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

RICH COUNTY, 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-00424-DN Judge: Honorable David Nuffer

Rich County, Utah ("Rich County" or "County"), a Utah political subdivision, and the State of Utah (the "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codified as Revised Statutes 2477 and as 43 U.S.C. § 932 (repealed October 21, 1976 with savings provisions recognizing validity of rights-of-way already established) (hereinafter "R.S. 2477").

JURISDICTION AND VENUE

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

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) and 72-5-103(2)(b).

4. On or about August 30, 2011, the State of Utah filed a Notice of Intent to File Suit 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.

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

8. The State also owns all property interests acquired from the United States at or after the time of statehood pursuant to Article XX of the Utah Constitution. The State of Utah is duly authorized to maintain this action as an undivided joint owner of the public highway rights-of-way claimed herein. *See generally* UTAH CODE ANN. §§ 72-3-103(3), 72-3-105(3), 72-5-103–105, and 72-5-302.

9. The State of Utah and the County are joint owners of R.S. 2477 rights-of-way within Rich County, Utah. UTAH CODE ANN. §§ 72-5-302(2) and 72-5-103(2)(b).

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

11. Defendant United States of America 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

12. R.S. 2477, provides: "*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."

13. 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.

14. 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 Management*, 425 F.3d 735, 741 (10th Cir. 2005) ("*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

15. Prior to its recent adverse actions, the United States Department of Interior ("DOI") historically recognized and agreed that State law is borrowed as to govern the acceptance, scope, and regulatory jurisdiction of R.S. 2477 public highways.

16. 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 DOI's compliance with its statutory duty to manage the public lands subject to valid existing rights.

17. 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.

18. 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.

19. 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.

20. As of and following 1986, R.S. 2477 interpretive policies stated in Bureau of Land Management ("BLM") 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.

21. 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).

22. 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.

23. 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; 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.

24. 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, enjoyment, and the implied or actual right to cross public land to access and use the property interest granted.

25. 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.

26. 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.

27. 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. *Sierra Club v. Hodel*, 848 F.2d 1068, 1083-84 (10th Cir. 1988).

28. 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.

29. 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 ("FLPMA"), 43 U.S.C. § 1701 et seq.

30. 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 to manage federal lands subject to these valid existing rights.

31. FLPMA Section 701(h) provides: "All actions by the Secretary concerned under this Act shall be subject to valid existing rights." 43 U.S.C. § 1701, note. *See also* 43 U.S.C. § 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

32. 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.

33. Rich County classifies its public highways as Class B (maintained) and Class D (unmaintained) county roads. This classification is a matter of State law and is generally only relevant herein to the manner of acceptance of the rights-of-way for the roads.

34. At all times relevant herein, State 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* UTAH CODE ANN. § 72-3-103 (prior law in accord); *see also* UTAH CODE ANN. § 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; 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 (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." UTAH CODE ANN. § 72-5-104 (prior law in accord).

35. The R.S. 2477 rights-of-way for the Class B roads claimed herein were initially accepted as public highways by public use for a continuous period of at least 10 years.

36. The R.S. 2477 rights-of-way for the Class B roads were later accepted by Rich County's official designation of these roads as county general highways or by Rich 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.

37. On or about June 10, 2008, the State and County evidenced their acceptance by filing supporting documentation for 29 B roads in the Rich County Recorder's Office. The documents include maps, legal descriptions, photographs and supporting affidavits and served to function as an acknowledgment of the State and County's acceptance of R.S. 2477 rights-of-way

for these 29 B roads. *See* U.C.A. §§72-5-309, 310. Copies of all documents were provided both to the State and local BLM field offices.

38. The R.S. 2477 rights-of-way for Plaintiffs' Class D roads claimed herein were accepted by the public's continuous use of the roads as public thoroughfares for a period in excess of 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.

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

40. Beginning on November 10, 2008, the State and County evidenced their acceptance by filing supporting documentation for 209 D roads in the Rich County Recorder's Office. The documents include maps, legal descriptions, photographs and supporting affidavits and served to function as an acknowledgment of the State and County's acceptance of R.S. 2477 rights-of-way for these 209 D roads. *See* U.C.A. §§72-5-309, 310. Copies of all documents were provided both to the State and local BLM field offices.

41. Despite the State and County's formal request that BLM "make reasoned determinations regarding the existence and scope" of these rights-of-way, BLM has failed to confirm or deny the existence of any single R.S. 2477 right-of-way in Rich County. *See Kane County v. Salazar*, 562 F.3d 1077 (10th Cir. 2009, C.J. Henry, concurring).

42. Rich County is the highway authority with sole jurisdiction and control of Class B and Class D roads within its borders. Rich County has the sole obligation to manage,

construct, and maintain its Class B roads to meet general travel standards established by State law. *See* UTAH CODE ANN. §§ 72-3-103(4) and 72-3-105(4).

43. 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.

44. In addition to the public lands of the United States, some of the roads claimed in this action have segments that access and cross private land, and 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").

45. In those instances where the roads and rights-of-way cross lands formerly in private or 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. *See* UTAH CODE ANN. §§ 53C-4-203(2) and 72-5-203; 43 U.S.C. § 1701, note. 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.

46. 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.

47. 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 72-5-305.

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

AREA DESCRIPTIONS

49. 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) Six Mile Area, (2) Otter Creek Area, (3) Twin Peaks Area, (4) New Canyon Area (5) Dry Canyon Area, (6) Sage Hollow Area, (7) Dean Hollow Area, and (8) Brazier/Warner Area (collectively, the "Eight Areas").

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

51. As important links in Plaintiffs' transportation system, clear title to the rights-of-way which underlie these roads is of the upmost importance to State of Utah and the County.

52. The Six Mile Area is located in north-central Rich County and is shown on Exhibit 3, attached hereto and incorporated herein.

53. The Six Mile Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Six Mile Road, BR21; (2) Rabbit Creek Road, BR20; (3) Laketown Mountain Road, BR22; (4) Manhead Road, BR73; (5) AR17 Road, AR17;

(6) AR18 Road, AR18; (7) AR20 Road, AR20; (8) AR20A Road, AR20A; (9) AR21 Road, AR21; (10) AR21A Road, AR21; (11) AR21B Road, AR21B; (12) AR22 Road, AR22; (13) AR22B Road, AR22B; (14) AR22D Road, AR22D; (15) AR23 Road, AR23; (16) AR24 Road, AR24; (17) AR25 Road, AR25; (18) AR29 Road, AR29; (19) AR30 Road, AR30; (20) AR31 Road, AR31; (21) AR126 Road, AR126; (22) AR127 Road, AR127; (23) AR128 Road, AR128; (24) AR128A Road, AR128A; (25) AR130 Road, AR130; (26) AR132 Road, AR132; and (27) AR133 Road, AR133.

54. The Otter Creek Area is located in north-central Rich County and is shown on Exhibit 4, attached hereto and incorporated herein.

55. The Otter Creek Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Otter Creek Road, BR28; (2) Otter Creek Cutoff Road, BR29; (3) AR3 Road, AR3; (4) AR4 Road, AR4; (5) AR5 Road, AR5; (6) AR40 Road, AR40; (7) AR40A Road, AR40A; (8) AR41 Road, AR41; (9) AR43 Road, AR43; (10) AR45 Road, AR45; (11) AR49 Road, AR49; (12) AR59 Road, AR59; (13) AR59A Road, AR59A; (14) AR60 Road, AR60; (15) AR60A Road, AR60A; (16) AR61 Road, AR61; (17) AR62 Road, AR62; (18) AR62A Road, AR62A; (19) AR63 Road, AR63; (20) AR137 Road, AR137; and (21) AR144 Road, AR144.

56. The Twin Peaks Area is located in west-central Rich County and is shown on Exhibit 5, attached hereto and incorporated herein.

57. The Twin Peaks Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Twin Peaks Road, BR23; (2) Nebeker Spring Road,

BR30; (3) AR38 Road, AR38; (4) AR38E Road, AR38E; (5) AR50 Road, AR50; (6) AR50B Road, AR50B; (7) AR50C Road, AR50C; (8) AR51 Road, AR51; (9) AR52 Road, AR52; (10) AR52A Road, AR52A; (11) AR52B Road, AR52B; (12) AR52C Road, AR52C; (13) AR53 Road, AR53; (14) AR53A Road, AR53A; (15) AR54 Road, AR54; (16) AR55 Road, AR55; (17) AR56 Road, AR56; (18) AR57 Road, AR57; (19) AR58 Road, AR58; (20) AR58A Road, AR58A; (21) AR121 Road, AR121; (22) AR121E Road, AR121E; (23) AR122 Road, AR122; (24) AR123 Road, AR123; (25) AR123A Road, AR123A; (26) AR124 Road, AR124; (27) AR124B Road, AR124B; (28) AR125 Road, AR125; (29) AR125B Road, AR125B; (30) AR135 Road, AR135; (31) AR142 Road, AR142; (32) AR142A Road, AR142A; (33) AR142B Road, AR142B; and (34) AR143 Road, AR143.

58. The New Canyon Area is located in central Rich County and is shown on Exhibit 6, attached hereto and incorporated herein.

59. The New Canyon Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Little Creek Road, BR31; (2) New Canyon Road, BR32; (3) Pole Canyon Road, BR34; (4) Old Canyon Road, BR33; (5) AR6 Road, AR6; (6) AR64 Road, AR64; (7) AR65 Road, AR65; (8) AR65A Road, AR65A; (9) AR65B Road, AR65B; (10) AR66 Road, AR66; (11) AR67 Road, AR67; (12) AR72 Road, AR72; (13) AR73 Road, AR73; (14) AR74 Road, AR74; (15) AR75 Road, AR75; (16) AR77 Road, AR77; (17) AR77A Road, AR77A; (18) AR77C Road, AR77C; (19) AR78 Road, AR78; (20) AR78A Road, AR78A; (21) AR78B Road, AR78B; (22) AR78C Road, AR78C; (23) AR79 Road, AR79; (24) AR145 Road,

AR145; (25) AR145A Road, AR145A; (26) AR146 Road, AR146; and (27) AR147 Road, AR147.

60. The Dry Canyon Area is located in central Rich County and is shown on Exhibit 7, attached hereto and incorporated herein.

61. The Dry Canyon Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Old Dry Cutoff Road, BR35; (2) Dry Canyon Road, BR36; (3) Big Creek Road, BR37; (4) Ted Pope's Homestead Road, BR38; (5) Valley Ridge Road; BR81, (6) AR69 Road, AR69; (7) AR69B Road, AR69B; (8) AR69D Road, AR69D; (9) AR69F Road, AR69F; (10) AR70 Road, AR70; (11) AR71 Road, AR71; (12) AR80 Road, AR80; (13) AR81 Road, AR81; (14) AR82 Road, AR82; (15) AR83 Road, AR83; (16) AR83A Road, AR83A; (17) AR84 Road, AR84; (18) AR85 Road, AR85; (19) AR85A Road, AR85A; (20) AR86 Road, AR86; (21) AR86A Road, AR86A; and (22) AR120 Road, AR120.

62. The Sage Hollow Area is located in central Rich County and is shown on Exhibit 8, attached hereto and incorporated herein.

63. The Sage Hollow Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Bryson/Sage Hollow Road, BR41; (2) Thousand Dollar Ridge Road, BR55; (3) AR7 Road, AR7; (4) AR7A Road, AR7A; (5) AR7B Road, AR7B; (6) AR7C Road, AR7C; (7) AR7D Road, AR7D; (8) AR7E Road, AR7E; (9) AR8 Road, AR8; (10) AR9 Road, AR9; (11) AR9A Road, AR9A; (12) AR9B Road, AR9B; (13) AR87 Road, AR87; (14) AR87B Road, AR87B; (15) AR88 Road, AR88; (16) AR89 Road, AR89; (17) AR89A Road, AR89A; (18) AR92 Road, AR92; (19) AR92A Road, AR92A; (20) AR92B Road,

AR92B; (21) AR165 Road, AR165; (22) AR166 Road, AR166; (23) AR170 Road, AR170; and (24) AR171 Road, AR171.

64. The Dean Hollow Area is located in south-central Rich County and is shown on Exhibit 9, attached hereto and incorporated herein.

65. The Dean Hollow Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Lewis Ridge/Dean Hollow Road, BR82; (2) Birch Creek Reservoir Road, BR56; (3) Woodruff Creek Road, BR57; (4) Long Hollow Road, BR58; (5) Wheatgrass Road, BR63; (6) AR11 Road, AR11; (7) AR11A Road, AR11A; (8) AR12 Road, AR12; (9) AR13 Road, AR13; (10) AR13B Road, AR13B; (11) AR13C Road, AR13C; (12) AR93 Road, AR93; (13) AR94 Road, AR94; (14) AR95 Road, AR95; (15) AR96 Road, AR96; (16) AR97 Road, AR97; (17) AR97A Road, AR97A; (18) AR97B Road, AR97B; (19) AR97C Road, AR97C; (20) AR98 Road, AR98; (21) AR98A Road, AR98A; and (22) AR98B Road, AR98B.

66. The Brazier/Warner Area is located in east-central Rich County and is shown on Exhibit 10, attached hereto and incorporated herein.

67. The Brazier/Warner Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Brazier-Warner Road, BR43; (2) Mine Road, BR75; (3) River Lane Road, BR44; (4) AR15 Road, AR15; (5) AR15B Road, AR15B; (6) AR15C Road, AR15C; (7) AR15D Road, AR15D; (8) AR15E Road, AR15E; (9) AR16 Road, AR16; (10) AR16A Road, AR16A; (11) AR16B Road, AR16B; (12) AR16C Road, AR16C; (13) AR16D Road, AR16D; (14) AR103 Road, AR103; (15) AR103A Road, AR103A; (16) AR103B

Road, AR103B; (17) AR104 Road, AR104; (18) AR104A Road, AR104A; (19) AR105 Road, AR105; (20) AR105A Road, AR105A; (21) AR107 Road, AR107; (22) AR108 Road, AR108; (23) AR108B Road, AR108B; (24) AR108C Road, AR108C; (25) AR108D Road, AR108D; (26) AR108E Road, AR108E; (27) AR109 Road, AR109; (28) AR110 Road, AR110; (29) AR110A Road, AR110A; (30) AR114 Road, AR114; (31) AR115 Road, AR115; (32) AR116 Road, AR116; (33) AR116A Road, AR116A; (34) AR117 Road, AR117; (35) AR117C Road, AR117C; (36) AR117D Road, AR117D; (37) Weston Road, AR156; (38) AR157 Road, AR157; (39) AR158 Road, AR158; (40) AR160 Road, AR160; (41) AR160A Road, AR160A; and (42) AR163 Road, AR163.

68. The surveyed centerline of the above named roads in the Eight Areas are displayed, respectively, as Exhibits 12-230, attached hereto and incorporated herein. Each centerline was plotted using NAD83 mapping grade Global Positioning Survey ("GPS") data collected by the State of Utah and personnel from the County. This centerline data has been verified, confirmed by on the ground inspection, referenced to historic aerial photography, and overlaid upon United States Geological Survey topographic maps.

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

70. 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 aliquot parts of each section, township, and range crossed by the right-of-way.

71. The United States Geological Survey (”USGS”) 7.5-minute quadrangle maps covering Rich County evidence the acceptance, use, and existence of the rights-of-way in this action prior to 1976. *See* Exhibit 11 for detailed map information.

72. 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 a United States Public Land Survey System (“PLSS”) aliquot part. 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.

73. With more precision than a PLSS aliquot part description, Plaintiffs have additionally 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.

74. 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.

75. The rights-of-way claimed herein and described in the GPS data, attached hereto as Exhibits 12-230, include only those portions of the roads crossing public lands under the jurisdiction of the DOI.

76. The segments of roads crossing private and SITLA lands are not at issue, are not contested, and are not claimed herein.

77. The segments of roads crossing United States land managed by the National Park Service ("NPS") 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

78. Rich County encompasses approximately 1,085 square miles of land. Approximately 32 % of the land within the County is federal land.

79. Due to the vast expanse of federal land in Rich County, R.S. 2477 provides the sole legal basis for Rich 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.

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

81. 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.

82. 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.

83. 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.

84. 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.

85. 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.

86. 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.

87. 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, Rich 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.

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

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

89. 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.

90. 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.

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

92. The State of Utah and Rich 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.

93. 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 Rich County which only resolution by the Court can redress.

94. 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.

95. 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.

96. 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.

97. 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.

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

99. 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.

100. 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.

101. 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 Rich 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.

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

103. 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.

104. 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.

105. 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 Rich County.

106. 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 Rich County with respect to the roads over R.S. 2477 rights-of-way at issue herein.

107. Because the DOI has failed to respond to the claims asserted by the State of Utah and Rich 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 Rich 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

108. 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).

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

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

111. 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.

112. 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.

113. 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.*

114. 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.

115. 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.

116. 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).

117. 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.

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

119. 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.

120. 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.*

121. 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.

122. 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").

123. 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).

124. 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.*

125. 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.*

126. 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").

127. 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."

128. 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."

129. 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.

130. 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.

131. 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.

132. 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.

133. 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 and D roads in Rich County.

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

135. 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.*

136. 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.

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

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

139. 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.*

140. 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.

141. 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.

142. 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.

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

144. 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.

145. 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.

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

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

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

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

150. 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.

151. 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 Rich 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.

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

153. 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."

154. Because the State of Utah and Rich 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.

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

156. Certain roads become impassable and dangerous without maintenance.

157. 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.

158. 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.

159. 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.

160. 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.

161. 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.

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

163. 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."

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

165. 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.

166. 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.

167. 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.

168. Rich 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).

169. Rich 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).

170. 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.

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

172. 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.

173. 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 Rich County.

174. 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.

175. 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.

176. 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.

177. Certain roads have fallen into disrepair without Rich 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.

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

179. 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.

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

181. 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").

182. 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*.

183. 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.

184. 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.*

185. 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.*

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

187. 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.

188. 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.

189. 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.

190. 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).

191. 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.

192. 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.

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

194. 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.

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

196. In response to Rich County's claims of ownership of these rights-of-way, the RMP finalized by the BLM covering Rich 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*.

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

198. The BLM's actions in implementing and enforcing the Salt Lake RMP's transportation decisions and the subsequent road closures have excluded Rich 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.

199. Despite the State of Utah and Rich 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.

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

201. 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.

202. 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
SIX MILE AREA

203. The State of Utah and Rich County incorporate herein and reallege each of the foregoing paragraphs.

204. The Six Mile Area is located in north-central Rich County in the northeastern region of Utah. *See* Exhibit 3.

205. The Six Mile Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Six Mile Road, BR21; (2) Rabbit Creek Road, BR20; (3) Laketown Mountain Road, BR22; (4) Manhead Road, BR73; (5) AR17 Road, AR17; (6) AR18 Road, AR18; (7) AR20 Road, AR20; (8) AR20A Road, AR20A; (9) AR21 Road, AR21; (10) AR21A Road, AR21; (11) AR21B Road, AR21B; (12) AR22 Road, AR22; (13) AR22B Road, AR22B; (14) AR22D Road, AR22D; (15) AR23 Road, AR23; (16) AR24 Road, AR24; (17) AR25 Road, AR25; (18) AR29 Road, AR29; (19) AR30 Road, AR30; (20) AR31 Road, AR31; (21) AR126 Road, AR126; (22) AR127 Road, AR127; (23) AR128 Road, AR128; (24) AR128A Road, AR128A; (25) AR130 Road, AR130; (26) AR132 Road, AR132; and (27) AR133 Road, AR133.

206. Each right-of-way claimed in the Six Mile 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.

207. All rights-of-way claimed in the Six Mile 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.

208. All rights-of-way claimed in the Six Mile 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).

209. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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.

Six Mile Road, BR21

210. The Six Mile Road is designated as county road number BR21 and State Geographic Information Database ("SGID") road identification number RD170061 and is more or less 9.68 miles long.

211. The centerline course of the Six Mile Road is depicted on the map included in Exhibit 12 (Six Mile Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

212. The west end of the Six Mile Road commences in the southeast quarter of section 27, Township 13 North, Range 6 East, S.L.B.M. and proceeds generally east where it meets the Manhead Road in the southeast quarter of section 30, Township 13 North, Range 8 East, S.L.B.M.

213. The specific right-of-way for the Six Mile Road claimed herein crosses 2.65 miles of BLM land in 7 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 12.

214. In this action, the State and County seek to quiet title to the public highway right-of-way for the Six Mile Road solely as it crosses United States public land as included and specifically described in Exhibit 12. The Six Mile Road includes the segments of road specifically set forth in Exhibit 12 and as exists on the ground.

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

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

216. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Six Mile Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

217. The appearance of the Six Mile Road on the Sage Creek (1969) and Leefe (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

218. The County confirmed its acceptance of the Six Mile Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Six Mile Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

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

Rabbit Creek Road, BR20

225. The Rabbit Creek Road is designated as county road number BR20 and State Geographic Information Database ("SGID") road identification number RD170059 and is more or less 6.73 miles long.

226. The centerline course of the Rabbit Creek Road is depicted on the map included in Exhibit 13 (Rabbit Creek Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, land administered by the Utah School and Institutional Trust Lands Administration ("SITLA") and public land administered by the BLM.

227. The west end of the Rabbit Creek Road commences in the northwest quarter of section 26, Township 13 North, Range 7 East, S.L.B.M. and proceeds generally north from Six Mile Road to the northeast quarter of section 28, Township 14 North, Range 7 East, S.L.B.M.

228. The specific right-of-way for the Rabbit Creek Road claimed herein crosses 2.49 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 13.

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

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

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

231. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Rabbit Creek Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

232. Prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Rabbit Creek Road using public funds pursuant to the County's governmental right and authority.

233. Witnesses with personal knowledge of the history of the Rabbit 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.

234. Currently known reputation in the community is that the Rabbit 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.

235. Public motor vehicle use of the Rabbit 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 for this road.

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

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

238. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rabbit 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.

Laketown Mountain Road, BR22

239. The Laketown Mountain Road is designated as county road number BR22 and State Geographic Information Database ("SGID") road identification number RD170063 and is more or less 1.79 miles long.

240. The centerline course of the Laketown Mountain Road is depicted on the map included in Exhibit 14 (Laketown Mountain Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

241. The south end of the Laketown Mountain Road commences in the southeast quarter of section 27, Township 13 North, Range 6 East, S.L.B.M and proceeds generally north in the north in the northeast quarter of section 22, Township 13 North, Range 6 East, S.L.B.M.

242. The specific right-of-way for the Laketown Mountain Road claimed herein crosses 0.47 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 14.

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

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

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

245. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Laketown Mountain Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

246. The appearance of the Laketown Mountain Road on the Sage Creek (1969) and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

247. The County confirmed its acceptance of the Laketown Mountain Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its

acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Laketown Mountain Road using public funds pursuant to the County's governmental right and authority.

248. Witnesses with personal knowledge of the history of the Laketown 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.

249. Currently known reputation in the community is that the Laketown 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.

250. Public motor vehicle use of the Laketown 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 for this road.

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

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

253. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Laketown 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.

Manhead Road, BR73

254. The Manhead Road is designated as county road number BR73 and State Geographic Information Database ("SGID") road identification number RD170075 and is more or less 7.44 miles long.

255. The centerline course of the Manhead Road is depicted on the map included in Exhibit 15 (Manhead Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

256. The south end of the Manhead Road commences in the northeast quarter of section 23, Township 12 North, Range 7 East, S.L.B.M. and proceeds generally northeast to the southwest quarter of section 16, Township 13 North, Range 8 East, S.L.B.M. to the state line.

257. The specific right-of-way for the Manhead Road claimed herein crosses 0.61 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 15.

258. In this action, the State and County seek to quiet title to the public highway right-of-way for the Manhead Road solely as it crosses United States public land as included and specifically described in Exhibit 15. The Manhead Road includes the segments of road specifically set forth in Exhibit 15 and as exists on the ground.

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

259. The Manhead 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 Manhead Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

261. The appearance of the Manhead Road on the Leefe (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

262. The County confirmed its acceptance of the Manhead Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Manhead Road using public funds pursuant to the County's governmental right and authority.

263. Witnesses with personal knowledge of the history of the Manhead Road confirm public use of this road as a public 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 Manhead Road has been open for all to come 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 Manhead Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

266. The Manhead 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 Manhead Road.

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

AR17 Road, AR17

269. The AR17 Road is designated as county road number AR17 and State Geographic Information Database ("SGID") road identification number RD170450 and is more or less 3.83 miles long.

270. The centerline course of the AR17 Road is depicted on the map included in Exhibit 16 (AR17), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

271. The west end of the AR17 Road commences in the southeast quarter of section 25, Township 13 North, Range 6 East, S.L.B.M. and proceeds generally northeast to the southeast quarter of section 21, Township 13 North, Range 7 East, S.L.B.M.

272. The specific right-of-way for the AR17 Road claimed herein crosses 1.25 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 16.

273. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR17 Road solely as it crosses United States public land as included and specifically described in Exhibit 16. The AR17 Road includes the segments of road specifically set forth in Exhibit 16 and as exists on the ground.

Acceptance of the AR17 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

274. The AR17 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

275. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR17 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

276. The appearance of the AR17 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

277. The AR17 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, or improving the AR17 Road pursuant to the County's governmental right and authority.

278. Witnesses with personal knowledge of the history of the AR17 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a weekly basis, weather permitting, for more than 10 years prior to October 21, 1976.

279. Currently known reputation in the community is that the AR17 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

280. Public motor vehicle use of the AR17 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

281. The AR17 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

282. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR17 Road.

283. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR17 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR18 Road, AR18

284. The AR18 Road is designated as county road number AR18 and State Geographic Information Database ("SGID") road identification number RD170453 and is more or less 7.54 miles long.

285. The centerline course of the AR18 Road is depicted on the map included in Exhibit 17 (AR18), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

286. The west end of the AR18 Road commences in the southeast quarter of section 28, Township 13 North, Range 6 East, S.L.B.M. and proceeds generally east to the southeast quarter of section 21, Township 13 North, Range 7 East, S.L.B.M. where it joins the Six Mile Road.

287. The specific right-of-way for the AR18 Road claimed herein crosses 2.32 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 17.

288. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR18 Road solely as it crosses United States public land as included and specifically described in Exhibit 17. The AR18 Road includes the segments of road specifically set forth in Exhibit 17 and as exists on the ground.

Acceptance of the AR18 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

289. The AR18 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

290. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR18 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

291. The appearance of the AR18 Road on the Sage Creek (1969) and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

292. The AR18 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, or improving the AR18 Road pursuant to the County's governmental right and authority.

293. Witnesses with personal knowledge of the history of the AR18 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

294. Currently known reputation in the community is that the AR18 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

295. Public motor vehicle use of the AR18 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

296. The AR18 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

297. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR18 Road.

298. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR18 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR20 Road, AR20

299. The AR20 Road is designated as county road number AR20 and State Geographic Information Database ("SGID") road identification number RD170454 and is more or less 1.47 miles long.

300. The centerline course of the AR20 Road is depicted on the map included in Exhibit 18 (AR20), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

301. The west end of the AR20 Road commences in the northwest quarter of section 34, Township 13 North, Range 6 East, S.L.B.M. and proceeds generally east-southeast to the southeast quarter of section 35, Township 13 North, Range 6 East, S.L.B.M.

302. The specific right-of-way for the AR20 Road claimed herein crosses 1.44 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 18.

303. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR20 Road solely as it crosses United States public land as included and specifically described in Exhibit 18. The AR20 Road includes the segments of road specifically set forth in Exhibit 18 and as exists on the ground.

Acceptance of the AR20 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

304. The AR20 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

305. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR20 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

306. The appearance of the AR20 Road on the Laketown (1969) and Sage Creek (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

307. The AR20 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, or improving the AR20 Road pursuant to the County's governmental right and authority.

308. Witnesses with personal knowledge of the history of the AR20 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

309. Currently known reputation in the community is that the AR20 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

310. Public motor vehicle use of the AR20 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

311. The AR20 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

312. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR20 Road.

313. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR20 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR20A Road, AR20A

314. The AR20A Road is designated as county road number AR20A and State Geographic Information Database ("SGID") road identification number RD170455 and is more or less 0.61 miles long.

315. The centerline course of the AR20A Road is depicted on the map included in Exhibit 19 (AR20A), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

316. The north end of the AR20A Road commences in the northwest quarter of section 35, Township 13 North, Range 6 East, S.L.B.M. and proceeds generally southeast to the southwest quarter of section 35, Township 13 North, Range 7 East, S.L.B.M.

317. The specific right-of-way for the AR20A Road claimed herein crosses 0.38 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 19.

318. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR20A Road solely as it crosses United States public land as included and specifically described in Exhibit 19. The AR20A Road includes the segments of road specifically set forth in Exhibit 19 and as exists on the ground.

Acceptance of the AR20A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

319. The AR20A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

320. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR20A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

321. The appearance of the AR20A Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

322. The AR20A 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, or improving the AR20A pursuant to the County's governmental right and authority.

323. Witnesses with personal knowledge of the history of the AR20A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

324. Currently known reputation in the community is that the AR20A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

325. Public motor vehicle use of the AR20A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

326. The AR20A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

327. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR20A Road.

328. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR20A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR21 Road, AR21

329. The AR21 Road is designated as county road number AR21 and State Geographic Information Database ("SGID") road identification number RD170456 and is more or less 9.60 miles long.

330. The centerline course of the AR21 Road is depicted on the map included in Exhibit 20 (AR21), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

331. The north end of the AR21 Road commences in the northwest quarter of section 34, Township 13 North, Range 6 East, S.L.B.M. and proceeds generally southeast to the

northeast quarter of section 13, Township 12 North, Range 7 East, S.L.B.M. where it meets the Manhead Road.

332. The specific right-of-way for the AR21 Road claimed herein crosses 6.58 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 20.

333. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR21 Road solely as it crosses United States public land as included and specifically described in Exhibit 20. The AR21 Road includes the segments of road specifically set forth in Exhibit 20 and as exists on the ground.

Acceptance of the AR21 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

334. The AR21 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

335. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR21 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

336. The appearance of the AR21 Road on the Leefe (1969), Sage Creek (1969) and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

337. The County confirmed its acceptance of the AR21 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, or improving the AR21 Road pursuant to the County's governmental right and authority.

338. Witnesses with personal knowledge of the history of the AR21 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

339. Currently known reputation in the community is that the AR21 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

340. Public motor vehicle use of the AR21 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

341. The AR21 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

342. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR21 Road.

343. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR21 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR21A Road, AR21A

344. The AR21A Road is designated as county road number AR21A and State Geographic Information Database ("SGID") road identification number RD170457 and is more or less 0.79 miles long.

345. The centerline course of the AR21A Road is depicted on the map included in Exhibit 21 (AR21A), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

346. The east end of the AR21A Road commences in the southeast quarter of section 34, Township 13 North, Range 6 East, S.L.B.M. and proceeds generally east to the southeast quarter of section 33, Township 13 North, Range 6 East, S.L.B.M.

347. The specific right-of-way for the AR21A Road claimed herein crosses 0.11 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 21.

348. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR21A Road solely as it crosses United States public land as included and specifically described in Exhibit 21. The AR21A Road includes the segments of road specifically set forth in Exhibit 21 and as exists on the ground.

Acceptance of the AR21A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

349. The AR21A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

350. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR21A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

351. The appearance of the AR21A Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

352. The AR21A 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, or improving the AR21A Road pursuant to the County's governmental right and authority.

353. Witnesses with personal knowledge of the history of the AR21A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

354. Currently known reputation in the community is that the AR21A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

355. Public motor vehicle use of the AR21A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

356. The AR21A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

357. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR21A Road.

358. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR21A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR21B Road, AR21B

359. The AR21B Road is designated as county road number AR21B and State Geographic Information Database ("SGID") road identification number RD170458 and is more or less 1.01 miles long.

360. The centerline course of the AR21B Road is depicted on the map included in Exhibit 22 (AR21B), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

361. The east end of the AR21B Road commences in the southwest quarter of section 9, Township 12 North, Range 7 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 8, Township 12 North, Range 7 East, S.L.B.M.

362. The specific right-of-way for the AR21B Road claimed herein crosses 1.01 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 22.

363. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR21B Road solely as it crosses United States public land as included and specifically described in Exhibit 22. The AR21B Road includes the segment of road specifically set forth in Exhibit 22 and as exists on the ground.

Acceptance of the AR21B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

364. The AR21B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

365. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR21B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

366. The appearance of the AR21B Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

367. The County confirmed its acceptance of the AR21B 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, or improving the AR21B Road pursuant to the County's governmental right and authority.

368. Witnesses with personal knowledge of the history of the AR21B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

369. Currently known reputation in the community is that the AR21B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

370. Public motor vehicle use of the AR21B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

371. The AR21B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

372. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR21B Road.

373. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR21B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR22 Road, AR22

374. The AR22 Road is designated as county road number AR22 and State Geographic Information Database ("SGID") road identification number RD170459 and is more or less 5.15 miles long.

375. The centerline course of the AR22 Road is depicted on the map included in Exhibit 23 (AR22), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

376. The east end of the AR22 Road commences in the southeast quarter of section 3, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally west from the Otter Creek Cutoff Road to the southeast quarter of section 33, Township 13 North, Range 7 East, S.L.B.M.

377. The specific right-of-way for the AR22 Road claimed herein crosses 3.4 miles of BLM land in 3 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 23.

378. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR22 Road solely as it crosses United States public land as included and specifically described in Exhibit 23. The AR22 Road includes the segments of road specifically set forth in Exhibit 23 and as exists on the ground.

Acceptance of the AR22 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

379. The AR22 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

380. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR22 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

381. The appearance of the AR22 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

382. The AR22 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, or improving the AR22 Road pursuant to the County's governmental right and authority.

383. Witnesses with personal knowledge of the history of the AR22 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

384. Currently known reputation in the community is that the AR22 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

385. Public motor vehicle use of the AR22 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

386. The AR22 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

387. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR22 Road.

388. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR22 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR22B Road, AR22B

389. The AR22B Road is designated as county road number AR22B and State Geographic Information Database ("SGID") road identification number RD170461 and is more or less 0.20 miles long.

390. The centerline course of the AR22B Road is depicted on the map included in Exhibit 24 (AR22B), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

391. The south end of the AR22B Road commences in the northeast quarter of section 3, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally north to the northeast quarter of section 3, Township 12 North, Range 6 East, S.L.B.M.

392. The specific right-of-way for the AR22B Road claimed herein crosses 0.2 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 24.

393. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR22B Road solely as it crosses United States public land as included and specifically described in Exhibit 24. The AR22B Road includes the segments of road specifically set forth in Exhibit 24 and as exists on the ground.

Acceptance of the AR22B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

394. The AR22B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

395. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR22B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

396. The appearance of the AR22B Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

397. The AR22B 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, or improving the AR22B Road pursuant to the County's governmental right and authority.

398. Witnesses with personal knowledge of the history of the AR22B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

399. Currently known reputation in the community is that the AR22B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

400. Public motor vehicle use of the AR22B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

401. The AR22B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

402. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR22B Road.

403. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR22B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR22D Road, AR22D

404. The AR22D Road is designated as county road number AR22D and State Geographic Information Database ("SGID") road identification number RD170462 and is more or less 0.30 miles long.

405. The centerline course of the AR22D Road is depicted on the map included in Exhibit 25 (AR22D), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

406. The south end of the AR22D Road commences in the northeast quarter of section 2, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally north to the southeast quarter of section 35, Township 13 North, Range 6 East, S.L.B.M.

407. The specific right-of-way for the AR22D Road claimed herein crosses 0.1 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 25.

408. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR22D Road solely as it crosses United States public land as included and specifically described in Exhibit 25. The AR22D Road includes the segments of road specifically set forth in Exhibit 25 and as exists on the ground.

Acceptance of the AR22D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

409. The AR22D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

410. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR22D Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

411. The appearance of the AR22D Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

412. The AR22D 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, or improving the AR22D Road pursuant to the County's governmental right and authority.

413. Witnesses with personal knowledge of the history of the AR22D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

414. Currently known reputation in the community is that the AR22D Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

415. Public motor vehicle use of the AR22D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

416. The AR22D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

417. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR22D Road.

418. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR22D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR23 Road, AR23

419. The AR23 Road is designated as county road number AR23 and State Geographic Information Database ("SGID") road identification number RD170464 and is more or less 2.10 miles long.

420. The centerline course of the AR23 Road is depicted on the map included in Exhibit 26 (AR23), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

421. The south end of the AR23 Road commences in the northwest quarter of section 33, Township 13 North, Range 7 East and proceeds generally southeast to the northeast quarter of section 6, Township 12 North, Range 7 East, S.L.B.M.

422. The specific right-of-way for the AR23 Road claimed herein crosses 1.67 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 26.

423. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR23 Road solely as it crosses United States public land as included and

specifically described in Exhibit 26. The AR23 Road includes the segments of road specifically set forth in Exhibit 26 and as exists on the ground.

Acceptance of the AR23 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

424. The AR23 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

425. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR23 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

426. The appearance of the AR23 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

427. The County confirmed its acceptance of the AR23 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, or improving the AR23 Road pursuant to the County's governmental right and authority.

428. Witnesses with personal knowledge of the history of the AR23 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

429. Currently known reputation in the community is that the AR23 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

430. Public motor vehicle use of the AR23 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

431. The AR23 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

432. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR23 Road.

433. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR23 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR24 Road, AR24

434. The AR24 Road is designated as county road number AR24 and State Geographic Information Database ("SGID") road identification number RD170465 and is more or less 1.37 miles long.

435. The centerline course of the AR24 Road is depicted on the map included in Exhibit 27 (AR24), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

436. The north end of the AR24 Road commences in the northeast quarter of section 5, Township 12 North, Range 7 East and proceeds generally southeast to the southeast quarter of section 9, Township 12 North, Range 7 East, S.L.B.M.

437. The specific right-of-way for the AR24 Road claimed herein crosses 1.37 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 27.

438. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR24 Road solely as it crosses United States public land as included and specifically described in Exhibit 27. The AR24 Road includes the segments of road specifically set forth in Exhibit 27 and as exists on the ground.

Acceptance of the AR24 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

439. The AR24 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

440. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR24 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

441. The appearance of the AR24 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

442. The County confirmed its acceptance of the AR24 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, or improving the AR24 Road pursuant to the County's governmental right and authority.

443. Witnesses with personal knowledge of the history of the AR24 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

444. Currently known reputation in the community is that the AR24 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

445. Public motor vehicle use of the AR24 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

446. The AR24 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

447. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR24 Road.

448. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR24 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR25 Road, AR25

449. The AR25 Road is designated as county road number AR25 and State Geographic Information Database ("SGID") road identification number RD170466 and is more or less 4.69 miles long.

450. The centerline course of the AR25 Road is depicted on the map included in Exhibit 28 (AR25), which is attached hereto and incorporated herein. This map further reflects that this road crosses SITLA land, private land and public land administered by the BLM.

451. The east end of the AR25 Road commences in the northeast quarter of section 13, Township 12 North, Range 8 East and proceeds from the Manhead Road generally northwest to the northeast quarter of section 8, Township 12 North, Range 7 East, S.L.B.M.

452. The specific right-of-way for the AR25 Road claimed herein crosses 3.32 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 28.

453. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR25 Road solely as it crosses United States public land as included and

specifically described in Exhibit 28. The AR25 Road includes the segments of road specifically set forth in Exhibit 28 and as exists on the ground.

Acceptance of the AR25 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

454. The AR25 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

455. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR25 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

456. The appearance of the AR25 Road on the Sage Creek (1969) and Leefe (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

457. The AR25 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, or improving the AR25 Road pursuant to the County's governmental right and authority.

458. Witnesses with personal knowledge of the history of the AR25 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

459. Currently known reputation in the community is that the AR25 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

460. Public motor vehicle use of the AR25 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

461. The AR25 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

462. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR25 Road.

463. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR25 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR29 Road, AR29

464. The AR29 Road is designated as county road number AR29 and State Geographic Information Database ("SGID") road identification number RD170469 and is more or less 0.67 miles long.

465. The centerline course of the AR29 Road is depicted on the map included in Exhibit 29 (AR29), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

466. The south end of the AR29 Road commences in the southwest quarter of section 12, Township 12 North, Range 6 East and proceeds generally northeast to the northwest quarter of section 12, Township 12 North, Range 6 East, S.L.B.M.

467. The specific right-of-way for the AR29 Road claimed herein crosses 0.58 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 29.

468. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR29 Road solely as it crosses United States public land as included and specifically described in Exhibit 29. The AR29 Road includes the segments of road specifically set forth in Exhibit 29 and as exists on the ground.

Acceptance of the AR29 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

469. The AR29 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

470. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR29 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

471. The appearance of the AR29 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

472. The AR29 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, or improving the AR29 Road pursuant to the County's governmental right and authority.

473. Witnesses with personal knowledge of the history of the AR29 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

474. Currently known reputation in the community is that the AR29 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

475. Public motor vehicle use of the AR29 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

476. The AR29 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

477. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR29 Road.

478. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR29 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR30 Road, AR30

479. The AR30 Road is designated as county road number AR30 and State Geographic Information Database ("SGID") road identification number RD170471 and is more or less 1.88 miles long.

480. The centerline course of the AR30 Road is depicted on the map included in Exhibit 30 (AR30), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

481. The south end of the AR30 Road commences in the northeast quarter of section 21, Township 12 North, Range 7 East and proceeds generally northwest to the northwest quarter of section 17, Township 12 North, Range 7 East, S.L.B.M.

482. The specific right-of-way for the AR30 Road claimed herein crosses 1.88 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 30.

483. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR30 Road solely as it crosses United States public land as included and

specifically described in Exhibit 30. The AR30 Road includes the segments of road specifically set forth in Exhibit 30 and as exists on the ground.

Acceptance of the AR30 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

484. The AR30 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

485. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR30 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

486. The AR30 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, or improving the AR30 Road pursuant to the County's governmental right and authority.

487. Witnesses with personal knowledge of the history of the AR30 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

488. Currently known reputation in the community is that the AR30 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

489. Public motor vehicle use of the AR30 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

490. The AR30 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

491. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR30 Road.

492. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR30 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR31 Road, AR31

493. The AR31 Road is designated as county road number AR31 and State Geographic Information Database ("SGID") road identification number RD170473 and is more or less 0.70 miles long.

494. The centerline course of the AR31 Road is depicted on the map included in Exhibit 31 (AR31), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

495. The south end of the AR31 Road commences in the southeast quarter of section 21, Township 12 North, Range 7 East and proceeds generally north to the southeast quarter of section 16, Township 12 North, Range 7 East, S.L.B.M.

496. The specific right-of-way for the AR31 Road claimed herein crosses 0.54 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 31.

497. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR31 Road solely as it crosses United States public land as included and specifically described in Exhibit 31. The AR31 Road includes the segments of road specifically set forth in Exhibit 31 and as exists on the ground.

Acceptance of the AR31 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

498. The AR31 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

499. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR31 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

500. The appearance of the AR31 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

501. The AR31 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, or improving the AR31 Road pursuant to the County's governmental right and authority.

502. Witnesses with personal knowledge of the history of the AR31 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

503. Currently known reputation in the community is that the AR31 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

504. Public motor vehicle use of the AR31 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

505. The AR31 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

506. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR31 Road.

507. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR31 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR126 Road, AR126

508. The AR126 Road is designated as county road number AR126 and State Geographic Information Database ("SGID") road identification number RD170390 and is more or less 0.54 miles long.

509. The centerline course of the AR126 Road is depicted on the map included in Exhibit 32 (AR126), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

510. The south end of the AR126 Road commences near the southern edge of the southwest quarter of section 23, Township 13 North, Range 6 East and proceeds from the Six Mile Road generally north to the northern edge of the southwest quarter of section 23, Township 13 North, Range 6 East, S.L.B.M.

511. The specific right-of-way for the AR126 Road claimed herein crosses 0.23 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 32.

512. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR126 Road solely as it crosses United States public land as included and specifically described in Exhibit 32. The AR126 Road includes the segments of road specifically set forth in Exhibit 32 and as exists on the ground.

Acceptance of the AR126 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

513. The AR126 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

514. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR126 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

515. The AR126 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, or improving the AR126 Road pursuant to the County's governmental right and authority.

516. Witnesses with personal knowledge of the history of the AR126 Road confirm public use of this road as a public 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 AR126 Road has been open for all to come 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 AR126 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

519. The AR126 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 AR126 Road.

521. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR126 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR127 Road, AR127

522. The AR127 Road is designated as county road number AR127 and State Geographic Information Database ("SGID") road identification number RD170391 and is more or less 0.78 miles long.

523. The centerline course of the AR127 Road is depicted on the map included in Exhibit 33 (AR127), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

524. The north end of the AR127 Road commences in the northeast quarter of section 22, Township 13 North, Range 6 East and proceeds from the Laketown Mountain Road generally southeast to the southwest quarter of section 23, Township 13 North, Range 6 East, S.L.B.M.

525. The specific right-of-way for the AR127 Road claimed herein crosses 0.16 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 33.

526. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR127 Road solely as it crosses United States public land as included and

specifically described in Exhibit 33. The AR127 Road includes the segments of road specifically set forth in Exhibit 33 and as exists on the ground.

Acceptance of the AR127 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

527. The AR127 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

528. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR127 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

529. The appearance of the AR127 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

530. The AR127 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, or improving the AR127 Road pursuant to the County's governmental right and authority.

531. Witnesses with personal knowledge of the history of the AR127 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

532. Currently known reputation in the community is that the AR127 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

533. Public motor vehicle use of the AR127 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

534. The AR127 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

535. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR127 Road.

536. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR127 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR128 Road, AR128

537. The AR128 Road is designated as county road number AR128 and State Geographic Information Database ("SGID") road identification number RD170392 and is more or less 0.99 miles long.

538. The centerline course of the AR128 Road is depicted on the map included in Exhibit 34 (AR128), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

539. The south end of the AR128 Road commences in the southeast quarter of section 27, Township 13 North, Range 6 East and proceeds generally northeast to the southwest quarter of section 22, Township 13 North, Range 6 East, S.L.B.M.

540. The specific right-of-way for the AR128 Road claimed herein crosses 0.65 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 34.

541. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR128 Road solely as it crosses United States public land as included and specifically described in Exhibit 34. The AR128 Road includes the segments of road specifically set forth in Exhibit 34 and as exists on the ground.

Acceptance of the AR128 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

542. The AR128 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

543. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR128 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

544. The appearance of the AR128 Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

545. The AR128 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, or improving the AR128 Road pursuant to the County's governmental right and authority.

546. Witnesses with personal knowledge of the history of the AR128 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

547. Currently known reputation in the community is that the AR128 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

548. Public motor vehicle use of the AR128 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

549. The AR128 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

550. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR128 Road.

551. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR128 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR128A Road, AR128A

552. The AR128A Road is designated as county road number AR128A and State Geographic Information Database ("SGID") road identification number RD170393 and is more or less 0.16 miles long.

553. The centerline course of the AR128A Road is depicted on the map included in Exhibit 35 (AR128A), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

554. The north end of the AR128A Road commences in the southeast quarter of section 22, Township 13 North, Range 6 East and proceeds generally south from the Laketown Mountain Road to the northeast quarter of section 27, Township 13 North, Range 6 East, S.L.B.M.

555. The specific right-of-way for the AR128A Road claimed herein crosses 0.16 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 35.

556. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR128A Road solely as it crosses United States public land as included and specifically described in Exhibit 35. The AR128A Road includes the segments of road specifically set forth in Exhibit 35 and as exists on the ground.

Acceptance of the AR128A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

557. The AR128A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

558. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR128A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

559. The appearance of the AR128A Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

560. The AR128A 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, or improving the AR128A Road pursuant to the County's governmental right and authority.

561. Witnesses with personal knowledge of the history of the AR128A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

562. Currently known reputation in the community is that the AR128A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

563. Public motor vehicle use of the AR128A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

564. The AR128A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

565. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR128A Road.

566. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR128A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR130 Road, AR130

567. The AR130 Road is designated as county road number AR130 and State Geographic Information Database ("SGID") road identification number RD170395 and is more or less 0.44 miles long.

568. The centerline course of the AR130 Road is depicted on the map included in Exhibit 36 (AR130), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

569. The west end of the AR130 Road commences in the northwest quarter of section 35, Township 13 North, Range 6 East and proceeds generally east to the northeast quarter of section 35, Township 13 North, Range 6 East, S.L.B.M.

570. The specific right-of-way for the AR130 Road claimed herein crosses .01 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 36.

571. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR130 Road solely as it crosses United States public land as included and specifically described in Exhibit 36. The AR130 Road includes the segments of road specifically set forth in Exhibit 36 and as exists on the ground.

Acceptance of the AR130 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

572. The AR130 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

573. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR130 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

574. The appearance of the AR130 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

575. The AR130 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, or improving the AR130 Road pursuant to the County's governmental right and authority.

576. Witnesses with personal knowledge of the history of the AR130 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

577. Currently known reputation in the community is that the AR130 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

578. Public motor vehicle use of the AR130 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

579. The AR130 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

580. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR130 Road.

581. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR130 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR132 Road, AR132

582. The AR132 Road is designated as county road number AR132 and State Geographic Information Database ("SGID") road identification number RD170396 and is more or less 1.26 miles long.

583. The centerline course of the AR132 Road is depicted on the map included in Exhibit 37 (AR132), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

584. The north end of the AR132 Road commences in the southwest quarter of section 10, Township 12 North, Range 7 East and proceeds generally east to the southeast quarter of section 16, Township 12 North, Range 7 East, S.L.B.M.

585. The specific right-of-way for the AR132 Road claimed herein crosses 1.23 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 37.

586. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR132 Road solely as it crosses United States public land as included and

specifically described in Exhibit 37. The AR132 Road includes the segments of road specifically set forth in Exhibit 37 and as exists on the ground.

Acceptance of the AR132 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

587. The AR132 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR132 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

589. The appearance of the AR132 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

590. The AR132 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, or improving the AR132 Road pursuant to the County's governmental right and authority.

591. Witnesses with personal knowledge of the history of the AR132 Road confirm public use of this road as a public 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 AR132 Road has been open for all to come 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 AR132 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

594. The AR132 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 AR132 Road.

596. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR132 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR133 Road, AR133

597. The AR133 Road is designated as county road number AR133 and State Geographic Information Database ("SGID") road identification number RD170397 and is more or less 4.45 miles long.

598. The centerline course of the AR133 Road is depicted on the map included in Exhibit 38 (AR133), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

599. The east end of the AR133 Road commences in the northwest quarter of section 15, Township 12 North, Range 7 East and proceeds generally east to the northwest quarter of section 12, Township 12 North, Range 6 East, S.L.B.M.

600. The specific right-of-way for the AR133 Road claimed herein crosses 4.45 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 38.

601. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR133 Road solely as it crosses United States public land as included and specifically described in Exhibit 38. The AR133 Road includes the segments of road specifically set forth in Exhibit 38 and as exists on the ground.

Acceptance of the AR133 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

602. The AR133 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

603. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR133 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

604. The appearance of the AR133 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

605. The AR133 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, or improving the AR133 Road pursuant to the County's governmental right and authority.

606. Witnesses with personal knowledge of the history of the AR133 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

607. Currently known reputation in the community is that the AR133 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

608. Public motor vehicle use of the AR133 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

609. The AR133 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

610. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR133 Road.

611. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR133 Road on lands owned 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
OTTER CREEK AREA

612. The State of Utah and Rich County incorporate herein and realleges each of the foregoing paragraphs.

613. The Otter Creek Area is located in north-central Rich County in the northeastern region of Utah. *See* Exhibit 4.

614. The Otter Creek Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Otter Creek Road, BR28; (2) Otter Creek Cutoff Road, BR29; (3) AR3 Road, AR3; (4) AR4 Road, AR4; (5) AR5 Road, AR5; (6) AR40 Road, AR40; (7) AR40A Road, AR40A; (8) AR41 Road, AR41; (9) AR43 Road, AR43; (10) AR45 Road, AR45; (11) AR49 Road, AR49; (12) AR59 Road, AR59; (13) AR59A Road, AR59A; (14) AR60 Road, AR60; (15) AR60A Road, AR60A; (16) AR61 Road, AR61; (17) AR62 Road, AR62; (18) AR62A Road, AR62A; (19) AR63 Road, AR63; (20) AR137 Road, AR137; and (21) AR144 Road, AR144.

615. Each right-of-way claimed in the Otter Creek 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.

616. All rights-of-way claimed in the Otter Creek 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.

617. All rights-of-way claimed in the Otter Creek 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).

618. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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.

Otter Creek Road, BR28

619. The Otter Creek Road is designated as county road number BR28 and State Geographic Information Database ("SGID") road identification number RD170191 and is more or less 14.40 miles long.

620. The centerline course of the Otter Creek Road is depicted on the map included in Exhibit 39 (Otter Creek Road), which is attached hereto and incorporated herein. This map

further reflects that this road crosses SITLA land, Forest Service land, private land and public land administered by the BLM.

621. The east end of the Otter Creek Road commences in the northeast quarter of section 17, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally west from State Highway 16 to the southeast quarter of section 16, Township 11 North, Range 5 East, S.L.B.M.

622. The specific right-of-way for the Otter Creek Road claimed herein crosses 8.17 miles of BLM land in six segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 39.

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

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

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

625. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Otter Creek Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

626. The appearance of the Otter Creek Road on the Red Spur Mountain (1969), Old Canyon (1969) and Randolph (1968) USGS 7.5-minute quadrangle maps evidences the

acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

627. The County confirmed its acceptance of the Otter Creek Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Otter Creek Road using public funds pursuant to the County's governmental right and authority.

628. Witnesses with personal knowledge of the history of the Otter 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.

629. Currently known reputation in the community is that the Otter 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.

630. Public motor vehicle use of the Otter 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 for this road.

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

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

633. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Otter 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.

Otter Creek Cutoff Road, BR29

634. The Otter Creek Cutoff Road is designated as county road number BR29 and State Geographic Information Database ("SGID") road identification number RD170190 and is more or less 7.03 miles long.

635. The centerline course of the Otter Creek Cutoff Road is depicted on the map included in Exhibit 40 (Otter Creek Cutoff Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

636. The north end of the Otter Creek Cutoff Road commences in the northwest quarter of section 22, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally south from the Twin Peaks Road to the southeast quarter of section 11, Township 11 North, Range 6 East, S.L.B.M.

637. The specific right-of-way for the Otter Creek Cutoff Road claimed herein crosses 6.34 miles of BLM land in four segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 40.

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

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

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

640. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Otter Creek Cutoff Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

641. The appearance of the Otter Creek Cutoff Road on the Randolph (1968), Old Canyon (1969) and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

642. The County confirmed its acceptance of the Otter Creek 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, or improving the Otter Creek Cutoff Road using public funds pursuant to the County's governmental right and authority.

643. Witnesses with personal knowledge of the history of the Otter Creek 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.

644. Currently known reputation in the community is that the Otter Creek 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.

645. Public motor vehicle use of the Otter Creek 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 for this road.

646. The Otter Creek Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

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

648. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Otter Creek 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.

AR3 Road, AR3

649. The AR3 Road is designated as county road number AR3 and State Geographic Information Database ("SGID") road identification number RD170470 and is more or less 6.04 miles long.

650. The centerline course of the AR3 Road is depicted on the map included in Exhibit 41 (AR3 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

651. The east end of the AR3 Road commences in the southeast quarter of section 20, Township 12 North, Range 7 East, S.L.B.M. and proceeds generally northwest from State Highway 30 to the southwest quarter of section 3, Township 12 North, Range 6 East, S.L.B.M. where it rejoins State Highway 30.

652. The specific right-of-way for the AR3 Road claimed herein crosses 4.35 miles of BLM land in eight segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 41.

653. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR3 Road solely as it crosses United States public land as included and specifically described in Exhibit 41. The AR3 Road includes the segments of road specifically set forth in Exhibit 41 and as exists on the ground.

Acceptance of the AR3 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

654. The AR3 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

655. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR3 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

656. The appearance of the AR3 Road on the Laketown (1969) and Sage Creek (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

657. The County confirmed its acceptance of the AR3 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, or improving the AR3 Road pursuant to the County's governmental right and authority.

658. Witnesses with personal knowledge of the history of the AR3 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

659. Currently known reputation in the community is that the AR3 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

660. Public motor vehicle use of the AR3 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

661. The AR3 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

662. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR3 Road.

663. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR3 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR4 Road, AR4

664. The AR4 Road is designated as county road number AR4 and State Geographic Information Database ("SGID") road identification number RD170479 and is more or less 1.83 miles long.

665. The centerline course of the AR4 Road is depicted on the map included in Exhibit 42 (AR4 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

666. The west end of the AR4 Road commences in the northwest quarter of section 26, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 19, Township 12 North, Range 7 East, S.L.B.M.

667. The specific right-of-way for the AR4 Road claimed herein crosses 1.38 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 42.

668. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR4 Road solely as it crosses United States public land as included and specifically described in Exhibit 42. The AR4 Road includes the segments of road specifically set forth in Exhibit 42 and as exists on the ground.

Acceptance of the AR4 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

669. The AR4 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

670. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR4 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

671. The appearance of the AR4 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

672. The AR4 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, or improving the AR4 Road pursuant to the County's governmental right and authority.

673. Witnesses with personal knowledge of the history of the AR4 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

674. Currently known reputation in the community is that the AR4 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

675. Public motor vehicle use of the AR4 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

676. The AR4 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

677. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR4 Road.

678. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR4 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR5 Road, AR5

679. The AR5 Road is designated as county road number AR5 and State Geographic Information Database ("SGID") road identification number RD170494 and is more or less 5.19 miles long.

680. The centerline course of the AR5 Road is depicted on the map included in Exhibit 43 (AR5 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses SITLA lands, private land and public land administered by the BLM.

681. The east end of the AR5 Road commences in the northwest quarter of section 4, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally west from State Highway 16 to the northwest quarter of section 27, Township 12 North, Range 6 East, S.L.B.M.

682. The specific right-of-way for the AR5 Road claimed herein crosses 3.96 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 43.

683. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR5 Road solely as it crosses United States public land as included and specifically described in Exhibit 43. The AR5 Road includes the segments of road specifically set forth in Exhibit 43 and as exists on the ground.

Acceptance of the AR5 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

684. The AR5 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

685. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR5 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

686. The appearance of the AR5 Road on the Randolph (1968) and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

687. The County confirmed its acceptance of the AR5 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, or improving the AR5 Road pursuant to the County's governmental right and authority.

688. Witnesses with personal knowledge of the history of the AR5 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

689. Currently known reputation in the community is that the AR5 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

690. Public motor vehicle use of the AR5 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

691. The AR5 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

692. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR5 Road.

693. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR5 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR40 Road, AR40

694. The AR40 Road is designated as county road number AR40 and State Geographic Information Database ("SGID") road identification number RD170480 and is more or less 5.20 miles long.

695. The centerline course of the AR40 Road is depicted on the map included in Exhibit 44 (AR40 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

696. The east end of the AR40 Road commences in the southeast quarter of section 33, Township 12 North, Range 7 East, S.L.B.M. and proceeds generally west from State Highway 16 to the southeast quarter of section 26, Township 12 North, Range 6 East, S.L.B.M.

697. The specific right-of-way for the AR40 Road claimed herein crosses 5.09 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 44.

698. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR40 Road solely as it crosses United States public land as included and specifically described in Exhibit 44. The AR40 Road includes the segments of road specifically set forth in Exhibit 44 and as exists on the ground.

Acceptance of the AR40 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

699. The AR40 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

700. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR40 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

701. The appearance of the AR40 Road on the Randolph (1968) and Sage Creek (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

702. The AR40 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, or improving the AR40 Road pursuant to the County's governmental right and authority.

703. Witnesses with personal knowledge of the history of the AR40 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

704. Currently known reputation in the community is that the AR40 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

705. Public motor vehicle use of the AR40 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

706. The AR40 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

707. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR40 Road.

708. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR40 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR40A Road, AR40A

709. The AR40A Road is designated as county road number AR40A and State Geographic Information Database ("SGID") road identification number RD170481 and is more or less 0.17 miles long.

710. The centerline course of the AR40A Road is depicted on the map included in Exhibit 45 (AR40A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

711. The south end of the AR40A Road commences in the southwest quarter of section 30, Township 12 North, Range 7 East, S.L.B.M. and proceeds generally north to the northwest quarter of section 30, Township 12 North, Range 7 East, S.L.B.M.

712. The specific right-of-way for the AR40A Road claimed herein crosses 0.17 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 45.

713. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR40A Road solely as it crosses United States public land as included and specifically described in Exhibit 45. The AR40A Road includes the segments of road specifically set forth in Exhibit 45 and as exists on the ground.

Acceptance of the AR40A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

714. The AR40A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

715. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR40A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

716. The appearance of the AR40A Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

717. The AR40A 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, or improving the AR40A Road pursuant to the County's governmental right and authority.

718. Witnesses with personal knowledge of the history of the AR40A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

719. Currently known reputation in the community is that the AR40A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

720. Public motor vehicle use of the AR40A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

721. The AR40A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

722. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR40A Road.

723. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR40A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR41 Road, AR41

724. The AR41 Road is designated as county road number AR41 and State Geographic Information Database ("SGID") road identification number RD170484 and is more or less 1.72 miles long.

725. The centerline course of the AR41 Road is depicted on the map included in Exhibit 46 (AR41 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

726. The west end of the AR41 Road commences in the southeast quarter of section 29, Township 12 North, Range 7 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 27, Township 12 North, Range 7 East, S.L.B.M.

727. The specific right-of-way for the AR41 Road claimed herein crosses 1.5 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 46.

728. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR41 Road solely as it crosses United States public land as included and specifically described in Exhibit 46. The AR41 Road includes the segments of road specifically set forth in Exhibit 46 and as exists on the ground.

Acceptance of the AR41 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

729. The AR41 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

730. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR41 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

731. The AR41 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, or improving the AR41 Road pursuant to the County's governmental right and authority.

732. Witnesses with personal knowledge of the history of the AR41 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

733. Currently known reputation in the community is that the AR41 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

734. Public motor vehicle use of the AR41 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

735. The AR41 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

736. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR41 Road.

737. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR41 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR43 Road, AR43

738. The AR43 Road is designated as county road number AR43 and State Geographic Information Database ("SGID") road identification number RD170486 and is more or less 1.60 miles long.

739. The centerline course of the AR43 Road is depicted on the map included in Exhibit 47 (AR43 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

740. The east end of the AR43 Road commences in the southeast quarter of section 22, Township 12 North, Range East, S.L.B.M. and proceeds generally west from State Highway 16 to the southwest quarter of section 21, Township 12 North, Range 7 East, S.L.B.M.

741. The specific right-of-way for the AR43 Road claimed herein crosses 1.08 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 47.

742. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR43 Road solely as it crosses United States public land as included and specifically described in Exhibit 47. The AR43 Road includes the segments of road specifically set forth in Exhibit 47 and as exists on the ground.

Acceptance of the AR43 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

743. The AR43 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

744. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR43 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

745. The appearance of the AR43 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

746. The AR43 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, or improving the AR43 Road pursuant to the County's governmental right and authority.

747. Witnesses with personal knowledge of the history of the AR43 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

748. Currently known reputation in the community is that the AR43 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

749. Public motor vehicle use of the AR43 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

750. The AR43 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

751. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR43 Road.

752. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR43 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR45 Road, AR45

753. The AR45 Road is designated as county road number AR45 and State Geographic Information Database ("SGID") road identification number RD170488 and is more or less 2.62 miles long.

754. The centerline course of the AR45 Road is depicted on the map included in Exhibit 48 (AR45 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

755. The north end of the AR45 Road commences in the southwest quarter of section 13, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally south to the southeast quarter of section 26, Township 12 North, Range 6 East, S.L.B.M.

756. The specific right-of-way for the AR45 Road claimed herein crosses 2.25 miles of BLM land in five segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 48.

757. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR45 Road solely as it crosses United States public land as included and specifically described in Exhibit 48. The AR45 Road includes the segments of road specifically set forth in Exhibit 48 and as exists on the ground.

Acceptance of the AR45 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

758. The AR45 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

759. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR45 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

760. The appearance of the AR45 Road on the Randolph (1968) and Sage Creek (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

761. The AR45 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, or improving the AR45 Road pursuant to the County's governmental right and authority.

762. Witnesses with personal knowledge of the history of the AR45 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

763. Currently known reputation in the community is that the AR45 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

764. Public motor vehicle use of the AR45 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

765. The AR45 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

766. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR45 Road.

767. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR45 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR49 Road, AR49

768. The AR49 Road is designated as county road number AR49 and State Geographic Information Database ("SGID") road identification number RD170492 and is more or less 5.45 miles long.

769. The centerline course of the AR49 Road is depicted on the map included in Exhibit 49 (AR49 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

770. The east end of the AR49 Road commences in the southeast quarter of section 20, Township 12 North, Range 7 East, S.L.B.M. and proceeds generally northwest to the southeast quarter of section 10, Township 12 North, Range 6 East, S.L.B.M.

771. The specific right-of-way for the AR49 Road claimed herein crosses 5.17 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 49.

772. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR49 Road solely as it crosses United States public land as included and specifically described in Exhibit 49. The AR49 Road includes the segments of road specifically set forth in Exhibit 49 and as exists on the ground.

Acceptance of the AR49 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

773. The AR49 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

774. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR49 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

775. The appearance of the AR49 Road on the Sage Creek (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

776. The AR49 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, or improving the AR49 Road pursuant to the County's governmental right and authority.

777. Witnesses with personal knowledge of the history of the AR49 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

778. Currently known reputation in the community is that the AR49 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

779. Public motor vehicle use of the AR49 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

780. The AR49 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

781. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR49 Road.

782. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR49 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR59 Road, AR59

783. The AR59 Road is designated as county road number AR59 and State Geographic Information Database ("SGID") road identification number RD170512 and is more or less 2.95 miles long.

784. The centerline course of the AR59 Road is depicted on the map included in Exhibit 50 (AR59 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

785. The east end of the AR59 Road commences in the northwest quarter of section 4, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally west then south from State Highway 16 to the northeast quarter of section 4, Township 11 North, Range 7 East, S.L.B.M.

786. The specific right-of-way for the AR59 Road claimed herein crosses 2.94 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 50.

787. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR59 Road solely as it crosses United States public land as included and

specifically described in Exhibit 50. The AR59 Road includes the segments of road specifically set forth in Exhibit 50 and as exists on the ground.

Acceptance of the AR59 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

788. The AR59 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

789. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR59 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

790. The appearance of the AR59 Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

791. The AR59 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, or improving the AR59 Road pursuant to the County's governmental right and authority.

792. Witnesses with personal knowledge of the history of the AR59 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

793. Currently known reputation in the community is that the AR59 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

794. Public motor vehicle use of the AR59 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

795. The AR59 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

796. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR59 Road.

797. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR59 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR59A Road, AR59A

798. The AR59A Road is designated as county road number AR59A and State Geographic Information Database ("SGID") road identification number RD170513 and is more or less 0.46 miles long.

799. The centerline course of the AR59A Road is depicted on the map included in Exhibit 51 (AR59A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

800. The west end of the AR59A Road commences in the northwest quarter of section 4, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally southwest to the southwest quarter of section 14, Township 11 North, Range 7 East, S.L.B.M.

801. The specific right-of-way for the AR59A Road claimed herein crosses 0.27 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 51.

802. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR59A Road solely as it crosses United States public land as included and specifically described in Exhibit 51. The AR59A Road includes the segments of road specifically set forth in Exhibit 51 and as exists on the ground.

Acceptance of the AR59A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

803. The AR59A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

804. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR59A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

805. The appearance of the AR59A Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

806. The AR59A 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, or improving the AR59A Road pursuant to the County's governmental right and authority.

807. Witnesses with personal knowledge of the history of the AR59A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

808. Currently known reputation in the community is that the AR59A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

809. Public motor vehicle use of the AR59A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

810. The AR59A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

811. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR59A Road.

812. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR59A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR60 Road, AR60

813. The AR60 Road is designated as county road number AR60 and State Geographic Information Database ("SGID") road identification number RD170516 and is more or less 1.69 miles long.

814. The centerline course of the AR60 Road is depicted on the map included in Exhibit 52 (AR60 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

815. The south end of the AR60 Road commences in the northwest quarter of section 7, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally north from the Otter Creek Road to the southeast quarter of section 31, Township 12 North, Range 7 East, S.L.B.M.

816. The specific right-of-way for the AR60 Road claimed herein crosses 1.25 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 52.

817. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR60 Road solely as it crosses United States public land as included and

specifically described in Exhibit 52. The AR60 Road includes the segments of road specifically set forth in Exhibit 52 and as exists on the ground.

Acceptance of the AR60 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

818. The AR60 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

819. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR60 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

820. The AR60 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, or improving the AR60 Road pursuant to the County's governmental right and authority.

821. Witnesses with personal knowledge of the history of the AR60 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

822. Currently known reputation in the community is that the AR60 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

823. Public motor vehicle use of the AR60 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

824. The AR60 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

825. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR60 Road.

826. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR60 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR60A Road, AR60A

827. The AR60A Road is designated as county road number AR60A and State Geographic Information Database ("SGID") road identification number RD170517 and is more or less 0.51 miles long.

828. The centerline course of the AR60A Road is depicted on the map included in Exhibit 53 (AR60A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

829. The west end of the AR60A Road commences in the southwest quarter of section 6, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally east to the southeast quarter of section 6, Township 11 North, Range 7 East, S.L.B.M.

830. The specific right-of-way for the AR60A Road claimed herein crosses 0.51 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 53.

831. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR60A Road solely as it crosses United States public land as included and specifically described in Exhibit 53. The AR60A Road includes the segments of road specifically set forth in Exhibit 53 and as exists on the ground.

Acceptance of the AR60A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

832. The AR60A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

833. The AR60A 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, or improving the AR60A Road pursuant to the County's governmental right and authority.

834. Witnesses with personal knowledge of the history of the AR60A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

835. Currently known reputation in the community is that the AR60A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

836. Public motor vehicle use of the AR60A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

837. The AR60A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

838. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR60A Road.

839. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR60A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR61 Road, AR61

840. The AR61 Road is designated as county road number AR61 and State Geographic Information Database ("SGID") road identification number RD170518 and is more or less 1.51 miles long.

841. The centerline course of the AR61 Road is depicted on the map included in Exhibit 54 (AR61 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses SITLA land, private land and public land administered by the BLM.

842. The south end of the AR61 Road commences in the northeast quarter of section 1, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally north from the Otter Creek Road to the southwest quarter of section 25, Township 12 North, Range 6 East, S.L.B.M.

843. The specific right-of-way for the AR61 Road claimed herein crosses 0.23 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 54.

844. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR61 Road solely as it crosses United States public land as included and specifically described in Exhibit 54. The AR61 Road includes the segments of road specifically set forth in Exhibit 54 and as exists on the ground.

Acceptance of the AR61 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

845. The AR61 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

846. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR61 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

847. The appearance of the AR61 Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

848. The AR61 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, or improving the AR61 Road pursuant to the County's governmental right and authority.

849. Witnesses with personal knowledge of the history of the AR61 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

850. Currently known reputation in the community is that the AR61 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

851. Public motor vehicle use of the AR61 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

852. The AR61 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

853. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR61 Road.

854. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR61 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR62 Road, AR62

855. The AR62 Road is designated as county road number AR62 and State Geographic Information Database ("SGID") road identification number RD170519 and is more or less 2.69 miles long.

856. The centerline course of the AR62 Road is depicted on the map included in Exhibit 55 (AR62 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

857. The west end of the AR62 Road commences in the southeast quarter of section 8, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally west from the Otter Creek Road to the southwest quarter of section 8, Township 11 North, Range 7 East, S.L.B.M.

858. The specific right-of-way for the AR62 Road claimed herein crosses 2.65 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 55.

859. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR62 Road solely as it crosses United States public land as included and specifically described in Exhibit 55. The AR62 Road includes the segments of road specifically set forth in Exhibit 55 and as exists on the ground.

Acceptance of the AR62 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

860. The AR62 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

861. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR62 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

862. The appearance of the AR62 Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

863. The AR62 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, or improving the AR62 Road pursuant to the County's governmental right and authority.

864. Witnesses with personal knowledge of the history of the AR62 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

865. Currently known reputation in the community is that the AR62 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

866. Public motor vehicle use of the AR62 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

867. The AR62 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

868. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR62 Road.

869. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR62 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR62A Road, AR62A

870. The AR62A Road is designated as county road number AR62A and State Geographic Information Database ("SGID") road identification number RD170520 and is more or less 0.86 miles long.

871. The centerline course of the AR62A Road is depicted on the map included in Exhibit 56 (AR62A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

872. The east end of the AR62A Road commences in the southeast quarter of section 12, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northwest to the northwest quarter of section 12, Township 11 North, Range 6 East, S.L.B.M.

873. The specific right-of-way for the AR62A Road claimed herein crosses 0.86 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 56.

874. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR62A Road solely as it crosses United States public land as included and specifically described in Exhibit 56. The AR62A Road includes the segments of road specifically set forth in Exhibit 56 and as exists on the ground.

Acceptance of the AR62A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

875. The AR62A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

876. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR62A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

877. The appearance of the AR62A Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

878. The AR62A 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, or improving the AR62A Road pursuant to the County's governmental right and authority.

879. Witnesses with personal knowledge of the history of the AR62A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

880. Currently known reputation in the community is that the AR62A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

881. Public motor vehicle use of the AR62A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

882. The AR62A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

883. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR62A Road.

884. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR62A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR63 Road, AR63

885. The AR63 Road is designated as county road number AR63 and State Geographic Information Database ("SGID") road identification number RD170521 and is more or less 1.94 miles long.

886. The centerline course of the AR63 Road is depicted on the map included in Exhibit 57 (AR63 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

887. The east end of the AR63 Road commences in the southeast quarter of section 17, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally west from State Highway 16 to the northeast quarter of section 18, Township 11 North, Range 7 East, S.L.B.M.

888. The specific right-of-way for the AR63 Road claimed herein crosses 1.76 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 57.

889. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR63 Road solely as it crosses United States public land as included and specifically described in Exhibit 57. The AR63 Road includes the segments of road specifically set forth in Exhibit 57 and as exists on the ground.

Acceptance of the AR63 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

890. The AR63 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

891. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR63 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

892. The appearance of the AR63 Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

893. The AR63 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, or improving the AR63 Road pursuant to the County's governmental right and authority.

894. Witnesses with personal knowledge of the history of the AR63 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

895. Currently known reputation in the community is that the AR63 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

896. Public motor vehicle use of the AR63 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

897. The AR63 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

898. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR63 Road.

899. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR63 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR137 Road, AR137

900. The AR137 Road is designated as county road number AR137 and State Geographic Information Database ("SGID") road identification number RD170402 and is more or less 4.02 miles long.

901. The centerline course of the AR137 Road is depicted on the map included in Exhibit 58 (AR137 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

902. The east end of the AR137 Road commences in the northeast quarter of section 26, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally southwest from the

Twin Peaks Road to the southeast quarter of section 34, Township 12 North, Range 6 East, S.L.B.M.

903. The specific right-of-way for the AR137 Road claimed herein crosses 3.4 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 58.

904. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR137 Road solely as it crosses United States public land as included and specifically described in Exhibit 58. The AR137 Road includes the segments of road specifically set forth in Exhibit 58 and as exists on the ground.

Acceptance of the AR137 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

905. The AR137 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

906. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR137 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

907. The appearance of the AR137 Road on the Randolph (1968), Old Canyon (1969), and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

908. The County confirmed its acceptance of the AR137 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, or improving the AR137 Road pursuant to the County's governmental right and authority.

909. Witnesses with personal knowledge of the history of the AR137 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

910. Currently known reputation in the community is that the AR137 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

911. Public motor vehicle use of the AR137 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

912. The AR137 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

913. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR137 Road.

914. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR137 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR144 Road, AR144

915. The AR144 Road is designated as county road number AR144 and State Geographic Information Database ("SGID") road identification number RD170414 and is more or less 1.46 miles long.

916. The centerline course of the AR144 Road is depicted on the map included in Exhibit 59 (AR144 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses SITLA land, private land and public land administered by the BLM.

917. The east end of the AR144 Road commences in the northwest quarter of section 1, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally north from the Otter Creek Road to the northwest quarter of section 35, Township 12 North, Range 6 East, S.L.B.M.

918. The specific right-of-way for the AR144 Road claimed herein crosses 0.87 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 59.

919. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR144 Road solely as it crosses United States public land as included and specifically described in Exhibit 59. The AR144 Road includes the segments of road specifically set forth in Exhibit 59 and as exists on the ground.

Acceptance of the AR144 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

920. The AR144 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

921. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR144 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

922. The appearance of the AR144 Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

923. The AR144 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, or improving the AR144 Road pursuant to the County's governmental right and authority.

