists on the ground.

Acceptance of the North Temple Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3662. The North Temple Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3663. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North Temple Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3664. The appearance of the North Temple Wash Road on the Temple Mountain (1953) USGS 7.5 minute quadrangle map and the Tempie Mountain (1953) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3665. The County confirmed its acceptance of the North Temple Wash Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Temple Wash Road using public funds pursuant to the County's governmental right and authority.

3666. Witnesses with personal knowledge of the history of the North Temple Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3667. Currently known reputation in the community is that the North Temple Wash

Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3668. Public motor vehicle use of the North Temple Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3669. The North Temple Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3670. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Temple Wash Road.

3671. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Temple Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Taylor Flat Cutoff Road, 1033

3672. The Taylor Flat Cutoff Road is designated as county road number 1033 and SGID road identification number RD080038 and is more or less 2.62 miles long.

3673. Exhibit 282 (attached hereto and incorporated herein) contains certain information pertaining to the Taylor Flat Cutoff Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list;

and a complete centerline description of the road.

3674. In this action, the State and County seek to quiet title to the public highway right-of-way for the Taylor Flat Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 282. The Taylor Flat Cutoff Road includes the segment of road specifically set forth in Exhibit 282 and as exists on the ground.

Acceptance of the Taylor Flat Cutoff Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3675. The Taylor Flat Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3676. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Taylor Flat Cutoff Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3677. The appearance of the Taylor Flat Cutoff Road on the Twin Knolls (1953) and San Rafael Knob (1953) USGS 7.5 minute quadrangle maps, and The Wickiup (1954) and San Rafael Knob (1952) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3678. The County confirmed its acceptance of the Taylor Flat Cutoff Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Taylor Flat Cutoff Road using public funds pursuant to the

County's governmental right and authority.

3679. Witnesses with personal knowledge of the history of the Taylor Flat Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3680. Currently known reputation in the community is that the Taylor Flat Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3681. Public motor vehicle use of the Taylor Flat Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3682. The Taylor Flat Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3683. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Taylor Flat Cutoff Road.

3684. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Taylor Flat Cutoff Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Temple Junction/Hidden Splendor Road, 1012

3685. The Temple Junction/Hidden Splendor Road is designated as county road number 1012 and SGID road identification number RD080015 and is more or less 38.88 miles long.

3686. Exhibit 283 (attached hereto and incorporated herein) contains certain information pertaining to the Temple Junction/Hidden Splendor Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3687. In this action, the State and County seek to quiet title to the public highway right-of-way for the Temple Junction/Hidden Splendor Road solely as it crosses United States public land as included and specifically described in Exhibit 283. The Temple Junction/Hidden Splendor Road includes the segment of road specifically set forth in Exhibit 283 and as exists on the ground.

Acceptance of the Temple Junction/Hidden Splendor Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3688. The Temple Junction/Hidden Splendor Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3689. Aerial photography from 1976 and 1977 confirms the historical use, existence, and acceptance of the right-of-way for the Temple Junction/Hidden Splendor Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3690. The appearance of the Temple Junction/Hidden Splendor Road on the Temple

Mountain (1953), San Rafael Knob (1953), Horse Valley (1953), Hunt Draw (1951), Old Woman Wash (1953), and Tomsich Butte (1953) USGS 7.5 minute quadrangle maps, and the Tempie Mountain (1953), San Rafael Knob (1952), and Wild Horse (1952) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3691. The County confirmed its acceptance of the Temple Junction/Hidden Splendor Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Temple Junction/Hidden Splendor Road using public funds pursuant to the County's governmental right and authority.

3692. Witnesses with personal knowledge of the history of the Temple Junction/Hidden Splendor Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3693. Currently known reputation in the community is that the Temple Junction/Hidden Splendor Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3694. Public motor vehicle use of the Temple Junction/Hidden Splendor Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3695. The Temple Junction/Hidden Splendor Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3696. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Temple Junction/Hidden Splendor Road.

3697. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Temple Junction/Hidden Splendor Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wild Horse/Muddy River Road, 1013

3698. The Wild Horse/Muddy River Road is designated as county road number 1013and SGID road identification number RD080016 and is more or less 19.39 miles long.

3699. Exhibit 284 (attached hereto and incorporated herein) contains certain information pertaining to the Wild Horse/Muddy River Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3700. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wild Horse/Muddy River Road solely as it crosses United States public land as included and specifically described in Exhibit 284. The Wild Horse/Muddy River Road includes the segment of road specifically set forth in Exhibit 284 and as exists on the ground.

Acceptance of the Wild Horse/Muddy River Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3701. The Wild Horse/Muddy River Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3702. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Wild Horse/Muddy River Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3703. The appearance of the Wild Horse/Muddy River Road on the Hunt Draw (1951), Little Wild Horse Mesa (1953), and Goblin Valley (1953) USGS 7.5 minute quadrangle maps, and the Wild Horse (1952) and Tempie Mountain (1953) USGS 15 minute quadrangle maps, evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3704. The County confirmed its acceptance of the Wild Horse/Muddy River Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wild Horse/Muddy River Road using public funds pursuant to the County's governmental right and authority.

3705. Witnesses with personal knowledge of the history of the Wild Horse/Muddy River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3706. Currently known reputation in the community is that the Wild Horse/Muddy River Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3707. Public motor vehicle use of the Wild Horse/Muddy River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3708. The Wild Horse/Muddy River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3709. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wild Horse/Muddy River Road.

3710. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wild Horse/Muddy River Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3660 Road

3711. The 3660 Road is designated as county road number 3660 and SGID road identification number RD080308 and is more or less 1.88 miles long.

