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

SANPETE 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-00430-DB Judge: Honorable Dee Benson

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

INTRODUCTION

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Section 8 of the Mining Act of 1866, 14 Stat. 251, 253, later codified as Revised Statutes 2477 and as 43 U.S.C. §932 (repealed October 21, 1976, with savings provisions recognizing validity of rights-of-way already established) (hereinafter "R.S. 2477").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

JURISDICTION AND VENUE

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

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

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

4. On or about December 9, 2011, the State filed a Notice of Intention to File Suit to Quiet Title to Certain Rights-of-Way in Sanpete County, Utah, with the Secretary of Interior over the R.S. 2477 rights-of-way that are the subject of this action. A copy of this letter is attached as Exhibit 1. This 2011 Notice of Intent supplemented the State's prior Notice of Intent

regarding R.S. 2477 sent in June 2000. A copy of this letter is attached as Exhibit 2. Thus, the State has complied with the requirement to provide notice to the head of the federal agency with jurisdiction over the lands in question 180 days prior to filing this action. 28 U.S.C. § 2409a(m).Venue is proper under 28 U.S.C. § 1391(e) inasmuch as the lands at issue are located within the state of Utah.

PARTIES

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

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

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

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

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

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

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

11. 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.

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

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

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

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

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

15. 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.

16. 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.

17. 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.

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

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

19. 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).

20. 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.

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

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

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

24. 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.

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

26. 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.

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

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

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

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

30. 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.

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

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

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

34. The R.S. 2477 rights-of-way for the Class B and D roads may also have been accepted by Sanpete County's designation of these roads as county general highways and/or by Sanpete 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.

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

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

37. 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.

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

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

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

40. 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.

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

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

AREA DESCRIPTIONS

43. 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 nine Areas: (1) Antelope Valley Area, (2) Big Hollow Area, (3) Flat Canyon Area, (4) Japanese Valley Area, (5) Lone Cedar Area, (6) Main Canyon Area, (7) Mellor Canyon Area, (8) Skyline Area, and (9) Southfield Area (collectively, the "Nine Areas").

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

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

46. The Antelope Valley Area is located in north-central Sanpete County and is shown on Exhibit 3, attached hereto and incorporated herein.

47. The Antelope Valley Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Antelope Valley Road, Sanp12; (2) West Valley Road, Sanp201; (3) SP264 Road; (4) SP266 Road; (5) SP267 Road; (6) SP271 Road; (7) SP272 Road; (8) SP273 Road; (9) SP274 Road; (10) SP275 Road; (11) SP278 Road; (12) SP283 Road; (13) SP284 Road; (14) SP286 Road; (15) SP289 Road; (16) SP290 Road; (17) SP293 Road; (18) SP294 Road; (19) SP294a Road; (20) SP295 Road; (21) SP311 Road; (22) SP315 Road; (23) SP315a Road; (24) SP317 Road; and (25) SP316 Road.

48. The Big Hollow Area is located in south-central Sanpete County and is shown on Exhibit 4, attached hereto and incorporated herein.

49. The Big Hollow Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Apple Tree Road, Sanp99: (2) Big Hollow Road, Sanp13; (3) Old 132 Road, Sanp166; (4) Water Hollow Road, Sanp14; (5) SP4 Road; (6) SP469 Road; (7) SP473 Road; (8) SP474 Road; (9) SP476 Road; (10) SP477 Road; (11) SP478 Road; (12) SP479 Road; (13) SP480 Road; (14) SP481 Road; (15) SP482 Road; (16) SP484 Road; (17) SP485 Road; (18) SP486 Road; (19) SP489 Road; (20) SP490 Road; (21) SP493 Road; (22) SP494 Road; (23) SP496 Road; (24) SP499 Road; (25) SP504 Road; (26) SP507 Road; (27) SP511 Road; and (28) SP503 Road.

50. The Flat Canyon Area is located in south-central Sanpete County and is shown on Exhibit 5, attached hereto and incorporated herein.