924. Witnesses with personal knowledge of the history of the AR144 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

925. Currently known reputation in the community is that the AR144 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

926. Public motor vehicle use of the AR144 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

927. The AR144 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

928. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR144 Road.

929. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR144 Road on lands owned 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
TWIN PEAKS AREA

930. The State of Utah and Rich County incorporate herein and realleges each of the foregoing paragraphs.

931. The Twin Peaks Area is located in west-central Rich County in the northeastern region of Utah. *See* Exhibit 5.

932. The Twin Peaks Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Twin Peaks Road, BR23; (2) Nebeker Spring Road, BR30; (3) AR38 Road, AR38; (4) AR38E Road, AR38E; (5) AR50 Road, AR50; (6) AR50B Road, AR50B; (7) AR50C Road, AR50C; (8) AR51 Road, AR51; (9) AR52 Road, AR52; (10) AR52A Road, AR52A; (11) AR52B Road, AR52B; (12) AR52C Road, AR52C; (13) AR53 Road, AR53; (14) AR53A Road, AR53A; (15) AR54 Road, AR54; (16) AR55 Road, AR55; (17) AR56 Road, AR56; (18) AR57 Road, AR57; (19) AR58 Road, AR58; (20) AR58A Road, AR58A; (21) AR121 Road, AR121; (22) AR121E Road, AR121E; (23) AR122 Road, AR122;

(24) AR123 Road, AR123; (25) AR123A Road, AR123A; (26) AR124 Road, AR124; (27) AR124B Road, AR124B; (28) AR125 Road, AR125; (29) AR125B Road, AR125B; (30) AR135 Road, AR135; (31) AR142 Road, AR142; (32) AR142A Road, AR142A; (33) AR142B Road, AR142B; and (34) AR143 Road, AR143.

933. Each right-of-way claimed in the Twin Peaks 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.

934. All rights-of-way claimed in the Twin Peaks 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.

935. All rights-of-way claimed in the Twin Peaks 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).

936. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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.

Twin Peaks Road, BR23

937. The Twin Peaks Road is designated as county road number BR23 and State Geographic Information Database ("SGID") road identification number RD170133 and is more or less 6.86 miles long.

938. The centerline course of the Twin Peaks Road is depicted on the map included in Exhibit 60 (Twin Peaks Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

939. The north end of the Twin Peaks Road commences in the southeast quarter of section 3, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally southwest from the State Highway 30 to the northwest quarter of section 30, Township 12 North, Range 6 East, S.L.B.M.

940. The specific right-of-way for the Twin Peaks Road claimed herein crosses 5.03 miles of BLM land in 6 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 60.

941. In this action, the State and County seek to quiet title to the public highway right-of-way for the Twin Peaks Road solely as it crosses United States public land as included and specifically described in Exhibit 60. The Twin Peaks Road includes the segments of road specifically set forth in Exhibit 60 and as exists on the ground.

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

942. The AR144 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

943. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Twin Peaks Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

944. The appearance of the Twin Peaks Road on the Sage Creek (1969) and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

945. The County confirmed its acceptance of the Twin Peaks Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Twin Peaks Road using public funds pursuant to the County's governmental right and authority.

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

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

948. Public motor vehicle use of the Twin Peaks Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

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

950. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Peaks Road.

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

Nebeker Spring Road, BR30

952. The Nebeker Spring Road is designated as county road number BR30 and State Geographic Information Database ("SGID") road identification number RD170127 and is more or less 1.17 miles long.

953. The centerline course of the Nebeker Spring Road is depicted on the map included in Exhibit 61 (Nebeker Spring Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

954. The east end of the Nebeker Spring Road commences in the northwest quarter of section 1, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally west from Otter Creek Road to the northwest quarter of section 2, Township 11 North, Range 5 East, S.L.B.M.

955. The specific right-of-way for the Nebeker Spring Road claimed herein crosses 1.17 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 61.

956. In this action, the State and County seek to quiet title to the public highway right-of-way for the Nebeker Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 61. The Nebeker Spring Road includes the segment of road specifically set forth in Exhibit 61 and as exists on the ground.

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

957. The AR144 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

958. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Nebeker Spring Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

959. The appearance of the Nebeker Spring Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

960. The County confirmed its acceptance of the Nebeker Spring Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its acceptance of

its R.S. 2477 right-of-way by managing, maintaining, or improving the Nebeker Spring Road using public funds pursuant to the County's governmental right and authority.

961. Witnesses with personal knowledge of the history of the Nebeker 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.

962. Currently known reputation in the community is that the Nebeker 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.

963. Public motor vehicle use of the Nebeker 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 for this road.

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

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

966. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Nebeker 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.

AR38 Road, AR38

967. The AR38 Road is designated as county road number AR38 and State Geographic Information Database ("SGID") road identification number RD170474 and is more or less 8.22 miles long.

968. The centerline course of the AR38 Road is depicted on the map included in Exhibit 62 (AR38 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

969. The south end of the AR38 Road commences in the southwest quarter of section 11, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally north from Otter Creek Road to the northwest quarter of section 7, Township 12 North, Range 6 East, S.L.B.M.

970. The specific right-of-way for the AR38 Road claimed herein crosses 6.34 miles of BLM land in 8 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 62.

971. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR38 Road solely as it crosses United States public land as included and specifically described in Exhibit 62. The AR38 Road includes the segments of road specifically set forth in Exhibit 62 and as exists on the ground.

Acceptance of the AR38 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

972. The AR38 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

973. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR38 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

974. The appearance of the AR38 Road on the Laketown (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

975. The AR38 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, or improving the AR38 Road pursuant to the County's governmental right and authority.

976. Witnesses with personal knowledge of the history of the AR38 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

977. Currently known reputation in the community is that the AR38 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

978. Public motor vehicle use of the AR38 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

979. The AR38 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

980. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR38 Road.

981. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR38 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR38E Road, AR38E

982. The AR38E Road is designated as county road number AR38E and State Geographic Information Database ("SGID") road identification number RD170478 and is more or less 0.49 miles long.

983. The centerline course of the AR38E Road is depicted on the map included in Exhibit 63 (AR38E Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

984. The south end of the AR38E Road commences in the northwest quarter of section 11, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally northeast to the northwest quarter of section 11, Township 11 North, Range 5 East, S.L.B.M.

985. The specific right-of-way for the AR38E Road claimed herein crosses 0.49 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 63.

986. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR38E Road solely as it crosses United States public land as included and specifically described in Exhibit 63. The AR38E Road includes the segments of road specifically set forth in Exhibit 63 and as exists on the ground.

Acceptance of the AR38E Road R.S. 2477 Right-of-way Prior to October 21, 1976.

987. The AR38E Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

988. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR38E Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

989. The AR38E 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, or improving the AR38E Road pursuant to the County's governmental right and authority.

990. Witnesses with personal knowledge of the history of the AR38E Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

991. Currently known reputation in the community is that the AR38E Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

992. Public motor vehicle use of the AR38E Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

993. The AR38E Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

994. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR38E Road.

995. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR38E Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR50 Road, AR50

996. The AR50 Road is designated as county road number AR50 and State Geographic Information Database ("SGID") road identification number RD170495 and is more or less 4.79 miles long.

997. The centerline course of the AR50 Road is depicted on the map included in Exhibit 64 (AR50 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

998. The east end of the AR50 Road commences in the northeast quarter of section 12, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally southwest from State Highway 30 to the southwest quarter of section 21, Township 12 North, Range 6 East, S.L.B.M.

999. The specific right-of-way for the AR50 Road claimed herein crosses 2.87 miles of BLM land in 4 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 64.

1000. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR50 Road solely as it crosses United States public land as included and specifically described in Exhibit 64. The AR50 Road includes the segments of road specifically set forth in Exhibit 64 and as exists on the ground.

Acceptance of the AR50 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1001. The AR50 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1002. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR50 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1003. The appearance of the AR50 Road on the Laketown (1969) and Sage Creek (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1004. The AR50 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, or improving the AR50 Road pursuant to the County's governmental right and authority.

1005. Witnesses with personal knowledge of the history of the AR50 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1006. Currently known reputation in the community is that the AR50 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1007. Public motor vehicle use of the AR50 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1008. The AR50 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1009. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR50 Road.

1010. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR50 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR50B Road, AR50B

1011. The AR50B Road is designated as county road number AR50B and State Geographic Information Database ("SGID") road identification number RD170497 and is more or less 0.41 miles long.

1012. The centerline course of the AR50B Road is depicted on the map included in Exhibit 65 (AR50B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1013. The east end of the AR50B Road commences in the southwest quarter of section 16, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally west to the southeast quarter of section 16, Township 12 North, Range 6 East, S.L.B.M.

1014. The specific right-of-way for the AR50B Road claimed herein crosses 0.11 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 65

1015. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR50B Road solely as it crosses United States public land as included and specifically described in Exhibit 65. The AR50B Road includes the segments of road specifically set forth in Exhibit 65 and as exists on the ground.

Acceptance of the AR50B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1016. The AR50B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1017. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR50B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1018. The appearance of the AR50B Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1019. The AR50B 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, or improving the AR50B Road pursuant to the County's governmental right and authority.

1020. Witnesses with personal knowledge of the history of the AR50B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1021. Currently known reputation in the community is that the AR50B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1022. Public motor vehicle use of the AR50B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1023. The AR50B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1024. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR50B Road.

1025. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR50B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR50C Road, AR50C

1026. The AR50C Road is designated as county road number AR50C and State Geographic Information Database ("SGID") road identification number RD170498 and is more or less 0.62 miles long.

1027. The centerline course of the AR50C Road is depicted on the map included in Exhibit 66 (AR50C Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1028. The east end of the AR50C Road commences in the southeast quarter of section 17, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally southwest to the northwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M.

1029. The specific right-of-way for the AR50C Road claimed herein crosses 0.62 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 66

1030. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR50C Road solely as it crosses United States public land as included and specifically described in Exhibit 66. The AR50C Road includes the segments of road specifically set forth in Exhibit 66 and as exists on the ground.

Acceptance of the AR50C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1031. The AR50C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1032. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR50C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1033. The AR50C 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, or improving the AR50C Road pursuant to the County's governmental right and authority.

1034. Witnesses with personal knowledge of the history of the AR50C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1035. Currently known reputation in the community is that the AR50C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1036. Public motor vehicle use of the AR50C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1037. The AR50C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1038. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR50C Road.

1039. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR50C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR51 Road, AR51

1040. The AR51 Road is designated as county road number AR51 and State Geographic Information Database ("SGID") road identification number RD170499 and is more or less 2.52 miles long.

1041. The centerline course of the AR51 Road is depicted on the map included in Exhibit 67 (AR51 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1042. The east end of the AR51 Road commences in the southeast quarter of section 20, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally west from the Twin Peaks Road to the northeast quarter of section 24, Township 12 North, Range 5 East, S.L.B.M.

1043. The specific right-of-way for the AR51 Road claimed herein crosses 2.17 miles of BLM land in 3 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 67.

1044. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR51 Road solely as it crosses United States public land as included and specifically described in Exhibit 67. The AR51 Road includes the segments of road specifically set forth in Exhibit 67 and as exists on the ground.

Acceptance of the AR51 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1045. The AR51 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1046. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR51 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1047. The appearance of the AR51 Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1048. The AR51 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, or improving the AR51 Road pursuant to the County's governmental right and authority.

1049. Witnesses with personal knowledge of the history of the AR51 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1050. Currently known reputation in the community is that the AR51 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1051. Public motor vehicle use of the AR51 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1052. The AR51 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1053. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR51 Road.

1054. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR51 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR52 Road, AR52

1055. The AR52 Road is designated as county road number AR52 and State Geographic Information Database ("SGID") road identification number RD170500 and is more or less 0.86 miles long.

1056. The centerline course of the AR52 Road is depicted on the map included in Exhibit 68 (AR52 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1057. The east end of the AR52 Road commences in the northeast quarter of section 20, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M.

1058. The specific right-of-way for the AR52 Road claimed herein crosses 0.86 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 68.

1059. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR52 Road solely as it crosses United States public land as included and specifically described in Exhibit 68. The AR52 Road includes the segments of road specifically set forth in Exhibit 68 and as exists on the ground.

Acceptance of the AR52 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1060. The AR52 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1061. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR52 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1062. The AR52 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, or improving the AR52 Road pursuant to the County's governmental right and authority.

1063. Witnesses with personal knowledge of the history of the AR52 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1064. Currently known reputation in the community is that the AR52 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1065. Public motor vehicle use of the AR52 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1066. The AR52 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1067. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR52 Road.

1068. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR52 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR52A Road, AR52A

1069. The AR52A Road is designated as county road number AR52A and State Geographic Information Database ("SGID") road identification number RD170501 and is more or less 0.34 miles long.

1070. The centerline course of the AR52A Road is depicted on the map included in Exhibit 69 (AR52A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1071. The south end of the AR52A Road commences in the southwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally north to the northwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M.

1072. The specific right-of-way for the AR52A Road claimed herein crosses 0.34 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 69.

1073. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR52A Road solely as it crosses United States public land as included and specifically described in Exhibit 69. The AR52A Road includes the segments of road specifically set forth in Exhibit 69 and as exists on the ground.

Acceptance of the AR52A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1074. The AR52A 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 AR52A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1076. The appearance of the AR52A Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1077. The AR52A 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, or improving the AR52A Road pursuant to the County's governmental right and authority.

1078. Witnesses with personal knowledge of the history of the AR52A Road confirm public use of this road as a public 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 AR52A Road has been open for all to come 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 AR52A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1081. The AR52A 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 AR52A Road.

1083. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR52A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR52B Road, AR52B

1084. The AR52B Road is designated as county road number AR52B and State Geographic Information Database ("SGID") road identification number RD170502 and is more or less 0.47 miles long.

1085. The centerline course of the AR52B Road is depicted on the map included in Exhibit 70 (AR52B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1086. The south end of the AR52B Road commences in the northwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally north to the northwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M.

1087. The specific right-of-way for the AR52B Road claimed herein crosses 0.47 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 70.

1088. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR52B Road solely as it crosses United States public land as included and specifically described in Exhibit 70. The AR52B Road includes the segments of road specifically set forth in Exhibit 70 and as exists on the ground.

Acceptance of the AR52B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1089. The AR52B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1090. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR52B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1091. The appearance of the AR52B Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1092. The AR52B 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, or improving the AR52B Road pursuant to the County's governmental right and authority.

1093. Witnesses with personal knowledge of the history of the AR52B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1094. Currently known reputation in the community is that the AR52B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1095. Public motor vehicle use of the AR52B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1096. The AR52B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1097. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR52B Road.

1098. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR52B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR52C Road, AR52C

1099. The AR52C Road is designated as county road number AR52C and State Geographic Information Database ("SGID") road identification number RD170503 and is more or less 0.48 miles long.

1100. The centerline course of the AR52C Road is depicted on the map included in Exhibit 71 (AR52C Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1101. The south end of the AR52C Road commences in the northwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally north to the northwest quarter of section 20, Township 12 North, Range 6 East, S.L.B.M.

1102. The specific right-of-way for the AR52C Road claimed herein crosses 0.48 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 71.

1103. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR52C Road solely as it crosses United States public land as included and specifically described in Exhibit 71. The AR52C Road includes the segments of road specifically set forth in Exhibit 71 and as exists on the ground.

Acceptance of the AR52C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1104. The AR52C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1105. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR52C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1106. The AR52C 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, or improving the AR52C Road pursuant to the County's governmental right and authority.

1107. Witnesses with personal knowledge of the history of the AR52C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1108. Currently known reputation in the community is that the AR52C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1109. Public motor vehicle use of the AR52C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1110. The AR52C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1111. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR52C Road.

1112. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR52C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR53 Road, AR53

1113. The AR53 Road is designated as county road number AR53 and State Geographic Information Database ("SGID") road identification number RD170504 and is more or less 1.32 miles long.

1114. The centerline course of the AR53 Road is depicted on the map included in Exhibit 72 (AR53 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1115. The south end of the AR53 Road commences in the northwest quarter of section 30, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Twin Peaks Road to the southwest quarter of section 24, Township 12 North, Range 5 East, S.L.B.M.

1116. The specific right-of-way for the AR53 Road claimed herein crosses 0.52 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 72.

1117. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR53 Road solely as it crosses United States public land as included and specifically described in Exhibit 72. The AR53 Road includes the segments of road specifically set forth in Exhibit 72 and as exists on the ground.

Acceptance of the AR53 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1118. The AR53 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1119. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR53 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1120. The appearance of the AR53 Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1121. The AR53 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR53 Road by managing, maintaining, or improving the AR53 Road pursuant to the County's governmental right and authority.

1122. Witnesses with personal knowledge of the history of the AR53 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1123. Currently known reputation in the community is that the AR53 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1124. Public motor vehicle use of the AR53 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1125. The AR53 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1126. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR53 Road.

1127. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR53 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR53A Road, AR53A

1128. The AR53A Road is designated as county road number AR53A and State Geographic Information Database ("SGID") road identification number RD170505 and is more or less 1.32 miles long.

1129. The centerline course of the AR53A Road is depicted on the map included in Exhibit 73 (AR53A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1130. The south end of the AR53A Road commences in the southeast quarter of section 24, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally northeast to the northwest quarter of section 19, Township 12 North, Range 6 East, S.L.B.M.

1131. The specific right-of-way for the AR53A Road claimed herein crosses 1.23 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 73.

1132. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR53A Road solely as it crosses United States public land as included and specifically described in Exhibit 73. The AR53A Road includes the segments of road specifically set forth in Exhibit 73 and as exists on the ground.

Acceptance of the AR53A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1133. The AR53A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1134. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR53A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1135. The appearance of the AR53A Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1136. The AR53A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR53A Road by managing, maintaining, or improving the AR53A Road pursuant to the County's governmental right and authority.

1137. Witnesses with personal knowledge of the history of the AR53A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1138. Currently known reputation in the community is that the AR53A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1139. Public motor vehicle use of the AR53A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1140. The AR53A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1141. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR53A Road.

1142. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR53A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR54 Road, AR54

1143. The AR54 Road is designated as county road number AR54 and State Geographic Information Database ("SGID") road identification number RD170506 and is more or less 1.91 miles long.

1144. The centerline course of the AR54 Road is depicted on the map included in Exhibit 74 (AR54 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1145. The east end of the AR54 Road commences in the northwest quarter of section 30, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally southwest from the Twin Peaks Road to the northeast quarter of section 35, Township 12 North, Range 5 East, S.L.B.M.

1146. The specific right-of-way for the AR54 Road claimed herein crosses 1.2 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 74.

1147. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR54 Road solely as it crosses United States public land as included and specifically described in Exhibit 74. The AR54 Road includes the segments of road specifically set forth in Exhibit 74 and as exists on the ground.

Acceptance of the AR54 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1148. The AR54 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1149. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR54 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1150. The appearance of the AR54 Road on the Laketown (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1151. The AR54 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR54 Road by managing, maintaining, or improving the AR54 Road pursuant to the County's governmental right and authority.

1152. Witnesses with personal knowledge of the history of the AR54 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1153. Currently known reputation in the community is that the AR54 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1154. Public motor vehicle use of the AR54 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1155. The AR54 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1156. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR54 Road.

1157. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR54 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR55 Road, AR55

1158. The AR55 Road is designated as county road number AR55 and State Geographic Information Database ("SGID") road identification number RD170507 and is more or less 3.10 miles long.

1159. The centerline course of the AR55 Road is depicted on the map included in Exhibit 75 (AR55 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1160. The east end of the AR55 Road commences in the northwest quarter of section 29, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally southwest to the northwest quarter of section 36, Township 12 North, Range 5 East, S.L.B.M.

1161. The specific right-of-way for the AR55 Road claimed herein crosses 3.1 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 75.

1162. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR55 Road solely as it crosses United States public land as included and specifically described in Exhibit 75. The AR55 Road includes the segments of road specifically set forth in Exhibit 75 and as exists on the ground.

Acceptance of the AR55 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1163. The AR55 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1164. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR55 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1165. The appearance of the AR55 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1166. The AR55 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR55 Road by managing, maintaining, or improving the AR55 Road pursuant to the County's governmental right and authority.

1167. Witnesses with personal knowledge of the history of the AR55 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1168. Currently known reputation in the community is that the AR55 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1169. Public motor vehicle use of the AR55 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1170. The AR55 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1171. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR55 Road.

1172. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR55 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR56 Road, AR56

1173. The AR56 Road is designated as county road number AR56 and State Geographic Information Database ("SGID") road identification number RD170508 and is more or less 1.44 miles long.

1174. The centerline course of the AR56 Road is depicted on the map included in Exhibit 76 (AR56 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1175. The east end of the AR56 Road commences in the northeast quarter of section 32, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Otter Creek Road to the southwest quarter of section 30, Township 12 North, Range 6 East, S.L.B.M.

1176. The specific right-of-way for the AR56 Road claimed herein crosses 1.44 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 76.

1177. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR56 Road solely as it crosses United States public land as included and specifically described in Exhibit 76. The AR56 Road includes the segments of road specifically set forth in Exhibit 76 and as exists on the ground.

Acceptance of the AR56 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1178. The AR56 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1179. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR56 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1180. The appearance of the AR56 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1181. The AR56 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR56 Road by managing, maintaining, or improving the AR56 Road pursuant to the County's governmental right and authority.

1182. Witnesses with personal knowledge of the history of the AR56 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1183. Currently known reputation in the community is that the AR56 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1184. Public motor vehicle use of the AR56 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1185. The AR56 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1186. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR56 Road.

1187. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR56 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR57 Road, AR57

1188. The AR57 Road is designated as county road number AR57 and State Geographic Information Database ("SGID") road identification number RD170509 and is more or less 1.62 miles long.

1189. The centerline course of the AR57 Road is depicted on the map included in Exhibit 77 (AR57 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1190. The east end of the AR57 Road commences in the northeast quarter of section 32, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Otter Creek Road to the southwest quarter of section 30, Township 12 North, Range 6 East, S.L.B.M.

1191. The specific right-of-way for the AR57 Road claimed herein crosses 1.62 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 77.

1192. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR57 Road solely as it crosses United States public land as included and specifically described in Exhibit 77. The AR57 Road includes the segments of road specifically set forth in Exhibit 77 and as exists on the ground.

Acceptance of the AR57 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1193. The AR57 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1194. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR57 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1195. The appearance of the AR57 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1196. The AR57 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR57 Road by managing, maintaining, or improving the AR57 Road pursuant to the County's governmental right and authority.

1197. Witnesses with personal knowledge of the history of the AR57 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1198. Currently known reputation in the community is that the AR57 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1199. Public motor vehicle use of the AR57 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1200. The AR57 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1201. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR57 Road.

1202. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR57 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR58 Road, AR58

1203. The AR58 Road is designated as county road number AR58 and State Geographic Information Database ("SGID") road identification number RD170510 and is more or less 2.83 miles long.

1204. The centerline course of the AR58 Road is depicted on the map included in Exhibit 78 (AR58 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1205. The south end of the AR58 Road commences in the southeast quarter of section 33, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally north from the Otter Creek Road to the southeast quarter of section 21, Township 12 North, Range 6 East, S.L.B.M. where it meets the Twin Peaks Road.

1206. The specific right-of-way for the AR58 Road claimed herein crosses 2.83 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 78.

1207. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR58 Road solely as it crosses United States public land as included and specifically described in Exhibit 78. The AR58 Road includes the segments of road specifically set forth in Exhibit 78 and as exists on the ground.

Acceptance of the AR58 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1208. The AR58 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1209. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR58 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1210. The appearance of the AR58 Road on the Old Canyon (1969) and Laketown (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1211. The AR58 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR58 Road by managing, maintaining, or improving the AR58 Road pursuant to the County's governmental right and authority.

1212. Witnesses with personal knowledge of the history of the AR58 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1213. Currently known reputation in the community is that the AR58 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1214. Public motor vehicle use of the AR58 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1215. The AR58 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1216. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR58 Road.

1217. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR58 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR58A Road, AR58A

1218. The AR58A Road is designated as county road number AR58A and State Geographic Information Database ("SGID") road identification number RD170511 and is more or less 0.51 miles long.

1219. The centerline course of the AR58A Road is depicted on the map included in Exhibit 79 (AR58A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1220. The east end of the AR58A Road commences in the northeast quarter of section 28, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally west to the northeast quarter of section 29, Township 12 North, Range 6 East, S.L.B.M.

1221. The specific right-of-way for the AR58A Road claimed herein crosses 0.51 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 79.

1222. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR58A Road solely as it crosses United States public land as included and specifically described in Exhibit 79. The AR58A Road includes the segments of road specifically set forth in Exhibit 79 and as exists on the ground.

Acceptance of the AR58A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1223. The AR58A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1224. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR58A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1225. The AR58A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR58A Road by managing, maintaining, or improving the AR58A Road pursuant to the County's governmental right and authority.

1226. Witnesses with personal knowledge of the history of the AR58A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1227. Currently known reputation in the community is that the AR58A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1228. Public motor vehicle use of the AR58A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1229. The AR58A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1230. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR58A Road.

1231. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR58A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR121 Road, AR121

1232. The AR121 Road is designated as county road number AR121 and State Geographic Information Database ("SGID") road identification number RD170378 and is more or less 4.37 miles long.

1233. The centerline course of the AR121 Road is depicted on the map included in Exhibit 80 (AR121 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

1234. The south end of the AR121 Road commences in the southeast quarter of section 3, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally north to the southeast quarter of section 27, Township 12 North, Range 5 East, S.L.B.M.

1235. The specific right-of-way for the AR121 Road claimed herein crosses 2.42 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 80.

1236. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR121 Road solely as it crosses United States public land as included and specifically described in Exhibit 80. The AR121 Road includes the segments of road specifically set forth in Exhibit 80 and as exists on the ground.

Acceptance of the AR121 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1237. The AR121 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR121 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1239. The appearance of the AR121 Road on the Old Canyon (1969) and Red Spur Mountain (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1240. The AR121 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR121 Road by managing, maintaining, or improving the AR121 Road pursuant to the County's governmental right and authority.

1241. Witnesses with personal knowledge of the history of the AR121 Road confirm public use of this road as a public 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 AR121 Road has been open for all to come 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 AR121 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1244. The AR121 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 AR121 Road.

1246. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR121 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR121E Road, AR121E

1247. The AR121E Road is designated as county road number AR121E and State Geographic Information Database ("SGID") road identification number RD170382 and is more or less 0.85 miles long.

1248. The centerline course of the AR121E Road is depicted on the map included in Exhibit 81 (AR121E Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

1249. The south end of the AR121E Road commences in the northwest quarter of section 2, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally west from Nebeker Spring Road to the northwest quarter of section 3, Township 11 North, Range 5 East, S.L.B.M.

1250. The specific right-of-way for the AR121E Road claimed herein crosses 0.59 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 81.

1251. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR121E Road solely as it crosses United States public land as included and specifically described in Exhibit 81. The AR121E Road includes the segments of road specifically set forth in Exhibit 81 and as exists on the ground.

Acceptance of the AR121E Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1252. The AR121E Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1253. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR121E Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1254. The appearance of the AR121E Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1255. The AR121E Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR121E Road by managing, maintaining, or improving the AR121E Road pursuant to the County's governmental right and authority.

1256. Witnesses with personal knowledge of the history of the AR121E Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1257. Currently known reputation in the community is that the AR121E Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1258. Public motor vehicle use of the AR121E Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1259. The AR121E Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1260. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR121E Road.

1261. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR121E Road on lands owned by the United States as described herein and including

AR122 Road, AR122

1262. The AR122 Road is designated as county road number AR122 and State Geographic Information Database ("SGID") road identification number RD170383 and is more or less 0.53 miles long.

1263. The centerline course of the AR122 Road is depicted on the map included in Exhibit 82 (AR122 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1264. The east end of the AR122 Road commences in the southeast quarter of section 10, Township 11 North, Range 5 East, S.L.B.M. and proceeds from the Otter Creek Road generally northwest to the southwest quarter of section 10, Township 11 North, Range 5 East, S.L.B.M.

1265. The specific right-of-way for the AR122 Road claimed herein crosses 0.3 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 82.

1266. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR122 Road solely as it crosses United States public land as included and specifically described in Exhibit 82. The AR122 Road includes the segments of road specifically set forth in Exhibit 82 and as exists on the ground.

Acceptance of the AR122 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1267. The AR122 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1268. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR122 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1269. The AR122 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR122 Road by managing, maintaining, or improving the AR122 Road pursuant to the County's governmental right and authority.

1270. Witnesses with personal knowledge of the history of the AR122 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1271. Currently known reputation in the community is that the AR122 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1272. Public motor vehicle use of the AR122 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1273. The AR122 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1274. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR122 Road.

1275. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR122 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR123 Road, AR123

1276. The AR123 Road is designated as county road number AR123 and State Geographic Information Database ("SGID") road identification number RD170384 and is more or less 1.43 miles long.

1277. The centerline course of the AR123 Road is depicted on the map included in Exhibit 83 (AR123 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses Forest Service land, state land and public land administered by the BLM.

1278. The north end of the AR123 Road commences in the southeast quarter of section 10, Township 11 North, Range 5 East, S.L.B.M. and proceeds from the Otter Creek Road generally southwest to the southeast quarter of section 16, Township 12 North, Range 6 East, S.L.B.M. where it rejoins the Otter Creek Road.

1279. The specific right-of-way for the AR123 Road claimed herein crosses .08 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 83.

1280. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR123 Road solely as it crosses United States public land as included and specifically described in Exhibit 83. The AR123 Road includes the segments of road specifically set forth in Exhibit 83 and as exists on the ground.

Acceptance of the AR123 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1281. The AR123 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1282. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR123 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1283. The appearance of the AR123 Road on the Red Spur Mountain (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1284. The County confirmed its acceptance of the AR123 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 the AR123 Road by managing, maintaining, or improving the AR123 Road pursuant to the County's governmental right and authority.

1285. Witnesses with personal knowledge of the history of the AR123 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1286. Currently known reputation in the community is that the AR123 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1287. Public motor vehicle use of the AR123 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1288. The AR123 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1289. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR123 Road.

1290. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR123 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR123A Road, AR123A

1291. The AR123A Road is designated as county road number AR123A and State Geographic Information Database ("SGID") road identification number RD170385 and is more or less 0.28 miles long.

1292. The centerline course of the AR123A Road is depicted on the map included in Exhibit 84 (AR123A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses Forest Service land and public land administered by the BLM.

1293. The north end of the AR123A Road commences in the southeast quarter of section 10, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally south from the Otter Creek Road to the northwest quarter of section 15, Township 11 North, Range 5 East, S.L.B.M.

1294. The specific right-of-way for the AR123A Road claimed herein crosses 0.28 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 84.

1295. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR123A Road solely as it crosses United States public land as included and specifically described in Exhibit 84. The AR123A Road includes the segments of road specifically set forth in Exhibit 84 and as exists on the ground.

Acceptance of the AR123A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1296. The AR123A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1297. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR123A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1298. The AR123A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR123A Road by managing, maintaining, or improving the AR123A Road pursuant to the County's governmental right and authority.

1299. Witnesses with personal knowledge of the history of the AR123A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1300. Currently known reputation in the community is that the AR123A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1301. Public motor vehicle use of the AR123A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1302. The AR123A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1303. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR123A Road.

1304. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR123A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR124 Road, AR124

1305. The AR124 Road is designated as county road number AR124 and State Geographic Information Database ("SGID") road identification number RD170386 and is more or less 4.85 miles long.

1306. The centerline course of the AR124 Road is depicted on the map included in Exhibit 85 (AR124 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1307. The north end of the AR124 Road commences in the southeast quarter of section 26, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally southwest to the northeast quarter of section 8, Township 11 North, Range 5 East, S.L.B.M.

1308. The specific right-of-way for the AR124 Road claimed herein crosses 2.02 miles of BLM land in 3 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 85.

1309. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR124 Road solely as it crosses United States public land as included and specifically described in Exhibit 85. The AR124 Road includes the segments of road specifically set forth in Exhibit 85 and as exists on the ground.

Acceptance of the AR124 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1310. The AR124 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1311. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR124 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1312. The appearance of the AR124 Road on the Red Spur Mountain (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1313. The AR124 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR124 Road by managing, maintaining, or improving the AR124 Road pursuant to the County's governmental right and authority.

1314. Witnesses with personal knowledge of the history of the AR124 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1315. Currently known reputation in the community is that the AR124 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1316. Public motor vehicle use of the AR124 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1317. The AR124 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1318. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR124 Road.

1319. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR124 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR124B Road, AR124B

1320. The AR124B Road is designated as county road number AR124B and State Geographic Information Database ("SGID") road identification number RD170387 and is more or less 0.17 miles long.

1321. The centerline course of the AR124B Road is depicted on the map included in Exhibit 86 (AR124B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1322. The south end of the AR124B Road commences in the southeast quarter of section 33, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally northwest to the northeast quarter of section 33, Township 12 North, Range 5 East, S.L.B.M.

1323. The specific right-of-way for the AR124B Road claimed herein crosses 0.17 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 86.

1324. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR124B Road solely as it crosses United States public land as included and specifically described in Exhibit 86. The AR124B Road includes the segments of road specifically set forth in Exhibit 86 and as exists on the ground.

Acceptance of the AR124B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1325. The AR124B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1326. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR124B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1327. The appearance of the AR124B Road on the Red Spur Mountain (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1328. The AR124B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR124B Road by managing, maintaining, or improving the AR124B Road pursuant to the County's governmental right and authority.

1329. Witnesses with personal knowledge of the history of the AR124B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1330. Currently known reputation in the community is that the AR124B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1331. Public motor vehicle use of the AR124B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1332. The AR124B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1333. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR124B Road.

1334. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR124B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR125 Road, AR125

1335. The AR125 Road is designated as county road number AR125 and State Geographic Information Database ("SGID") road identification number RD170388 and is more or less 2.64 miles long.

1336. The centerline course of the AR125 Road is depicted on the map included in Exhibit 87 (AR125 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only private land and public land administered by the BLM.

1337. The north end of the AR125 Road commences in the southeast quarter of section 27, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally southwest to the northwest quarter of section 4, Township 11 North, Range 5 East, S.L.B.M.

1338. The specific right-of-way for the AR125 Road claimed herein crosses 1.16 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 87.

1339. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR125 Road solely as it crosses United States public land as included and specifically described in Exhibit 87. The AR125 Road includes the segments of road specifically set forth in Exhibit 87 and as exists on the ground.

Acceptance of the AR125 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1340. The AR125 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1341. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR125 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1342. The appearance of the AR125 Road on the Red Spur Mountain (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1343. The AR125 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR125 Road by managing, maintaining, or improving the AR125 Road pursuant to the County's governmental right and authority.

1344. Witnesses with personal knowledge of the history of the AR125 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1345. Currently known reputation in the community is that the AR125 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1346. Public motor vehicle use of the AR125 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1347. The AR125 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1348. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR125 Road.

1349. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR125 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR125B Road, AR125B

1350. The AR125B Road is designated as county road number AR125B and State Geographic Information Database ("SGID") road identification number RD170389 and is more or less 0.21 miles long.

1351. The centerline course of the AR125B Road is depicted on the map included in Exhibit 88 (AR125B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1352. The south end of the AR125B Road commences in the southeast quarter of section 33, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally northwest to the northeast quarter of section 33, Township 12 North, Range 5 East, S.L.B.M.

1353. The specific right-of-way for the AR125B Road claimed herein crosses 0.21 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 88.

1354. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR125B Road solely as it crosses United States public land as included and specifically described in Exhibit 88. The AR125B Road includes the segments of road specifically set forth in Exhibit 88 and as exists on the ground.

Acceptance of the AR125B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1355. The AR125B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1356. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR125B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1357. The AR125B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR125B Road by managing, maintaining, or improving the AR125B Road pursuant to the County's governmental right and authority.

1358. Witnesses with personal knowledge of the history of the AR125B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1359. Currently known reputation in the community is that the AR125B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1360. Public motor vehicle use of the AR125B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1361. The AR125B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1362. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR125B Road.

1363. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR125B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR135 Road, AR135

1364. The AR135 Road is designated as county road number AR135 and State Geographic Information Database ("SGID") road identification number RD170401 and is more or less 1.12 miles long.

1365. The centerline course of the AR135 Road is depicted on the map included in Exhibit 89 (AR135 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1366. The south end of the AR135 Road commences in the southwest quarter of section 22, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Twin Peaks Road to the southeast quarter of section 16, Township 12 North, Range 6 East, S.L.B.M.

1367. The specific right-of-way for the AR135 Road claimed herein crosses 0.76 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 89.

1368. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR135 Road solely as it crosses United States public land as included and specifically described in Exhibit 89. The AR135 Road includes the segments of road specifically set forth in Exhibit 89 and as exists on the ground.

Acceptance of the AR135 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1369. The AR135 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1370. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR135 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1371. The appearance of the AR135 Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1372. The AR135 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR135 Road by managing, maintaining, or improving the AR135 Road pursuant to the County's governmental right and authority.

1373. Witnesses with personal knowledge of the history of the AR135 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1374. Currently known reputation in the community is that the AR135 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1375. Public motor vehicle use of the AR135 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1376. The AR135 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1377. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR135 Road.

1378. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR135 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR142 Road, AR142

1379. The AR142 Road is designated as county road number AR142 and State Geographic Information Database ("SGID") road identification number RD170410 and is more or less 4.07 miles long.

1380. The centerline course of the AR142 Road is depicted on the map included in Exhibit 90 (AR142 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1381. The south end of the AR142 Road commences in the northeast quarter of section 2, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally north from the Nebeker Spring Road to the southeast quarter of section 13, Township 12 North, Range 5 East, S.L.B.M.

1382. The specific right-of-way for the AR142 Road claimed herein crosses 3.82 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 90.

1383. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR142 Road solely as it crosses United States public land as included and specifically described in Exhibit 90. The AR142 Road includes the segments of road specifically set forth in Exhibit 90 and as exists on the ground.

Acceptance of the AR142 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1384. The AR142 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1385. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR142 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1386. The appearance of the AR142 Road on the Laketown (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1387. The AR142 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR142 Road by managing, maintaining, or improving the AR142 Road pursuant to the County's governmental right and authority.

1388. Witnesses with personal knowledge of the history of the AR142 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1389. Currently known reputation in the community is that the AR142 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1390. Public motor vehicle use of the AR142 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1391. The AR142 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1392. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR142 Road.

1393. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR142 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR142A Road, AR142A

1394. The AR142A Road is designated as county road number AR142A and State Geographic Information Database ("SGID") road identification number RD170411 and is more or less 0.96 miles long.