3712. Exhibit 285 (attached hereto and incorporated herein) contains certain information pertaining to the 3660 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3713. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3660 Road solely as it crosses United States public land as included and specifically described in Exhibit 285. The 3660 Road includes the segment of road specifically set forth in Exhibit 285 and as exists on the ground.

Acceptance of the 3660 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3714. The 3660 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3715. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3660 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3716. The 3660 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3660 Road pursuant to the County's governmental right and authority.

3717. Witnesses with personal knowledge of the history of the 3660 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3718. Currently known reputation in the community is that the 3660 Road has been

open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3719. Public motor vehicle use of the 3660 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3720. The 3660 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3721. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3660 Road.

3722. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3660 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3662 Road

3723. The 3662 Road is designated as county road number 3662 and SGID road identification number RD080311 and is more or less 1.54 miles long.

3724. Exhibit 286 (attached hereto and incorporated herein) contains certain information pertaining to the 3662 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3725. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3662 Road solely as it crosses United States public land as included and specifically described in Exhibit 286. The 3662 Road includes the segment of road specifically set forth in Exhibit 286 and as exists on the ground.

Acceptance of the 3662 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3726. The 3662 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3727. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3662 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3728. The 3662 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3662 Road pursuant to the County's governmental right and authority.

3729. Witnesses with personal knowledge of the history of the 3662 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3730. Currently known reputation in the community is that the 3662 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3731. Public motor vehicle use of the 3662 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3732. The 3662 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3733. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3662 Road.

3734. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3662 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3663 Road

3735. The 3663 Road is designated as county road number 3663 and SGID road identification number RD080312 and is more or less 1.47 miles long.

3736. Exhibit 287 (attached hereto and incorporated herein) contains certain information pertaining to the 3663 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3737. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3663 Road solely as it crosses United States public land as included and

specifically described in Exhibit 287. The 3663 Road includes the segment of road specifically set forth in Exhibit 287 and as exists on the ground.

Acceptance of the 3663 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3738. The 3663 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3739. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 3663 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3740. The 3663 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3663 Road pursuant to the County's governmental right and authority.

3741. Witnesses with personal knowledge of the history of the 3663 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3742. Currently known reputation in the community is that the 3663 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3743. Public motor vehicle use of the 3663 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3744. The 3663 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3745. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3663 Road.

3746. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3663 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3842-A Road

3747. The 3842-A Road is designated as county road number 3842-A and SGID road identification number RD080371 and is more or less 1.6 miles long.

3748. Exhibit 288 (attached hereto and incorporated herein) contains certain information pertaining to the 3842-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3749. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3842-A Road solely as it crosses United States public land as included and specifically described in Exhibit 288. The 3842-A Road includes the segment of road specifically set forth in Exhibit 288 and as exists on the ground.

Acceptance of the 3842-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3750. The 3842-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3751. The appearance of the 3842-A Road on the Greasewood Draw (1953) USGS 7.5 minute quadrangle map and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3752. The County confirmed its acceptance of the 3842-A Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3842-A Road pursuant to the County's governmental right and authority.

3753. Witnesses with personal knowledge of the history of the 3842-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3754. Currently known reputation in the community is that the 3842-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3755. Public motor vehicle use of the 3842-A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public

highway right-of-way underlying this road.

3756. The 3842-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3757. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3842-A Road.

3758. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3842-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3842-B Road

3759. The 3842-B Road is designated as county road number 3842-B and SGID road identification number RD080372 and is more or less 2.32 miles long.

3760. Exhibit 289 (attached hereto and incorporated herein) contains certain information pertaining to the 3842-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3761. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3842-B Road solely as it crosses United States public land as included and specifically described in Exhibit 289. The 3842-B Road includes the segment of road specifically set forth in Exhibit 289 and as exists on the ground.

Acceptance of the 3842-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3762. The 3842-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3763. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3842-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3764. The appearance of the 3842-B Road on the Greasewood Draw (1953) USGS 7.5 minute quadrangle map and the Tidewell Bottoms (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3765. The County confirmed its acceptance of the 3842-B Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3842-B Road pursuant to the County's governmental right and authority.

3766. Witnesses with personal knowledge of the history of the 3842-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3767. Currently known reputation in the community is that the 3842-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10

years prior to October 21, 1976, and continuing to the present.

3768. Public motor vehicle use of the 3842-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3769. The 3842-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3770. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3842-B Road.

3771. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3842-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3915-A Road

3772. The 3915-A Road is designated as county road number 3915-A and SGID road identification number RD080393 and is more or less 7.93 miles long.

3773. Exhibit 290 (attached hereto and incorporated herein) contains certain information pertaining to the 3915-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3774. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 3915-A Road solely as it crosses United States public land as included and specifically described in Exhibit 290. The 3915-A Road includes the segment of road specifically set forth in Exhibit 290 and as exists on the ground.

Acceptance of the 3915-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3775. The 3915-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3776. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3915-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3777. The 3915-A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3915-A Road pursuant to the County's governmental right and authority.

3778. Witnesses with personal knowledge of the history of the 3915-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3779. Currently known reputation in the community is that the 3915-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3780. Public motor vehicle use of the 3915-A Road as a public thoroughfare traversing

unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3781. The 3915-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3782. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3915-A Road.

3783. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3915-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3915-C Road

3784. The 3915-C Road is designated as county road number 3915-C and SGID road identification number RD080392 and is more or less 5.18 miles long.

3785. Exhibit 291 (attached hereto and incorporated herein) contains certain information pertaining to the 3915-C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3786. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3915-C Road solely as it crosses United States public land as included and specifically described in Exhibit 291. The 3915-C Road includes the segment of road

specifically set forth in Exhibit 291 and as exists on the ground.