51. The Flat Canyon Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Flat Canyon Road, Sanp17; (2) Yuba Lake Road, Sanp210; (3) SP05 Road; (4) SP389 Road; (5) SP390 Road; (6) SP391 Road; (7) SP394 Road; (8) SP396 Road; (9) SP397 Road; (10) SP399 Road; (11) SP400 Road; (12) SP403 Road; (13) SP404 Road; (14) SP405 Road; (15) SP406 Road; (16) SP410 Road; (17) SP412 Road; (18) SP516 Road; (19) SP518 Road; (20) SP519 Road; (21) SP522 Road; (22) SP524 Road; (23) SP525 Road; (24) SP527 Road; (25) SP527a Road; (26) SP528 Road; (27) SP530 Road; (28) SP531 Road; (29) SP533a Road; (30) SP534 Road; (31) SP536 Road; (32) SP537 Road; and (33) SP538 Road.

52. The Japanese Valley Area is located in south-central Sanpete County and is shown on Exhibit 6, attached hereto and incorporated herein.

53. The Japanese Valley Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Chris Hollow Road, Sanp42; (2) Hayes Canyon Road, Sanp39; (3) Japanese Valley Road, Sanp290; (4) SP74 Road; (5) SP87 Road; (6) SP112 Road; (7) SP115 Road; (8) SP117 Road; (9) SP118a Road; (10) SP124 Road; (11) SP129 Road; (12) SP133 Road; (13) SP135 Road; (14) SP137 Road; (15) SP142 Road; (16) SP144 Road; (17) SP146 Road; (18) SP147 Road; (19) SP148 Road; (20) SP149 Road; (21) SP150 Road; (22) SP150a Road; (23) SP152 Road; (24) SP154 Road; (25) SP155 Road; (26) SP160 Road; (27) SP161 Road; (28) SP164 Road; (29) SP167 Road; (30) SP170 Road; (31) SP173 Road; (32) SP176 Road; (33) SP177 Road; (34) SP178 Road; (35) SP179 Road; (36) SP181 Road; and (37) SP182 Road.

54. The Lone Cedar Area is located in south-central Sanpete County and is shown on Exhibit 7, attached hereto and incorporated herein.

55. The Lone Cedar Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Lone Cedar Road, Sanp5; (2) SESR885 Road; (3) SESR889 Road; (4) SP1 Road; (5) SP2 Road; (6) SP3 Road; (7) SP3a Road; (8) SP5 Road; (9) SP7 Road; (10) SP8 Road; (11) SP10 Road; (12) SP12 Road; (13) SP13 Road; (14) SP15b Road; (15) SP16 Road; (16) SP17 Road; (17) SP18 Road; (18) SP20 Road; (19) SP22 Road; (20) SP23 Road; (21) SP26 Road; (22) SP27 Road; (23) SP28 Road; (24) SP32 Road; (25) SP33 Road; (26) SP36 Road; (27) SP42 Road; (28) SP46 Road; (29) SP47 Road; (30) SP49 Road; (31) SP52 Road; (32) SP53 Road; (33) SP54 Road; (34) SP55 Road; (35) SP56 Road; (36) SP57 Road;(37) SP58 Road; (38) SP60 Road; (39) SP61 Road; (40) SP62 Road; (41) SP64 Road; (42) SP65 Road; (43) SP68 Road; (44) SP73 Road; (45) SP76 Road; (46) SP77 Road; (47) SP78 Road; (48) SP81 Road; (49) SP82 Road; (50) SP84 Road; (51) SP86 Road; (52) SP88 Road; (53) SP88a Road; (54) SP90 Road; (55) SP91 Road; (56) SP92 Road; (57) SP100 Road; and (58) SP107 Road.

56. The Main Canyon Area is located in south-central Sanpete County and is shown on Exhibit 8, attached hereto and incorporated herein.

57. The Main Canyon Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Dry Canyon Road, Sanp19, (2) Left Hand Fork Road, Sanp43, (3) Main Canyon Road, Sanp8, (4) SP416 Road; (5) SP417a Road; (6) SP422 Road; (7) SP423 Road; (8) SP427 Road; (9) SP428 Road; (10) SP434 Road; (11) SP436 Road; (12) SP438

Road; (13) SP441 Road; (14) SP447 Road; (15) SP448 Road; (16) SP449 Road; (17) SP451 Road; (18) SP453 Road; (19) SP460 Road; and (20) SP461 Road.

58. The Mellor Canyon Area is located in south-central Sanpete County and is shown on Exhibit 9, attached hereto and incorporated herein.

59. The Mellor Canyon Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Mellor Canyon Road, Sanp18, (2) Sanpitch Dairy Road, Sanp238, (3) SP297 Road, (4) SP299 Road, (5) SP306 Road, (6) SP307 Road, (7) SP310 Road, (8) SP314 Road, (9) SP319 Road, (10) SP321 Road, (11) SP327 Road, (12) SP333 Road, (13) SP334 Road, (14) SP340 Road, (15) SP349 Road, (16) SP352 Road, (17) SP355 Road, (18) SP357 Road, (19) SP360 Road, and (20) SP367 Road.