1395. The centerline course of the AR142A Road is depicted on the map included in Exhibit 91 (AR142A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1396. The south end of the AR142A Road commences in the southwest quarter of section 24, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally northwest to the southeast quarter of section 14, Township 12 North, Range 5 East, S.L.B.M.

1397. The specific right-of-way for the AR142A Road claimed herein crosses 0.96 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 91.

1398. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR142A Road solely as it crosses United States public land as included and specifically described in Exhibit 91. The AR142A Road includes the segments of road specifically set forth in Exhibit 91 and as exists on the ground.

Acceptance of the AR142A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1399. The AR142A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1400. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR142A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1401. The appearance of the AR142A Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1402. The AR142A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR142A Road by managing, maintaining, or improving the AR142A Road pursuant to the County's governmental right and authority.

1403. Witnesses with personal knowledge of the history of the AR142A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1404. Currently known reputation in the community is that the AR142A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1405. Public motor vehicle use of the AR142A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1406. The AR142A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1407. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR142A Road.

1408. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR142A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR142B Road, AR142B

1409. The AR142B Road is designated as county road number AR142B and State Geographic Information Database ("SGID") road identification number RD170412 and is more or less 0.47 miles long.

1410. The centerline course of the AR142B Road is depicted on the map included in Exhibit 92 (AR142B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1411. The south end of the AR142B Road commences in the northwest quarter of section 24, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally north to the southwest quarter of section 13, Township 12 North, Range 5 East, S.L.B.M.

1412. The specific right-of-way for the AR142B Road claimed herein crosses 0.37 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 92.

1413. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR142B Road solely as it crosses United States public land as included and

specifically described in Exhibit 92. The AR142B Road includes the segments of road specifically set forth in Exhibit 92 and as exists on the ground.

Acceptance of the AR142B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1414. The AR142B 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR142B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1416. The appearance of the AR142B Road on the Laketown (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1417. The AR142B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR142B Road by managing, maintaining, or improving the AR142B Road pursuant to the County's governmental right and authority.

1418. Witnesses with personal knowledge of the history of the AR142B Road confirm public use of this road as a public 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 AR142B Road has been open for all to come 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 AR142B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1421. The AR142B 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 AR142B Road.

1423. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR142B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR143 Road, AR143

1424. The AR143 Road is designated as county road number AR143 and State Geographic Information Database ("SGID") road identification number RD170413 and is more or less 1.16 miles long.

1425. The centerline course of the AR143 Road is depicted on the map included in Exhibit 93 (AR143 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1426. The north end of the AR143 Road commences in the northeast quarter of section 25, Township 12 North, Range 5 East, S.L.B.M. and proceeds generally south to the southwest quarter of section 31, Township 12 North, Range 6 East, S.L.B.M.

1427. The specific right-of-way for the AR143 Road claimed herein crosses 1.13 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 93.

1428. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR143 Road solely as it crosses United States public land as included and specifically described in Exhibit 93. The AR143 Road includes the segments of road specifically set forth in Exhibit 93 and as exists on the ground.

Acceptance of the AR143 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1429. The AR143 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1430. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR143 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1431. The appearance of the AR143 Road on the Laketown (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1432. The AR143 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR143 Road by managing, maintaining, or improving the AR143 Road pursuant to the County's governmental right and authority.

1433. Witnesses with personal knowledge of the history of the AR143 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1434. Currently known reputation in the community is that the AR143 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1435. Public motor vehicle use of the AR143 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1436. The AR143 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1437. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR143 Road.

1438. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR143 Road on lands owned 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
NEW CANYON AREA

1439. The State of Utah and Rich County incorporate herein and realleges each of the foregoing paragraphs.

1440. The New Canyon Area is located in central Rich County in the northeastern region of Utah. *See* Exhibit 6.

1441. The New Canyon Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Little Creek Road, BR31; (2) New Canyon Road, BR32; (3) Pole Canyon Road, BR34; (4) Old Canyon Road, BR33; (5) AR6 Road, AR6; (6) AR64 Road, AR64; (7) AR65 Road, AR65; (8) AR65A Road, AR65A; (9) AR65B Road, AR65B; (10) AR66 Road, AR66; (11) AR67 Road, AR67; (12) AR72 Road, AR72; (13) AR73 Road, AR73; (14) AR74 Road, AR74; (15) AR75 Road, AR75; (16) AR77 Road, AR77; (17) AR77A Road, AR77A; (18) AR77C Road, AR77C; (19) AR78 Road, AR78; (20) AR78A Road, AR78A; (21) AR78B Road, AR78B; (22) AR78C Road, AR78C; (23) AR79 Road, AR79; (24) AR145 Road, AR145; (25) AR145A Road, AR145A; (26) AR146 Road, AR146; and (27) AR147 Road, AR147.

1442. Each right-of-way claimed in the New 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.

1443. All rights-of-way claimed in the New 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.

1444. All rights-of-way claimed in the New 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).

1445. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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.

Little Creek Road, BR31

1446. The Little Creek Road is designated as county road number BR31 and State Geographic Information Database ("SGID") road identification number RD170193 and is more or less 3.79 miles long.

1447. The centerline course of the Little Creek Road is depicted on the map included in Exhibit 94 (Little Creek Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1448. The north end of the Little Creek Road commences in the northwest quarter of section 14, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally southeast from the Otter Creek Cutoff Road to the northeast quarter of section 30, Township 11 North, Range 7 East, S.L.B.M.

1449. The specific right-of-way for the Little Creek Road claimed herein crosses 0.99 miles of BLM land in 5 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 94.

1450. In this action, the State and County seek to quiet title to the public highway right-of-way for the Little Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 94. The Little Creek Road includes the segments of road specifically set forth in Exhibit 94 and as exists on the ground.

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

1451. The Little Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1452. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Little Creek Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1453. The appearance of the Little Creek Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1454. The County confirmed its acceptance of the Little Creek Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Little Creek Road using public funds pursuant to the County's governmental right and authority.

1455. Witnesses with personal knowledge of the history of the Little 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.

1456. Currently known reputation in the community is that the Little 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.

1457. Public motor vehicle use of the Little 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 for this road.

1458. The Little Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1459. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Creek Road.

1460. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Little 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.

New Canyon Road, BR32

1461. The New Canyon Road is designated as county road number BR32 and State Geographic Information Database ("SGID") road identification number RD170194 and is more or less 5.71 miles long.

1462. The centerline course of the New Canyon Road is depicted on the map included in Exhibit 95 (New Canyon Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, Forest Service land and public land administered by the BLM.

1463. The east end of the New Canyon Road commences in the northeast quarter of section 23, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally west from the Little Creek Road to the southeast quarter of section 23, Township 11 North, Range 5 East, S.L.B.M.

1464. The specific right-of-way for the New Canyon Road claimed herein crosses 3.19 miles of BLM land in 4 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 95.

1465. In this action, the State and County seek to quiet title to the public highway right-of-way for the New Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 95. The New Canyon Road includes the segments of road specifically set forth in Exhibit 95 and as exists on the ground.

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

1466. The New Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1467. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the New Canyon Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1468. The appearance of the New Canyon Road on the Randolph (1968) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1469. The County confirmed its acceptance of the New Canyon Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of

its R.S. 2477 right-of-way by managing, maintaining, or improving the New Canyon Road using public funds pursuant to the County's governmental right and authority.

1470. Witnesses with personal knowledge of the history of the New 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.

1471. Currently known reputation in the community is that the New 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.

1472. Public motor vehicle use of the New 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 for this road.

1473. The New Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1474. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the New Canyon Road.

1475. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the New 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.

Pole Canyon Road, BR34

1476. The Pole Canyon Road is designated as county road number BR34 and State Geographic Information Database ("SGID") road identification number RD170228 and is more or less 4.07 miles long.

1477. The centerline course of the Pole Canyon Road is depicted on the map included in Exhibit 96 (Pole Canyon Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

1478. The east end of the Pole Canyon Road commences in the southeast quarter of section 28, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally west from the Old Canyon Road to the southwest quarter of section 25, Township 11 North, Range 5 East, S.L.B.M.

1479. The specific right-of-way for the Pole Canyon Road claimed herein crosses 2.98 miles of BLM land in 3 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 96.

1480. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pole Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 96. The Pole Canyon Road includes the segments of road specifically set forth in Exhibit 96 and as exists on the ground.

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

1481. The Pole Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1482. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Pole Canyon Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1483. The appearance of the Pole Canyon Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1484. The County confirmed its acceptance of the Pole Canyon Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Pole Canyon Road using public funds pursuant to the County's governmental right and authority.

1485. Witnesses with personal knowledge of the history of the Pole 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.

1486. Currently known reputation in the community is that the Pole 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.

1487. Public motor vehicle use of the Pole 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 for this road.

1488. The Pole Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1489. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pole Canyon Road.

1490. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pole 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 Canyon Road, BR33

1491. The Old Canyon Road is designated as county road number BR33 and State Geographic Information Database ("SGID") road identification number RD170230 and is more or less 8.13 miles long.

1492. The centerline course of the Old Canyon Road is depicted on the map included in Exhibit 97 (Old Canyon Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, Forest Service land and public land administered by the BLM.

1493. The east end of the Old Canyon Road commences in the southwest quarter of section 24, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally west from the Little Creek Road to the southwest quarter of section 35, Township 11 North, Range 5 East, S.L.B.M.

1494. The specific right-of-way for the Old Canyon Road claimed herein crosses 2.79 miles of BLM land in 6 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 97.

1495. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 97. The Old Canyon Road includes the segments of road specifically set forth in Exhibit 97 and as exists on the ground.

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

1496. The Old Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1497. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Old Canyon Road as a public highway located on the land

at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1498. The appearance of the Old Canyon Road on the Randolph (1968) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1499. The County confirmed its acceptance of the Old Canyon Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Old Canyon Road using public funds pursuant to the County's governmental right and authority.

1500. Witnesses with personal knowledge of the history of the Old 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.

1501. Currently known reputation in the community is that the Old 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.

1502. Public motor vehicle use of the Old 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 for this road.

1503. The Old Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1504. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Canyon Road.

1505. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old 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.

AR6 Road, AR6

1506. The AR6 Road is designated as county road number AR6 and State Geographic Information Database ("SGID") road identification number RD170515 and is more or less 2.99 miles long.

1507. The centerline course of the AR6 Road is depicted on the map included in Exhibit 98 (AR6 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1508. The north end of the AR6 Road commences in the northeast quarter of section 32, Township 12 North, Range 6 East, S.L.B.M. and proceeds generally south from the Otter Creek Road to the northeast quarter of section 7, Township 11 North, Range 6 East, S.L.B.M.

1509. The specific right-of-way for the AR6 Road claimed herein crosses 2.99 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 98.

1510. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR6 Road solely as it crosses United States public land as included and specifically described in Exhibit 98. The AR6 Road includes the segments of road specifically set forth in Exhibit 98 and as exists on the ground.

Acceptance of the AR6 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1511. The AR6 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1512. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR6 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1513. The appearance of the AR6 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1514. The County confirmed its acceptance of the AR6 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 the AR6 Road by managing, maintaining, or improving the AR6 Road pursuant to the County's governmental right and authority.

1515. Witnesses with personal knowledge of the history of the AR6 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1516. Currently known reputation in the community is that the AR6 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1517. Public motor vehicle use of the AR6 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1518. The AR6 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1519. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR6 Road.

1520. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR6 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR64 Road, AR64

1521. The AR64 Road is designated as county road number AR64 and State Geographic Information Database ("SGID") road identification number RD170522 and is more or less 2.09 miles long.

1522. The centerline course of the AR64 Road is depicted on the map included in Exhibit 99 (AR64 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land public land administered by the BLM.

1523. The west end of the AR64 Road commences in the northeast quarter of section 12, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally east to the northeast quarter of section 8, Township 11 North, Range 6 East, S.L.B.M.

1524. The specific right-of-way for the AR64 Road claimed herein crosses 1.93 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 99.

1525. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR64 Road solely as it crosses United States public land as included and specifically described in Exhibit 99. The AR64 Road includes the segments of road specifically set forth in Exhibit 99 and as exists on the ground.

Acceptance of the AR64 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1526. The AR64 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1527. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR64 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1528. The AR64 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR64 Road by managing, maintaining, or improving the AR64 Road pursuant to the County's governmental right and authority.

1529. Witnesses with personal knowledge of the history of the AR64 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1530. Currently known reputation in the community is that the AR64 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1531. Public motor vehicle use of the AR64 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1532. The AR64 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1533. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR64 Road.

1534. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR64 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR65 Road, AR65

1535. The AR65 Road is designated as county road number AR65 and State Geographic Information Database ("SGID") road identification number RD170523 and is more or less 7.87 miles long.

1536. The centerline course of the AR65 Road is depicted on the map included in Exhibit 100 (AR65 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land public land administered by the BLM.

1537. The east end of the AR65 Road commences in the southwest quarter of section 3, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally southwest from the Otter Creek Cutoff Road to the northeast quarter of section 18, Township 11 North, Range 6 East, S.L.B.M.

1538. The specific right-of-way for the AR65 Road claimed herein crosses 7.63 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 100.

1539. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR65 Road solely as it crosses United States public land as included and specifically described in Exhibit 100. The AR65 Road includes the segments of road specifically set forth in Exhibit 100 and as exists on the ground.

Acceptance of the AR65 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1540. The AR65 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1541. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR65 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1542. The appearance of the AR65 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1543. The AR65 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR65 Road by managing, maintaining, or improving the AR65 Road pursuant to the County's governmental right and authority.

1544. Witnesses with personal knowledge of the history of the AR65 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1545. Currently known reputation in the community is that the AR65 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1546. Public motor vehicle use of the AR65 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1547. The AR65 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1548. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR65 Road.

1549. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR65 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR65A Road, AR65A

1550. The AR65A Road is designated as county road number AR65A and State Geographic Information Database ("SGID") road identification number RD170524 and is more or less 0.44 miles long.

1551. The centerline course of the AR65A Road is depicted on the map included in Exhibit 101 (AR65A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land public land administered by the BLM.

1552. The south end of the AR65A Road commences in the northwest quarter of section 6, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally north to the southeast quarter of section 31, Township 12 North, Range 6 East, S.L.B.M.

1553. The specific right-of-way for the AR65A Road claimed herein crosses 0.44 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 101.

1554. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR65A Road solely as it crosses United States public land as included and specifically described in Exhibit 101. The AR65A Road includes the segments of road specifically set forth in Exhibit 101 and as exists on the ground.

Acceptance of the AR65A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1555. The AR65A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1556. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR65A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1557. The appearance of the AR65A Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1558. The AR65A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR65A Road by managing, maintaining, or improving the AR65A Road pursuant to the County's governmental right and authority.

1559. Witnesses with personal knowledge of the history of the AR65A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1560. Currently known reputation in the community is that the AR65A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1561. Public motor vehicle use of the AR65A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1562. The AR65A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1563. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR65A Road.

1564. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR65A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR65B Road, AR65B

1565. The AR65B Road is designated as county road number AR65B and State Geographic Information Database ("SGID") road identification number RD170525 and is more or less 0.37 miles long.

1566. The centerline course of the AR65B Road is depicted on the map included in Exhibit 102 (AR65B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1567. The west end of the AR65B Road commences in the southwest quarter of section 12, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally east to the southeast quarter of section 12, Township 11 North, Range 5 East, S.L.B.M.

1568. The specific right-of-way for the AR65B Road claimed herein crosses 0.37 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 102.

1569. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR65B Road solely as it crosses United States public land as included and

specifically described in Exhibit 102. The AR65B Road includes the segments of road specifically set forth in Exhibit 102 and as exists on the ground.

Acceptance of the AR65B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1570. The AR65B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1571. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR65B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1572. The appearance of the AR65B Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1573. The AR65B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR65B Road by managing, maintaining, or improving the AR65B Road pursuant to the County's governmental right and authority.

1574. Witnesses with personal knowledge of the history of the AR65B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1575. Currently known reputation in the community is that the AR65B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1576. Public motor vehicle use of the AR65B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1577. The AR65B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1578. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR65B Road.

1579. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR65B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR66 Road, AR66

1580. The AR66 Road is designated as county road number AR66 and State Geographic Information Database ("SGID") road identification number RD170526 and is more or less 2.40 miles long.

1581. The centerline course of the AR66 Road is depicted on the map included in Exhibit 103 (AR66 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1582. The north end of the AR66 Road commences in the southwest quarter of section 12, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally southwest to the Forest Service boundary at the southwest quarter of section 14, Township 11 North, Range 5 East, S.L.B.M.

1583. The specific right-of-way for the AR66 Road claimed herein crosses 2.4 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 103.

1584. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR66 Road solely as it crosses United States public land as included and specifically described in Exhibit 103. The AR66 Road includes the segments of road specifically set forth in Exhibit 103 and as exists on the ground.

Acceptance of the AR66 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1585. The AR66 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1586. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR66 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1587. The appearance of the AR66 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1588. The AR66 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR66 Road by managing, maintaining, or improving the AR66 Road pursuant to the County's governmental right and authority.

1589. Witnesses with personal knowledge of the history of the AR66 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1590. Currently known reputation in the community is that the AR66 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1591. Public motor vehicle use of the AR66 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1592. The AR66 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1593. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR66 Road.

1594. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR66 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR67 Road, AR67

1595. The AR67 Road is designated as county road number AR67 and State Geographic Information Database ("SGID") road identification number RD170527 and is more or less 0.87 miles long.

1596. The centerline course of the AR67 Road is depicted on the map included in Exhibit 104 (AR67 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1597. The west end of the AR67 Road commences in the northeast quarter of section 18, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northeast to the northwest quarter of section 17, Township 11 North, Range 6 East, S.L.B.M.

1598. The specific right-of-way for the AR67 Road claimed herein crosses 0.35 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 104.

1599. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR67 Road solely as it crosses United States public land as included and

specifically described in Exhibit 104. The AR67 Road includes the segments of road specifically set forth in Exhibit 104 and as exists on the ground.

Acceptance of the AR67 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1600. The AR67 Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

1601. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR67 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1602. The appearance of the AR67 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1603. The AR67 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR67 Road by managing, maintaining, or improving the AR67 Road pursuant to the County's governmental right and authority.

1604. Witnesses with personal knowledge of the history of the AR67 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1605. Currently known reputation in the community is that the AR67 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1606. Public motor vehicle use of the AR67 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1607. The AR67 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1608. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR67 Road.

1609. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR67 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR72 Road, AR72

1610. The AR72 Road is designated as county road number AR72 and State Geographic Information Database ("SGID") road identification number RD170538 and is more or less 6.38 miles long.

1611. The centerline course of the AR72 Road is depicted on the map included in Exhibit 105 (AR72 Road), which is attached hereto and incorporated herein. This map further

reflects that this road crosses Forest Service land, private land, state land, and public land administered by the BLM.

1612. The south end of the AR72 Road commences in the southwest quarter of section 32, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Old Canyon Road and across the Pole Canyon Road to the southeast quarter of section 28, Township 11 North, Range 5 East, S.L.B.M.

1613. The specific right-of-way for the AR72 Road claimed herein crosses 2.04 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 105.

1614. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR72 Road solely as it crosses United States public land as included and specifically described in Exhibit 105. The AR72 Road includes the segments of road specifically set forth in Exhibit 105 and as exists on the ground.

Acceptance of the AR72 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1615. The AR72 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1616. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR72 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1617. The appearance of the AR72 Road on the Red Spur Mountain (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1618. The AR72 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR72 Road by managing, maintaining, or improving the AR72 Road pursuant to the County's governmental right and authority.

1619. Witnesses with personal knowledge of the history of the AR72 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1620. Currently known reputation in the community is that the AR72 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1621. Public motor vehicle use of the AR72 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1622. The AR72 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1623. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR72 Road.

1624. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR72 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR73 Road, AR73

1625. The AR73 Road is designated as county road number AR73 and State Geographic Information Database ("SGID") road identification number RD170541 and is more or less 1.07 miles long.

1626. The centerline course of the AR73 Road is depicted on the map included in Exhibit 106 (AR73 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses SITLA land and public land administered by the BLM.

1627. The west end of the AR73 Road commences in the northeast quarter of section 36, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally northeast to the northeast quarter of section 31, Township 11 North, Range 6 East, S.L.B.M.

1628. The specific right-of-way for the AR73 Road claimed herein crosses 0.88 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 106.

1629. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR73 Road solely as it crosses United States public land as included and

specifically described in Exhibit 106. The AR73 Road includes the segments of road specifically set forth in Exhibit 106 and as exists on the ground.

Acceptance of the AR73 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1630. The AR73 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1631. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR73 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1632. The AR73 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR73 Road by managing, maintaining, or improving the AR73 Road pursuant to the County's governmental right and authority.

1633. Witnesses with personal knowledge of the history of the AR73 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1634. Currently known reputation in the community is that the AR73 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1635. Public motor vehicle use of the AR73 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

1636. The AR73 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1637. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR73 Road.

1638. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR73 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR74 Road, AR74

1639. The AR74 Road is designated as county road number AR74 and State Geographic Information Database ("SGID") road identification number RD170542 and is more or less 1.42 miles long.

1640. The centerline course of the AR74 Road is depicted on the map included in Exhibit 107 (AR74 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses SITLA land and public land administered by the BLM.

1641. The north end of the AR74 Road commences in the northwest quarter of section 31, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally south from the Pole Canyon Road to the northeast quarter of section 6, Township 10 North, Range 6 East, S.L.B.M.

1642. The specific right-of-way for the AR74 Road claimed herein crosses 0.88 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 107.

1643. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR74 Road solely as it crosses United States public land as included and specifically described in Exhibit 107. The AR74 Road includes the segments of road specifically set forth in Exhibit 107 and as exists on the ground.

Acceptance of the AR74 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1644. The AR74 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1645. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR74 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1646. The appearance of the AR74 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1647. The AR74 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR74 Road by managing, maintaining, or improving the AR74 Road pursuant to the County's governmental right and authority.

1648. Witnesses with personal knowledge of the history of the AR74 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1649. Currently known reputation in the community is that the AR74 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1650. Public motor vehicle use of the AR74 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1651. The AR74 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1652. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR74 Road.

1653. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR74 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR75 Road, AR75

1654. The AR75 Road is designated as county road number AR75 and State Geographic Information Database ("SGID") road identification number RD170543 and is more or less 3.10 miles long.

1655. The centerline course of the AR75 Road is depicted on the map included in Exhibit 108 (AR75 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, Forest Service land and public land administered by the BLM.

1656. The south end of the AR75 Road commences in the southwest quarter of section 25, Township 11 North, Range 5 East, S.L.B.M. and proceeds generally north across the Pole Canyon Road and New Canyon Road to the northeast quarter of section 23, Township 11 North, Range 5 East, S.L.B.M.

1657. The specific right-of-way for the AR75 Road claimed herein crosses 1.51 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 108.

1658. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR75 Road solely as it crosses United States public land as included and specifically described in Exhibit 108. The AR75 Road includes the segments of road specifically set forth in Exhibit 108 and as exists on the ground.

Acceptance of the AR75 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1659. The AR75 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1660. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR75 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1661. The appearance of the AR75 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1662. The AR75 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR75 Road by managing, maintaining, or improving the AR75 Road pursuant to the County's governmental right and authority.

1663. Witnesses with personal knowledge of the history of the AR75 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1664. Currently known reputation in the community is that the AR75 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1665. Public motor vehicle use of the AR75 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1666. The AR75 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1667. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR75 Road.

1668. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR75 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR77 Road, AR77

1669. The AR77 Road is designated as county road number AR77 and State Geographic Information Database ("SGID") road identification number RD170546 and is more or less 2.33 miles long.

1670. The centerline course of the AR77 Road is depicted on the map included in Exhibit 109 (AR77 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1671. The east end of the AR77 Road commences in the southeast quarter of section 29, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northwest from Pole Canyon Road to the southeast quarter of section 24, Township 11 North, Range 5 East, S.L.B.M.

1672. The specific right-of-way for the AR77 Road claimed herein crosses 0.95 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 109.

1673. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR77 Road solely as it crosses United States public land as included and specifically described in Exhibit 109. The AR77 Road includes the segments of road specifically set forth in Exhibit 109 and as exists on the ground.

Acceptance of the AR77 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1674. The AR77 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1675. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR77 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1676. The appearance of the AR77 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1677. The AR77 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR77 Road by managing, maintaining, or improving the AR77 Road pursuant to the County's governmental right and authority.

1678. Witnesses with personal knowledge of the history of the AR77 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1679. Currently known reputation in the community is that the AR77 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1680. Public motor vehicle use of the AR77 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1681. The AR77 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1682. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR77 Road.

1683. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR77 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR77A Road, AR77A

1684. The AR77A Road is designated as county road number AR77A and State Geographic Information Database ("SGID") road identification number RD170547 and is more or less 1.70 miles long.

1685. The centerline course of the AR77A Road is depicted on the map included in Exhibit 110 (AR77A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1686. The east end of the AR77A Road commences in the northeast quarter of section 30, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northwest to the southeast quarter of section 24, Township 11 North, Range 5 East, S.L.B.M.

1687. The specific right-of-way for the AR77A Road claimed herein crosses 1.22 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 110.

1688. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR77A Road solely as it crosses United States public land as included and specifically described in Exhibit 110. The AR77A Road includes the segments of road specifically set forth in Exhibit 110 and as exists on the ground.

Acceptance of the AR77A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1689. The AR77A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1690. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR77A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1691. The AR77A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR77A Road by managing, maintaining, or improving the AR77A Road pursuant to the County's governmental right and authority.

1692. Witnesses with personal knowledge of the history of the AR77A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1693. Currently known reputation in the community is that the AR77A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1694. Public motor vehicle use of the AR77A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1695. The AR77A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1696. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR77A Road.

1697. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR77A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR77C Road, AR77C

1698. The AR77C Road is designated as county road number AR77C and State Geographic Information Database ("SGID") road identification number RD170548 and is more or less 0.70 miles long.

1699. The centerline course of the AR77C Road is depicted on the map included in Exhibit 111 (AR77C Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1700. The south end of the AR77C Road commences in the southeast quarter of section 29, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Pole Canyon Road to the northeast quarter of section 30, Township 11 North, Range 6 East, S.L.B.M.

1701. The specific right-of-way for the AR77C Road claimed herein crosses 0.21 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 111.

1702. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR77C Road solely as it crosses United States public land as included and specifically described in Exhibit 111. The AR77C Road includes the segments of road specifically set forth in Exhibit 111 and as exists on the ground.

Acceptance of the AR77C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1703. The AR77C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1704. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR77C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1705. The appearance of the AR77C Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1706. The AR77C Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR77C Road by managing, maintaining, or improving the AR77C Road pursuant to the County's governmental right and authority.

1707. Witnesses with personal knowledge of the history of the AR77C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1708. Currently known reputation in the community is that the AR77C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1709. Public motor vehicle use of the AR77C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1710. The AR77C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1711. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR77C Road.

1712. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR77C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR78 Road, AR78

1713. The AR78 Road is designated as county road number AR78 and State Geographic Information Database ("SGID") road identification number RD170550 and is more or less 2.96 miles long.

1714. The centerline course of the AR78 Road is depicted on the map included in Exhibit 112 (AR78 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1715. The east end of the AR78 Road commences in the northeast quarter of section 20, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally southeast from the New Canyon Road eventually looping northeast back to the New Canyon Road in the northwest quarter of section 20, Township 11 North, Range 6 East, S.L.B.M.

1716. The specific right-of-way for the AR78 Road claimed herein crosses 1.58 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 112.

1717. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR78 Road solely as it crosses United States public land as included and specifically described in Exhibit 112. The AR78 Road includes the segments of road specifically set forth in Exhibit 112 and as exists on the ground.

Acceptance of the AR78 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1718. The AR78 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1719. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR78 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1720. The appearance of the AR78 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1721. The AR78 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR78 Road by managing, maintaining, or improving the AR78 Road pursuant to the County's governmental right and authority.

1722. Witnesses with personal knowledge of the history of the AR78 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1723. Currently known reputation in the community is that the AR78 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1724. Public motor vehicle use of the AR78 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1725. The AR78 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1726. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR78 Road.

1727. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR78 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR78A Road, AR78A

1728. The AR78A Road is designated as county road number AR78A and State Geographic Information Database ("SGID") road identification number RD170551 and is more or less 0.56 miles long.

1729. The centerline course of the AR78A Road is depicted on the map included in Exhibit 113 (AR78A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1730. The south end of the AR78A Road commences in the southeast quarter of section 29, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Pole Canyon Road to the northeast quarter of section 29, Township 11 North, Range 6 East, S.L.B.M.

1731. The specific right-of-way for the AR78A Road claimed herein crosses 0.25 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 113.

1732. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR78A Road solely as it crosses United States public land as included and

specifically described in Exhibit 113. The AR78A Road includes the segments of road specifically set forth in Exhibit 113 and as exists on the ground.

Acceptance of the AR78A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1733. The AR78A Road has long served as a public highway providing access to and across public. This road serves the public's transportation needs.

1734. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR78A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1735. The AR78A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR78A Road by managing, maintaining, or improving the AR78A Road pursuant to the County's governmental right and authority.

1736. Witnesses with personal knowledge of the history of the AR78A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1737. Currently known reputation in the community is that the AR78A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1738. Public motor vehicle use of the AR78A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

1739. The AR78A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1740. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR78A Road.

1741. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR78A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR78B Road, AR78B

1742. The AR78B Road is designated as county road number AR78B and State Geographic Information Database ("SGID") road identification number RD170552 and is more or less 1.53 miles long.

1743. The centerline course of the AR78B Road is depicted on the map included in Exhibit 114 (AR78B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1744. The west end of the AR78B Road commences in the northeast quarter of section 28, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northeast to the southeast quarter of section 21, Township 11 North, Range 6 East, S.L.B.M.

1745. The specific right-of-way for the AR78B Road claimed herein crosses 1.14 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 114.

1746. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR78B Road solely as it crosses United States public land as included and specifically described in Exhibit 114. The AR78B Road includes the segments of road specifically set forth in Exhibit 114 and as exists on the ground.

Acceptance of the AR78B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1747. The AR78B 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR78B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1749. The AR78B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR78B Road by managing, maintaining, or improving the AR78B Road pursuant to the County's governmental right and authority.

1750. Witnesses with personal knowledge of the history of the AR78B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1751. Currently known reputation in the community is that the AR78B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1752. Public motor vehicle use of the AR78B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1753. The AR78B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1754. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR78B Road.

1755. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR78B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR78C Road, AR78C

1756. The AR78C Road is designated as county road number AR78C and State Geographic Information Database ("SGID") road identification number RD170553 and is more or less 0.87 miles long.

1757. The centerline course of the AR78C Road is depicted on the map included in Exhibit 115 (AR78C Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1758. The west end of the AR78C Road commences in the southwest quarter of section 21, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 22, Township 11 North, Range 6 East, S.L.B.M.

1759. The specific right-of-way for the AR78C Road claimed herein crosses 0.72 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 115.

1760. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR78C Road solely as it crosses United States public land as included and specifically described in Exhibit 115. The AR78C Road includes the segments of road specifically set forth in Exhibit 115 and as exists on the ground.

Acceptance of the AR78C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1761. The AR78C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1762. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR78C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1763. The appearance of the AR78C Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1764. The AR78C Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR78C Road by managing, maintaining, or improving the AR78C Road pursuant to the County's governmental right and authority.

1765. Witnesses with personal knowledge of the history of the AR78C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1766. Currently known reputation in the community is that the AR78C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1767. Public motor vehicle use of the AR78C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1768. The AR78C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1769. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR78C Road.

1770. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR78C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR79 Road, AR79

1771. The AR79 Road is designated as county road number AR79 and State Geographic Information Database ("SGID") road identification number RD170554 and is more or less 1.89 miles long.

1772. The centerline course of the AR79 Road is depicted on the map included in Exhibit 116 (AR79 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses Forest Service, SITLA and private land and public land administered by the BLM.

1773. The east end of the AR79 Road commences in the northwest quarter of section 6, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally northwest from the Old Canyon Road to the northeast quarter of section 35, Township 11 North, Range 5 East, S.L.B.M.

1774. The specific right-of-way for the AR79 Road claimed herein crosses 0.22 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 116.

1775. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR79 Road solely as it crosses United States public land as included and specifically described in Exhibit 116. The AR79 Road includes the segments of road specifically set forth in Exhibit 116 and as exists on the ground.

Acceptance of the AR79 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1776. The AR79 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1777. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR79 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1778. The appearance of the AR79 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1779. The AR79 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR79 Road by managing, maintaining, or improving the AR79 Road pursuant to the County's governmental right and authority.

1780. Witnesses with personal knowledge of the history of the AR79 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1781. Currently known reputation in the community is that the AR79 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1782. Public motor vehicle use of the AR79 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1783. The AR79 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1784. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR79 Road.

1785. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR79 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR145 Road, AR145

1786. The AR145 Road is designated as county road number AR145 and State Geographic Information Database ("SGID") road identification number RD170415 and is more or less 0.96 miles long.

1787. The centerline course of the AR145 Road is depicted on the map included in Exhibit 117 (AR145 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1788. The east end of the AR145 Road commences in the northeast quarter of section 18, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally northwest to the northeast quarter of section 18, Township 11 North, Range 6 East, S.L.B.M.

1789. The specific right-of-way for the AR145 Road claimed herein crosses 0.68 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 117.

1790. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR145 Road solely as it crosses United States public land as included and specifically described in Exhibit 117. The AR145 Road includes the segments of road specifically set forth in Exhibit 117 and as exists on the ground.

Acceptance of the AR145 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1791. The AR145 Road has long served as a public highway providing access to and across public. This road serves the public's transportation needs.

1792. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR145 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1793. The appearance of the AR145 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1794. The AR145 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR145 Road by managing, maintaining, or improving the AR145 Road pursuant to the County's governmental right and authority.

1795. Witnesses with personal knowledge of the history of the AR145 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1796. Currently known reputation in the community is that the AR145 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1797. Public motor vehicle use of the AR145 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1798. The AR145 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1799. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR145 Road.

1800. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR145 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR145A Road, AR145A

1801. The AR145A Road is designated as county road number AR145A and State Geographic Information Database ("SGID") road identification number RD170416 and is more or less 0.28 miles long.

1802. The centerline course of the AR145A Road is depicted on the map included in Exhibit 118 (AR145A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1803. The west end of the AR145A Road commences in the southeast quarter of section 7, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally east to the southeast quarter of section 7, Township 11 North, Range 6 East, S.L.B.M.

1804. The specific right-of-way for the AR145A Road claimed herein crosses 0.16 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 118.

1805. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR145A Road solely as it crosses United States public land as included and

specifically described in Exhibit 118. The AR145A Road includes the segments of road specifically set forth in Exhibit 118 and as exists on the ground.

Acceptance of the AR145A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1806. The AR145A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1807. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR145A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1808. The appearance of the AR145A Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1809. The AR145A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR145A Road by managing, maintaining, or improving the AR145A Road pursuant to the County's governmental right and authority.

1810. Witnesses with personal knowledge of the history of the AR145A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1811. Currently known reputation in the community is that the AR145A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1812. Public motor vehicle use of the AR145A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1813. The AR145A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1814. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR145A Road.

1815. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR145A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR146 Road, AR146

1816. The AR146 Road is designated as county road number AR146 and State Geographic Information Database ("SGID") road identification number RD170418 and is more or less 1.65 miles long.

1817. The centerline course of the AR146 Road is depicted on the map included in Exhibit 119 (AR146 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1818. The east end of the AR146 Road commences in the southeast quarter of section 9, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally west to the northeast quarter of section 8, Township 11 North, Range 6 East, S.L.B.M.

1819. The specific right-of-way for the AR146 Road claimed herein crosses 1.08 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 119.

1820. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR146 Road solely as it crosses United States public land as included and specifically described in Exhibit 119. The AR146 Road includes the segments of road specifically set forth in Exhibit 119 and as exists on the ground.

Acceptance of the AR146 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1821. The AR146 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1822. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR146 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1823. The appearance of the AR146 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1824. The AR146 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR146 Road by managing, maintaining, or improving the AR146 Road pursuant to the County's governmental right and authority.

1825. Witnesses with personal knowledge of the history of the AR146 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1826. Currently known reputation in the community is that the AR146 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1827. Public motor vehicle use of the AR146 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1828. The AR146 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1829. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR146 Road.

1830. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR146 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR147 Road, AR147

1831. The AR147 Road is designated as county road number AR147 and State Geographic Information Database ("SGID") road identification number RD170420 and is more or less 4.60 miles long.

1832. The centerline course of the AR147 Road is depicted on the map included in Exhibit 120 (AR147 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1833. The east end of the AR147 Road commences in the southwest quarter of section 10, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally west from the Otter Creek Cutoff to the southwest quarter of section 1, Township 11 North, Range 5 East, S.L.B.M.

1834. The specific right-of-way for the AR147 Road claimed herein crosses 3.56 miles of BLM land in five segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 120.

1835. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR147 Road solely as it crosses United States public land as included and

specifically described in Exhibit 120. The AR147 Road includes the segments of road specifically set forth in Exhibit 120 and as exists on the ground.

Acceptance of the AR147 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1836. The AR147 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1837. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR147 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1838. The appearance of the AR147 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1839. The AR147 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of the AR147 Road by managing, maintaining, or improving the AR147 Road pursuant to the County's governmental right and authority.

1840. Witnesses with personal knowledge of the history of the AR147 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1841. Currently known reputation in the community is that the AR147 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1842. Public motor vehicle use of the AR147 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1843. The AR147 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1844. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR147 Road.

1845. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR147 Road on lands owned 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
DRY CANYON AREA

1846. The State of Utah and Rich County incorporate herein and realleges each of the foregoing paragraphs.

1847. The Dry Canyon Area is located in central Rich County in the northeastern region of Utah. *See* Exhibit 7.

1848. The Dry Canyon Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Old Dry Cutoff Road, BR35; (2) Dry Canyon Road, BR36; (3) Big Creek Road, BR37; (4) Ted Pope's Homestead Road, BR38; (5) Valley Ridge Road; BR81, (6) AR69 Road, AR69; (7) AR69B Road, AR69B; (8) AR69D Road, AR69D; (9) AR69F Road, AR69F; (10) AR70 Road, AR70; (11) AR71 Road, AR71; (12) AR80 Road, AR80; (13) AR81 Road, AR81; (14) AR82 Road, AR82; (15) AR83 Road, AR83; (16) AR83A Road, AR83A; (17) AR84 Road, AR84; (18) AR85 Road, AR85; (19) AR85A Road, AR85A; (20) AR86 Road, AR86; (21) AR86A Road, AR86A; and (22) AR120 Road, AR120.