Acceptance of the 3915-C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3787. The 3915-C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3788. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3915-C Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3789. The appearance of the 3915-C Road the Horse Valley (1953) USGS 7.5 minute quadrangle map and the Wild Horse (1952) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3790. The 3915-C Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3915-C Road pursuant to the County's governmental right and authority.

3791. Witnesses with personal knowledge of the history of the 3915-C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3792. Currently known reputation in the community is that the 3915-C Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10

years prior to October 21, 1976, and continuing to the present.

3793. Public motor vehicle use of the 3915-C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3794. The 3915-C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3795. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3915-C Road.

3796. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3915-C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3917-A Road

3797. The 3917-A Road is designated as county road number 3917-A and SGID road identification number RD080396 and is more or less 0.33 miles long.

3798. Exhibit 292 (attached hereto and incorporated herein) contains certain information pertaining to the 3917-A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3799. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 3917-A Road solely as it crosses United States public land as included and specifically described in Exhibit 292. The 3917-A Road includes the segment of road specifically set forth in Exhibit 292 and as exists on the ground.

Acceptance of the 3917-A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3800. The 3917-A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3801. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3917-A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3802. The 3917-A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3917-A Road pursuant to the County's governmental right and authority.

3803. Witnesses with personal knowledge of the history of the 3917-A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3804. Currently known reputation in the community is that the 3917-A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3805. Public motor vehicle use of the 3917-A Road as a public thoroughfare traversing

unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3806. The 3917-A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3807. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3917-A Road.

3808. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3917-A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3920-B Road

3809. The 3920-B Road is designated as county road number 3920-B and SGID road identification number RD080402 and is more or less 1.44 miles long.

3810. Exhibit 293 (attached hereto and incorporated herein) contains certain information pertaining to the 3920-B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3811. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3920-B Road solely as it crosses United States public land as included and specifically described in Exhibit 293. The 3920-B Road includes the segment of road

specifically set forth in Exhibit 293 and as exists on the ground.

Acceptance of the 3920-B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3812. The 3920-B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3813. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3920-B Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3814. The 3920-B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3920-B Road pursuant to the County's governmental right and authority.

3815. Witnesses with personal knowledge of the history of the 3920-B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3816. Currently known reputation in the community is that the 3920-B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3817. Public motor vehicle use of the 3920-B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public

highway right-of-way underlying this road.

3818. The 3920-B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3819. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3920-B Road.

3820. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3920-B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3920-C Road

3821. The 3920-C Road is designated as county road number 3920-C and SGID road identification number RD080403 and is more or less 2.73miles long.

3822. Exhibit 294 (attached hereto and incorporated herein) contains certain information pertaining to the 3920-C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3823. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3920-C Road solely as it crosses United States public land as included and specifically described in Exhibit 294. The 3920-C Road includes the segment of road specifically set forth in Exhibit 294 and as exists on the ground.

Acceptance of the 3920-C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3824. The 3920-C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3825. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3920-C Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3826. The 3920-C Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3920-C Road pursuant to the County's governmental right and authority.

3827. Witnesses with personal knowledge of the history of the 3920-C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3828. Currently known reputation in the community is that the 3920-C Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3829. Public motor vehicle use of the 3920-C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3830. The 3920-C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3831. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3920-C Road.

3832. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3920-C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

3920-D Road

3833. The 3920-D Road is designated as county road number 3920-D and SGID road identification number RD080404 and is more or less 2.4 miles long.

3834. Exhibit 295 (attached hereto and incorporated herein) contains certain information pertaining to the 3920-D Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3835. In this action, the State and County seek to quiet title to the public highway right-of-way for the 3920-D Road solely as it crosses United States public land as included and specifically described in Exhibit 295. The 3920-D Road includes the segment of road specifically set forth in Exhibit 295 and as exists on the ground.

Acceptance of the 3920-D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3836. The 3920-D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3837. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 3920-D Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3838. The 3920-D Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 3920-D Road pursuant to the County's governmental right and authority.

3839. Witnesses with personal knowledge of the history of the 3920-D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3840. Currently known reputation in the community is that the 3920-D Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3841. Public motor vehicle use of the 3920-D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3842. The 3920-D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3843. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 3920-D Road.

3844. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 3920-D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Baptist Draw Road, 3917

3845. The Baptist Draw Road is designated as county road number 3917 and SGID road identification number RD080395 and is more or less 2.49 miles long.

3846. Exhibit 296 (attached hereto and incorporated herein) contains certain information pertaining to the Baptist Draw Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3847. In this action, the State and County seek to quiet title to the public highway right-of-way for the Baptist Draw Road solely as it crosses United States public land as included and specifically described in Exhibit 296. The Baptist Draw Road includes the segment of road specifically set forth in Exhibit 296 and as exists on the ground.

Acceptance of the Baptist Draw Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3848. The Baptist Draw Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3849. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Baptist Draw Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3850. The Baptist Draw Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Baptist Draw Road pursuant to the County's governmental right and authority.

3851. Witnesses with personal knowledge of the history of the Baptist Draw Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3852. Currently known reputation in the community is that the Baptist Draw Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3853. Public motor vehicle use of the Baptist Draw Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

3854. The Baptist Draw Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3855. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Baptist Draw Road.

3856. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Baptist Draw Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Baptist Draw Air Strip Road, 3917-C exten

3857. The Baptist Draw Air Strip Road is designated as county road number 3917-C exten and SGID road identification number RD080398 and is more or less 0.34 miles long.