60. The Skyline Area is located in south-central Sanpete County and is shown on Exhibit 10, attached hereto and incorporated herein.

61. The Skyline Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Skyline West Mountain Road, Sanp4; (2) SP298 Road; (3) SP359a Road; (4) SP359b Road; (5) SP374 Road; (6) SP375 Road; (7) SP382 Road; (8) SP385 Road; (9) SP386 Road; (10) SP407 Road; (11) SP408 Road; and (12) SP409 Road.

62. The Southfield Area is located in south-central Sanpete County and is shown on Exhibit 11, attached hereto and incorporated herein.

63. The Southfield Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Landfill Road, Sanp288; (2) Southfield Road, Sanp289; (3) SP186 Road; (4) SP187 Road; (5) SP188 Road; (6) SP193 Road; (7) SP194 Road; (8) SP199

Road; (9) SP201 Road; (10) SP202 Road; (11) SP208 Road; (12) SP210 Road; (13) SP213 Road; (14) SP215 Road; (15) SP216 Road; (16) SP218b Road; (17) SP219 Road; (18) SP222 Road; (19) SP230 Road; (20) SP231a Road; (21) SP232 Road; (22) SP233 Road; (23) SP243 Road; (24) SP246 Road; (25) SP247 Road; (26) SP250 Road; (27) SP255 Road; and (28) SP259 Road.

64. The surveyed centerline of the above-named roads in the Nine Areas are displayed, respectively, as Exhibits 13-273, attached hereto and incorporated herein. Each centerline was plotted using NAD83 mapping grade Global Positioning Survey ("GPS") data collected by Plaintiffs. This centerline data has been verified, confirmed by on the ground inspection, referenced to historic aerial photography, and overlaid upon United States Geological Survey ("USGS") topographic maps.

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

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

67. The USGS 7.5-and 15-minute quadrangle maps covering Sanpete County evidence the existence, use, and acceptance of the rights-of-way in this action prior to 1976. *See* Exhibit 12 for detailed map information.

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

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

70. 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.

71. This action seeks to quiet title only to those portions of the rights-of-way and roads claimed herein and described in the GPS data, attached hereto as Exhibits 13-273, crossing public lands under the jurisdiction of the DOI. As stated earlier, the course, existence, and location of the segments of the rights-of-way and roads crossing private and SITLA lands are not at issue, are not contested, and are not claimed herein.

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

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

THE CASE OR CONTROVERSY

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

73. Sanpete County encompasses approximately 1,601 square miles of land. Approximately 51 % of the land within the County is federal land.

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

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

76. 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.

77. 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.

78. 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.

79. For decades, and in some instances a century, Plaintiffs and the public have benefited 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.

80. 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.

81. 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.

82. 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, Sanpete 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.

83. 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

84. 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.

85. 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.

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

87. The State of Utah and Sanpete 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.

88. 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 Sanpete County which only resolution by the Court can redress.

89. 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.

90. 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.

91. 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.

92. 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.

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

94. 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.

95. 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.

96. 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 Sanpete 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.

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

98. 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.

99. 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.

100. 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 Sanpete County.

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

102. Because the DOI has failed to respond to the claims asserted by the State of Utah and Sanpete 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 Sanpete County remain in dispute.

C. <u>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</u>

103. 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).

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

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

106. 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.

107. 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.

108. 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.*

109. 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.

110. 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.

111. 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).

112. 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.

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

114. 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.

115. 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.*

116. 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.

117. 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").

118. 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).

119. 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.*

120. 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.*

121. 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").

122. 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."

123. 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."

124. 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.

125. 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.

126. 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.

127. 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.

128. 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 in Sanpete County.

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

130. 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.*

131. 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.

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

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

134. 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.*

135. 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.

136. 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.

137. 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.

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

139. 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.

140. 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.

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

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

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

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

145. 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.

146. 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 Sanpete 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.

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

148. 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."

149. Because the State of Utah and Sanpete 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.

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

151. Certain roads become impassable and dangerous without maintenance.

152. 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.

153. 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.

154. 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.

155. 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.

156. 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.

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

158. 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."

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

160. 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.

161. 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.