1849. Each right-of-way claimed in the Dry 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.

1850. All rights-of-way claimed in the Dry 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.

1851. All rights-of-way claimed in the Dry 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).

1852. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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.

Old Dry Cutoff Road, BR35

1853. The Old Dry Cutoff Road is designated as county road number BR35 and State Geographic Information Database ("SGID") road identification number RD170329 and is more or less 0.91 miles long.

1854. The centerline course of the Old Dry Cutoff Road is depicted on the map included in Exhibit 121 (Old Dry Cutoff Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1855. The north end of the Old Dry Cutoff Road commences in the northeast quarter of section 1, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally south from Old Canyon Road to Dry Canyon Road in the southwest quarter of section 6, Township 10 North, Range 6 East, S.L.B.M.

1856. The specific right-of-way for the Old Dry Cutoff Road claimed herein crosses 0.29 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 121.

1857. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old Dry Cutoff Road solely as it crosses United States public land as included and

specifically described in Exhibit 121. The Old Dry Cutoff Road includes the segments of road specifically set forth in Exhibit 121 and as exists on the ground.

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

1858. The Old Dry Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1859. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Old Dry Cutoff Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1860. The appearance of the Old Dry Cutoff Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1861. The County confirmed its acceptance of the Old Dry 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, or improving the Old Dry Cutoff Road using public funds pursuant to the County's governmental right and authority.

1862. Witnesses with personal knowledge of the history of the Old Dry 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.

1863. Currently known reputation in the community is that the Old Dry 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.

1864. Public motor vehicle use of the Old Dry 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 for this road.

1865. The Old Dry Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1866. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Dry Cutoff Road.

1867. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old Dry 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.

Dry Canyon Road, BR36

1868. The Dry Canyon Road is designated as county road number BR36 and State Geographic Information Database ("SGID") road identification number RD170330 and is more or less 8.36 miles long.

1869. The centerline course of the Dry Canyon Road is depicted on the map included in Exhibit 122 (Dry Canyon Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land, private land and public land administered by the BLM.

1870. The east end of the Dry Canyon Road commences in the northwest quarter of section 36, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally west from the Big Creek Road to the southwest quarter of section 2, Township 10 North, Range 5 East, S.L.B.M.

1871. The specific right-of-way for the Dry Canyon Road claimed herein crosses 4.13 miles of BLM land in 6 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 122.

1872. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dry Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 122. The Dry Canyon Road includes the segments of road specifically set forth in Exhibit 122 and as exists on the ground.

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

1873. The Dry Canyon Road has long served as a public highway providing access to and across public land, private land, state SITLA land, and to other roads. This road serves the public's transportation needs.

1874. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dry Canyon Road as a public highway located on the land

at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1875. The appearance of the Dry Canyon Road on the Randolph (1968) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1876. The County confirmed its acceptance of the Dry 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, or improving the Dry Canyon Road using public funds pursuant to the County's governmental right and authority.

1877. Witnesses with personal knowledge of the history of the Dry 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.

1878. Currently known reputation in the community is that the Dry 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.

1879. Public motor vehicle use of the Dry 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 for this road.

1880. The Dry Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1881. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Canyon Road.

1882. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dry 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.

Big Creek Road, BR37

1883. The Big Creek Road is designated as county road number BR37 and State Geographic Information Database ("SGID") road identification number RD170331 and is more or less 12.46 miles long.

1884. The centerline course of the Big Creek Road is depicted on the map included in Exhibit 123 (Big Creek Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state SITLA land, private land and public land administered by the BLM.

1885. The east end of the Big Creek Road commences in the southeast quarter of section 30, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally southwest to the northeast quarter of section 35, Township 10 North, Range 5 East, S.L.B.M.

1886. The specific right-of-way for the Big Creek Road claimed herein crosses 3.14 miles of BLM land in six segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 123.

1887. In this action, the State and County seek to quiet title to the public highway right-of-way for the Big Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 123. The Big Creek Road includes the segments of road specifically set forth in Exhibit 123 and as exists on the ground.

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

1888. The Big Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1889. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Big Creek Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1890. The appearance of the Big Creek Road on the Birch Creek Reservoirs (1969), Woodruff (1968), and Randolph (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1891. The County confirmed its acceptance of the Big Creek Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of

its R.S. 2477 right-of-way by managing, maintaining, or improving the Big Creek Road using public funds pursuant to the County's governmental right and authority.

1892. Witnesses with personal knowledge of the history of the Big 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.

1893. Currently known reputation in the community is that the Big 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.

1894. Public motor vehicle use of the Big 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 for this road.

1895. The Big Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1896. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Creek Road.

1897. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Big 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.

Ted Pope's Homestead Road, BR38

1898. The Ted Pope's Homestead Road is designated as county road number BR38 and State Geographic Information Database ("SGID") road identification number RD170332 and is more or less 3.26 miles long.

1899. The centerline course of the Ted Pope's Homestead Road is depicted on the map included in Exhibit 124 (Ted Pope's Homestead Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1900. The east end of the Ted Pope's Homestead Road commences in the northeast quarter of section 19, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally northwest to the northeast quarter of section 15, Township 10 North, Range 5 East, S.L.B.M.

1901. The specific right-of-way for the Ted Pope's Homestead Road claimed herein crosses 2.46 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 124.

1902. In this action, the State and County seek to quiet title to the public highway right-of-way for the Ted Pope's Homestead Road solely as it crosses United States public land as included and specifically described in Exhibit 124. The Ted Pope's Homestead Road includes the segments of road specifically set forth in Exhibit 124 and as exists on the ground.

Acceptance of the Ted Pope's Homestead Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1903. The Ted Pope's Homestead Road has long served as access to and across public land. This road serves the public's transportation needs.

1904. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Ted Pope's Homestead Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1905. The appearance of the Ted Pope's Homestead Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1906. The County confirmed its acceptance of the Ted Pope's Homestead Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Ted Pope's Homestead Road using public funds pursuant to the County's governmental right and authority.

1907. Witnesses with personal knowledge of the history of the Ted Pope's Homestead Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1908. Currently known reputation in the community is that the Ted Pope's Homestead Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1909. Public motor vehicle use of the Ted Pope's Homestead Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1910. The Ted Pope's Homestead Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1911. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Ted Pope's Homestead Road.

1912. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Ted Pope's Homestead Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Valley Ridge Road, BR81

1913. The Valley Ridge Road is designated as county road number BR81 and State Geographic Information Database ("SGID") road identification number RD170328 and is more or less 4.39 miles long.

1914. The centerline course of the Valley Ridge Road is depicted on the map included in Exhibit 125 (Valley Ridge Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1915. The east end of the Valley Ridge Road commences in the southeast quarter of section 19, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally west from Big Creek Road to the northeast quarter of section 21, Township 10 North, Range 5 East, S.L.B.M.

1916. The specific right-of-way for the Valley Ridge Road claimed herein crosses 3.99 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 125.

1917. In this action, the State and County seek to quiet title to the public highway right-of-way for the Valley Ridge Road solely as it crosses United States public land as included and specifically described in Exhibit 125. The Valley Ridge Road includes the segments of road specifically set forth in Exhibit 125 and as exists on the ground.

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

1918. The Valley Ridge Road has long served access to and across public land. This road serves the public's transportation needs.

1919. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Valley Ridge Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1920. The appearance of the Valley Ridge Road on the Curtis Ridge (1969) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1921. The County confirmed its acceptance of the Valley Ridge 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, or improving Valley Ridge Road using public funds pursuant to the County's governmental right and authority.

1922. Witnesses with personal knowledge of the history of the Valley Ridge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis for more than 10 years prior to October 21, 1976.

1923. Currently known reputation in the community is that the Valley Ridge Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1924. Public motor vehicle use of the Valley Ridge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1925. The Valley Ridge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1926. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Valley Ridge Road.

1927. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Valley Ridge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR69 Road, AR69

1928. The AR69 Road is designated as county road number AR69 and State Geographic Information Database ("SGID") road identification number RD170528 and is more or less 9.64 miles long.

1929. The centerline course of the AR69 Road is depicted on the map included in Exhibit 126 (AR69 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1930. The east end of the AR69 Road commences in the southeast quarter of section 24, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally southwest from the Little Creek Road to the northwest quarter of section 7, Township 10 North, Range 6 East, S.L.B.M.

1931. The specific right-of-way for the AR69 Road claimed herein crosses 8.29 miles of BLM land in four segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 126.

1932. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR69 Road solely as it crosses United States public land as included and specifically described in Exhibit 126. The AR69 Road includes the segments of road specifically set forth in Exhibit 126 and as exists on the ground.

Acceptance of the AR69 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1933. The AR69 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1934. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR69 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1935. The appearance of the AR69 Road on the Randolph (1968), Birch Creek Reservoirs (1969), and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1936. The AR69 Road was accepted as a public 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, or improving the AR69 Road pursuant to the County's governmental right and authority.

1937. Witnesses with personal knowledge of the history of the AR69 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1938. Currently known reputation in the community is that the AR69 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1939. Public motor vehicle use of the AR69 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1940. The AR69 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1941. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR69 Road.

1942. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR69 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR69B Road, AR69B

1943. The AR69B Road is designated as county road number AR69B and State Geographic Information Database ("SGID") road identification number RD170529 and is more or less 0.92 miles long.

1944. The centerline course of the AR69B Road is depicted on the map included in Exhibit 127 (AR69B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1945. The north end of the AR69B Road commences in the southeast quarter of section 22, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally south from the Little Creek Road to the southwest quarter of section 26, Township 11 North, Range 6 East, S.L.B.M.

1946. The specific right-of-way for the AR69B Road claimed herein crosses 0.15 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 127.

1947. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR69B Road solely as it crosses United States public land as included and specifically described in Exhibit 127. The AR69B Road includes the segments of road specifically set forth in Exhibit 127 and as exists on the ground.

Acceptance of the AR69B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1948. The AR69B Road has long served as a public highway providing access to and across public land, to Utah communities, private land, and to other roads. 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 AR69B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1950. The appearance of the AR69B Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1951. The AR69B Road was accepted as a public 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, or improving the AR69B Road pursuant to the County's governmental right and authority.

1952. Witnesses with personal knowledge of the history of the AR69B Road confirm public use of this road as a public 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 AR69B Road has been open for all to come 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 AR69B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1955. The AR69B 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 AR69B Road.

1957. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR69B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR69D Road, AR69D

1958. The AR69D Road is designated as county road number AR69D and State Geographic Information Database ("SGID") road identification number RD170530 and is more or less 0.17 miles long.

1959. The centerline course of the AR69D Road is depicted on the map included in Exhibit 128 (AR69D Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses public land administered by the BLM.

1960. The west end of the AR69D Road commences in the southwest quarter of section 34, Township 11 North, Range 6 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 34, Township 11 North, Range 6 East, S.L.B.M.

1961. The specific right-of-way for the AR69D Road claimed herein crosses 0.17 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 128.

1962. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR69D Road solely as it crosses United States public land as included and specifically described in Exhibit 128. The AR69D Road includes the segments of road specifically set forth in Exhibit 128 and as exists on the ground.

Acceptance of the AR69D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1963. The AR69D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1964. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR69D Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1965. The AR69D Road was accepted as a public 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, or improving the AR69D Road pursuant to the County's governmental right and authority.

1966. Witnesses with personal knowledge of the history of the AR69D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1967. Currently known reputation in the community is that the AR69D Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1968. Public motor vehicle use of the AR69D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1969. The AR69D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1970. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR69D Road.

1971. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR69D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR69F Road, AR69F

1972. The AR69F Road is designated as county road number AR69F and State Geographic Information Database ("SGID") road identification number RD170531 and is more or less 0.84 miles long.

1973. The centerline course of the AR69F Road is depicted on the map included in Exhibit 129 (AR69F Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

1974. The south end of the AR69F Road commences in the northeast quarter of section 17, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally north, crossing the Big Creek Road, to the southeast quarter of section 8, Township 10 North, Range 6 East, S.L.B.M.

1975. The specific right-of-way for the AR69F Road claimed herein crosses 0.83 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 129.

1976. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR69F Road solely as it crosses United States public land as included and specifically described in Exhibit 129. The AR69F Road includes the segments of road specifically set forth in Exhibit 129 and as exists on the ground.

Acceptance of the AR69F Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1977. The AR69F Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1978. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR69F Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

1979. The appearance of the AR69F Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

1980. The AR69F Road was accepted as a public 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, or improving the AR69F Road pursuant to the County's governmental right and authority.

1981. Witnesses with personal knowledge of the history of the AR69F Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1982. Currently known reputation in the community is that the AR69F Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1983. Public motor vehicle use of the AR69F Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1984. The AR69F Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1985. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR69F Road.

1986. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR69F Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR70 Road, AR70

1987. The AR70 Road is designated as county road number AR70 and State Geographic Information Database ("SGID") road identification number RD170534 and is more or less 2.24 miles long.

1988. The centerline course of the AR70 Road is depicted on the map included in Exhibit 130 (AR70 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

1989. The north end of the AR70 Road commences in the southeast quarter of section 4, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally west from the Dry Canyon Road to the southeast quarter of section 7, Township 10 North, Range 6 East, S.L.B.M.

1990. The specific right-of-way for the AR70 Road claimed herein crosses 2.24 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 130.

1991. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR70 Road solely as it crosses United States public land as included and specifically described in Exhibit 130. The AR70 Road includes the segments of road specifically set forth in Exhibit 130 and as exists on the ground.

Acceptance of the AR70 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1992. The AR70 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1993. The AR70 Road was accepted as a public 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, or improving the AR70 Road pursuant to the County's governmental right and authority.

1994. Witnesses with personal knowledge of the history of the AR70 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1995. Currently known reputation in the community is that the AR70 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

1996. Public motor vehicle use of the AR70 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

1997. The AR70 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1998. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR70 Road.

1999. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR70 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR71 Road, AR71

2000. The AR71 Road is designated as county road number AR71 and State Geographic Information Database ("SGID") road identification number RD170536 and is more or less 3.37 miles long.

2001. The centerline course of the AR71 Road is depicted on the map included in Exhibit 131 (AR71 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land, private land and public land administered by the BLM.

2002. The west end of the AR71 Road commences in the southwest quarter of section 2, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally east from the Dry Canyon Road to the northeast quarter of section 6, Township 10 North, Range 6 East, S.L.B.M.

2003. The specific right-of-way for the AR71 Road claimed herein crosses 1.84 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 131.

2004. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR71 Road solely as it crosses United States public land as included and specifically described in Exhibit 131. The AR71 Road includes the segments of road specifically set forth in Exhibit 131 and as exists on the ground.

Acceptance of the AR71 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2005. The AR71 Road has long served as a public highway providing access to and across public land, private land, state land, and to other roads. This road serves the public's transportation needs.

2006. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR71 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2007. The AR71 Road was accepted as a public 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, or improving the AR71 Road pursuant to the County's governmental right and authority.

2008. Witnesses with personal knowledge of the history of the AR71 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2009. Currently known reputation in the community is that the AR71 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2010. Public motor vehicle use of the AR71 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2011. The AR71 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2012. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR71 Road.

2013. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR71 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR80 Road, AR80

2014. The AR80 Road is designated as county road number AR80 and State Geographic Information Database ("SGID") road identification number RD170560 and is more or less 1.81 miles long.

2015. The centerline course of the AR80 Road is depicted on the map included in Exhibit 132 (AR80 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2016. The south end of the AR80 Road commences in the northeast quarter of section 13, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally north from the Ted Pope's Homestead Road to the southwest quarter of section 6, Township 10 North, Range 6 East, S.L.B.M.

2017. The specific right-of-way for the AR80 Road claimed herein crosses 1.72 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 132.

2018. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR80 Road solely as it crosses United States public land as included and specifically described in Exhibit 132. The AR80 Road includes the segments of road specifically set forth in Exhibit 132 and as exists on the ground.

Acceptance of the AR80 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2019. The AR80 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2020. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR80 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2021. The appearance of the AR80 Road on the Birch Creek Reservoirs (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2022. The AR80 Road was accepted as a public 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, or improving the AR80 Road pursuant to the County's governmental right and authority.

2023. Witnesses with personal knowledge of the history of the AR80 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2024. Currently known reputation in the community is that the AR80 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2025. Public motor vehicle use of the AR80 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2026. The AR80 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2027. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR80 Road.

2028. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR80 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR81 Road, AR81

2029. The AR81 Road is designated as county road number AR81 and State Geographic Information Database ("SGID") road identification number RD170561 and is more or less 2.07 miles long.

2030. The centerline course of the AR81 Road is depicted on the map included in Exhibit 133 (AR81 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land and public land administered by the BLM.

2031. The west end of the AR81 Road commences in the southeast quarter of section 2, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally east from the Dry Canyon Road to the southeast quarter of section 12, Township 10 North, Range 5 East, S.L.B.M.

2032. The specific right-of-way for the AR81 Road claimed herein crosses 1.66 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 133.

2033. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR81 Road solely as it crosses United States public land as included and specifically described in Exhibit 133. The AR81 Road includes the segments of road specifically set forth in Exhibit 133 and as exists on the ground.

Acceptance of the AR81 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2034. The AR81 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2035. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR81 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2036. The appearance of the AR81 Road on the Birch Creek Reservoirs (1969) and Old Canyon (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2037. The AR81 Road was accepted as a public 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, or improving the AR81 Road pursuant to the County's governmental right and authority.

2038. Witnesses with personal knowledge of the history of the AR81 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2039. Currently known reputation in the community is that the AR81 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2040. Public motor vehicle use of the AR81 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2041. The AR81 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2042. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR81 Road.

2043. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR81 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR82 Road, AR82

2044. The AR82 Road is designated as county road number AR82 and State Geographic Information Database ("SGID") road identification number RD170562 and is more or less 3.00 miles long.

2045. The centerline course of the AR82 Road is depicted on the map included in Exhibit 134 (AR82 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land, Forest Service land, private land and public land administered by the BLM.

2046. The east end of the AR82 Road commences in the southwest quarter of section 6, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 3, Township 10 North, Range 5 East, S.L.B.M.

2047. The specific right-of-way for the AR82 Road claimed herein crosses 1.16 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 134.

2048. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR82 Road solely as it crosses United States public land as included and specifically described in Exhibit 134. The AR82 Road includes the segments of road specifically set forth in Exhibit 134 and as exists on the ground.

Acceptance of the AR82 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2049. The AR82 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2050. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR82 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2051. The appearance of the AR82 Road on the Old Canyon (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2052. The AR82 Road was accepted as a public 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, or improving the AR82 Road pursuant to the County's governmental right and authority.

2053. Witnesses with personal knowledge of the history of the AR82 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2054. Currently known reputation in the community is that the AR82 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2055. Public motor vehicle use of the AR82 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2056. The AR82 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2057. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR82 Road.

2058. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR82 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR83 Road, AR83

2059. The AR83 Road is designated as county road number AR83 and State Geographic Information Database ("SGID") road identification number RD170563 and is more or less 2.37 miles long.

2060. The centerline course of the AR83 Road is depicted on the map included in Exhibit 135 (AR83 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses Forest Service land and public land administered by the BLM.

2061. The east end of the AR83 Road commences in the northeast quarter of section 13, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally northwest from Ted Pope's Homestead Road to the northeast quarter of section 10, Township 10 North, Range 5 East, S.L.B.M.

2062. The specific right-of-way for the AR83 Road claimed herein crosses 1.98 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 135.

2063. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR83 Road solely as it crosses United States public land as included and specifically described in Exhibit 135. The AR83 Road includes the segments of road specifically set forth in Exhibit 135 and as exists on the ground.

Acceptance of the AR83 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2064. The AR83 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2065. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR83 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2066. The appearance of AR83 Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2067. The AR83 Road was accepted as a public 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, or improving the AR83 Road pursuant to the County's governmental right and authority.

2068. Witnesses with personal knowledge of the history of the AR83 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2069. Currently known reputation in the community is that the AR83 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2070. Public motor vehicle use of the AR83 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2071. The AR83 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2072. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR83 Road.

2073. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR83 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR83A Road, AR83A

2074. The AR83A Road is designated as county road number AR83A and State Geographic Information Database ("SGID") road identification number RD170564 and is more or less 0.29 miles long.

2075. The centerline course of the AR83A Road is depicted on the map included in Exhibit 136 (AR83A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

2076. The east end of the AR83A Road commences in the northwest quarter of section 11, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally southwest to the northwest quarter of section 11, Township 10 North, Range 5 East, S.L.B.M.

2077. The specific right-of-way for the AR83A Road claimed herein crosses 0.29 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 136.

2078. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR83A Road solely as it crosses United States public land as included and

specifically described in Exhibit 136. The AR83A Road includes the segments of road specifically set forth in Exhibit 136 and as exists on the ground.

Acceptance of the AR83A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2079. The AR83A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2080. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR83A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2081. The appearance of the AR83A Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2082. The AR83A Road was accepted as a public 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, or improving the AR83A Road pursuant to the County's governmental right and authority.

2083. Witnesses with personal knowledge of the history of the AR83A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2084. Currently known reputation in the community is that the AR83A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2085. Public motor vehicle use of the AR83A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2086. The AR83A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2087. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR83A Road.

2088. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR83A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR84 Road, AR84

2089. The AR84 Road is designated as county road number AR84 and State Geographic Information Database ("SGID") road identification number RD170565 and is more or less 3.97 miles long.

2090. The centerline course of the AR84 Road is depicted on the map included in Exhibit 137 (AR84 Road), which is attached hereto and incorporated herein. This map further

reflects that this road crosses Forest Service land, private land and public land administered by the BLM.

2091. The east end of the AR84 Road commences in the southwest quarter of section 18, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 15, Township 10 North, Range 5 East, S.L.B.M.

2092. The specific right-of-way for the AR84 Road claimed herein crosses 1.84 miles of BLM land in four segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 137.

2093. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR84 Road solely as it crosses United States public land as included and specifically described in Exhibit 137. The AR84 Road includes the segments of road specifically set forth in Exhibit 137 and as exists on the ground.

Acceptance of the AR84 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2094. The AR84 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2095. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR84 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2096. The appearance of the AR84 Road on the Birch Creek Reservoirs (1969) and Curtis Ridge (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2097. The AR84 Road was accepted as a public 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, or improving the AR84 Road pursuant to the County's governmental right and authority.

2098. Witnesses with personal knowledge of the history of the AR84 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2099. Currently known reputation in the community is that the AR84 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2100. Public motor vehicle use of the AR84 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2101. The AR84 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2102. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR84 Road.

2103. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR84 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR85 Road, AR85

2104. The AR85 Road is designated as county road number AR85 and State Geographic Information Database ("SGID") road identification number RD170566 and is more or less 4.86 miles long.

2105. The centerline course of the AR85 Road is depicted on the map included in Exhibit 138 (AR85 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses Forest Service land, private land and public land administered by the BLM.

2106. The east end of the AR85 Road commences in the southwest quarter of section 18, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 22, Township 10 North, Range 5 East, S.L.B.M.

2107. The specific right-of-way for the AR85 Road claimed herein crosses 1.86 miles of BLM land in four segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 138.

2108. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR85 Road solely as it crosses United States public land as included and specifically described in Exhibit 138. The AR85 Road includes the segments of road specifically set forth in Exhibit 138 and as exists on the ground.

Acceptance of the AR85 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2109. The AR85 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2110. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR85 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2111. The appearance of the AR85 Road on the Birch Creek Reservoirs (1969) and Curtis Ridge (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2112. The AR85 Road was accepted as a public 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, or improving the AR85 Road pursuant to the County's governmental right and authority.

2113. Witnesses with personal knowledge of the history of the AR85 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2114. Currently known reputation in the community is that the AR85 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2115. Public motor vehicle use of the AR85 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2116. The AR85 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2117. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR85 Road.

2118. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR85 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR85A Road, AR85A

2119. The AR85A Road is designated as county road number AR85A and State Geographic Information Database ("SGID") road identification number RD170567 and is more or less 0.62 miles long.

2120. The centerline course of the AR85A Road is depicted on the map included in Exhibit 139 (AR85A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses Forest Service land and public land administered by the BLM.

2121. The south end of the AR85A Road commences in the southwest quarter of section 22, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally north to the northeast quarter of section 21, Township 10 North, Range 5 East, S.L.B.M.

2122. The specific right-of-way for the AR85A Road claimed herein crosses 0.33 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 139.

2123. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR85A Road solely as it crosses United States public land as included and specifically described in Exhibit 139. The AR85A Road includes the segments of road specifically set forth in Exhibit 139 and as exists on the ground.

Acceptance of the AR85A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2124. The AR85A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2125. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR85A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2126. The appearance of the AR85A Road on the Curtis Ridge (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2127. The AR85A Road was accepted as a public 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, or improving the AR85A Road pursuant to the County's governmental right and authority.

2128. Witnesses with personal knowledge of the history of the AR85A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2129. Currently known reputation in the community is that the AR85A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2130. Public motor vehicle use of the AR85A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2131. The AR85A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2132. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR85A Road.

2133. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR85A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR86 Road, AR86

2134. The AR86 Road is designated as county road number AR86 and State Geographic Information Database ("SGID") road identification number RD170568 and is more or less 1.25 miles long.

2135. The centerline course of the AR86 Road is depicted on the map included in Exhibit 140 (AR86 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2136. The north end of the AR86 Road commences in the southeast quarter of section 22, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally south from the Valley Ridge Road to the southwest quarter of section 27, Township 10 North, Range 5 East, S.L.B.M.

2137. The specific right-of-way for the AR86 Road claimed herein crosses 1.25 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 140.

2138. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR86 Road solely as it crosses United States public land as included and

specifically described in Exhibit 140. The AR86 Road includes the segments of road specifically set forth in Exhibit 140 and as exists on the ground.

Acceptance of the AR86 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2139. The AR86 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2140. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR86 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2141. The appearance of the AR86 Road on the Curtis Ridge (1969) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2142. The AR86 Road was accepted as a public 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, or improving the AR86 Road pursuant to the County's governmental right and authority.

2143. Witnesses with personal knowledge of the history of the AR86 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2144. Currently known reputation in the community is that the AR86 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2145. Public motor vehicle use of the AR86 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2146. The AR86 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2147. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR86 Road.

2148. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR86 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR86A Road, AR86A

2149. The AR86A Road is designated as county road number AR86A and State Geographic Information Database ("SGID") road identification number RD170569 and is more or less 1.04 miles long.

2150. The centerline course of the AR86A Road is depicted on the map included in Exhibit 141 (AR86A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2151. The west end of the AR86A Road commences in the southeast quarter of section 22, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally east to the northwest quarter of section 26, Township 10 North, Range 5 East, S.L.B.M.

2152. The specific right-of-way for the AR86A Road claimed herein crosses 1.01 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 141.

2153. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR86A Road solely as it crosses United States public land as included and specifically described in Exhibit 141. The AR86A Road includes the segments of road specifically set forth in Exhibit 141 and as exists on the ground.

Acceptance of the AR86A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2154. The AR86A Road has long served as a public highway providing access to and across public land and access to private land. This road serves the public's transportation needs.

2155. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR86A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2156. The AR86A Road was accepted as a public 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, or improving the AR86A Road pursuant to the County's governmental right and authority.

2157. Witnesses with personal knowledge of the history of the AR86A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2158. Currently known reputation in the community is that the AR86A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2159. Public motor vehicle use of the AR86A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2160. The AR86A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2161. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR86A Road.

2162. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR86A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR120 Road, AR120

2163. The AR120 Road is designated as county road number AR120 and State Geographic Information Database ("SGID") road identification number RD170377 and is more or less 1.42 miles long.

2164. The centerline course of the AR120 Road is depicted on the map included in Exhibit 142 (AR120 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2165. The east end of the AR120 Road commences in the southwest quarter of section 30, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally west from the Big Creek Road to the southeast quarter of section 26, Township 11 North, Range 6 East, S.L.B.M.

2166. The specific right-of-way for the AR120 Road claimed herein crosses 1.38 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 142.

2167. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR120 Road solely as it crosses United States public land as included and specifically described in Exhibit 142. The AR120 Road includes the segments of road specifically set forth in Exhibit 142 and as exists on the ground.

Acceptance of the AR120 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2168. The AR120 Road has long served as a public highway providing access to and across public land and to private land. This road serves the public's transportation needs.

2169. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR120 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2170. The appearance of the AR120 Road on the Randolph (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2171. The AR120 Road was accepted as a public 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, or improving the AR120 Road pursuant to the County's governmental right and authority.

2172. Witnesses with personal knowledge of the history of the AR120 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2173. Currently known reputation in the community is that the AR120 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2174. Public motor vehicle use of the AR120 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2175. The AR120 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2176. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR120 Road.

2177. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR120 Road on lands owned 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
SAGE HOLLOW AREA

2178. The State of Utah and Rich County incorporate herein and realleges each of the foregoing paragraphs.

2179. The Sage Hollow Area is located in south-central Rich County in the northeastern region of Utah. *See* Exhibit 8.

2180. The Sage Hollow Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Bryson/Sage Hollow Road, BR41; (2) Thousand Dollar Ridge Road, BR55; (3) AR7 Road, AR7; (4) AR7A Road, AR7A; (5) AR7B Road, AR7B; (6) AR7C Road, AR7C; (7) AR7D Road, AR7D; (8) AR7E Road, AR7E; (9) AR8 Road, AR8; (10)

AR9 Road, AR9; (11) AR9A Road, AR9A; (12) AR9B Road, AR9B; (13) AR87 Road, AR87; (14) AR87B Road, AR87B; (15) AR88 Road, AR88; (16) AR89 Road, AR89; (17) AR89A Road, AR89A; (18) AR92 Road, AR92; (19) AR92A Road, AR92A; (20) AR92B Road, AR92B; (21) AR165 Road, AR165; (22) AR166 Road, AR166; (23) AR170 Road, AR170; and (24) AR171 Road, AR171.

2181. Each right-of-way claimed in the Sage Hollow 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.

2182. All rights-of-way claimed in the Sage Hollow 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.

2183. All rights-of-way claimed in the Sage Hollow 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).

2184. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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.

Bryson/Sage Hollow Road, BR41

2185. The Bryson/Sage Hollow Road (formerly known as the Bryson Road and Sage Hollow Road) is designated as county road number BR41 and State Geographic Information Database ("SGID") road identification number RD170335 and is more or less 6.76 miles long.

2186. The centerline course of the Bryson/Sage Hollow Road is depicted on the map included in Exhibit 143 (Bryson/Sage Hollow Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state SITLA land, private land, and public land administered by the BLM.

2187. The east end of the Bryson/Sage Hollow Road commences in the southeast quarter of section 30, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally west then south to the northeast quarter of section 13, Township 9 North, Range 6 East, S.L.B.M.

2188. The specific right-of-way for the Bryson/Sage Hollow Road claimed herein crosses 5.23 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 143.

2189. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bryson/Sage Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 143. The Bryson/Sage Hollow Road include the segment of road specifically set forth in Exhibit 143 and as exists on the ground.

Acceptance of the Bryson/Sage Hollow Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2190. The Bryson/Sage Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2191. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Bryson/Sage Hollow Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2192. The appearance of the Bryson/Sage Hollow Road on the Woodruff (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2193. The County confirmed its acceptance of the Bryson/Sage Hollow Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Bryson/Sage Hollow Road using public funds pursuant to the County's governmental right and authority.

2194. Witnesses with personal knowledge of the history of the Bryson/Sage 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.

2195. Currently known reputation in the community is that the Bryson/Sage 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.

2196. Public motor vehicle use of the Bryson/Sage 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 for this road.

2197. The Bryson/Sage Hollow Road traverse a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2198. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bryson/Sage Hollow Road.

2199. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bryson/Sage 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.

Thousand Dollar Ridge Road, BR55

2200. The Thousand Dollar Ridge Road is designated as county road number BR55 and State Geographic Information Database ("SGID") road identification number RD170334 and is more or less 5.04 miles long.

2201. The centerline course of the Thousand Dollar Ridge Road is depicted on the map included in Exhibit 144 (Thousand Dollar Ridge Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state SITLA land, private land, and public land administered by the BLM.

2202. The east end of the Thousand Dollar Ridge Road commences in the northwest quarter of section 30, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally southwest from the Big Creek Road to the northeast quarter of section 9, Township 9 North, Range 5 East, S.L.B.M. where it joins with the Lewis Ridge/Dean Hollow Road.

2203. The specific right-of-way for the Thousand Dollar Ridge Road claimed herein crosses 2.11 miles of BLM land in four segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 144.

2204. In this action, the State and County seek to quiet title to the public highway right-of-way for the Thousand Dollar Ridge Road solely as it crosses United States public land as included and specifically described in Exhibit 144. The Thousand Dollar Ridge Road includes the segments of road specifically set forth in Exhibit 144 and as exists on the ground.

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

2205. The Thousand Dollar Ridge Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2206. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Thousand Dollar Ridge Road as a public highway located

on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2207. The appearance of the Thousand Dollar Ridge Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2208. The County confirmed its acceptance of the Thousand Dollar Ridge Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Thousand Dollar Ridge Road using public funds pursuant to the County's governmental right and authority.

2209. Witnesses with personal knowledge of the history of the Thousand Dollar Ridge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2210. Currently known reputation in the community is that the Thousand Dollar Ridge Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2211. Public motor vehicle use of the Thousand Dollar Ridge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or

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

2212. The Thousand Dollar Ridge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2213. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Thousand Dollar Ridge Road.

2214. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Thousand Dollar Ridge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR7 Road, AR7

2215. The AR7 Road is designated as county road number AR7 and State Geographic Information Database ("SGID") road identification number RD170533 and is more or less 5.67 miles long.

2216. The centerline course of the AR7 Road is depicted on the map included in Exhibit 145 (AR7 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

2217. The north end of the AR7 Road commences in the southwest quarter of section 6, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally south to the southeast quarter of section 32, Township 10 North, Range 7 East, S.L.B.M.

2218. The specific right-of-way for the AR7 Road claimed herein crosses 4.1 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 145.

2219. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR7 Road solely as it crosses United States public land as included and specifically described in Exhibit 145. The AR7 Road includes the segments of road specifically set forth in Exhibit 145 and as exists on the ground.

Acceptance of the AR7 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2220. The AR7 Road has long served as a public highway providing access to and across public land, to Utah Communities, state land, private land and to other roads. This road serves the public's transportation needs.

2221. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR7 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2222. The appearance of the AR7 Road on the Woodruff (1968) and Randolph (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2223. The County confirmed its acceptance of the AR7 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, or improving the AR7 Road pursuant to the County's governmental right and authority.

2224. Witnesses with personal knowledge of the history of the AR7 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2225. Currently known reputation in the community is that the AR7 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2226. Public motor vehicle use of the AR7 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2227. The AR7 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2228. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR7 Road.

2229. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR7 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR7A Road, AR7A

2230. The AR7A Road is designated as county road number AR7A and State Geographic Information Database ("SGID") road identification number RD170555 and is more or less 0.67 miles long.

2231. The centerline course of the AR7A Road is depicted on the map included in Exhibit 146 (AR7A Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2232. The east end of the AR7A Road commences in the southwest quarter of section 7, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally west to the northeast quarter of section 13, Township 10 North, Range 6 East, S.L.B.M.

2233. The specific right-of-way for the AR7A Road claimed herein crosses 0.67 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 146.

2234. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR7A Road solely as it crosses United States public land as included and specifically described in Exhibit 146. The AR7A Road includes the segments of road specifically set forth in Exhibit 146 and as exists on the ground.

Acceptance of the AR7A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2235. The AR7A 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 AR7A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2237. The appearance of the AR7A Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2238. The AR7A Road was accepted as a public 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, or improving the AR7A Road pursuant to the County's governmental right and authority.

2239. Witnesses with personal knowledge of the history of the AR7A Road confirm public use of this road as a public 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 AR7A Road has been open for all to come 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 AR7A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2242. The AR7A 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 AR7A Road.

2244. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR7A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR7B Road, AR7B

2245. The AR7B Road is designated as county road number AR7B and State Geographic Information Database ("SGID") road identification number RD170556 and is more or less 0.23 miles long.

2246. The centerline course of the AR7B Road is depicted on the map included in Exhibit 147 (AR7B Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2247. The east end of the AR7B Road commences in the northwest quarter of section 18, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally west to the northeast quarter of section 13, Township 10 North, Range 6 East, S.L.B.M.

2248. The specific right-of-way for the AR7B Road claimed herein crosses 0.23 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 147.

2249. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR7B Road solely as it crosses United States public land as included and specifically described in Exhibit 147. The AR7B Road includes the segments of road specifically set forth in Exhibit 147 and as exists on the ground.

Acceptance of the AR7B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2250. The AR7B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2251. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR7B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2252. The appearance of the AR7B Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2253. The AR7B Road was accepted as a public 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, or improving the AR7B Road pursuant to the County's governmental right and authority.

2254. Witnesses with personal knowledge of the history of the AR7B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2255. Currently known reputation in the community is that the AR7B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2256. Public motor vehicle use of the AR7B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2257. The AR7B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2258. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR7B Road.

2259. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR7B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR7C Road, AR7C

2260. The AR7C Road is designated as county road number AR7C and State Geographic Information Database ("SGID") road identification number RD170596 and is more or less 2.71 miles long.

2261. The centerline course of the AR7C Road is depicted on the map included in Exhibit 148 (AR7C Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2262. The west end of the AR7C Road commences in the southeast quarter of section 23, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally east to the northwest quarter of section 20, Township 10 North, Range 7 East, S.L.B.M.

2263. The specific right-of-way for the AR7C Road claimed herein crosses 2.71 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 148.

2264. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR7C Road solely as it crosses United States public land as included and specifically described in Exhibit 148. The AR7C Road includes the segments of road specifically set forth in Exhibit 148 and as exists on the ground.

Acceptance of the AR7C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2265. The AR7C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2266. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR7C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2267. The appearance of AR7C Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2268. The AR7C Road was accepted as a public 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, or improving the AR7C Road pursuant to the County's governmental right and authority.

2269. Witnesses with personal knowledge of the history of the AR7C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2270. Currently known reputation in the community is that the AR7C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2271. Public motor vehicle use of the AR7C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2272. The AR7C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2273. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR7C Road.

2274. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR7C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR7D Road, AR7D

2275. The AR7D Road is designated as county road number AR7D and State Geographic Information Database ("SGID") road identification number RD170557 and is more or less 0.45 miles long.