3858. Exhibit 297 (attached hereto and incorporated herein) contains certain information pertaining to the Baptist Draw Air Strip Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3859. In this action, the State and County seek to quiet title to the public highway right-of-way for the Baptist Draw Air Strip Road solely as it crosses United States public land as included and specifically described in Exhibit 297. The Baptist Draw Air Strip Road includes the segment of road specifically set forth in Exhibit 297 and as exists on the ground.

Acceptance of the Baptist Draw Air Strip Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3860. The Baptist Draw Air Strip Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3861. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Baptist Draw Air Strip Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3862. The Baptist Draw Air Strip Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Baptist Draw Air Strip Road pursuant to the County's governmental right and authority.

3863. Witnesses with personal knowledge of the history of the Baptist Draw Air Strip Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3864. Currently known reputation in the community is that the Baptist Draw Air Strip Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3865. Public motor vehicle use of the Baptist Draw Air Strip Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of

an R.S. 2477 public highway right-of-way underlying this road.

3866. The Baptist Draw Air Strip Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3867. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Baptist Draw Air Strip Road.

3868. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Baptist Draw Air Strip Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cliff Dweller Flat Road, 3661

3869. The Cliff Dweller Flat Road is designated as county road number 3661 and SGID road identification number RD080310 and is more or less 2.11 miles long.

3870. Exhibit 298 (attached hereto and incorporated herein) contains certain information pertaining to the Cliff Dweller Flat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3871. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cliff Dweller Flat Road solely as it crosses United States public land as included and specifically described in Exhibit 298. The Cliff Dweller Flat Road includes the segment of road specifically set forth in Exhibit 298 and as exists on the ground.

Acceptance of the Cliff Dweller Flat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3872. The Cliff Dweller Flat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3873. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cliff Dweller Flat Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3874. The Cliff Dweller Flat Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cliff Dweller Flat Road pursuant to the County's governmental right and authority.

3875. Witnesses with personal knowledge of the history of the Cliff Dweller Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3876. Currently known reputation in the community is that the Cliff Dweller Flat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3877. Public motor vehicle use of the Cliff Dweller Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

3878. The Cliff Dweller Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3879. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cliff Dweller Flat Road.

3880. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cliff Dweller Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Home Base Road, 3829

3881. The Home Base Road is designated as county road number 3829 and SGID road identification number RD080363 and is more or less 10.63 miles long.

3882. Exhibit 299 (attached hereto and incorporated herein) contains certain information pertaining to the Home Base Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3883. In this action, the State and County seek to quiet title to the public highway right-of-way for the Home Base Road solely as it crosses United States public land as included and specifically described in Exhibit 299. The Home Base Road includes the segment of road specifically set forth in Exhibit 299 and as exists on the ground.

Acceptance of the Home Base Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3884. The Home Base Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3885. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Home Base Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3886. The Home Base Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Home Base Road pursuant to the County's governmental right and authority.

3887. Witnesses with personal knowledge of the history of the Home Base Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3888. Currently known reputation in the community is that the Home Base Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3889. Public motor vehicle use of the Home Base Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

3890. The Home Base Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3891. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Home Base Road.

3892. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Home Base Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hyde Draw Loop Road, 3659

3893. The Hyde Draw Loop Road is designated as county road number 3659 and SGID road identification number RD080307 and is more or less 7.5 miles long.

3894. Exhibit 300 (attached hereto and incorporated herein) contains certain information pertaining to the Hyde Draw Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3895. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hyde Draw Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 300. The Hyde Draw Loop Road includes the segment of road specifically set forth in Exhibit 300 and as exists on the ground.

Acceptance of the Hyde Draw Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3896. The Hyde Draw Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3897. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Hyde Draw Loop Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3898. The appearance of the Hyde Draw Loop Road on the Drowned Hole Draw (1953) USGS 7.5 minute quadrangle map and the The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3899. The Hyde Draw Loop Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hyde Draw Loop Road pursuant to the County's governmental right and authority.

3900. Witnesses with personal knowledge of the history of the Hyde Draw Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3901. Currently known reputation in the community is that the Hyde Draw Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

3902. Public motor vehicle use of the Hyde Draw Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3903. The Hyde Draw Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3904. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hyde Draw Loop Road.

3905. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hyde Draw Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lone Man Butte Road, 3827

3906. The Lone Man Butte Road is designated as county road number 3827 and SGID road identification number RD080360 and is more or less 6.95 miles long.

3907. Exhibit 301 (attached hereto and incorporated herein) contains certain information pertaining to the Lone Man Butte Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3908. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lone Man Butte Road solely as it crosses United States public land as included and specifically described in Exhibit 301. The Lone Man Butte Road includes the segment of road specifically set forth in Exhibit 301 and as exists on the ground.

Acceptance of the Lone Man Butte Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3909. The Lone Man Butte Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3910. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lone Man Butte Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3911. The appearance of the Lone Man Butte Road on the Twin Knolls (1953) USGS 7.5 minute quadrangle map and the The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3912. The County confirmed its acceptance of the Lone Man Butte Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lone Man Butte Road pursuant to the County's governmental right and authority.

3913. Witnesses with personal knowledge of the history of the Lone Man Butte Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3914. Currently known reputation in the community is that the Lone Man Butte Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3915. Public motor vehicle use of the Lone Man Butte Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3916. The Lone Man Butte Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3917. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lone Man Butte Road.

3918. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lone Man Butte Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower Reef Lost Spring Road, 3942

3919. The Lower Reef Lost Spring Road is designated as county road number 3942 and

SGID road identification number RD080408 and is more or less 8.98 miles long.

3920. Exhibit 302 (attached hereto and incorporated herein) contains certain information pertaining to the Lower Reef Lost Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3921. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower Reef Lost Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 302. The Lower Reef Lost Spring Road includes the segment of road specifically set forth in Exhibit 302 and as exists on the ground.