162. 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.

163. Sanpete 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).

164. Sanpete 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).

165. 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.

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

167. 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.

168. 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 Sanpete County.

169. 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.

170. 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.

171. 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.

172. Certain roads have fallen into disrepair without Sanpete 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.

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

174. 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.

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

176. 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").

177. 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*.

178. 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.

179. 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.*

180. 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.*

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

182. 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.

183. 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.

184. 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.

185. 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).

186. 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.

187. 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.

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

189. 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.

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

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

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

193. The BLM's actions in implementing and enforcing the Richfield RMP's transportation decisions and the subsequent road closures have excluded Sanpete 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.

194. Despite the State of Utah and Sanpete 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.

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

196. 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.

197. 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
ANTELOPE VALLEY AREA

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

199. The Antelope Valley Area is located in southeastern Sanpete County. *See* Exhibit 3.

200. The Antelope Valley Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Antelope Valley Road, Sanp12; (2) West Valley Road, Sanp201; (3) SP264 Road; (4) SP266 Road; (5) SP267 Road; (6) SP271 Road; (7) SP272 Road; (8) SP273 Road; (9) SP274 Road; (10) SP275 Road; (11) SP278 Road; (12) SP283 Road; (13) SP284 Road; (14) SP286 Road; (15) SP289 Road; (16) SP290 Road; (17) SP293 Road; (18) SP294 Road; (19) SP294a Road; (20) SP295 Road; (21) SP311 Road; (22) SP315 Road; (23) SP315a Road; (24) SP317 Road; and (25) SP316 Road.

201. Each right-of-way claimed in the Antelope Valley 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.

202. All rights-of-way claimed in the Antelope Valley 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.

203. All rights-of-way claimed in the Antelope Valley 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).

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

Antelope Valley Road, Sanp12

205. The Antelope Valley Road is designated as county road number Sanp12 and SGID road identification number RD200023 and is more or less 11.95 miles long.

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

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

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

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

209. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Antelope Valley Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

210. The appearance of the Antelope Valley Road on the Manti (1965), Sterling (1966), and Gunnison (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

211. The County confirmed its acceptance of the Antelope Valley Road by 1974, 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 Antelope Valley Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

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

West Valley Road, Sanp201

218. The West Valley Road is designated as county road number Sanp201 and SGID road identification number RD200114 and is more or less 4.67 miles long.

219. Exhibit 14 (attached hereto and incorporated herein) contains certain information pertaining to the West Valley Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

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

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

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

222. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the West Valley Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

223. The appearance of the West Valley Road on the Manti (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

224. The County confirmed its acceptance of the West Valley Road by 1974, 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 West Valley Road using public funds pursuant to the County's governmental right and authority.

225. Witnesses with personal knowledge of the history of the West Valley Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

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

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

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

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

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

SP264 Road

231. The SP264 Road is designated as county road number SPVM0264 and SGID road identification number RD200529 and is more or less 1.35 miles long.

232. Exhibit 15 (attached hereto and incorporated herein) contains certain information pertaining to the SP264 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

233. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP264 Road solely as it crosses United States public land as included and specifically described in Exhibit 15. The SP264 Road includes the segment of road specifically set forth in Exhibit 15 and as it exists on the ground.

Acceptance of the SP264 Road R.S. 2477 Right-of-way Prior to October 21, 1976

234. The SP264 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

235. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP264 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

236. The appearance of the SP264 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

237. The SP264 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 SP264 Road pursuant to the County's governmental right and authority.

238. Witnesses with personal knowledge of the history of the SP264 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

239. Currently known reputation in the community is that the SP264 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

240. Public motor vehicle use of the SP264 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

241. The SP264 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

242. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP264 Road.

243. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP264 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP266 Road

244. The SP266 Road is designated as county road number SPVM0266 and SGID road identification number RD200530 and is more or less .54 miles long.

245. Exhibit 16 (attached hereto and incorporated herein) contains certain information pertaining to the SP266 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

246. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP266 Road solely as it crosses United States public land as included and specifically described in Exhibit 16. The SP266 Road includes the segment of road specifically set forth in Exhibit 16 and as it exists on the ground.

Acceptance of the SP266 Road R.S. 2477 Right-of-way Prior to October 21, 1976

247. The SP266 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

248. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP266 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

249. The SP266 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 SP266 Road pursuant to the County's governmental right and authority.