2276. The centerline course of the AR7D Road is depicted on the map included in Exhibit 149 (AR7D Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2277. The east end of the AR7D Road commences in the southeast quarter of section 30, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally west to the northwest quarter of section 30, Township 10 North, Range 7 East, S.L.B.M.

2278. The specific right-of-way for the AR7D Road claimed herein crosses 0.45 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 149.

2279. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR7D Road solely as it crosses United States public land as included and

specifically described in Exhibit 149. The AR7D Road includes the segments of road specifically set forth in Exhibit 149 and as exists on the ground.

Acceptance of the AR7D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2280. The AR7D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2281. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR7D Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2282. The appearance of the AR7D Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2283. The AR7D Road was accepted as a public 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, or improving the AR7D Road pursuant to the County's governmental right and authority.

2284. Witnesses with personal knowledge of the history of the AR7D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2285. Currently known reputation in the community is that the AR7D Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2286. Public motor vehicle use of the AR7D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2287. The AR7D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2288. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR7D Road.

2289. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR7D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR7E Road, AR7E

2290. The AR7E Road is designated as county road number AR7E and State Geographic Information Database ("SGID") road identification number RD170558 and is more or less 0.64 miles long.

2291. The centerline course of the AR7E Road is depicted on the map included in Exhibit 150 (AR7E Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2292. The east end of the AR7E Road commences in the southeast quarter of section 30, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally southwest to the southwest quarter of section 30, Township 10 North, Range 7 East, S.L.B.M.

2293. The specific right-of-way for the AR7E Road claimed herein crosses 0.64 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 150.

2294. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR7E Road solely as it crosses United States public land as included and specifically described in Exhibit 150. The AR7E Road includes the segments of road specifically set forth in Exhibit 150 and as exists on the ground.

Acceptance of the AR7E Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2295. The AR7E Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2296. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR7E Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2297. The AR7E Road was accepted as a public 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, or improving the AR7E Road pursuant to the County's governmental right and authority.

2298. Witnesses with personal knowledge of the history of the AR7E Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2299. Currently known reputation in the community is that the AR7E Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2300. Public motor vehicle use of the AR7E Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2301. The AR7E Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2302. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR7E Road.

2303. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR7E Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR8 Road, AR8

2304. The AR8 Road is designated as county road number AR8 and State Geographic Information Database ("SGID") road identification number RD170559 and is more or less 3.73 miles long.

2305. The centerline course of the AR8 Road is depicted on the map included in Exhibit 151 (AR8 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2306. The east end of the AR8 Road commences in the southeast quarter of section 19, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally west to the northwest quarter of section 27, Township 10 North, Range 6 East, S.L.B.M.

2307. The specific right-of-way for the AR8 Road claimed herein crosses 3.73 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 151.

2308. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR8 Road solely as it crosses United States public land as included and specifically described in Exhibit 151. The AR8 Road includes the segments of road specifically set forth in Exhibit 151 and as exists on the ground.

Acceptance of the AR8 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2309. The AR8 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR8 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2311. The appearance of the AR8 Road on the Woodruff (1968) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2312. The County confirmed its acceptance of the AR8 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, or improving the AR8 Road pursuant to the County's governmental right and authority.

2313. Witnesses with personal knowledge of the history of the AR8 Road confirm public use of this road as a public 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 AR8 Road has been open for all to come 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 AR8 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2316. The AR8 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 AR8 Road.

2318. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR8 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR9 Road, AR9

2319. The AR9 Road is designated as county road number AR9 and State Geographic Information Database ("SGID") road identification number RD170578 and is more or less 6.01 miles long.

2320. The centerline course of the AR9 Road is depicted on the map included in Exhibit 152 (AR9 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land, private land and public land administered by the BLM.

2321. The north end of the AR9 Road commences in the northwest quarter of section 15, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally south from the Big Creed Road to the northwest quarter of section 1, Township 9 North, Range 6 East, S.L.B.M.

2322. The specific right-of-way for the AR9 Road claimed herein crosses 4.97 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 152.

2323. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR9 Road solely as it crosses United States public land as included and specifically described in Exhibit 152. The AR9 Road includes the segments of road specifically set forth in Exhibit 152 and as exists on the ground.

Acceptance of the AR9 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2324. The AR9 Road has long served as a public highway providing access to and across public land, Utah communities, private land, state land and other roads. This road serves the public's transportation needs.

2325. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR9 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2326. The appearance of the AR9 Road on the Woodruff (1968) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2327. The County confirmed its acceptance of the AR9 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, or improving the AR9 Road pursuant to the County's governmental right and authority.

2328. Witnesses with personal knowledge of the history of the AR9 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2329. Currently known reputation in the community is that the AR9 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2330. Public motor vehicle use of the AR9 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2331. The AR9 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2332. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR9 Road.

2333. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR9 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR9A Road, AR9A

2334. The AR9A Road is designated as county road number AR9A and State Geographic Information Database ("SGID") road identification number RD170593 and is more or less 0.81 miles long.

2335. The centerline course of the AR9A Road is depicted on the map included in Exhibit 153 (AR9A Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2336. The south end of the AR9A Road commences in the southeast quarter of section 15, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally north to the northwest quarter of section 14, Township 10 North, Range 6 East, S.L.B.M.

2337. The specific right-of-way for the AR9A Road claimed herein crosses 0.81 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 153.

2338. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR9A Road solely as it crosses United States public land as included and specifically described in Exhibit 153. The AR9A Road includes the segments of road specifically set forth in Exhibit 153 and as exists on the ground.

Acceptance of the AR9A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2339. The AR9A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2340. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR9A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2341. The appearance of the AR9A Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2342. The County confirmed its acceptance of the AR9A 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, or improving the AR9A Road pursuant to the County's governmental right and authority.

2343. Witnesses with personal knowledge of the history of the AR9A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2344. Currently known reputation in the community is that the AR9A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2345. Public motor vehicle use of the AR9A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2346. The AR9A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2347. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR9A Road.

2348. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR9A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR9B Road, AR9B

2349. The AR9B Road is designated as county road number AR9B and State Geographic Information Database ("SGID") road identification number RD170594 and is more or less 0.51 miles long.

2350. The centerline course of the AR9B Road is depicted on the map included in Exhibit 154 (AR9B Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2351. The east end of the AR9B Road commences in the southwest quarter of section 22, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally west to the southeast quarter of section 21, Township 10 North, Range 6 East, S.L.B.M.

2352. The specific right-of-way for the AR9B Road claimed herein crosses 0.51 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 154.

2353. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR9B Road solely as it crosses United States public land as included and specifically described in Exhibit 154. The AR9B Road includes the segments of road specifically set forth in Exhibit 154 and as exists on the ground.

Acceptance of the AR9B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2354. The AR9B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2355. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR9B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2356. The appearance of the AR9B Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2357. The AR9B Road was accepted as a public 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, or improving the AR9B Road pursuant to the County's governmental right and authority.

2358. Witnesses with personal knowledge of the history of the AR9B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2359. Currently known reputation in the community is that the AR9B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2360. Public motor vehicle use of the AR9B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2361. The AR9B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2362. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR9B Road.

2363. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR9B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR87 Road, AR87

2364. The AR87 Road is designated as county road number AR87 and State Geographic Information Database ("SGID") road identification number RD170570 and is more or less 3.32 miles long.

2365. The centerline course of the AR87 Road is depicted on the map included in Exhibit 155 (AR87 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2366. The north end of the AR87 Road commences in the northeast quarter of section 15, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally southwest to the southeast quarter of section 29, Township 10 North, Range 6 East, S.L.B.M.

2367. The specific right-of-way for the AR87 Road claimed herein crosses 2.02 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 155.

2368. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR87 Road solely as it crosses United States public land as included and specifically described in Exhibit 155. The AR87 Road includes the segments of road specifically set forth in Exhibit 155 and as exists on the ground.

Acceptance of the AR87 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2369. The AR87 Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2370. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR87 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2371. The appearance of the AR87 Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2372. The AR87 Road was accepted as a public 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, or improving the AR87 Road pursuant to the County's governmental right and authority.

2373. Witnesses with personal knowledge of the history of the AR87 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2374. Currently known reputation in the community is that the AR87 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2375. Public motor vehicle use of the AR87 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2376. The AR87 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2377. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR87 Road.

2378. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR87 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR87B Road

2379. The AR87B Road is designated as county road number AR87B and State Geographic Information Database ("SGID") road identification number RD170572 and is more or less 2.48 miles long.

2380. The centerline course of the AR87B Road is depicted on the map included in Exhibit 156 (AR87B Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2381. The north end of the AR87B Road commences in the northwest quarter of section 21, Township 10 North, Range 6 East, S.L.B.M. and proceeds generally south to the northeast quarter of section 29, Township 10 North, Range 6 East, S.L.B.M.

2382. The specific right-of-way for the AR87B Road claimed herein crosses 2.48 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 156.

2383. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR87B Road solely as it crosses United States public land as included and specifically described in Exhibit 156. The AR87B Road includes the segments of road specifically set forth in Exhibit 156 and as exists on the ground.

Acceptance of the AR87B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2384. The AR87B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2385. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR87B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2386. The appearance of the AR87B Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2387. The AR87B Road was accepted as a public 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, or improving the AR87B Road pursuant to the County's governmental right and authority.

2388. Witnesses with personal knowledge of the history of the AR87B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2389. Currently known reputation in the community is that the AR87B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2390. Public motor vehicle use of the AR87B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2391. The AR87B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2392. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR87B Road.

2393. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR87B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR88 Road, AR88

2394. The AR88 Road is designated as county road number AR88 and State Geographic Information Database ("SGID") road identification number RD170574 and is more or less 7.05 miles long.

2395. The centerline course of the AR88 Road is depicted on the map included in Exhibit 157 (AR88 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state SITLA land, private land and public land administered by the BLM.

2396. The east end of the AR88 Road commences in the northwest quarter of section 28, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally southwest from State Highway 16 to the northeast quarter of section 5, Township 9 North, Range 6 East, S.L.B.M.

2397. The specific right-of-way for the AR88 Road claimed herein crosses 6.86 miles of BLM land in four segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 157.

2398. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR88 Road solely as it crosses United States public land as included and specifically described in Exhibit 157. The AR88 Road includes the segments of road specifically set forth in Exhibit 157 and as exists on the ground.

Acceptance of the AR88 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2399. The AR88 Road has long served as a public highway providing access to and across public land, Utah communities, private land, state land and other roads. This road serves the public's transportation needs.

2400. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR88 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2401. The appearance of the AR88 Road on the Woodruff (1968) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2402. The AR88 Road was accepted as a public 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, or improving the AR88 Road pursuant to the County's governmental right and authority.

2403. Witnesses with personal knowledge of the history of the AR88 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2404. Currently known reputation in the community is that the AR88 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2405. Public motor vehicle use of the AR88 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2406. The AR88 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2407. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR88 Road.

2408. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR88 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR89 Road, AR89

2409. The AR89 Road is designated as county road number AR89 and State Geographic Information Database ("SGID") road identification number RD170576 and is more or less 2.73 miles long.

2410. The centerline course of the AR89 Road is depicted on the map included in Exhibit 158 (AR89 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state SITLA land and public land administered by the BLM.

2411. The west end of the AR89 Road commences in the northeast quarter of section 5, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally east from the Lewis

Ridge/Dean Hollow Road to the southwest quarter of section 35, Township 10 North, Range 6 East, S.L.B.M.

2412. The specific right-of-way for the AR89 Road claimed herein crosses 2.55 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 158.

2413. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR89 Road solely as it crosses United States public land as included and specifically described in Exhibit 158. The AR89 Road includes the segments of road specifically set forth in Exhibit 158 and as exists on the ground.

Acceptance of the AR89 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2414. The AR89 Road has long served as a public highway providing access to and across public land, state land and other roads. This road serves the public's transportation needs.

2415. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR89 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2416. The AR89 Road was accepted as a public 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, or improving the AR89 Road pursuant to the County's governmental right and authority.

2417. Witnesses with personal knowledge of the history of the AR89 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2418. Currently known reputation in the community is that the AR89 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2419. Public motor vehicle use of the AR89 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2420. The AR89 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2421. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR89 Road.

2422. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR89 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR89A Road, AR89A

2423. The AR89A Road is designated as county road number AR89A and State Geographic Information Database ("SGID") road identification number RD170577 and is more or less 0.30 miles long.

2424. The centerline course of the AR89A Road is depicted on the map included in Exhibit 159 (AR89A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses SITLA state land and public land administered by the BLM.

2425. The east end of the AR89A Road commences in the northwest quarter of section 2, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally west to the northeast quarter of section 3, Township 9 North, Range 6 East, S.L.B.M.

2426. The specific right-of-way for the AR89A Road claimed herein crosses 0.28 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 159.

2427. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR89A Road solely as it crosses United States public land as included and specifically described in Exhibit 159. The AR89A Road includes the segments of road specifically set forth in Exhibit 159 and as exists on the ground.

Acceptance of the AR89A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2428. The AR89A Road has long served as a public highway providing access to and across public land, state land and other roads. This road serves the public's transportation needs.

2429. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR89A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2430. The appearance of the AR89A Road on the Woodruff (1968) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2431. The AR89A Road was accepted as a public 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, or improving the AR89A Road pursuant to the County's governmental right and authority.

2432. Witnesses with personal knowledge of the history of the AR89A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2433. Currently known reputation in the community is that the AR89A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2434. Public motor vehicle use of the AR89A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2435. The AR89A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2436. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR89A Road.

2437. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR89A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR92 Road, AR92

2438. The AR92 Road is designated as county road number AR92 and State Geographic Information Database ("SGID") road identification number RD170579 and is more or less 2.95 miles long.

2439. The centerline course of the AR92 Road is depicted on the map included in Exhibit 160 (AR92 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state SITLA land and public land administered by the BLM.

2440. The west end of the AR92 Road commences in the northeast quarter of section 4, Township 9 North, Range 5 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 31, Township 10 North, Range 6 East, S.L.B.M.

2441. The specific right-of-way for the AR92 Road claimed herein crosses 0.72 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 160.

2442. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR92 Road solely as it crosses United States public land as included and specifically described in Exhibit 160. The AR92 Road includes the segments of road specifically set forth in Exhibit 160 and as exists on the ground.

Acceptance of the AR92 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2443. The AR92 Road has long served as a public highway providing access to and across public land and state land. This road serves the public's transportation needs.

2444. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR92 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2445. The appearance of the AR92 Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2446. The AR92 Road was accepted as a public 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, or improving the AR92 Road pursuant to the County's governmental right and authority.

2447. Witnesses with personal knowledge of the history of the AR92 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2448. Currently known reputation in the community is that the AR92 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2449. Public motor vehicle use of the AR92 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2450. The AR92 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2451. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR92 Road.

2452. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR92 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR92A Road, AR92A

2453. The AR92A Road is designated as county road number AR92A and State Geographic Information Database ("SGID") road identification number RD170580 and is more or less 0.21 miles long.

2454. The centerline course of the AR92A Road is depicted on the map included in Exhibit 161 (AR92A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2455. The west end of the AR92A Road commences in the southeast quarter of section 34, Township 10 North, Range 5 East, S.L.B.M. and proceeds generally south from the Thousand Dollar Ridge Road to the northeast quarter of section 4, Township 9 North, Range 5 East, S.L.B.M.

2456. The specific right-of-way for the AR92A Road claimed herein crosses 0.2 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 161.

2457. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR92A Road solely as it crosses United States public land as included and specifically described in Exhibit 161. The AR92A Road includes the segments of road specifically set forth in Exhibit 161 and as exists on the ground.

Acceptance of the AR92A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2458. The AR92A Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2459. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR92A Road as a public highway located on the land at

issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2460. The appearance of the AR92A Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2461. The AR92A Road was accepted as a public 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, or improving the AR92A Road pursuant to the County's governmental right and authority.

2462. Witnesses with personal knowledge of the history of the AR92A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2463. Currently known reputation in the community is that the AR92A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2464. Public motor vehicle use of the AR92A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2465. The AR92A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2466. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR92A Road.

2467. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR92A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR92B Road, AR92B

2468. The AR92B Road is designated as county road number AR92B and State Geographic Information Database ("SGID") road identification number RD170581 and is more or less 0.39 miles long.

2469. The centerline course of the AR92B Road is depicted on the map included in Exhibit 162 (AR92B Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2470. The south end of the AR92B Road commences in the southeast quarter of section 4, Township 9 North, Range 5 East, S.L.B.M. and proceeds generally north from the Thousand Dollar Ridge Road to the northeast quarter of section 4, Township 9 North, Range 5 East, S.L.B.M.

2471. The specific right-of-way for the AR92B Road claimed herein crosses 0.39 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 162.

2472. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR92B Road solely as it crosses United States public land as included and specifically described in Exhibit 162. The AR92B Road includes the segments of road specifically set forth in Exhibit 162 and as exists on the ground.

Acceptance of the AR92B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2473. The AR92B Road has long served as a public highway providing access to and across public land other roads. This road serves the public's transportation needs.

2474. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR92B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2475. The appearance of the AR92B Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2476. The AR92B Road was accepted as a public 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, or improving the AR92B Road pursuant to the County's governmental right and authority.

2477. Witnesses with personal knowledge of the history of the AR92B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2478. Currently known reputation in the community is that the AR92B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2479. Public motor vehicle use of the AR92B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2480. The AR92B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2481. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR92B Road.

2482. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR92B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR165 Road, AR165

2483. The AR165 Road is designated as county road number AR165 and State Geographic Information Database ("SGID") road identification number RD170440 and is more or less 3.02 miles long.

2484. The centerline course of the AR165 Road is depicted on the map included in Exhibit 163 (AR165 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state SITLA land and public land administered by the BLM.

2485. The south end of the AR165 Road commences in the northwest quarter of section 5, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally north from the Lewis Ridge/Dean Hollow Road to the northwest quarter of section 27, Township 10 North, Range 6 East, S.L.B.M.

2486. The specific right-of-way for the AR165 Road claimed herein crosses 1.8 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 163.

2487. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR165 Road solely as it crosses United States public land as included and specifically described in Exhibit 163. The AR165 Road includes the segments of road specifically set forth in Exhibit 163 and as exists on the ground.

Acceptance of the AR165 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2488. The AR165 Road has long served as a public highway providing access to and across public land, state land and other roads. This road serves the public's transportation needs.

2489. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR165 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2490. The appearance of the AR165 Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2491. The AR165 Road was accepted as a public 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, or improving the AR165 Road pursuant to the County's governmental right and authority.

2492. Witnesses with personal knowledge of the history of the AR165 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2493. Currently known reputation in the community is that the AR165 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2494. Public motor vehicle use of the AR165 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2495. The AR165 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2496. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR165 Road.

2497. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR165 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR166 Road, AR166

2498. The AR166 Road is designated as county road number AR166 and State Geographic Information Database ("SGID") road identification number RD170441 and is more or less 1.41 miles long.

2499. The centerline course of the AR166 Road is depicted on the map included in Exhibit 164 (AR166 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2500. The south end of the AR166 Road commences in the southwest quarter of section 19, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally northeast to the southeast quarter of section 17, Township 10 North, Range 7 East, S.L.B.M.

2501. The specific right-of-way for the AR166 Road claimed herein crosses 1.11 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 164.

2502. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR166 Road solely as it crosses United States public land as included and

specifically described in Exhibit 164. The AR166 Road includes the segments of road specifically set forth in Exhibit 164 and as exists on the ground.

Acceptance of the AR166 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2503. The AR166 Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2504. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR166 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2505. The appearance of the AR166 Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2506. The AR166 Road was accepted as a public 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, or improving the AR166 Road pursuant to the County's governmental right and authority.

2507. Witnesses with personal knowledge of the history of the AR166 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2508. Currently known reputation in the community is that the AR166 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2509. Public motor vehicle use of the AR166 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2510. The AR166 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2511. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR166 Road.

2512. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR166 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR170 Road, AR170

2513. The AR170 Road is designated as county road number AR170 and State Geographic Information Database ("SGID") road identification number RD170451 and is more or less 0.71 miles long.

2514. The centerline course of the AR170 Road is depicted on the map included in Exhibit 165 (AR170 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2515. The south end of the AR170 Road commences in the northeast quarter of section 4, Township 9 North, Range 5 East, S.L.B.M. and proceeds from the Thousand Dollar Ridge Road looping back to the south to the northeast quarter of section 4, Township 9 North, Range 5 East, S.L.B.M.

2516. The specific right-of-way for the AR170 Road claimed herein crosses 0.16 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 165.

2517. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR170 Road solely as it crosses United States public land as included and specifically described in Exhibit 165. The AR170 Road includes the segments of road specifically set forth in Exhibit 165 and as exists on the ground.

Acceptance of the AR170 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2518. The AR170 Road has long served as a public highway providing access to and across public land and private land. This road serves the public's transportation needs.

2519. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR170 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2520. The appearance of the AR170 Road on the Curtis Ridge (1969) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2521. The AR170 Road was accepted as a public 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, or improving the AR170 Road pursuant to the County's governmental right and authority.

2522. Witnesses with personal knowledge of the history of the AR170 Road confirm public use of this road as a public 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 AR170 Road has been open for all to come 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 AR170 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2525. The AR170 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 AR170 Road.

2527. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR170 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR171 Road, AR171

2528. The AR171 Road is designated as county road number AR171 and State Geographic Information Database ("SGID") road identification number RD170452 and is more or less 0.35 miles long.

2529. The centerline course of the AR171 Road is depicted on the map included in Exhibit 166 (AR171 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2530. The south end of the AR171 Road commences in the southwest quarter of section 3, Township 9 North, Range 5 East, S.L.B.M. and proceeds generally northwest to the southeast quarter of section 4, Township 9 North, Range 5 East, S.L.B.M.

2531. The specific right-of-way for the AR171 Road claimed herein crosses 0.35 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 166.

2532. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR171 Road solely as it crosses United States public land as included and

specifically described in Exhibit 166. The AR171 Road includes the segments of road specifically set forth in Exhibit 166 and as exists on the ground.

Acceptance of the AR171 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2533. The AR171 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2534. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR171 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2535. The appearance of the AR171 Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2536. The AR171 Road was accepted as a public 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, or improving the AR171 Road pursuant to the County's governmental right and authority.

2537. Witnesses with personal knowledge of the history of the AR171 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2538. Currently known reputation in the community is that the AR171 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2539. Public motor vehicle use of the AR171 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2540. The AR171 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2541. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR171 Road.

2542. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR171 Road on lands owned 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
DEAN HOLLOW AREA

2543. The State of Utah and Rich County incorporate herein and realleges each of the foregoing paragraphs.

2544. The Dean Hollow Area is located in south-central Rich County in the northeastern region of Utah. *See* Exhibit 9.

2545. The Dean Hollow consists of the following roads—listed by Common Road Name and County Unique Number: (1) Lewis Ridge/Dean Hollow Road, BR82; (2) Birch Creek Reservoir Road, BR56; (3) Woodruff Creek Road, BR57; (4) Long Hollow Road, BR58; (5) Wheatgrass Road, BR63; (6) AR11 Road, AR11; (7) AR11A Road, AR11A; (8) AR12 Road, AR12; (9) AR13 Road, AR13; (10) AR13B Road, AR13B; (11) AR13C Road, AR13C; (12) AR93 Road, AR93; (13) AR94 Road, AR94; (14) AR95 Road, AR95; (15) AR96 Road, AR96; (16) AR97 Road, AR97; (17) AR97A Road, AR97A; (18) AR97B Road, AR97B; (19) AR97C Road, AR97C; (20) AR98 Road, AR98; (21) AR98A Road, AR98A; and (22) AR98B Road, AR98B.

2546. Each right-of-way claimed in the Dean Hollow 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.

2547. All rights-of-way claimed in the Dean Hollow 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.

2548. All rights-of-way claimed in the Dean Hollow 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).

2549. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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.

Lewis Ridge/Dean Hollow Road, BR82

2550. The Lewis Ridge/Dean Hollow Road (formally known as Dean Hollow Road and Lewis Ridge/Dean Hollow Road) is designated as county road number BR82 and State Geographic Information Database ("SGID") road identification numbers RD170336 and is more or less 10.54 miles long.

2551. The centerline course of the Lewis Ridge/Dean Hollow Road is depicted on the map included in Exhibit 167 (Lewis Ridge/Dean Hollow Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2552. The east end of the Lewis Ridge/Dean Hollow Road commences in the northwest quarter of section 18, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally northwest from State Highway 39 to the north east quarter of section 9, Township 9 North, Range 5 East, S.L.B.M. where it meets the Lewis Ridge/Dean Hollow Road.

2553. The specific right-of-way for the Lewis Ridge/Dean Hollow Road claimed herein crosses 8.77 miles of BLM land in 3 segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 167.

2554. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lewis Ridge/Dean Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 167. The Lewis Ridge/Dean Hollow Road includes the segment of road specifically set forth in Exhibit 167 and as exists on the ground.

Acceptance of the Lewis Ridge/Dean Hollow Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2555. The Lewis Ridge/Dean Hollow Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2556. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lewis Ridge/Dean Hollow Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2557. The appearance of the Lewis Ridge/Dean Hollow Road on the Woodruff (1968) and Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2558. The County confirmed its acceptance of the Lewis Ridge/Dean Hollow Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Lewis

Ridge/Dean Hollow Road using public funds pursuant to the County's governmental right and authority.

2559. Witnesses with personal knowledge of the history of the Lewis Ridge/Dean 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.

2560. Currently known reputation in the community is that the Lewis Ridge/Dean 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.

2561. Public motor vehicle use of the Lewis Ridge/Dean 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 for this road.

2562. The Lewis Ridge/Dean Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2563. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lewis Ridge/Dean Hollow Road.

2564. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lewis Ridge/Dean 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.

Birch Creek Reservoir Road, BR56

2565. The Birch Creek Reservoir Road is designated as county road number BR56 and State Geographic Information Database ("SGID") road identification number RD170262 and is more or less 1.19 miles long.

2566. The centerline course of the Birch Creek Reservoir Road is depicted on the map included in Exhibit 168 (Birch Creek Reservoir Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2567. The south end of the Birch Creek Reservoir Road commences in the northwest quarter of section 20, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally west from State Highway 39 to the northwest quarter of section 19, Township 9 North, Range 6 East, S.L.B.M.

2568. The specific right-of-way for the Birch Creek Reservoir Road claimed herein crosses 0.91 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 168.

2569. In this action, the State and County seek to quiet title to the public highway right-of-way for the Birch Creek Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 168. The Birch Creek Reservoir Road includes the segments of road specifically set forth in Exhibit 168 and as exists on the ground.

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

2570. The Birch Creek Reservoir Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2571. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Birch Creek Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2572. The appearance of the Birch Creek Reservoir Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2573. The County confirmed its acceptance of the Birch Creek 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, or improving the Birch Creek Reservoir Road using public roads pursuant to the County's governmental right and authority.

2574. Witnesses with personal knowledge of the history of the Birch Creek 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.

2575. Currently known reputation in the community is that the Birch Creek 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.

2576. Public motor vehicle use of the Birch Creek 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 for this road.

2577. The Birch Creek Reservoir 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 Birch Creek Reservoir Road.

2579. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Birch Creek 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.

Woodruff Creek Road, BR57

2580. The Woodruff Creek Road is designated as county road number BR57 and State Geographic Information Database ("SGID") road identification number RD170231 and is more or less 4.11 miles long.

2581. The centerline course of the Woodruff Creek Road is depicted on the map included in Exhibit 169 (Woodruff Creek Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

2582. The north end of the Woodruff Creek Road commences in the southwest quarter of section 22, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally southwest from State Highway 39 to the southwest quarter of section 31, Township 9 North, Range 6 East, S.L.B.M.

2583. The specific right-of-way for the Woodruff Creek Road claimed herein crosses .06 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 169.

2584. In this action, the State and County seek to quiet title to the public highway right-of-way for the Woodruff Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 169. The Woodruff Creek Road includes the segments of road specifically set forth in Exhibit 169 and as exists on the ground.

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

2585. The Woodruff Creek Road has long served as a public highway providing access to and across public land, private land, state land and other roads. This road serves the public's transportation needs.

2586. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Woodruff Creek Road as a public highway located on the

land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2587. The appearance of the Woodruff Creek Road on the Meachum Ridge (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2588. The County confirmed its acceptance of the Woodruff Creek Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Woodruff Creek Road using public funds pursuant to the County's governmental right and authority.

2589. Witnesses with personal knowledge of the history of the Woodruff 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.

2590. Currently known reputation in the community is that the Woodruff 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.

2591. Public motor vehicle use of the Woodruff 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 for this road.

2592. The Woodruff Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2593. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Woodruff Creek Road.

2594. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Woodruff 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.

Long Hollow Road, BR58

2595. The Long Hollow Road is designated as county road number BR58 and State Geographic Information Database ("SGID") road identification number RD170232 and is more or less 4.60 miles long.

2596. The centerline course of the Long Hollow Road is depicted on the map included in Exhibit 170 (Long Hollow Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2597. The north end of the Long Hollow Road commences in the southwest quarter of section 27, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally southwest from the Woodruff Creek Road to the southeast quarter of section 7, Township 8 North, Range 6 East, S.L.B.M.

2598. The specific right-of-way for the Long Hollow Road claimed herein crosses 2.78 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 170.

2599. In this action, the State and County seek to quiet title to the public highway right-of-way for the Long Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 170. The Long Hollow Road includes the segments of road specifically set forth in Exhibit 170 and as exists on the ground.

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

2600. The Long Hollow Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2601. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Long Hollow Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2602. The appearance of the Long Hollow Road on the Meachum Ridge (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2603. The County confirmed its acceptance of the Long Hollow Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of

its R.S. 2477 right-of-way by managing, maintaining, or improving the Long Hollow Road using public funds pursuant to the County's governmental right and authority.

2604. Witnesses with personal knowledge of the history of the Long 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.

2605. Currently known reputation in the community is that the Long 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.

2606. Public motor vehicle use of the Long 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 for this road.

2607. The Long Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2608. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Hollow Road.

2609. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Long 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.

Wheatgrass Road, BR63

2610. The Wheatgrass Road is designated as county road number BR63 and State Geographic Information Database ("SGID") road identification number RD170233 and is more or less 9.83 miles long.

2611. The centerline course of the Wheatgrass Road is depicted on the map included in Exhibit 171 (Wheatgrass Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

2612. The north end of the Wheatgrass Road commences in the southeast quarter of section 29, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally southwest to the southeast quarter of section 20, Township 8 North, Range 6 East, S.L.B.M.

2613. The specific right-of-way for the Wheatgrass Road claimed herein crosses 2.85 miles of BLM land in four segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 171.

2614. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wheatgrass Road solely as it crosses United States public land as included and specifically described in Exhibit 171. The Wheatgrass Road includes the segments of road specifically set forth in Exhibit 171 and as exists on the ground.

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

2615. The Wheatgrass Road has long served as a public highway providing access to and across public land, private land, state land and other roads. This road serves the public's transportation needs.

2616. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Wheatgrass Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2617. The appearance of the Wheatgrass Road on the Meachum Ridge (1968) and Neponset Reservoir NW (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2618. The County confirmed its acceptance of the Wheatgrass Road by 1955, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1955 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Wheatgrass Road using public funds pursuant to the County's governmental right and authority.

2619. Witnesses with personal knowledge of the history of the Wheatgrass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2620. Currently known reputation in the community is that the Wheatgrass Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2621. Public motor vehicle use of the Wheatgrass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2622. The Wheatgrass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2623. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wheatgrass Road.

2624. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wheatgrass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR11 Road, AR11

2625. The AR11 Road is designated as county road number AR11 and State Geographic Information Database ("SGID") road identification number RD170365 and is more or less 6.42 miles long.

2626. The centerline course of the AR11 Road is depicted on the map included in Exhibit 172 (AR11 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

2627. The east end of the AR11 Road commences in the northwest quarter of section 21, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally northwest to the northwest quarter of section 10, Township 9 North, Range 5 East, S.L.B.M.

2628. The specific right-of-way for the AR11 Road claimed herein crosses 4.06 miles of BLM land in five segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 172.

2629. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR11 Road solely as it crosses United States public land as included and specifically described in Exhibit 172. The AR11 Road includes the segments of road specifically set forth in Exhibit 172 and as exists on the ground.

Acceptance of the AR11 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2630. The AR11 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2631. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR11 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2632. The appearance of the AR11 Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2633. The County confirmed its acceptance of the AR11 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, or improving the AR11 Road pursuant to the County's governmental right and authority.

2634. Witnesses with personal knowledge of the history of the AR11 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2635. Currently known reputation in the community is that the AR11 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2636. Public motor vehicle use of the AR11 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2637. The AR11 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2638. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR11 Road.

2639. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR11 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR11A Road, AR11A

2640. The AR11A Road is designated as county road number AR11A and State Geographic Information Database ("SGID") road identification number RD170375 and is more or less 0.61 miles long.

2641. The centerline course of the AR11A Road is depicted on the map included in Exhibit 173 (AR11A Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2642. The east end of the AR11A Road commences in the northwest quarter of section 15, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally west to the southeast quarter of section 16, Township 9 North, Range 6 East, S.L.B.M.

2643. The specific right-of-way for the AR11A Road claimed herein crosses 0.61 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 173.

2644. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR11A Road solely as it crosses United States public land as included and

specifically described in Exhibit 173. The AR11A Road includes the segments of road specifically set forth in Exhibit 173 and as exists on the ground.

Acceptance of the AR11A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2645. The AR11A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2646. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR11A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2647. The appearance of the AR11A Road on the Birch Creek Reservoirs (1969) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2648. The AR11A Road was accepted as a public 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, or improving the AR11A Road pursuant to the County's governmental right and authority.

2649. Witnesses with personal knowledge of the history of the AR11A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2650. Currently known reputation in the community is that the AR11A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2651. Public motor vehicle use of the AR11A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2652. The AR11A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2653. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR11A Road.

2654. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR11A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR12 Road, AR12

2655. The AR12 Road is designated as county road number AR12 and State Geographic Information Database ("SGID") road identification number RD170376 and is more or less 0.87 miles long.

2656. The centerline course of the AR12 Road is depicted on the map included in Exhibit 174 (AR12 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2657. The north end of the AR12 Road commences in the northeast quarter of section 5, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally southwest to the southwest quarter of section 5, Township 9 North, Range 6 East, S.L.B.M.

2658. The specific right-of-way for the AR12 Road claimed herein crosses 0.77 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 174.

2659. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR12 Road solely as it crosses United States public land as included and specifically described in Exhibit 174. The AR12 Road includes the segments of road specifically set forth in Exhibit 174 and as exists on the ground.

Acceptance of the AR12 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2660. The AR12 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2661. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR12 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2662. The County confirmed its acceptance of the AR12 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, or improving the AR12 Road pursuant to the County's governmental right and authority.

2663. Witnesses with personal knowledge of the history of the AR12 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2664. Currently known reputation in the community is that the AR12 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2665. Public motor vehicle use of the AR12 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2666. The AR12 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2667. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR12 Road.

2668. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR12 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR13 Road, AR13

2669. The AR13 Road is designated as county road number AR13 and State Geographic Information Database ("SGID") road identification number RD170394 and is more or less 7.15 miles long.

2670. The centerline course of the AR13 Road is depicted on the map included in Exhibit 175 (AR13 Road), which is attached hereto and incorporated herein. This map further reflects that this road only private land and public land administered by the BLM.

2671. The west end of the AR13 Road commences in the southeast quarter of section 6, Township 9 North, Range 5 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 9, Township 9 North, Range 6 East, S.L.B.M.

2672. The specific right-of-way for the AR13 Road claimed herein crosses 5.69 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 175.

2673. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR13 Road solely as it crosses United States public land as included and specifically described in Exhibit 175. The AR13 Road includes the segments of road specifically set forth in Exhibit 175 and as exists on the ground.

Acceptance of the AR13 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2674. The AR13 Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2675. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR13 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2676. The appearance of the AR13 Road on the Birch Creek Reservoirs (1969) and Curtis Ridge (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2677. The County confirmed its acceptance of the AR13 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, or improving the AR13 Road pursuant to the County's governmental right and authority.

2678. Witnesses with personal knowledge of the history of the AR13 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2679. Currently known reputation in the community is that the AR13 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2680. Public motor vehicle use of the AR13 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2681. The AR13 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2682. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR13 Road.

2683. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR13 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR13B Road, AR13B

2684. The AR13B Road is designated as county road number AR13B and State Geographic Information Database ("SGID") road identification number RD170405 and is more or less 1.39 miles long.

2685. The centerline course of the AR13B Road is depicted on the map included in Exhibit 176 (AR13B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2686. The north end of the AR13B Road commences in the south half of section 12, Township 9 North, Range 5 East, S.L.B.M. and proceeds generally southwest to the southwest quarter of section 14, Township 9 North, Range 5 East, S.L.B.M.

2687. The specific right-of-way for the AR13B Road claimed herein crosses 1.37 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 176.

2688. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR13B Road solely as it crosses United States public land as included and specifically described in Exhibit 176. The AR13B Road includes the segments of road specifically set forth in Exhibit 176 and as exists on the ground.

Acceptance of the AR13B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2689. The AR13B Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2690. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR13B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2691. The AR13B Road was accepted as a public 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, or improving the AR13B Road pursuant to the County's governmental right and authority.

2692. Witnesses with personal knowledge of the history of the AR13B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2693. Currently known reputation in the community is that the AR13B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2694. Public motor vehicle use of the AR13B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2695. The AR13B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2696. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR13B Road.

2697. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR13B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR13C Road, AR13C

2698. The AR13C Road is designated as county road number AR13C and State Geographic Information Database ("SGID") road identification number RD170406 and is more or less 1.39 miles long.

2699. The centerline course of the AR13C Road is depicted on the map included in Exhibit 177 (AR13C Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2700. The south end of the AR13C Road commences in the northeast quarter of section 19, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally north from the Birch Creek Reservoir Road to the southwest quarter of section 7, Township 9 North, Range 6 East, S.L.B.M.

2701. The specific right-of-way for the AR13C Road claimed herein crosses 1.32 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 177.

2702. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR13C Road solely as it crosses United States public land as included and specifically described in Exhibit 177. The AR13C Road includes the segments of road specifically set forth in Exhibit 177 and as exists on the ground.

Acceptance of the AR13C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2703. The AR13C Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2704. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR13C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2705. The AR13C Road was accepted as a public 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, or improving the AR13C Road pursuant to the County's governmental right and authority.

2706. Witnesses with personal knowledge of the history of the AR13C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2707. Currently known reputation in the community is that the AR13C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2708. Public motor vehicle use of the AR13C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

2709. The AR13C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2710. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR13C Road.