Acceptance of the Lower Reef Lost Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3922. The Lower Reef Lost Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3923. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lower Reef Lost Spring Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3924. The appearance of the Lower Reef Lost Spring Road on the Temple Mountain (1953) USGS 7.5 minute quadrangle map and the Tempie Mountain (1953) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3925. The County confirmed its acceptance of the Lower Reef Lost Spring Road by

1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower Reef Lost Spring Road pursuant to the County's governmental right and authority.

3926. Witnesses with personal knowledge of the history of the Lower Reef Lost Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3927. Currently known reputation in the community is that the Lower Reef Lost Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3928. Public motor vehicle use of the Lower Reef Lost Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3929. The Lower Reef Lost Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3930. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower Reef Lost Spring Road.

3931. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Lower Reef Lost Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Molly's Castle Road, 4031

3932. The Molly's Castle Road is designated as county road number 4031 and SGID road identification number RD080447 and is more or less 5.8 miles long.

3933. Exhibit 303 (attached hereto and incorporated herein) contains certain information pertaining to the Molly's Castle Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3934. In this action, the State and County seek to quiet title to the public highway right-of-way for the Molly's Castle Road solely as it crosses United States public land as included and specifically described in Exhibit 303. The Molly's Castle Road includes the segment of road specifically set forth in Exhibit 303 and as exists on the ground.

Acceptance of the Molly's Castle Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3935. The Molly's Castle Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3936. The Molly's Castle Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Molly's Castle Road pursuant to the County's governmental right and authority.

3937. Witnesses with personal knowledge of the history of the Molly's Castle Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3938. Currently known reputation in the community is that the Molly's Castle Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3939. Public motor vehicle use of the Molly's Castle Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3940. The Molly's Castle Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3941. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Molly's Castle Road.

3942. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Molly's Castle Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Muddy Creek Road, 3014

3943. The Muddy Creek Road is designated as county road number 3014 and SGID road identification number RD080601 and is more or less 7.16 miles long.

3944. Exhibit 304 (attached hereto and incorporated herein) contains certain information pertaining to the Muddy Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3945. In this action, the State and County seek to quiet title to the public highway right-of-way for the Muddy Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 304. The Muddy Creek Road includes the segment of road specifically set forth in Exhibit 304 and as exists on the ground.

Acceptance of the Muddy Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3946. The Muddy Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3947. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Muddy Creek Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3948. The appearance of the Muddy Creek Road on the Hunt Draw (1951) USGS 7.5 minute quadrangle map and the Wild Horse (1952) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for

more detailed map information.

3949. The County confirmed its acceptance of the Muddy Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Muddy Creek Road pursuant to the County's governmental right and authority.

3950. Witnesses with personal knowledge of the history of the Muddy Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3951. Currently known reputation in the community is that the Muddy Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3952. Public motor vehicle use of the Muddy Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3953. The Muddy Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3954. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Muddy Creek Road.

3955. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Muddy Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Ernie Canyon Spur Road, 3833

3956. The North Ernie Canyon Spur Road is designated as county road number 3833 and SGID road identification number RD080364 and is more or less 1.19 miles long.

3957. Exhibit 305 (attached hereto and incorporated herein) contains certain information pertaining to the North Ernie Canyon Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3958. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Ernie Canyon Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 305. The North Ernie Canyon Spur Road includes the segment of road specifically set forth in Exhibit 305 and as exists on the ground.

Acceptance of the North Ernie Canyon Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3959. The North Ernie Canyon Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3960. Aerial photography from 1977 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the North Ernie Canyon Spur Road as a public highway

located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3961. The North Ernie Canyon Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Ernie Canyon Spur Road pursuant to the County's governmental right and authority.

3962. Witnesses with personal knowledge of the history of the North Ernie Canyon Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3963. Currently known reputation in the community is that the North Ernie Canyon Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3964. Public motor vehicle use of the North Ernie Canyon Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3965. The North Ernie Canyon Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3966. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the North Ernie Canyon Spur Road.

3967. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Ernie Canyon Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Temple Wash Road, 3924

3968. The North Temple Wash Road is designated as county road number 3924 and SGID road identification number RD080406 and is more or less 5.35 miles long.

3969. Exhibit 306 (attached hereto and incorporated herein) contains certain information pertaining to the North Temple Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3970. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Temple Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 306. The North Temple Wash Road includes the segment of road specifically set forth in Exhibit 306 and as exists on the ground.

Acceptance of the North Temple Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3971. The North Temple Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3972. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North Temple Wash Road as a public highway located on

the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3973. The appearance of the North Temple Wash Road on the Temple Mountain (1953) USGS 7.5 minute quadrangle map and the Tempie Mountain (1953) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3974. The County confirmed its acceptance of the North Temple Wash Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Temple Wash Road pursuant to the County's governmental right and authority.

3975. Witnesses with personal knowledge of the history of the North Temple Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3976. Currently known reputation in the community is that the North Temple Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3977. Public motor vehicle use of the North Temple Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of

an R.S. 2477 public highway right-of-way underlying this road.

3978. The North Temple Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3979. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Temple Wash Road.

3980. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Temple Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Draw Road, 3648

3981. The Red Draw Road is designated as county road number 3648 and SGID road identification number RD080295 and is more or less 2.93 miles long.

3982. Exhibit 307 (attached hereto and incorporated herein) contains certain information pertaining to the Red Draw Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3983. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Draw Road solely as it crosses United States public land as included and specifically described in Exhibit 307. The Red Draw Road includes the segment of road specifically set forth in Exhibit 307 and as exists on the ground.

Acceptance of the Red Draw Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3984. The Red Draw Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3985. The appearance of the Red Draw Road on the Drowned Hole Draw (1953) USGS 7.5 minute quadrangle map and the The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

3986. The County confirmed its acceptance of the Red Draw Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Draw Road pursuant to the County's governmental right and authority.