250. Witnesses with personal knowledge of the history of the SP266 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

251. Currently known reputation in the community is that the SP266 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

252. Public motor vehicle use of the SP266 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

253. The SP266 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

254. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP266 Road.

255. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP266 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP267 Road

256. The SP267 Road is designated as county road number SP267 and SGID road identification number RD200531 and is more or less 1.54 miles long.

257. Exhibit 17 (attached hereto and incorporated herein) contains certain information pertaining to the SP267 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

258. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP267 Road solely as it crosses United States public land as included and specifically described in Exhibit 17. The SP267 Road includes the segment of road specifically set forth in Exhibit 17 and as it exists on the ground.

Acceptance of the SP267 Road R.S. 2477 Right-of-way Prior to October 21, 1976

259. The SP267 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP267 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

261. The appearance of the SP267 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

262. The SP267 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 SP267 Road pursuant to the County's governmental right and authority.

263. Witnesses with personal knowledge of the history of the SP267 Road confirm public use of this road as a public 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 SP267 Road has been open for all to come 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 SP267 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

266. The SP267 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 SP267 Road.

268. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP267 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP271 Road

269. The SP271 Road is designated as county road number SPVM0271 and SGID road identification number RD200532 and is more or less .11 miles long.

270. Exhibit 18 (attached hereto and incorporated herein) contains certain information pertaining to the SP271 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

271. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP271 Road solely as it crosses United States public land as included and specifically described in Exhibit 18. The SP271 Road includes the segment of road specifically set forth in Exhibit 18 and as it exists on the ground.

Acceptance of the SP271 Road R.S. 2477 Right-of-way Prior to October 21, 1976

272. The SP271 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

273. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP271 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

274. The appearance of the SP271 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

275. The SP271 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 SP271 Road pursuant to the County's governmental right and authority.

276. Witnesses with personal knowledge of the history of the SP271 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

277. Currently known reputation in the community is that the SP271 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

278. Public motor vehicle use of the SP271 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

279. The SP271 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

280. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP271 Road.

281. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP271 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP272 Road

282. The SP272 Road is designated as county road number SPVM0272 and SGID road identification number RD200533 and is more or less 1.65 miles long.

283. Exhibit 19 (attached hereto and incorporated herein) contains certain information pertaining to the SP272 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

284. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP272 Road solely as it crosses United States public land as included and specifically described in Exhibit 19. The SP272 Road includes the segment of road specifically set forth in Exhibit 19 and as it exists on the ground.

Acceptance of the SP272 Road R.S. 2477 Right-of-way Prior to October 21, 1976

285. The SP272 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

286. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP272 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

287. The appearance of the SP272 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

288. The SP272 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 SP272 Road pursuant to the County's governmental right and authority.

289. Witnesses with personal knowledge of the history of the SP272 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

290. Currently known reputation in the community is that the SP272 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

291. Public motor vehicle use of the SP272 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

292. The SP272 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

293. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP272 Road.

294. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP272 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP273 Road

295. The SP273 Road is designated as county road number SPVM0273 and SGID road identification number RD200534 and is more or less 1.03 miles long.

296. Exhibit 20 (attached hereto and incorporated herein) contains certain information pertaining to the SP273 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

297. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP273 Road solely as it crosses United States public land as included and specifically described in Exhibit 20. The SP273 Road includes the segment of road specifically set forth in Exhibit 20 and as it exists on the ground.

Acceptance of the SP273 Road R.S. 2477 Right-of-way Prior to October 21, 1976

298. The SP273 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

299. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP273 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

300. The appearance of the SP273 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

301. The SP273 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 SP273 Road pursuant to the County's governmental right and authority.

302. Witnesses with personal knowledge of the history of the SP273 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

303. Currently known reputation in the community is that the SP273 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

304. Public motor vehicle use of the SP273 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

305. The SP273 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

306. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP273 Road.

307. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP273 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP274 Road

308. The SP274 Road is designated as county road number SPVM0274 and SGID road identification number RD200535 and is more or less .94 miles long.

309. Exhibit 21 (attached hereto and incorporated herein) contains certain information pertaining to the SP274 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

310. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP274 Road solely as it crosses United States public land as included and

specifically described in Exhibit 21. The SP274 Road includes the segment of road specifically set forth in Exhibit 21 and as it exists on the ground.

Acceptance of the SP274 Road R.S. 2477 Right-of-way Prior to October 21, 1976

311. The SP274 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

312. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP274 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

313. The appearance of the SP274 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

314. The SP274 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 SP274 Road pursuant to the County's governmental right and authority.