2711. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR13C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR93 Road, AR93

2712. The AR93 Road is designated as county road number AR93 and State Geographic Information Database ("SGID") road identification number RD170582 and is more or less 0.90 miles long.

2713. The centerline course of the AR93 Road is depicted on the map included in Exhibit 178 (AR93 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2714. The west end of the AR93 Road commences in the southwest quarter of section 2, Township 9 North, Range 5 East, S.L.B.M. and proceeds generally east to the northwest quarter of section 7, Township 9 North, Range 6 East, S.L.B.M.

2715. The specific right-of-way for the AR93 Road claimed herein crosses 0.9 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 178.

2716. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR93 Road solely as it crosses United States public land as included and specifically described in Exhibit 178. The AR93 Road includes the segments of road specifically set forth in Exhibit 178 and as exists on the ground.

Acceptance of the AR93 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2717. The AR93 Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2718. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR93 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2719. The AR93 Road was accepted as a public 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, or improving the AR93 Road pursuant to the County's governmental right and authority.

2720. Witnesses with personal knowledge of the history of the AR93 Road confirm public use of this road as a public 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 AR93 Road has been open for all to come 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 AR93 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2723. The AR93 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 AR93 Road.

2725. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR93 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR94 Road, AR94

2726. The AR94 Road is designated as county road number AR94 and State Geographic Information Database ("SGID") road identification number RD170583 and is more or less 3.29 miles long.

2727. The centerline course of the AR94 Road is depicted on the map included in Exhibit 179 (AR94 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2728. The south end of the AR94 Road commences in the southeast quarter of section 22, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally north from State Highway 39 to the northwest quarter of section 10, Township 9 North, Range 6 East, S.L.B.M.

2729. The specific right-of-way for the AR94 Road claimed herein crosses 3.13 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 179.

2730. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR94 Road solely as it crosses United States public land as included and specifically described in Exhibit 179. The AR94 Road includes the segments of road specifically set forth in Exhibit 179 and as exists on the ground.

Acceptance of the AR94 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2731. The AR94 Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2732. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR94 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2733. The appearance of the AR94 Road on the Birch Creek Reservoirs (1969) and Meachum Ridge (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2734. The AR94 Road was accepted as a public 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, or improving the AR94 Road pursuant to the County's governmental right and authority.

2735. Witnesses with personal knowledge of the history of the AR94 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2736. Currently known reputation in the community is that the AR94 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2737. Public motor vehicle use of the AR94 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2738. The AR94 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2739. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR94 Road.

2740. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR94 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR95 Road, AR95

2741. The AR95 Road is designated as county road number AR95 and State Geographic Information Database ("SGID") road identification number RD170584 and is more or less 1.34 miles long.

2742. The centerline course of the AR95 Road is depicted on the map included in Exhibit 180 (AR95 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

2743. The north end of the AR95 Road commences in the southeast quarter of section 10, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally south to the southeast quarter of section 15, Township 9 North, Range 6 East, S.L.B.M.

2744. The specific right-of-way for the AR95 Road claimed herein crosses 1.34 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 180.

2745. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR95 Road solely as it crosses United States public land as included and specifically described in Exhibit 180. The AR95 Road includes the segments of road specifically set forth in Exhibit 180 and as exists on the ground.

Acceptance of the AR95 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2746. The AR95 Road has long served as a public highway providing access to and across public land, private land and other roads. This road serves the public's transportation needs.

2747. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR95 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2748. The appearance of the AR95 Road on the Birch Creek Reservoirs (1969) and Woodruff (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2749. The AR95 Road was accepted as a public 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, or improving the AR95 Road pursuant to the County's governmental right and authority.

2750. Witnesses with personal knowledge of the history of the AR95 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2751. Currently known reputation in the community is that the AR95 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2752. Public motor vehicle use of the AR95 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2753. The AR95 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2754. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR95 Road.

2755. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR95 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR96 Road, AR96

2756. The AR96 Road is designated as county road number AR96 and State Geographic Information Database ("SGID") road identification number RD170585 and is more or less 2.87 miles long.

2757. The centerline course of the AR96 Road is depicted on the map included in Exhibit 181 (AR96 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land and public land administered by the BLM.

2758. The north end of the AR96 Road commences in the northwest quarter of section 1, Township 9 North, Range 6 East, S.L.B.M. and proceeds generally south to the southeast quarter of section 14, Township 9 North, Range 6 East, S.L.B.M.

2759. The specific right-of-way for the AR96 Road claimed herein crosses 2.41 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 181.

2760. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR96 Road solely as it crosses United States public land as included and specifically described in Exhibit 181. The AR96 Road includes the segments of road specifically set forth in Exhibit 181 and as exists on the ground.

Acceptance of the AR96 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2761. The AR96 Road has long served as a public highway providing access to and across public land, state land and to other roads. This road serves the public's transportation needs.

2762. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR96 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2763. The appearance of the AR96 Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2764. The AR96 Road was accepted as a public 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, or improving the AR96 Road pursuant to the County's governmental right and authority.

2765. Witnesses with personal knowledge of the history of the AR96 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2766. Currently known reputation in the community is that the AR96 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2767. Public motor vehicle use of the AR96 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2768. The AR96 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2769. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR96 Road.

2770. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR96 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR97 Road, AR97

2771. The AR97 Road is designated as county road number AR97 and State Geographic Information Database ("SGID") road identification number RD170586 and is more or less 1.69 miles long.

2772. The centerline course of the AR97 Road is depicted on the map included in Exhibit 182 (AR97 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

2773. The west end of the AR97 Road commences in the northeast quarter of section 12, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 5, Township 9 North, Range 7 East, S.L.B.M.

2774. The specific right-of-way for the AR97 Road claimed herein crosses 1.69 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 182.

2775. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR97 Road solely as it crosses United States public land as included and specifically described in Exhibit 182. The AR97 Road includes the segments of road specifically set forth in Exhibit 182 and as exists on the ground.

Acceptance of the AR97 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2776. The AR97 Road has long served as a public highway providing access to and across public land, state land and to other roads. This road serves the public's transportation needs.

2777. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR97 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2778. The appearance of the AR97 Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2779. The AR97 Road was accepted as a public 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, or improving the AR97 Road pursuant to the County's governmental right and authority.

2780. Witnesses with personal knowledge of the history of the AR97 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2781. Currently known reputation in the community is that the AR97 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2782. Public motor vehicle use of the AR97 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2783. The AR97 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2784. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR97 Road.

2785. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR97 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR97A Road, AR97A

2786. The AR97A Road is designated as county road number AR97A and State Geographic Information Database ("SGID") road identification number RD170587 and is more or less 0.41 miles long.

2787. The centerline course of the AR97A Road is depicted on the map included in Exhibit 183 (AR97A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

2788. The south end of the AR97A Road commences in the southeast quarter of section 6, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally northwest to the southeast quarter of section 6, Township 9 North, Range 7 East, S.L.B.M.

2789. The specific right-of-way for the AR97A Road claimed herein crosses .41 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 183.

2790. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR97A Road solely as it crosses United States public land as included and specifically described in Exhibit 183. The AR97A Road includes the segments of road specifically set forth in Exhibit 183 and as exists on the ground.

Acceptance of the AR97A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2791. The AR97A Road has long served as a public highway providing access to and across public land, state land and to other roads. This road serves the public's transportation needs.

2792. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR97A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2793. The appearance of the AR97A Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2794. The AR97A Road was accepted as a public 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, or improving the AR97A Road pursuant to the County's governmental right and authority.

2795. Witnesses with personal knowledge of the history of the AR97A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2796. Currently known reputation in the community is that the AR97A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2797. Public motor vehicle use of the AR97A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2798. The AR97A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2799. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR97A Road.

2800. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR97A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR97B Road, AR97B

2801. The AR97B Road is designated as county road number AR97B and State Geographic Information Database ("SGID") road identification number RD170588 and is more or less 0.65 miles long.

2802. The centerline course of the AR97B Road is depicted on the map included in Exhibit 184 (AR97B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

2803. The south end of the AR97B Road commences in the northwest quarter of section 6, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally northwest to the southeast quarter of section 6, Township 9 North, Range 7 East, S.L.B.M.

2804. The specific right-of-way for the AR97B Road claimed herein crosses 0.65 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 184.

2805. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR97B Road solely as it crosses United States public land as included and specifically described in Exhibit 184. The AR97B Road includes the segments of road specifically set forth in Exhibit 184 and as exists on the ground.

Acceptance of the AR97B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2806. The AR97B 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR97B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2808. The appearance of the AR97B Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2809. The AR97B Road was accepted as a public 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, or improving the AR97B Road pursuant to the County's governmental right and authority.

2810. Witnesses with personal knowledge of the history of the AR97B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2811. Currently known reputation in the community is that the AR97B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2812. Public motor vehicle use of the AR97B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2813. The AR97B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2814. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR97B Road.

2815. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR97B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR97C Road, AR97C

2816. The AR97C Road is designated as county road number AR97C and State Geographic Information Database ("SGID") road identification number RD170589 and is more or less 0.75 miles long.

2817. The centerline course of the AR97C Road is depicted on the map included in Exhibit 185 (AR97C Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

2818. The east end of the AR97C Road commences in the southeast quarter of section 5, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 5, Township 9 North, Range 7 East, S.L.B.M.

2819. The specific right-of-way for the AR97C Road claimed herein crosses 0.75 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 185.

2820. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR97C Road solely as it crosses United States public land as included and specifically described in Exhibit 185. The AR97C Road includes the segments of road specifically set forth in Exhibit 185 and as exists on the ground.

Acceptance of the AR97C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2821. The AR97C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2822. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR97C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2823. The appearance of the AR97C Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2824. The AR97C Road was accepted as a public 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, or improving the AR97C Road pursuant to the County's governmental right and authority.

2825. Witnesses with personal knowledge of the history of the AR97C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2826. Currently known reputation in the community is that the AR97C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2827. Public motor vehicle use of the AR97C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2828. The AR97C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2829. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR97C Road.

2830. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR97C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR98 Road, AR98

2831. The AR98 Road is designated as county road number AR98 and State Geographic Information Database ("SGID") road identification number RD170590 and is more or less 1.91 miles long.

2832. The centerline course of the AR98 Road is depicted on the map included in Exhibit 186 (AR98 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses only public land administered by the BLM.

2833. The north end of the AR98 Road commences in the northwest quarter of section 33, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally south from the Bryson/Sage Hollow Road to the southeast quarter of section 5, Township 9 North, Range 7 East, S.L.B.M.

2834. The specific right-of-way for the AR98 Road claimed herein crosses 1.87 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 186.

2835. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR98 Road solely as it crosses United States public land as included and specifically described in Exhibit 186. The AR98 Road includes the segments of road specifically set forth in Exhibit 186 and as exists on the ground.

Acceptance of the AR98 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2836. The AR98 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2837. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR98 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2838. The AR98 Road was accepted as a public 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, or improving the AR98 Road pursuant to the County's governmental right and authority.

2839. Witnesses with personal knowledge of the history of the AR98 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2840. Currently known reputation in the community is that the AR98 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2841. Public motor vehicle use of the AR98 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2842. The AR98 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2843. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR98 Road.

2844. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR98 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR98A Road, AR98A

2845. The AR98A Road is designated as county road number AR98A and State Geographic Information Database ("SGID") road identification number RD170591 and is more or less 1.13 miles long.

2846. The centerline course of the AR98A Road is depicted on the map included in Exhibit 187 (AR98A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land and public land administered by the BLM.

2847. The north end of the AR98A Road commences in the southwest quarter of section 32, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally south from the

Bryson/Sage Hollow Road to the southeast quarter of section 5, Township 9 North, Range 7 East, S.L.B.M.

2848. The specific right-of-way for the AR98A Road claimed herein crosses 1 mile of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 187.

2849. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR98A Road solely as it crosses United States public land as included and specifically described in Exhibit 187. The AR98A Road includes the segments of road specifically set forth in Exhibit 187 and as exists on the ground.

Acceptance of the AR98A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2850. The AR98A Road has long served as a public highway providing access to and across public land, state land and to other roads. This road serves the public's transportation needs.

2851. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR98A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2852. The appearance of the AR98A Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2853. The AR98A Road was accepted as a public 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, or improving the AR98A Road pursuant to the County's governmental right and authority.

2854. Witnesses with personal knowledge of the history of the AR98A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2855. Currently known reputation in the community is that the AR98A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2856. Public motor vehicle use of the AR98A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2857. The AR98A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2858. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR98A Road.

2859. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR98A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR98B Road, AR98B

2860. The AR98B Road is designated as county road number AR98B and State Geographic Information Database ("SGID") road identification number RD170592 and is more or less 0.22 miles long.

2861. The centerline course of the AR98B Road is depicted on the map included in Exhibit 188 (AR98B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses public land administered by the BLM.

2862. The north end of the AR98B Road commences in the southwest quarter of section 4, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 4, Township 9 North, Range 7 East, S.L.B.M.

2863. The specific right-of-way for the AR98B Road claimed herein crosses 0.22 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 188.

2864. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR98B Road solely as it crosses United States public land as included and specifically described in Exhibit 188. The AR98B Road includes the segments of road specifically set forth in Exhibit 188 and as exists on the ground.

Acceptance of the AR98B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2865. The AR98B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2866. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR98B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2867. The appearance of the AR98B Road on the Woodruff (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2868. The AR98B Road was accepted as a public 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, or improving the AR98B Road pursuant to the County's governmental right and authority.

2869. Witnesses with personal knowledge of the history of the AR98B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2870. Currently known reputation in the community is that the AR98B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2871. Public motor vehicle use of the AR98B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2872. The AR98B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2873. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR98B Road.

2874. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR98B Road on lands owned 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
BRAZIER/WARNER AREA

2875. The State of Utah and Rich County incorporate herein and realleges each of the foregoing paragraphs.

2876. The Brazier/Warner Area is located in east-central Rich County in the northeastern region of Utah. *See* Exhibit 10.

2877. The Brazier/Warner Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Brazier-Warner Road, BR43; (2) Mine Road, BR75; (3) River Lane Road, BR44; (4) AR15 Road, AR15; (5) AR15B Road, AR15B; (6) AR15C Road, AR15C; (7) AR15D Road, AR15D; (8) AR15E Road, AR15E; (9) AR16 Road,

AR16; (10) AR16A Road, AR16A; (11) AR16B Road, AR16B; (12) AR16C Road, AR16C; (13) AR16D Road, AR16D; (14) AR103 Road, AR103; (15) AR103A Road, AR103A; (16) AR103B Road, AR103B; (17) AR104 Road, AR104; (18) AR104A Road, AR104A; (19) AR105 Road, AR105; (20) AR105A Road, AR105A; (21) AR107 Road, AR107; (22) AR108 Road, AR108; (23) AR108B Road, AR108B; (24) AR108C Road, AR108C; (25) AR108D Road, AR108D; (26) AR108E Road, AR108E; (27) AR109 Road, AR109; (28) AR110 Road, AR110; (29) AR110A Road, AR110A; (30) AR114 Road, AR114; (31) AR115 Road, AR115; (32) AR116 Road, AR116; (33) AR116A Road, AR116A; (34) AR117 Road, AR117; (35) AR117C Road, AR117C; (36) AR117D Road, AR117D; (37) Weston Road, AR156; (38) AR157 Road, AR157; (39) AR158 Road, AR158; (40) AR160 Road, AR160; (41) AR160A Road, AR160A; and (42) AR163 Road, AR163.

2878. Each right-of-way claimed in the Brazier/Warner Hollow 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.

2879. All rights-of-way claimed in the Brazier/Warner Hollow 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.

2880. All rights-of-way claimed in the Brazier/Warner Hollow 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).

2881. Prior to October 21, 1976, the State of Utah, Rich County, and the public through continuous use accepted use 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

Brazier/Warner Road, BR43

2882. The Brazier/Warner Road is designated as county road number BR43 and State Geographic Information Database ("SGID") road identification number RD170042 and is more or less 15.02 miles long.

2883. The centerline course of the Brazier/Warner Road is depicted on the map included in Exhibit 189 (Brazier/Warner Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

2884. The south end of the Brazier/Warner Road commences in the northeast quarter of section 12, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally north eventually crossing the easternmost boundary of the county before reentering the county and proceeding to the southwest quarter of section 18, Township 11 North, Range 8 East, S.L.B.M.

2885. The specific right-of-way for the Brazier/Warner Road claimed herein crosses 12.53 miles of BLM land in ten segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 189.

2886. In this action, the State and County seek to quiet title to the public highway right-of-way for the Brazier/Warner Road solely as it crosses United States public land as included and specifically described in Exhibit 189. The Brazier/Warner Road includes the segments of road specifically set forth in Exhibit 189 and as exists on the ground.

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

2887. The Brazier/Warner Road has long served as a public highway providing access to and across public land, private land, state land and other roads. This road serves the public's transportation needs.

2888. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Brazier/Warner Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2889. The appearance of the Brazier/Warner Road on the Woodruff Narrows (1968) and Rex Peak (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2890. The County confirmed its acceptance of the Brazier/Warner 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, or improving the Brazier/Warner Road using public funds pursuant to the County's governmental right and authority.

2891. Witnesses with personal knowledge of the history of the Brazier/Warner Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2892. Currently known reputation in the community is that the Brazier/Warner Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2893. Public motor vehicle use of the Brazier/Warner Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2894. The Brazier/Warner Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2895. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Brazier/Warner Road.

2896. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Brazier/Warner Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Mine Road, BR75

2897. The Mine Road is designated as county road number BR75 and State Geographic Information Database ("SGID") road identification number RD170272 and is more or less 5.51 miles long.

2898. The centerline course of the Mine Road is depicted on the map included in Exhibit 190 (Mine Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2899. The south end of the Mine Road commences in the northwest quarter of section 18, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally north from the intersection of the Brazier/Warner Road and the River Lane Road to the southwest quarter of section 21, Township 12 North, Range 8 East, S.L.B.M.

2900. The specific right-of-way for the Mine Road claimed herein crosses 2.44 miles of BLM land in five segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 190.

2901. In this action, the State and County seek to quiet title to the public highway right-of-way for the Mine Road solely as it crosses United States public land as included and specifically described in Exhibit 190. The Mine Road includes the segments of road specifically set forth in Exhibit 190 and as exists on the ground.

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

2902. The Mine Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2903. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Mine Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2904. The appearance of the Mine Road on the Leefe (1968) and Rex Peak (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2905. The County confirmed its acceptance of the Mine Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the Mine Road using public funds pursuant to the County's governmental right and authority.

2906. Witnesses with personal knowledge of the history of the 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.

2907. Currently known reputation in the community is that the 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.

2908. Public motor vehicle use of the 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 for this road.

2909. The Mine Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2910. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Mine Road.

2911. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 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.

River Lane Road, BR44

2912. The River Lane Road is designated as county road number BR44 and State Geographic Information Database ("SGID") road identification number RD170276 and is more or less 3.44 miles long.

2913. The centerline course of the River Lane Road is depicted on the map included in Exhibit 191 (River Lane Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

2914. The south end of the River Lane Road commences in the northeast quarter of section 27, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally northeast to the southwest quarter of section 18, Township 11 North, Range 8 East, S.L.B.M.

2915. The specific right-of-way for the River Lane Road claimed herein crosses 0.1 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 191.

2916. In this action, the State and County seek to quiet title to the public highway right-of-way for the River Lane Road solely as it crosses United States public land as included and specifically described in Exhibit 191. The River Lane Road includes the segments of road specifically set forth in Exhibit 191 and as exists on the ground.

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

2917. The River Lane Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2918. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the River Lane Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2919. The appearance of the River Lane Road on the Randolph (1968) and Rex Peak (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2920. The County confirmed its acceptance of the River Lane Road by 1937, when it designated and accepted the road as a County highway on the County's general highway map. From at least 1937 and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the River Lane Road using public funds pursuant to the County's governmental right and authority.

2921. Witnesses with personal knowledge of the history of the River Lane Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2922. Currently known reputation in the community is that the River Lane Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2923. Public motor vehicle use of the River Lane Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2924. The River Lane Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2925. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the River Lane Road.

2926. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the River Lane Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR15 Road, AR15

2927. The AR15 Road is designated as county road number AR15 and State Geographic Information Database ("SGID") road identification number RD170421 and is more or less 6.07 miles long.

2928. The centerline course of the AR15 Road is depicted on the map included in Exhibit 192 (AR15 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2929. The north end of the AR15 Road commences in the southwest quarter of section 30, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally south from the Brazier-Warner Road to the northeast quarter of section 19, Township 10 North, Range 8 East, S.L.B.M.

2930. The specific right-of-way for the AR15 Road claimed herein crosses 6.07 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 192.

2931. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR15 Road solely as it crosses United States public land as included and specifically described in Exhibit 192. The AR15 Road includes the segments of road specifically set forth in Exhibit 192 and as exists on the ground.

Acceptance of the AR15 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2932. The AR15 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2933. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR15 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2934. The appearance of the AR15 Road on the Woodruff Narrows (1968) and Rex Peak (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2935. The County confirmed its acceptance of the AR15 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, or improving the AR15 Road pursuant to the County's governmental right and authority.

2936. Witnesses with personal knowledge of the history of the AR15 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2937. Currently known reputation in the community is that the AR15 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2938. Public motor vehicle use of the AR15 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2939. The AR15 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2940. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR15 Road.

2941. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR15 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR15B Road, AR15B

2942. The AR15B Road is designated as county road number AR15B and State Geographic Information Database ("SGID") road identification number RD170428 and is more or less 0.12 miles long.

2943. The centerline course of the AR15B Road is depicted on the map included in Exhibit 193 (AR15B Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2944. The north end of the AR15B Road commences in the northwest quarter of section 6, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally south to the southwest quarter of section 6, Township 10 North, Range 8 East, S.L.B.M.

2945. The specific right-of-way for the AR15B Road claimed herein crosses 0.12 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 193.

2946. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR15B Road solely as it crosses United States public land as included and specifically described in Exhibit 193. The AR15B Road includes the segments of road specifically set forth in Exhibit 193 and as exists on the ground.

Acceptance of the AR15B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2947. The AR15B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2948. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR15B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2949. The appearance of the AR15B Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2950. The AR15B Road was accepted as a public 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, or improving the AR15B Road pursuant to the County's governmental right and authority.

2951. Witnesses with personal knowledge of the history of the AR15B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2952. Currently known reputation in the community is that the AR15B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2953. Public motor vehicle use of the AR15B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2954. The AR15B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2955. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR15B Road.

2956. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR15B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR15C Road, AR15C

2957. The AR15C Road is designated as county road number AR15C and State Geographic Information Database ("SGID") road identification number RD170429 and is more or less 0.63 miles long.

2958. The centerline course of the AR15C Road is depicted on the map included in Exhibit 194 (AR15C Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2959. The north end of the AR15C Road commences in the northeast quarter of section 7, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally south to the southeast quarter of section 7, Township 10 North, Range 8 East, S.L.B.M.

2960. The specific right-of-way for the AR15C Road claimed herein crosses 0.63 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 194.

2961. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR15C Road solely as it crosses United States public land as included and specifically described in Exhibit 194. The AR15C Road includes the segments of road specifically set forth in Exhibit 194 and as exists on the ground.

Acceptance of the AR15C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2962. The AR15C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2963. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR15C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2964. The appearance of the AR15C Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2965. The AR15C Road was accepted as a public 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, or improving the AR15C Road pursuant to the County's governmental right and authority.

2966. Witnesses with personal knowledge of the history of the AR15C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2967. Currently known reputation in the community is that the AR15C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2968. Public motor vehicle use of the AR15C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2969. The AR15C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2970. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR15C Road.

2971. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR15C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR15D Road, AR15D

2972. The AR15D Road is designated as county road number AR15D and State Geographic Information Database ("SGID") road identification number RD170430 and is more or less 0.35 miles long.

2973. The centerline course of the AR15D Road is depicted on the map included in Exhibit 195 (AR15D Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2974. The east end of the AR15D Road commences in the southwest quarter of section 8, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally west to the southeast quarter of section 7, Township 10 North, Range 8 East, S.L.B.M.

2975. The specific right-of-way for the AR15D Road claimed herein crosses 0.35 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 195.

2976. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR15D Road solely as it crosses United States public land as included and specifically described in Exhibit 195. The AR15D Road includes the segments of road specifically set forth in Exhibit 195 and as exists on the ground.

Acceptance of the AR15D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2977. The AR15D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2978. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR15D Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2979. The appearance of the AR15D Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2980. The AR15D Road was accepted as a public 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, or improving the AR15D Road pursuant to the County's governmental right and authority.

2981. Witnesses with personal knowledge of the history of the AR15D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2982. Currently known reputation in the community is that the AR15D Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

2983. Public motor vehicle use of the AR15D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2984. The AR15D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2985. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR15D Road.

2986. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR15D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR15E Road, AR15E

2987. The AR15E Road is designated as county road number AR15E and State Geographic Information Database ("SGID") road identification number RD170431 and is more or less 0.69 miles long.

2988. The centerline course of the AR15E Road is depicted on the map included in Exhibit 196 (AR15E Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

2989. The east end of the AR15E Road commences in the northwest quarter of section 17, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally west to the southeast quarter of section 18, Township 10 North, Range 8 East, S.L.B.M.

2990. The specific right-of-way for the AR15E Road claimed herein crosses 0.69 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 196.

2991. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR15E Road solely as it crosses United States public land as included and specifically described in Exhibit 196. The AR15E Road includes the segments of road specifically set forth in Exhibit 196 and as exists on the ground.

Acceptance of the AR15E Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2992. The AR15E 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR15E Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

2994. The appearance of the AR15E Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

2995. The AR15E Road was accepted as a public 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, or improving the AR15E Road pursuant to the County's governmental right and authority.

2996. Witnesses with personal knowledge of the history of the AR15E Road confirm public use of this road as a public 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 AR15E Road has been open for all to come 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 AR15E Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

2999. The AR15E 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 AR15E Road.

3001. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR15E Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR16 Road, AR16

3002. The AR16 Road is designated as county road number AR16 and State Geographic Information Database ("SGID") road identification number RD170432 and is more or less 1.30 miles long.

3003. The centerline course of the AR16 Road is depicted on the map included in Exhibit 197 (AR16 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3004. The west end of the AR16 Road commences in the southwest quarter of section 8, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 9, Township 10 North, Range 8 East, S.L.B.M.

3005. The specific right-of-way for the AR16 Road claimed herein crosses 1.3 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 197.

3006. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR16 Road solely as it crosses United States public land as included and specifically described in Exhibit 197. The AR16 Road includes the segments of road specifically set forth in Exhibit 197 and as exists on the ground.

Acceptance of the AR16 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3007. The AR16 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3008. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR16 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3009. The appearance of the AR16 Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3010. The County confirmed its acceptance of the AR16 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, or improving the AR16 Road pursuant to the County's governmental right and authority.

3011. Witnesses with personal knowledge of the history of the AR16 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3012. Currently known reputation in the community is that the AR16 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3013. Public motor vehicle use of the AR16 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3014. The AR16 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3015. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR16 Road.

3016. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR16 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR16A Road, AR16A

3017. The AR16A Road is designated as county road number AR16A and State Geographic Information Database ("SGID") road identification number RD170446 and is more or less 0.88 miles long.

3018. The centerline course of the AR16A Road is depicted on the map included in Exhibit 198 (AR16A Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3019. The north end of the AR16A Road commences in the southwest quarter of section 8, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally south to the northwest quarter of section 17, Township 10 North, Range 8 East, S.L.B.M.

3020. The specific right-of-way for the AR16A Road claimed herein crosses 0.88 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 198.

3021. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR16A Road solely as it crosses United States public land as included and specifically described in Exhibit 198. The AR16A Road includes the segments of road specifically set forth in Exhibit 198 and as exists on the ground.

Acceptance of the AR16A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3022. The AR16A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3023. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR16A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3024. The appearance of the AR16A Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3025. The County confirmed its acceptance of the AR16A 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, or improving the AR16A Road pursuant to the County's governmental right and authority.

3026. Witnesses with personal knowledge of the history of the AR16A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3027. Currently known reputation in the community is that the AR16A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3028. Public motor vehicle use of the AR16A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3029. The AR16A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3030. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR16A Road.

3031. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR16A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR16B Road, AR16B

3032. The AR16B Road is designated as county road number AR16B and State Geographic Information Database ("SGID") road identification number RD170447 and is more or less 0.38 miles long.

3033. The centerline course of the AR16B Road is depicted on the map included in Exhibit 199 (AR16B Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3034. The south end of the AR16B Road commences in the southeast quarter of section 8, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally north to the northeast quarter of section 8, Township 10 North, Range 8 East, S.L.B.M.

3035. The specific right-of-way for the AR16B Road claimed herein crosses 0.38 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 199.

3036. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR16B Road solely as it crosses United States public land as included and specifically described in Exhibit 199. The AR16B Road includes the segments of road specifically set forth in Exhibit 199 and as exists on the ground.

Acceptance of the AR16B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3037. The AR16B Road has long served as a public highway providing access to and across public land, to the Warner Spring and to other roads. This road serves the public's transportation needs.

3038. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR16B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3039. The appearance of the AR16B Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3040. The AR16B Road was accepted as a public 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, or improving the AR16B Road pursuant to the County's governmental right and authority.

3041. Witnesses with personal knowledge of the history of the AR16B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3042. Currently known reputation in the community is that the AR16B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3043. Public motor vehicle use of the AR16B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3044. The AR16B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3045. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR16B Road.

3046. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR16B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR16C Road, AR16C

3047. The AR16C Road is designated as county road number AR16C and State Geographic Information Database ("SGID") road identification number RD170448 and is more or less 0.35 miles long.

3048. The centerline course of the AR16C Road is depicted on the map included in Exhibit 200 (AR16C Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3049. The east end of the AR16C Road commences in the southeast quarter of section 8, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally west to the southwest quarter of section 8, Township 10 North, Range 8 East, S.L.B.M.

3050. The specific right-of-way for the AR16C Road claimed herein crosses 0.35 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 200.

3051. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR16C Road solely as it crosses United States public land as included and specifically described in Exhibit 200. The AR16C Road includes the segments of road specifically set forth in Exhibit 200 and as exists on the ground.

Acceptance of the AR16C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3052. The AR16C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3053. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR16C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3054. The appearance of the AR16C Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3055. The County confirmed its acceptance of the AR16C 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, or improving the AR16C Road pursuant to the County's governmental right and authority.

3056. Witnesses with personal knowledge of the history of the AR16C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3057. Currently known reputation in the community is that the AR16C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3058. Public motor vehicle use of the AR16C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3059. The AR16C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3060. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR16C Road.

3061. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR16C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR16D Road, AR16D

3062. The AR16D Road is designated as county road number AR16D and State Geographic Information Database ("SGID") road identification number RD170449 and is more or less 0.81 miles long.

3063. The centerline course of the AR16D Road is depicted on the map included in Exhibit 201 (AR16D Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land and public land administered by the BLM.

3064. The north end of the AR16D Road commences in the southeast quarter of section 8, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally southeast to the northwest quarter of section 16, Township 10 North, Range 8 East, S.L.B.M.

3065. The specific right-of-way for the AR16D Road claimed herein crosses 0.45 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 201.

3066. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR16D Road solely as it crosses United States public land as included and specifically described in Exhibit 201. The AR16D Road includes the segments of road specifically set forth in Exhibit 201 and as exists on the ground.

Acceptance of the AR16D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3067. The AR16D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3068. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR16D Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3069. The appearance of the AR16D Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3070. The AR16D Road was accepted as a public 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, or improving the AR16D Road pursuant to the County's governmental right and authority.

3071. Witnesses with personal knowledge of the history of the AR16D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3072. Currently known reputation in the community is that the AR16D Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3073. Public motor vehicle use of the AR16D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3074. The AR16D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3075. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR16D Road.

3076. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR16D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR103 Road, AR103

3077. The AR103 Road is designated as county road number AR103 and State Geographic Information Database ("SGID") road identification number RD170350 and is more or less 1.47 miles long.

3078. The centerline course of the AR103 Road is depicted on the map included in Exhibit 202 (AR103 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land and public land administered by the BLM.

3079. The north end of the AR103 Road commences in the southeast quarter of section 7, Township 8 North, Range 8 East, S.L.B.M. and proceeds generally east from State Highway 16 and then loops south to the northwest quarter of section 17, Township 8 North, Range 8 East, S.L.B.M.

3080. The specific right-of-way for the AR103 Road claimed herein crosses 1.36 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 202.

3081. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR103 Road solely as it crosses United States public land as included and specifically described in Exhibit 202. The AR103 Road includes the segments of road specifically set forth in Exhibit 202 and as exists on the ground.

Acceptance of the AR103 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3082. The AR103 Road has long served as a public highway providing access to and across public land, state land and to other roads. This road serves the public's transportation needs.

3083. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR103 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3084. The appearance of the AR103 Road on the Neponset Reservoir NE (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3085. The AR103 Road was accepted as a public 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, or improving the AR103 Road pursuant to the County's governmental right and authority.

3086. Witnesses with personal knowledge of the history of the AR103 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3087. Currently known reputation in the community is that the AR103 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3088. Public motor vehicle use of the AR103 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3089. The AR103 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3090. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR103 Road.

3091. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR103 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR103A Road, AR103A

3092. The AR103A Road is designated as county road number AR103A and State Geographic Information Database ("SGID") road identification number RD170351 and is more or less 0.57 miles long.

3093. The centerline course of the AR103A Road is depicted on the map included in Exhibit 203 (AR103A Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3094. The south end of the AR103A Road commences in the southwest quarter of section 8, Township 8 North, Range 8 East, S.L.B.M. and proceeds generally northwest to the northwest quarter of section 8, Township 8 North, Range 8 East, S.L.B.M.

3095. The specific right-of-way for the AR103A Road claimed herein crosses 0.57miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 203.

3096. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR103A Road solely as it crosses United States public land as included and specifically described in Exhibit 203. The AR103A Road includes the segments of road specifically set forth in Exhibit 203 and as exists on the ground.

Acceptance of the AR103A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3097. The AR103A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3098. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR103A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3099. The appearance of the AR103A Road on the Neponset Reservoir NE (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3100. The AR103A Road was accepted as a public 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, or improving the AR103A Road pursuant to the County's governmental right and authority.

3101. Witnesses with personal knowledge of the history of the AR103A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3102. Currently known reputation in the community is that the AR103A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3103. Public motor vehicle use of the AR103A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3104. The AR103A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3105. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR103A Road.

3106. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR103A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR103B Road, AR103B

3107. The AR103A Road is designated as county road number AR103B and State Geographic Information Database ("SGID") road identification number RD170352 and is more or less 0.18 miles long.

3108. The centerline course of the AR103B Road is depicted on the map included in Exhibit 204 (AR103B Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state and public land administered by the BLM.

3109. The south end of the AR103B Road commences in the southeast quarter of section 7, Township 8 North, Range 8 East, S.L.B.M. and proceeds generally northwest to the southeast quarter of section 7, Township 8 North, Range 8 East, S.L.B.M.

3110. The specific right-of-way for the AR103B Road claimed herein crosses 0.1 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 204.

3111. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR103B Road solely as it crosses United States public land as included and specifically described in Exhibit 204. The AR103B Road includes the segments of road specifically set forth in Exhibit 204 and as exists on the ground.

Acceptance of the AR103B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3112. The AR103B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3113. The AR103B Road was accepted as a public 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, or improving the AR103B Road pursuant to the County's governmental right and authority.

3114. Witnesses with personal knowledge of the history of the AR103B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3115. Currently known reputation in the community is that the AR103B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3116. Public motor vehicle use of the AR103B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3117. The AR103B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3118. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR103B Road.

3119. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR103B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR104 Road, AR104

3120. The AR104 Road is designated as county road number AR104 and State Geographic Information Database ("SGID") road identification number RD170353 and is more or less 3.18 miles long.

3121. The centerline course of the AR104 Road is depicted on the map included in Exhibit 205 (AR104 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

3122. The south end of the AR104 Road commences in the southeast quarter of section 7, Township 8 North, Range 8 East, S.L.B.M. and proceeds generally north and then west from State Highway 16 to the northwest quarter of section 1, Township 8 North, Range 7 East, S.L.B.M.

3123. The specific right-of-way for the AR104 Road claimed herein crosses 2.77 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 205.

3124. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR104 Road solely as it crosses United States public land as included and specifically described in Exhibit 205. The AR104 Road includes the segments of road specifically set forth in Exhibit 205 and as exists on the ground.

Acceptance of the AR104 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3125. The AR104 Road has long served as a public highway providing access to and across public land, state land, private land and to other roads. This road serves the public's transportation needs.

3126. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR104 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3127. The appearance of the AR104 Road on the Neponset Reservoir NE (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3128. The AR104 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, or improving the AR104 Road pursuant to the County's governmental right and authority.

3129. Witnesses with personal knowledge of the history of the AR104 Road confirm public use of this road as a public 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 AR104 Road has been open for all to come 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 AR104 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3132. The AR104 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 AR104 Road.

3134. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR104 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR104A Road, AR104A

3135. The AR104A Road is designated as county road number AR104A and State Geographic Information Database ("SGID") road identification number RD170354 and is more or less 0.17 miles long.

3136. The centerline course of the AR104A Road is depicted on the map included in Exhibit 206 (AR104A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land and public land administered by the BLM.

3137. The north end of the AR104A Road commences in the southeast quarter of section 6, Township 8 North, Range 8 East, S.L.B.M. and proceeds generally southwest to the southwest quarter of section 5, Township 8 North, Range 8 East, S.L.B.M.

3138. The specific right-of-way for the AR104A Road claimed herein crosses .05 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 206.

3139. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR104A Road solely as it crosses United States public land as included and specifically described in Exhibit 206. The AR104A Road includes the segments of road specifically set forth in Exhibit 206 and as exists on the ground.

Acceptance of the AR104A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3140. The AR104A Road has long served as a public highway providing access to and across public land, state land and to other roads. This road serves the public's transportation needs.

3141. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR104A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3142. The appearance of the AR104A Road on the Neponset Reservoir NE (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3143. The AR104A 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, or improving the AR104A Road pursuant to the County's governmental right and authority.

3144. Witnesses with personal knowledge of the history of the AR104A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3145. Currently known reputation in the community is that the AR104A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3146. Public motor vehicle use of the AR104A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3147. The AR104A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3148. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR104A Road.

3149. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR104A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR105 Road, AR105

3150. The AR105 Road is designated as county road number AR105 and State Geographic Information Database ("SGID") road identification number RD170355 and is more or less 2.12 miles long.