3987. Witnesses with personal knowledge of the history of the Red Draw Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3988. Currently known reputation in the community is that the Red Draw Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3989. Public motor vehicle use of the Red Draw Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

3990. The Red Draw Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3991. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Draw Road.

3992. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Draw Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Straight Wash Road, 3859

3993. The Straight Wash Road is designated as county road number 3859 and SGID road identification number RD080375 and is more or less 1.31 miles long.

3994. Exhibit 308 (attached hereto and incorporated herein) contains certain information pertaining to the Straight Wash Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3995. In this action, the State and County seek to quiet title to the public highway right-of-way for the Straight Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 308. The Straight Wash Road includes the segment of road specifically set forth in Exhibit 308 and as exists on the ground.

Acceptance of the Straight Wash Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3996. The Straight Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3997. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Straight Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3998. The Straight Wash Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Straight Wash Road pursuant to the County's governmental right and authority.

3999. Witnesses with personal knowledge of the history of the Straight Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

4000. Currently known reputation in the community is that the Straight Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

4001. Public motor vehicle use of the Straight Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

4002. The Straight Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

4003. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Straight Wash Road.

4004. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Straight Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Twin Knolls Road, 3826

4005. The Twin Knolls Road is designated as county road number 3826 and SGID road identification number RD080359 and is more or less 3.61 miles long.

4006. Exhibit 309 (attached hereto and incorporated herein) contains certain information pertaining to the Twin Knolls Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

4007. In this action, the State and County seek to quiet title to the public highway right-of-way for the Twin Knolls Road solely as it crosses United States public land as included and specifically described in Exhibit 309. The Twin Knolls Road includes the segment of road specifically set forth in Exhibit 309 and as exists on the ground.

Acceptance of the Twin Knolls Road R.S. 2477 Right-of-way Prior to October 21, 1976.

4008. The Twin Knolls Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

4009. Aerial photography from 1977or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Twin Knolls Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

4010. The appearance of the Twin Knolls Road on the Twin Knolls (1953) USGS 7.5 minute quadrangle maps and the The Wickiup (1954) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11 for more detailed map information.

4011. The County confirmed its acceptance of the Twin Knolls Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Twin Knolls Road pursuant to the County's governmental right and authority.

4012. Witnesses with personal knowledge of the history of the Twin Knolls Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

4013. Currently known reputation in the community is that the Twin Knolls Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

4014. Public motor vehicle use of the Twin Knolls Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

4015. The Twin Knolls Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

4016. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Twin Knolls Road.

4017. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Twin Knolls Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper Little Wild Horse Road, 3920

4018. The Upper Little Wild Horse Road is designated as county road number 3920 and SGID road identification number RD080400 and is more or less 0.46 miles long.

4019. Exhibit 310 (attached hereto and incorporated herein) contains certain information pertaining to the Upper Little Wild Horse Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership

list; and a complete centerline description of the road.

4020. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper Little Wild Horse Road solely as it crosses United States public land as included and specifically described in Exhibit 310. The Upper Little Wild Horse Road includes the segment of road specifically set forth in Exhibit 310 and as exists on the ground.

Acceptance of the Upper Little Wild Horse Road R.S. 2477 Right-of-way Prior to October 21, 1976.

4021. The Upper Little Wild Horse Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

4022. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Upper Little Wild Horse Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

4023. The Upper Little Wild Horse Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Upper Little Wild Horse Road pursuant to the County's governmental right and authority.

4024. Witnesses with personal knowledge of the history of the Upper Little Wild Horse Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

4025. Currently known reputation in the community is that the Upper Little Wild Horse

Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

4026. Public motor vehicle use of the Upper Little Wild Horse Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

4027. The Upper Little Wild Horse Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

4028. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper Little Wild Horse Road.

4029. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper Little Wild Horse Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request relief against the Defendant as follows:

1. On its First Cause of Action – Dutch Flat Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) South Sand Bench Loop & Spur Road, 708; (2) Wilsonville Road, 421; (3) Emery TV Tower Road, 805; (4) Dutch Flat & Salt Wash Spur Road, 705; (5) Red Point Spur Road, 918; (6) Miller's Canyon/Willow Springs

Road, 912; (7) Molen Seep Wash Road, 706; (8) East Molen Seep Wash Road, 707; (9) Muddy Spur Road, 917; (10) Ferron Old Dump, 722; (11) Soda Spur Road, 610; (12) Clawson/Paradise Road, 605; (13) Black Spur Road, 914; (14) Cowboy Mine Road, 915; (15) Old Jensen Ranch Road, 413; (16) 2400 East Ferron, 608; (17) Clawson Bench Cutoff, 414; (18) Hunter/Price Road, 426, (19) Moore Old State Highway, 801; (20) 3406-A Road; (21) 3491-B Road; (22) 3498-A Road; (23) 3513-A Road; (24) 3515-A Road; (25) 3517-A Road; (26) 3619A Road; (27) 3627 Road; (28) 3631 Road; (29) 3631-A Road; (30) 3631-B Road; (31) 708-A Road; (32) 708-B Road; (33) 708-C Road; (34) Canyon Pond/Bass Pond, 3609; (35) Cedar Ridge Loop Road, 3586; (36) Cedar Ridge Ranch Loop Road, 3576, (37) Coal Wash, 3642A-4; (38) Coal Wash Dugway, 3624A-1; (39) Coal Wash to Wood Hollow, 3517; (40) Devil's Racetrack Road, 3619; (41) Dry Wash Spur Road, 3595; (42) Dry Wash /Cedar Ridge Ranch, 3572; (43) East Sand Bench North, 3514; (44) East Sand Bench South, 3513; (45) Emery TV/Rochester, 3580; (46) Ferron Reef Cutoff Road, 3502; (47) Fuller Bottom, 3416; (48) Locomotive Point, 3630-A; (49) Lone Tree Reservoir, 3604; (50) Molen Reef, 3592; (51) North Reef Spur, 3573; (52) North Salt Wash to Fuller Bot, 3516; (53) Orchard Draw, 3630; (54) Salt Wash Spur; 3518; (55) Salt Wash to Fuller Bottom, 3515; (56) Sand Bench, 3498; (57) Secret Mesa, 3773; (58) South Sand Res. Spur, 3512; (59) South Sand Reservoir, 3406; (60) Twin Ponds Road, 3603; (61) Upper South Salt Wash, 3610; (62) Wickiup Loop Road, 3627A, (63) Wood Hollow Across Eagle Canyon, 3614; and (64) Yellow Seep, 3491;