3151. The centerline course of the AR105 Road is depicted on the map included in Exhibit 207 (AR105 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

3152. The south end of the AR105 Road commences in the northeast quarter of section 11, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally north to the northeast quarter of section 35, Township 10 North, Range 7 East, S.L.B.M.

3153. The specific right-of-way for the AR105 Road claimed herein crosses 1.54 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 207.

3154. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR105 Road solely as it crosses United States public land as included and specifically described in Exhibit 207. The AR105 Road includes the segments of road specifically set forth in Exhibit 207 and as exists on the ground.

Acceptance of the AR105 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3155. The AR105 Road has long served as a public highway providing access to and across public land, state land, private land and to other roads. This road serves the public's transportation needs.

3156. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR105 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3157. The appearance of the AR105 Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3158. The AR105 Road was accepted as a public 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, or improving the AR105 Road pursuant to the County's governmental right and authority.

3159. Witnesses with personal knowledge of the history of the AR105 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3160. Currently known reputation in the community is that the AR105 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3161. Public motor vehicle use of the AR105 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3162. The AR105 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3163. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR105 Road.

3164. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR105 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR105A Road, AR105A

3165. The AR105A Road is designated as county road number AR105A and State Geographic Information Database ("SGID") road identification number RD170356 and is more or less 0.37 miles long.

3166. The centerline course of the AR105A Road is depicted on the map included in Exhibit 208 (AR105A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

3167. The west end of the AR105A Road commences in the northwest quarter of section 12, Township 9 North, Range 7 East, S.L.B.M. and proceeds generally east to the southwest quarter of section 1, Township 9 North, Range 7 East, S.L.B.M.

3168. The specific right-of-way for the AR105A Road claimed herein crosses 0.33 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 208.

3169. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR105A Road solely as it crosses United States public land as included and specifically described in Exhibit 208. The AR105A Road includes the segments of road specifically set forth in Exhibit 208 and as exists on the ground.

Acceptance of the AR105A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3170. The AR105A Road has long served as a public highway providing access to and across public land and private land. This road serves the public's transportation needs.

3171. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR105A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3172. The appearance of the AR105A Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3173. The AR105A Road was accepted as a public 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, or improving the AR105A Road pursuant to the County's governmental right and authority.

3174. Witnesses with personal knowledge of the history of the AR105A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3175. Currently known reputation in the community is that the AR105A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3176. Public motor vehicle use of the AR105A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3177. The AR105A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3178. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR105A Road.

3179. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR105A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR107 Road, AR107

3180. The AR107 Road is designated as county road number AR107 and State Geographic Information Database ("SGID") road identification number RD170357 and is more or less 3.31 miles long.

3181. The centerline course of the AR107 Road is depicted on the map included in Exhibit 209 (AR107 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3182. The south end of the AR107 Road commences in the southeast quarter of section 30, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally northwest to the northwest quarter of section 13, Township 10 North, Range 7 East, S.L.B.M.

3183. The specific right-of-way for the AR107 Road claimed herein crosses 3.31 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 209.

3184. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR107 Road solely as it crosses United States public land as included and specifically described in Exhibit 209. The AR107 Road includes the segments of road specifically set forth in Exhibit 209 and as exists on the ground.

Acceptance of the AR107 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3185. The AR107 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3186. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR107 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3187. The appearance of the AR107 Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3188. The County confirmed its acceptance of the AR107 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, or improving the AR107 Road pursuant to the County's governmental right and authority.

3189. Witnesses with personal knowledge of the history of the AR107 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3190. Currently known reputation in the community is that the AR107 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3191. Public motor vehicle use of the AR107 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3192. The AR107 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3193. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR107 Road.

3194. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR107 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR108 Road, AR108

3195. The AR108 Road is designated as county road number AR108 and State Geographic Information Database ("SGID") road identification number RD170359 and is more or less 5.56 miles long.

3196. The centerline course of the AR108 Road is depicted on the map included in Exhibit 210 (AR108 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses state land and public land administered by the BLM.

3197. The north end of the AR108 Road commences in the southwest quarter of section 6, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally south to the northeast quarter of section 35, Township 10 North, Range 7 East, S.L.B.M.

3198. The specific right-of-way for the AR108 Road claimed herein crosses 4.78 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 210.

3199. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR108 Road solely as it crosses United States public land as included and specifically described in Exhibit 210. The AR108 Road includes the segments of road specifically set forth in Exhibit 210 and as exists on the ground.

Acceptance of the AR108 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3200. The AR108 Road has long served as a public highway providing access to and across public land, state land and to other roads. This road serves the public's transportation needs.

3201. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR108 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3202. The appearance of the AR108 Road on the Woodruff Narrows (1968) and Rex Peak (1968) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3203. The AR108 Road was accepted as a public 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, or improving the AR108 Road pursuant to the County's governmental right and authority.

3204. Witnesses with personal knowledge of the history of the AR108 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3205. Currently known reputation in the community is that the AR108 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3206. Public motor vehicle use of the AR108 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3207. The AR108 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3208. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR108 Road.

3209. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR108 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR108B Road, AR108B

3210. The AR108B Road is designated as county road number AR108B and State Geographic Information Database ("SGID") road identification number RD170360 and is more or less 1.29 miles long.

3211. The centerline course of the AR108B Road is depicted on the map included in Exhibit 211 (AR108B Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3212. The east end of the AR108B Road commences in the southwest quarter of section 24, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally west to the northeast quarter of section 26, Township 10 North, Range 7 East, S.L.B.M.

3213. The specific right-of-way for the AR108B Road claimed herein crosses 1.29 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 211.

3214. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR108B Road solely as it crosses United States public land as included and specifically described in Exhibit 211. The AR108B Road includes the segments of road specifically set forth in Exhibit 211 and as exists on the ground.

Acceptance of the AR108B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3215. The AR108B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3216. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR108B Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3217. The appearance of the AR108B Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3218. The AR108B Road was accepted as a public 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, or improving the AR108B Road pursuant to the County's governmental right and authority.

3219. Witnesses with personal knowledge of the history of the AR108B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3220. Currently known reputation in the community is that the AR108B Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3221. Public motor vehicle use of the AR108B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3222. The AR108B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3223. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR108B Road.

3224. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR108B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR108C Road, AR108C

3225. The AR108C Road is designated as county road number AR108C and State Geographic Information Database ("SGID") road identification number RD170361 and is more or less 0.90 miles long.

3226. The centerline course of the AR108C Road is depicted on the map included in Exhibit 212 (AR108C Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3227. The north end of the AR108C Road commences in the southwest quarter of section 13, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally south to the northwest quarter of section 24, Township 10 North, Range 7 East, S.L.B.M.

3228. The specific right-of-way for the AR108C Road claimed herein crosses 0.9 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 212.

3229. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR108C Road solely as it crosses United States public land as included and specifically described in Exhibit 212. The AR108C Road includes the segments of road specifically set forth in Exhibit 212 and as exists on the ground.

Acceptance of the AR108C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3230. The AR108C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3231. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR108C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3232. The appearance of the AR108C Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3233. The AR108C Road was accepted as a public 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, or improving the AR108C Road pursuant to the County's governmental right and authority.

3234. Witnesses with personal knowledge of the history of the AR108C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3235. Currently known reputation in the community is that the AR108C Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3236. Public motor vehicle use of the AR108C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3237. The AR108C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3238. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR108C Road.

3239. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR108C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR108D Road, AR108D

3240. The AR108D Road is designated as county road number AR108D and State Geographic Information Database ("SGID") road identification number RD170362 and is more or less 0.83 miles long.

3241. The centerline course of the AR108D Road is depicted on the map included in Exhibit 213 (AR108D Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3242. The south end of the AR108D Road commences in the northwest quarter of section 7, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally north to the northeast quarter of section 12, Township 10 North, Range 7 East, S.L.B.M.

3243. The specific right-of-way for the AR108D Road claimed herein crosses 0.83 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 213.

3244. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR108D Road solely as it crosses United States public land as included and

specifically described in Exhibit 213. The AR108D Road includes the segments of road specifically set forth in Exhibit 213 and as exists on the ground.

Acceptance of the AR108D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3245. The AR108D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3246. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR108D Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3247. The appearance of the AR108D Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3248. The AR108D Road was accepted as a public 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, or improving the AR108D Road pursuant to the County's governmental right and authority.

3249. Witnesses with personal knowledge of the history of the AR108D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3250. Currently known reputation in the community is that the AR108D Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3251. Public motor vehicle use of the AR108D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3252. The AR108D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3253. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR108D Road.

3254. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR108D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR108E Road, AR108E

3255. The AR108E Road is designated as county road number AR108E and State Geographic Information Database ("SGID") road identification number RD170363 and is more or less 0.99 miles long.

3256. The centerline course of the AR108E Road is depicted on the map included in Exhibit 214 (AR108E Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3257. The west end of the AR108E Road commences in the northwest quarter of section 18, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally southeast to the southeast quarter of section 18, Township 10 North, Range 8 East, S.L.B.M.

3258. The specific right-of-way for the AR108E Road claimed herein crosses 0.99 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 214.

3259. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR108E Road solely as it crosses United States public land as included and specifically described in Exhibit 214. The AR108E Road includes the segments of road specifically set forth in Exhibit 214 and as exists on the ground.

Acceptance of the AR108E Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3260. The AR108E Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3261. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR108E Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3262. The appearance of the AR108E Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3263. The AR108E Road was accepted as a public 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, or improving the AR108E Road pursuant to the County's governmental right and authority.

3264. Witnesses with personal knowledge of the history of the AR108E Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3265. Currently known reputation in the community is that the AR108E Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3266. Public motor vehicle use of the AR108E Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3267. The AR108E Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3268. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR108E Road.

3269. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR108E Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR109 Road, AR109

3270. The AR109 Road is designated as county road number AR109 and State Geographic Information Database ("SGID") road identification number RD170364 and is more or less 1.41 miles long.

3271. The centerline course of the AR109 Road is depicted on the map included in Exhibit 215 (AR109 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

3272. The west end of the AR109 Road commences in the northwest quarter of section 8, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally east to the state line in the northwest quarter of section 9, Township 10 North, Range 8 East, S.L.B.M.

3273. The specific right-of-way for the AR109 Road claimed herein crosses 1.14 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 215.

3274. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR109 Road solely as it crosses United States public land as included and

specifically described in Exhibit 215. The AR109 Road includes the segments of road specifically set forth in Exhibit 215 and as exists on the ground.

Acceptance of the AR109 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3275. The AR109 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3276. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR109 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3277. The appearance of the AR109 Road on the Woodruff Narrows (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3278. The AR109 Road was accepted as a public 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, or improving the AR109 Road pursuant to the County's governmental right and authority.

3279. Witnesses with personal knowledge of the history of the AR109 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3280. Currently known reputation in the community is that the AR109 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3281. Public motor vehicle use of the AR109 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3282. The AR109 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3283. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR109 Road.

3284. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR109 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR110 Road, AR110

3285. The AR110 Road is designated as county road number AR110 and State Geographic Information Database ("SGID") road identification number RD170366 and is more or less 3.82 miles long.

3286. The centerline course of the AR110 Road is depicted on the map included in Exhibit 216 (AR110 Road), which is attached hereto and incorporated herein. This map further

reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

3287. The south end of the AR110 Road commences in the southwest quarter of section 6, Township 10 North, Range 8 East, S.L.B.M. and proceeds generally west before looping to the south and back to the east to the northwest quarter of section 6, Township 10 North, Range 8 East, S.L.B.M.

3288. The specific right-of-way for the AR110 Road claimed herein crosses 3.44 miles of BLM land in three segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 216.

3289. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR110 Road solely as it crosses United States public land as included and specifically described in Exhibit 216. The AR110 Road includes the segments of road specifically set forth in Exhibit 216 and as exists on the ground.

Acceptance of the AR110 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3290. The AR110 Road has long served as a public highway providing access to and across public land, private land, state land and other roads. This road serves the public's transportation needs.

3291. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR110 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3292. The appearance of the AR110 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3293. The AR110 Road was accepted as a public 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, or improving the AR110 Road pursuant to the County's governmental right and authority.

3294. Witnesses with personal knowledge of the history of the AR110 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3295. Currently known reputation in the community is that the AR110 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3296. Public motor vehicle use of the AR110 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3297. The AR110 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3298. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR110 Road.

3299. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR110 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR110A Road, AR110A

3300. The AR110A Road is designated as county road number AR110A and State Geographic Information Database ("SGID") road identification number RD170367 and is more or less 0.50 miles long.

3301. The centerline course of the AR110A Road is depicted on the map included in Exhibit 217 (AR110A Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3302. The east end of the AR110A Road commences in the northeast quarter of section 11, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally west to the northwest quarter of section 11, Township 10 North, Range 7 East, S.L.B.M.

3303. The specific right-of-way for the AR110A Road claimed herein crosses 0.5 miles of BLM land in one segments. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 217.

3304. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR110A Road solely as it crosses United States public land as included and

specifically described in Exhibit 217. The AR110A Road includes the segments of road specifically set forth in Exhibit 217 and as exists on the ground.

Acceptance of the AR110A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3305. The AR110A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3306. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR110A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3307. The AR110A Road was accepted as a public 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, or improving the AR110A Road pursuant to the County's governmental right and authority.

3308. Witnesses with personal knowledge of the history of the AR110A Road confirm public use of this road as a public 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 AR110A Road has been open for all to come 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 AR110A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3311. The AR110A 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 AR110A Road.

3313. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR110A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR114 Road, AR114

3314. The AR114 Road is designated as county road number AR114 and State Geographic Information Database ("SGID") road identification number RD170369 and is more or less 0.55 miles long.

3315. The centerline course of the AR114 Road is depicted on the map included in Exhibit 218 (AR114 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3316. The south end of the AR114 Road commences in the southeast quarter of section 25, Township 11 North, Range 7 East, S.L.B.M. and proceeds generally north to the northeast quarter of section 25, Township 11 North, Range 7 East, S.L.B.M.

3317. The specific right-of-way for the AR114 Road claimed herein crosses 0.55 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 218.

3318. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR114 Road solely as it crosses United States public land as included and specifically described in Exhibit 218. The AR114 Road includes the segments of road specifically set forth in Exhibit 218 and as exists on the ground.

Acceptance of the AR114 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3319. The AR114 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3320. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR114 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3321. The appearance of the AR114 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3322. The AR114 Road was accepted as a public 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, or improving the AR114 Road pursuant to the County's governmental right and authority.

3323. Witnesses with personal knowledge of the history of the AR114 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3324. Currently known reputation in the community is that the AR114 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3325. Public motor vehicle use of the AR114 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3326. The AR114 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3327. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR114 Road.

3328. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR114 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR115 Road, AR115

3329. The AR115 Road is designated as county road number AR115 and State Geographic Information Database ("SGID") road identification number RD170597 and is more or less 1.48 miles long.

3330. The centerline course of the AR115 Road is depicted on the map included in Exhibit 219 (AR115 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

3331. The north end of the AR115 Road commences in the northeast quarter of section 7, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally south from the Mine Road to the southwest quarter of section 8, Township 11 North, Range 8 East, S.L.B.M.

3332. The specific right-of-way for the AR115 Road claimed herein crosses 0.46 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 219.

3333. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR115 Road solely as it crosses United States public land as included and specifically described in Exhibit 219. The AR115 Road includes the segments of road specifically set forth in Exhibit 219 and as exists on the ground.

Acceptance of the AR115 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3334. The AR115 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3335. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR115 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3336. The appearance of the AR115 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3337. The AR115 Road was accepted as a public 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, or improving the AR115 Road pursuant to the County's governmental right and authority.

3338. Witnesses with personal knowledge of the history of the AR115 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3339. Currently known reputation in the community is that the AR115 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3340. Public motor vehicle use of the AR115 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3341. The AR115 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3342. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR115 Road.

3343. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR115 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR116 Road, AR116

3344. The AR116 Road is designated as county road number AR116 and State Geographic Information Database ("SGID") road identification number RD170370 and is more or less 0.26 miles long.

3345. The centerline course of the AR116 Road is depicted on the map included in Exhibit 220 (AR116 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3346. The north end of the AR116 Road commences in the southeast quarter of section 6, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally east from the Mine Road to the southwest quarter of section 5, Township 11 North, Range 8 East, S.L.B.M.

3347. The specific right-of-way for the AR116 Road claimed herein crosses 0.26 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 220.

3348. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR116 Road solely as it crosses United States public land as included and specifically described in Exhibit 220. The AR116 Road includes the segments of road specifically set forth in Exhibit 220 and as exists on the ground.

Acceptance of the AR116 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3349. The AR116 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3350. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR116 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3351. The appearance of the AR116 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3352. The AR116 Road was accepted as a public 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, or improving the AR116 Road pursuant to the County's governmental right and authority.

3353. Witnesses with personal knowledge of the history of the AR116 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3354. Currently known reputation in the community is that the AR116 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3355. Public motor vehicle use of the AR116 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3356. The AR116 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3357. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR116 Road.

3358. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR116 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR116A Road, AR116A

3359. The AR116A Road is designated as county road number AR116A and State Geographic Information Database ("SGID") road identification number RD170371 and is more or less 0.18 miles long.

3360. The centerline course of the AR116A Road is depicted on the map included in Exhibit 221 (AR116A Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

3361. The north end of the AR116A Road commences in the southeast quarter of section 6, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally south from the Mine Road to the southeast quarter of section 5, Township 11 North, Range 8 East, S.L.B.M.

3362. The specific right-of-way for the AR116A Road claimed herein crosses 0.14 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 221.

3363. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR116A Road solely as it crosses United States public land as included and specifically described in Exhibit 221. The AR116A Road includes the segments of road specifically set forth in Exhibit 221 and as exists on the ground.

Acceptance of the AR116A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3364. The AR116A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3365. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR116A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3366. The appearance of the AR116A Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3367. The AR116A Road was accepted as a public 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, or improving the AR116A Road pursuant to the County's governmental right and authority.

3368. Witnesses with personal knowledge of the history of the AR116A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3369. Currently known reputation in the community is that the AR116A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3370. Public motor vehicle use of the AR116A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3371. The AR116A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3372. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR116A Road.

3373. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR116A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR117 Road, AR117

3374. The AR117 Road is designated as county road number AR117 and State Geographic Information Database ("SGID") road identification number RD170372 and is more or less 4.47 miles long.

3375. The centerline course of the AR117 Road is depicted on the map included in Exhibit 222 (AR117 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land, state SITLA land, and public land administered by the BLM.

3376. The north end of the AR117 Road commences in the southeast quarter of section 29, Township 12 North, Range 8 East, S.L.B.M. and proceeds generally south from the Mine Road to the state boundary in the northwest quarter of section 16, Township 11 North, Range 8 East, S.L.B.M.

3377. The specific right-of-way for the AR117 Road claimed herein crosses 3.16 miles of BLM land in two segments. NAD83 mapping grade GPS data plotting the centerline and course of the segments crossing BLM land is contained in Exhibit 222.

3378. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR117 Road solely as it crosses United States public land as included and specifically described in Exhibit 222. The AR117 Road includes the segments of road specifically set forth in Exhibit 222 and as exists on the ground.

Acceptance of the AR117 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3379. The AR117 Road has long served as a public highway providing access to and across public land, private land, state land and to other roads. This road serves the public's transportation needs.

3380. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR117 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3381. The appearance of the AR117 Road on the Rex Peak (1968) and Leefe (1969) USGS 7.5-minute quadrangle maps evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3382. The AR117 Road was accepted as a public 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, or improving the AR117 Road pursuant to the County's governmental right and authority.

3383. Witnesses with personal knowledge of the history of the AR117 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3384. Currently known reputation in the community is that the AR117 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3385. Public motor vehicle use of the AR117 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3386. The AR117 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3387. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR117 Road.

3388. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR117 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR117C Road, AR117C

3389. The AR117C Road is designated as county road number AR117C and State Geographic Information Database ("SGID") road identification number RD170373 and is more or less 0.98 miles long.

3390. The centerline course of the AR117C Road is depicted on the map included in Exhibit 223 (AR117C Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

3391. The north end of the AR117C Road commences in the southeast quarter of section 32, Township 12 North, Range 8 East, S.L.B.M. and proceeds generally south to the southeast quarter of section 5, Township 11 North, Range 8 East, S.L.B.M.

3392. The specific right-of-way for the AR117C Road claimed herein crosses 0.75 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 223.

3393. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR117C Road solely as it crosses United States public land as included and specifically described in Exhibit 223. The AR117C Road includes the segments of road specifically set forth in Exhibit 223 and as exists on the ground.

Acceptance of the AR117C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3394. The AR117C Road has long served as a public highway providing access to and across public land, private and to other roads. 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 AR117C Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3396. The appearance of the AR117C Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3397. The AR117C Road was accepted as a public 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, or improving the AR117C Road pursuant to the County's governmental right and authority.

3398. Witnesses with personal knowledge of the history of the AR117C Road confirm public use of this road as a public 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 AR117C Road has been open for all to come 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 AR117C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3401. The AR117C 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 AR117C Road.

3403. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR117C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR117D Road, AR117D

3404. The AR117D Road is designated as county road number AR117D and State Geographic Information Database ("SGID") road identification number RD170374 and is more or less 0.49 miles long.

3405. The centerline course of the AR117D Road is depicted on the map included in Exhibit 224 (AR117D Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3406. The east end of the AR117D Road commences in the southeast quarter of section 4, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally west to the southeast quarter of section 5, Township 11 North, Range 8 East, S.L.B.M.

3407. The specific right-of-way for the AR117D Road claimed herein crosses 0.49 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 224.

3408. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR117D Road solely as it crosses United States public land as included and specifically described in Exhibit 224. The AR117D Road includes the segments of road specifically set forth in Exhibit 224 and as exists on the ground.

Acceptance of the AR117D Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3409. The AR117D Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3410. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR117D Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3411. The appearance of the AR117D Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3412. The AR117D Road was accepted as a public 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, or improving the AR117D Road pursuant to the County's governmental right and authority.

3413. Witnesses with personal knowledge of the history of the AR117D Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3414. Currently known reputation in the community is that the AR117D Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3415. Public motor vehicle use of the AR117D Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3416. The AR117D Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3417. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR117D Road.

3418. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR117D Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Weston Road, AR156

3419. The Weston Road is designated as county road number AR156 and State Geographic Information Database ("SGID") road identification number RD170423 and is more or less 1.55 miles long.

3420. The centerline course of the Weston Road is depicted on the map included in Exhibit 225 (Weston Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

3421. The east end of the Weston Road commences in the southeast quarter of section 6, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally west from the Mine Road to the southeast quarter of section 1, Township 11 North, Range 7 East, S.L.B.M.

3422. The specific right-of-way for the Weston Road claimed herein crosses 0.19 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 225.

3423. In this action, the State and County seek to quiet title to the public highway right-of-way for the Weston Road solely as it crosses United States public land as included and specifically described in Exhibit 225. The Weston Road includes the segments of road specifically set forth in Exhibit 225 and as exists on the ground.

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

3424. The Weston Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3425. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Weston Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3426. The appearance of the Weston Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3427. The County confirmed its acceptance of the Weston 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, or improving the Weston Road pursuant to the County's governmental right and authority.

3428. Witnesses with personal knowledge of the history of the Weston Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3429. Currently known reputation in the community is that the Weston Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3430. Public motor vehicle use of the Weston Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3431. The Weston Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3432. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Weston Road.

3433. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Weston Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR157 Road, AR157

3434. The AR157 is designated as county road number AR157 and State Geographic Information Database ("SGID") road identification number RD170424 and is more or less 0.28 miles long.

3435. The centerline course of the AR157 Road is depicted on the map included in Exhibit 226 (AR157 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3436. The west end of the AR157 Road commences in the northeast quarter of section 29, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally east from the Brazier/Warner Road to the northwest quarter of section 28, Township 11 North, Range 8 East, S.L.B.M.

3437. The specific right-of-way for the AR157 Road claimed herein crosses 0.28 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 226.

3438. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR157 Road solely as it crosses United States public land as included and specifically described in Exhibit 226. The AR157 Road includes the segments of road specifically set forth in Exhibit 226 and as exists on the ground.

Acceptance of the AR157 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3439. The AR157 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3440. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR157 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3441. The appearance of the AR157 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3442. The AR157 Road was accepted as a public 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, or improving the AR157 Road pursuant to the County's governmental right and authority.

3443. Witnesses with personal knowledge of the history of the AR157 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3444. Currently known reputation in the community is that the AR157 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3445. Public motor vehicle use of the AR157 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3446. The AR157 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3447. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR157 Road.

3448. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR157 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR158 Road, AR158

3449. The AR158 is designated as county road number AR158 and State Geographic Information Database ("SGID") road identification number RD170425 and is more or less 0.30 miles long.

3450. The centerline course of the AR158 Road is depicted on the map included in Exhibit 227 (AR158 Road), which is attached hereto and incorporated herein. This map further reflects that this road crosses private land and public land administered by the BLM.

3451. The north end of the AR158 Road commences in the northwest quarter of section 18, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally southeast from the Mine Road to the northwest quarter of section 28, Township 11 North, Range 8 East, S.L.B.M.

3452. The specific right-of-way for the AR158 Road claimed herein crosses 0.11 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 227.

3453. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR158 Road solely as it crosses United States public land as included and specifically described in Exhibit 227. The AR158 Road includes the segments of road specifically set forth in Exhibit 227 and as exists on the ground.

Acceptance of the AR158 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3454. The AR158 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3455. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR158 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3456. The appearance of the AR158 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3457. The County confirmed its acceptance of the AR158 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, or improving the AR158 Road pursuant to the County's governmental right and authority.

3458. Witnesses with personal knowledge of the history of the AR158 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3459. Currently known reputation in the community is that the AR158 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3460. Public motor vehicle use of the AR158 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3461. The AR158 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3462. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR158 Road.

3463. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR158 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR160 Road, AR160

3464. The AR160 is designated as county road number AR160 and State Geographic Information Database ("SGID") road identification number RD170433 and is more or less 0.94 miles long.

3465. The centerline course of the AR160 Road is depicted on the map included in Exhibit 228 (AR160 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3466. The north end of the AR160 Road commences in the southwest quarter of section 30, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally southeast from the Brazier/Warner Road to the northeast quarter of section 31, Township 11 North, Range 8 East, S.L.B.M.

3467. The specific right-of-way for the AR160 Road claimed herein crosses 0.94 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 228.

3468. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR160 Road solely as it crosses United States public land as included and specifically described in Exhibit 228. The AR160 Road includes the segments of road specifically set forth in Exhibit 228 and as exists on the ground.

Acceptance of the AR160 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3469. The AR160 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 AR160 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3471. The appearance of the AR160 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3472. The AR160 Road was accepted as a public 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, or improving the AR160 Road pursuant to the County's governmental right and authority.

3473. Witnesses with personal knowledge of the history of the AR160 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3474. Currently known reputation in the community is that the AR160 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3475. Public motor vehicle use of the AR160 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3476. The AR160 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3477. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR160 Road.

3478. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR160 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR160A Road, AR160A

3479. The AR160A is designated as county road number AR160A and State Geographic Information Database ("SGID") road identification number RD170434 and is more or less 0.13 miles long.

3480. The centerline course of the AR160A Road is depicted on the map included in Exhibit 229 (AR160A Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3481. The south end of the AR160A Road commences in the southeast quarter of section 30, Township 11 North, Range 8 East, S.L.B.M. and proceeds generally northeast from the to the southeast quarter of section 30, Township 11 North, Range 8 East, S.L.B.M.

3482. The specific right-of-way for the AR160A Road claimed herein crosses 0.13 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 229.

3483. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR160A Road solely as it crosses United States public land as included and specifically described in Exhibit 229. The AR160A Road includes the segments of road specifically set forth in Exhibit 229 and as exists on the ground.

Acceptance of the AR160A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3484. The AR160A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3485. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR160A Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3486. The AR160A Road was accepted as a public 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, or improving the AR160A Road pursuant to the County's governmental right and authority.

3487. Witnesses with personal knowledge of the history of the AR160A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3488. Currently known reputation in the community is that the AR160A Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3489. Public motor vehicle use of the AR160A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3490. The AR160A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3491. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR160A Road.

3492. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR160A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

AR163 Road, AR163

3493. The AR163 is designated as county road number AR163 and State Geographic Information Database ("SGID") road identification number RD170438 and is more or less 1.31 miles long.

3494. The centerline course of the AR163 Road is depicted on the map included in Exhibit 230 (AR163 Road), which is attached hereto and incorporated herein. This map further reflects that this road only crosses public land administered by the BLM.

3495. The south end of the AR163 Road commences in the northwest quarter of section 1, Township 10 North, Range 7 East, S.L.B.M. and proceeds generally northeast to the southeast quarter of section 36, Township 11 North, Range 7 East, S.L.B.M.

3496. The specific right-of-way for the AR163 Road claimed herein crosses 1.31 miles of BLM land in one segment. NAD83 mapping grade GPS data plotting the centerline and course of the segment crossing BLM land is contained in Exhibit 230.

3497. In this action, the State and County seek to quiet title to the public highway right-of-way for the AR163 Road solely as it crosses United States public land as included and specifically described in Exhibit 230. The AR163 Road includes the segments of road specifically set forth in Exhibit 230 and as exists on the ground.

Acceptance of the AR163 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3498. The AR163 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3499. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the AR163 Road as a public highway located on the land at issue in this case and following the course described herein. Aerial photography taken more recently continues to show the road as it existed prior to October 21, 1976.

3500. The appearance of the AR163 Road on the Rex Peak (1968) USGS 7.5-minute quadrangle map evidences the acceptance, use, and existence of the right-of-way for this road. *See* Exhibit 11 for more detailed map information.

3501. The AR163 Road was accepted as a public 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, or improving the AR163 Road pursuant to the County's governmental right and authority.

3502. Witnesses with personal knowledge of the history of the AR163 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3503. Currently known reputation in the community is that the AR163 Road has been open for all to come and go as they please whenever convenient or necessary for more than 10 years prior to October 21, 1976, and continuing to the present.

3504. Public motor vehicle use of the AR163 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way for this road.

3505. The AR163 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3506. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the AR163 Road.

3507. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the AR163 Road on lands owned 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 – Six Mile Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Six Mile Road, BR21; (2) Rabbit Creek Road, BR20; (3) Laketown Mountain Road, BR22; (4) Manhead Road, BR73; (5) AR17 Road, AR17; (6) AR18 Road, AR18; (7) AR20 Road, AR20; (8) AR20A Road, AR20A; (9) AR21 Road, AR21; (10) AR21A Road, AR21; (11) AR21B Road, AR21B; (12) AR22 Road, AR22; (13) AR22B Road, AR22B; (14) AR22D Road, AR22D; (15) AR23 Road, AR23; (16) AR24 Road, AR24; (17) AR25 Road, AR25; (18) AR29 Road, AR29; (19) AR30 Road, AR30;

(20) AR31 Road, AR31; (21) AR126 Road, AR126; (22) AR127 Road, AR127; (23) AR128 Road, AR128; (24) AR128A Road, AR128A; (25) AR130 Road, AR130; (26) AR132 Road, AR132; (27) AR133 Road, AR133; and

2. On its Second Cause of Action – Otter Creek Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Otter Creek Road, BR28; (2) Otter Creek Cutoff Road, BR29; (3) AR3 Road, AR3; (4) AR4 Road, AR4; (5) AR5 Road, AR5; (6) AR40 Road, AR40; (7) AR40A Road, AR40A; (8) AR41 Road, AR41; (9) AR43 Road, AR43; (10) AR45 Road, AR45; (11) AR49 Road, AR49; (12) AR59 Road, AR59; (13) AR59A Road, AR59A; (14) AR60 Road, AR60; (15) AR60A Road, AR60A; (16) AR61 Road, AR61; (17) AR62 Road, AR62; (18) AR62A Road, AR62A; (19) AR63 Road, AR63; (20) AR137 Road, AR137; (21) AR144 Road, AR144; and

3. On its Third Cause of Action – Twin Peaks Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Twin Peaks Road, BR23; (2) Nebeker Spring Road, BR30; (3) AR38 Road, AR38; (4) AR38E Road, AR38E; (5) AR50 Road, AR50; (6) AR50B Road, AR50B; (7) AR50C Road, AR50C; (8) AR51 Road, AR51; (9) AR52 Road, AR52; (10) AR52A Road, AR52A; (11) AR52B Road, AR52B; (12) AR52C Road, AR52C; (13) AR53 Road, AR53; (14) AR53A Road, AR53A; (15) AR54 Road, AR54; (16) AR55 Road, AR55; (17) AR56 Road, AR56; (18) AR57 Road, AR57; (19) AR58 Road, AR58; (20) AR58A Road, AR58A; (21) AR121 Road, AR121; (22) AR121E Road, AR121E; (23) AR122 Road, AR122; (24) AR123 Road, AR123; (25) AR123A Road, AR123A; (26) AR124 Road, AR124; (27) AR124B Road, AR124B; (28) AR125 Road, AR125; (29)

AR125B Road, AR125B; (30) AR135 Road, AR135; (31) AR142 Road, AR142; (32) AR142A Road, AR142A; (33) AR142B Road, AR142B; (34) AR143 Road, AR143; and

4. On its Fourth Cause of Action – New Canyon Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Little Creek Road, BR31; (2) New Canyon Road, BR32; (3) Pole Canyon Road, BR34; (4) Old Canyon Road, BR33; (5) AR6 Road, AR6; (6) AR64 Road, AR64; (7) AR65 Road, AR65; (8) AR65A Road, AR65A; (9) AR65B Road, AR65B; (10) AR66 Road, AR66; (11) AR67 Road, AR67; (12) AR72 Road, AR72; (13) AR73 Road, AR73; (14) AR74 Road, AR74; (15) AR75 Road, AR75; (16) AR77 Road, AR77; (17) AR77A Road, AR77A; (18) AR77C Road, AR77C; (19) AR78 Road, AR78; (20) AR78A Road, AR78A; (21) AR78B Road, AR78B; (22) AR78C Road, AR78C; (23) AR79 Road, AR79; (24) AR145 Road, AR145; (25) AR145A Road, AR145A; (26) AR146 Road, AR146; (27) AR147 Road, AR147; and

5. On its Fifth Cause of Action – Dry Canyon Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Old Dry Cutoff Road, BR35; (2) Dry Canyon Road, BR36; (3) Big Creek Road, BR37; (4) Ted Pope's Homestead Road, BR38; (5) Valley Ridge Road; BR81, (6) AR69 Road, AR69; (7) AR69B Road, AR69B; (8) AR69D Road, AR69D; (9) AR69F Road, AR69F; (10) AR70 Road, AR70; (11) AR71 Road, AR71; (12) AR80 Road, AR80; (13) AR81 Road, AR81; (14) AR82 Road, AR82; (15) AR83 Road, AR83; (16) AR83A Road, AR83A; (17) AR84 Road, AR84; (18) AR85 Road, AR85; (19) AR85A Road, AR85A; (20) AR86 Road, AR86; (21) AR86A Road, AR86A; (22) AR120 Road, AR120; and

6. On its Sixth Cause of Action – Sage Hollow Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Bryson/Sage Hollow Road, BR41; (2) Thousand Dollar Ridge Road, BR55; (3) AR7 Road, AR7; (4) AR7A Road, AR7A; (5) AR7B Road, AR7B; (6) AR7C Road, AR7C; (7) AR7D Road, AR7D; (8) AR7E Road, AR7E; (9) AR8 Road, AR8; (10) AR9 Road, AR9; (11) AR9A Road, AR9A; (12) AR9B Road, AR9B; (13) AR87 Road, AR87; (14) AR87B Road, AR87B; (15) AR88 Road, AR88; (16) AR89 Road, AR89; (17) AR89A Road, AR89A; (18) AR92 Road, AR92; (19) AR92A Road, AR92A; (20) AR92B Road, AR92B; (21) AR165 Road, AR165; (22) AR166 Road, AR166; (23) AR170 Road, AR170; (24) AR171 Road, AR171; and

7. On its Seventh Cause of Action – Dean Hollow Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Lewis Ridge/Dean Hollow Road, BR82; (2) Birch Creek Reservoir Road, BR56; (3) Woodruff Creek Road, BR57; (4) Long Hollow Road, BR58; (5) Wheatgrass Road, BR63; (6) AR11 Road, AR11; (7) AR11A Road, AR11A; (8) AR12 Road, AR12; (9) AR13 Road, AR13; (10) AR13B Road, AR13B; (11) AR13C Road, AR13C; (12) AR93 Road, AR93; (13) AR94 Road, AR94; (14) AR95 Road, AR95; (15) AR96 Road, AR96; (16) AR97 Road, AR97; (17) AR97A Road, AR97A; (18) AR97B Road, AR97B; (19) AR97C Road, AR97C; (20) AR98 Road, AR98; (21) AR98A Road, AR98A; (22) AR98B Road, AR98B; and

8. On its Eighth Cause of Action – Brazier/Warner Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Brazier-Warner Road, BR43; (2) Mine Road, BR75; (3) River Lane Road, BR44; (4) AR15 Road, AR15; (5)

AR15B Road, AR15B; (6) AR15C Road, AR15C; (7) AR15D Road, AR15D; (8) AR15E Road, AR15E; (9) AR16 Road, AR16; (10) AR16A Road, AR16A; (11) AR16B Road, AR16B; (12) AR16C Road, AR16C; (13) AR16D Road, AR16D; (14) AR103 Road, AR103; (15) AR103A Road, AR103A; (16) AR103B Road, AR103B; (17) AR104 Road, AR104; (18) AR104A Road, AR104A; (19) AR105 Road, AR105; (20) AR105A Road, AR105A; (21) AR107 Road, AR107; (22) AR108 Road, AR108; (23) AR108B Road, AR108B; (24) AR108C Road, AR108C; (25) AR108D Road, AR108D; (26) AR108E Road, AR108E; (27) AR109 Road, AR109; (28) AR110 Road, AR110; (29) AR110A Road, AR110A; (30) AR114 Road, AR114; (31) AR115 Road, AR115; (32) AR116 Road, AR116; (33) AR116A Road, AR116A; (34) AR117 Road, AR117; (35) AR117C Road, AR117C; (36) AR117D Road, AR117D; (37) Weston Road, AR156; (38) AR157 Road, AR157; (39) AR158 Road, AR158; (40) AR160 Road, AR160; (41) AR160A Road, AR160A; (42) AR163 Road, AR163; and

9. An order awarding costs, fees and attorneys' fees to the extent permitted by law; and

10. An order granting such further and other relief as may be appropriate.

Respectfully submitted this 28th day of August 2012.

/s/ Roger R. Fairbanks
Assistant Attorney General