2. On its Second Cause of Action – Ferron Canyon Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Cottonwood

Canyon Road, 506; (2) Des Bee Dove Road, 416; (3) Emery/Link Canyon Road, 905; (4) Ferron Canyon Road, 701; (5) Johnson Bench Road, 511; (6) Link Canyon Road, 911; (7) Muddy Canyon Road, 806; (8) Old Ferron Dugway Road, 720; (9) Rock Canyon Flat Road, 604; (10) Rock Canyon Road, 603; and (11) South Canal Road, 322;

3. On its Third Cause of Action – Green River Cutoff Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Airport Cleveland Road, 212; (2) Buffalo Bench Road, 330; (3) Buffalo Hollow Road, 333; (4) Buffalo Hollow Spur, 334; (5) Cleveland/Cedar Mountain Road, 206; (6) Desert Lake Loop, 110; (7) Desert Lake/Lawrence Tan Seeps Road, 215; (8) Dinosaur Quarry & Flat Top Road, 216; (9) Green River Cutoff, 401; (10) Hambrick Bottoms Road, 404; (11) Jimmy Staker Road, 109; (12) Lawrence/Cleveland Road, 328; (13) Little Cedar Mountain Road, 403; (14) Lower Cedar Mountain Road, 335; (15) Marsh Flat Road. 128; (16) Marsing Spur, 124; (17) Marsing/Desert Lake Road, 114; (18) Miller Creek Road, 120; (19) Mounds and Wellington Road, 118; (20) North Ditch Road, 108; (21) North Elmo Highway, 101; (22) North Railroad Road, 119; (23) Peterson Spur, 107; (24) Potter Spur, 213; (25) Price River Road, 115; (26) Red Seep Road, 402; (27) Silvagni Ranch Road, 127; (28) South Flat Bus Loop, 201; (29) Staker to U-10, 105; (30) Von Fail Road, 122; (31) F11 Road; (32) 3269 Road; (33) 3270 Road; (34) 3272 Road; (35) 3278 Road; (36) 3286 Road; (37) 3286-A Road; (38) 3289 Road; (39) 3290 Road; (40) 3290-A Road; (41) 3423 Road; (42) 3431 Road; (43) Bull Hollow Road, 3260; (44) Bull Hollow/Buckhorn Reservoir Road, 3259; (45) Cedar Hollow Road, 3256; (46) Cedar Mt./Dinosaur Road, 3262; (47) Dinosaur Bottoms Spur Road, 3263-A; (48) Dinosaur Bottoms

Spur " Road, 3263 (49) f03 Road; (50) Jackass Flat Cutoff Road, 3254; (51) MK Tunnels Road, f05; (52) Red Seep/Buckhorn Reservoir Road, 3258; (53) Victor Junction South Road, 3092; and (54) XX Road, 3255;

4. On its Fourth Cause of Action – the Long Street Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Green River Motocross Road, 1003; (2) Horse Canyon/Coon Springs Road, 125; (3) Lila Canyon Road, 126; (4) Long Street, 1001; (5) Woodside & Lower Price River Road, 129; (6) 3143-A Road; (7) 3143-B Road; (8) 3143-C Road; (9) 3331-A Road; (10) 3331-E Road; (11) Beckwith Plateau Road, 129A; (12) Lila Canyon Tramway Road, 3146; (13) Lower Range Creek Road, 3331-C; (14) Range Creek Road, 3152; and (15); Turtle Canyon Road, 3143;

5. On its Fifth Cause of Action – the Red Canyon Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Albrech Reservoir Road, 922; (2) Family Butte Road, 1024; (3) George's Draw Road, 336; (4) Hanni Mine Road, 1020; (5) Home Base Cutoff Road, 341; (6) Kimball Draw/Cat Canyon Road, 927; (7) Last Chance Wash Cutoff Road, 925; (8) Little Black Mountain Spur Road, 926; (9) Red Canyon Loop Road, 1019; (10) Sand Cave Spring Road, 924; (11) Sinbad Well Road, 340; (12) Tomsich Mountain Spur Road, 1021; (13) Lower Last Chance Loop Road, 920 (14) Upper Last Chance Road, 921; (15) Willow Springs Wash to I-70 Road, 923; (16) 3763 Road; (17) 3764-B Road; (18) 3780-B Road; (19) Link Flat Spurs Road, 3782; (20) 3786-A Road; (21) 3786-B Road; (22) 3899-A Road; (23) 3899-B Road; (24) 3905-B Road; (25) 3906-B Road; (26) 922-A Road; (27) 922-B Road; (28) 922-C Road; (29) 9999a Road; (30) Copper Globe Landing Strip Road, 3778;

(31) Corral Canyon Spring Road, 3999; (32) Eagle Canyon Road, 3788; (33) Earls Draw Road, 9999; (34) Earls Draw Spur Road, 3828; (35) Justensen Flats East Road, 3774; (36) Link Flat Spur Road, 3780; (37) Moroni Slopes/Chimney Canyon Road, 4000; (38) Oil Well Bench Spur Road, 3992; (39) Road Hollow Road, 3787; (40) Rods Valley Road, 3786; (41) Saddle Horse Cutoff Road, 3625; (42) Saddle Horse Cutoff Extension Road, 3625-A; (43) Seger's Hole Loop Road, 3899-C; (44) South Cedar Mountain Road, 3889; (45) Slaughter Slopes Reservoir Road, 3905; and (46) Last Chance Well Cutoff Road, 3997;

6. On its Sixth Cause of Action – San Rafael River Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Box Flat Road, 410 (2) Buckmaster Road, 1032; (3) Four Corners Mine Road, 1029; (4) Johanson Cabin Road, 327; (5) Lawrence/Tan Seeps Road, 332; (6) Lawrence/Tan Seeps/Wedge Road, 406; (7) Lower Wedge & Spurs Road, 407; (8) San Rafael River Road, 320; (9) Smith Camp Road, 1030; (10) Trail Spring Road, 1031; (11) Wedge Road, 405; (12) 3519 Road; (13) 3534 Road; (14) 3550-A Road; (15) 3652-A Road; (16) 3652-B Road; (17) Black Dragon/Hatt Ranch Road, 3669A; (18) Box Flat Road, 3535; (19) Calf Mesa Road, 3527; (20) Cane Wash Road, 627B; (21) Drowned Hole Road, 3653; (22) f02 Road; (23) Jerry's Flat Loop Road, 3647-A; (24) Limestone Bench Cutoff Road, 3624-C; (25) Limestone Bench Spur Road, 3528-A; (26) Lockhart Box Road, 3536; (27) Oil Well Draw Overlook Road, 3637; (28) Prickly Pear Road, 3451; (29) Smith CBN to GR Cut off Road, 3459; (30) Trail Spring Road, 3553; (31) Upper Oil Well Draw Road, 3639; (32) Wedge Over Look Road, 3520; and (33) West Wedge Road, 3417;

7. On its Seventh Cause of Action – the Saucer Basin Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Acerson Mine Road, 1027; (2) Chaffin Ranch Road, 1048; (3) Dugout Creek Road, 1046; (4) Gilson Butte Well Road, 1023; (5) Green River Airport Road, 1009; (6) Green River Old State Highway, 1007; (7) Keg Knoll Road, 1026; (8) Lookout Point Loop Road, 1025; (9) Lower San Rafael Road, 1010; (10) Moonshine Spring Road, 1044; (11) Nine Mile Reservoir Road, 1043; (12) Sand Road, 1049; (13) Saucer Basin Road, 1011; (14) Spring Canyon Landing Field Road, 1047; (15) Spring Canyon Road, 1045; (16) 3946-A Road; (17) 3946-B Road; (18) 3946-C Road; (19) 3946-D Road; (20) 3946-E Road; (21) 3946-F Road; (22) 3946-G Road; (23) 3946-H Road; (24) 3949 Road; (25) 3952-A Road; (26) 3952-B Road; (27) 3952-C Road; (28) 3952-D Road; (29) 3978 Road; (30) 4066-A Road; (31) 4069a Road; (32) Gilson/Rattlesnake Butte Road, 4037; (33) Hatt Ranch/SR River Road, 3691; (34) Keg Knoll Road, 4066; (35) Keg Spring Canyon Road, 3984; (36) Lookout Point Road, 3982; (37) Moonshine/Saucer Basin Wells Road, 4060; (38) San Rafael Valley Spur Road, 3843; (39) SR-24/Dugout Spring Road, 3952; (40) The Spur Road, 4069; and (41) Green River Overlook Road, 1042;

8. On its Eighth Cause of Action – the Wild Horse Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Big Wild Horse Spur Road, 1017; (2) Buckskin Spring Road, 1018; (3) Chute Canyon Road, 1016; (4) Goblin Valley Road, 1014; (5) Hatt Ranch Bypass Road, 1028; (6) North Temple Wash Road, 1015; (7) Taylor Flat Cutoff Road, 1033; (8) Temple Junction/Hidden Splendor Road, 1012; (9) Wild Horse/Muddy River Road, 1013; (10) 3660 Road; (11) 3662 Road; (12) 3663 Road; (13) 3842-A

Road; (14) 3842-B Road; (15) 3915-A Road; (16) 3915-C Road; (17) 3917-A Road; (18) 3920-B Road; (19) 3920-C Road; (20) 3920-D Road; (21) Baptist Draw Road, 3917; (22) Baptist Draw Air Strip Road, 3917-C exten; (23) Cliff Dweller Flat Road, 3661; (24) Home Base Road, 3829; (25) Hyde Draw Loop Road, 3659; (26) Lone Man Butte Road, 3827; (27) Lower Reef Lost Spring Road, 3942; (28) Molly's Castle Road, 4031; (29) Muddy Creek Road, 3014; (30) North Ernie Canyon Spur Road, 3833; (31) North Temple Wash Road, 3924; (32) Red Draw Road, 3648; (33) Straight Wash Road, 3859; (34) Twin Knolls Road, 3826; and (35) Upper Little Wild Horse Road, 3920;

9. An order awarding costs and fees, specifically including, but not limited to, reasonable attorney fees to the extent permitted by law; and

10. An order granting such further and other relief as may be appropriate.

Respectfully submitted this 29th day of August, 2012.

/s/ Roger R. Fairbanks
Assistant Attorney General