315. Witnesses with personal knowledge of the history of the SP274 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

316. Currently known reputation in the community is that the SP274 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

317. Public motor vehicle use of the SP274 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

318. The SP274 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

319. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP274 Road.

320. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP274 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP275 Road

321. The SP275 Road is designated as county road number SPVM0275 and SGID road identification number RD200536 and is more or less 2.03 miles long.

322. Exhibit 22 (attached hereto and incorporated herein) contains certain information pertaining to the SP275 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

323. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP275 Road solely as it crosses United States public land as included and specifically described in Exhibit 22. The SP275 Road includes the segment of road specifically set forth in Exhibit 22 and as it exists on the ground.

Acceptance of the SP275 Road R.S. 2477 Right-of-way Prior to October 21, 1976

324. The SP275 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

325. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP275 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

326. The appearance of the SP275 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

327. The County confirmed its acceptance of the SP275 Road by 1974, 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 SP275 Road pursuant to the County's governmental right and authority.

328. Witnesses with personal knowledge of the history of the SP275 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

329. Currently known reputation in the community is that the SP275 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

330. Public motor vehicle use of the SP275 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

331. The SP275 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

332. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP275 Road.

333. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP275 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP278 Road

334. The SP278 Road is designated as county road number SPVM0278 and SGID road identification number RD200539 and is more or less .55 miles long.

335. Exhibit 23 (attached hereto and incorporated herein) contains certain information pertaining to the SP278 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

336. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP278 Road solely as it crosses United States public land as included and specifically described in Exhibit 23. The SP278 Road includes the segment of road specifically set forth in Exhibit 23 and as it exists on the ground.

Acceptance of the SP278 Road R.S. 2477 Right-of-way Prior to October 21, 1976

337. The SP278 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

338. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP278 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

339. The appearance of the SP278 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

340. The SP278 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 SP278 Road pursuant to the County's governmental right and authority.

341. Witnesses with personal knowledge of the history of the SP278 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

342. Currently known reputation in the community is that the SP278 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

343. Public motor vehicle use of the SP278 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

344. The SP278 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

345. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP278 Road.

346. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP278 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP283 Road

347. The SP283 Road is designated as county road number SPVM0283 and SGID road identification number RD200542 and is more or less .32 miles long.

348. Exhibit 24 (attached hereto and incorporated herein) contains certain information pertaining to the SP283 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

349. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP283 Road solely as it crosses United States public land as included and specifically described in Exhibit 24. The SP283 Road includes the segment of road specifically set forth in Exhibit 24 and as it exists on the ground.

Acceptance of the SP283 Road R.S. 2477 Right-of-way Prior to October 21, 1976

350. The SP283 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

351. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP283 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

352. The SP283 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 SP283 Road pursuant to the County's governmental right and authority.

353. Witnesses with personal knowledge of the history of the SP283 Road confirm public use of this road as a public 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 SP283 Road has been open for all to come 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 SP283 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

356. The SP283 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 SP283 Road.

358. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP283 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP284 Road

359. The SP284 Road is designated as county road number SPVM0284 and SGID road identification number RD200543 and is more or less .31 miles long.

360. Exhibit 25 (attached hereto and incorporated herein) contains certain information pertaining to the SP284 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

361. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP284 Road solely as it crosses United States public land as included and specifically described in Exhibit 25. The SP284 Road includes the segment of road specifically set forth in Exhibit 25 and as it exists on the ground.

Acceptance of the SP284 Road R.S. 2477 Right-of-way Prior to October 21, 1976

362. The SP284 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

363. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP284 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

364. The SP284 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 SP284 Road pursuant to the County's governmental right and authority.

365. Witnesses with personal knowledge of the history of the SP284 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

366. Currently known reputation in the community is that the SP284 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

367. Public motor vehicle use of the SP284 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

368. The SP284 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

369. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP284 Road.

370. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP284 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP286 Road

371. The SP286 Road is designated as county road number SPVM0286 and SGID road identification number RD200544 and is more or less .27 miles long.

372. Exhibit 26 (attached hereto and incorporated herein) contains certain information pertaining to the SP286 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

373. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP286 Road solely as it crosses United States public land as included and specifically described in Exhibit 26. The SP286 Road includes the segment of road specifically set forth in Exhibit 26 and as it exists on the ground.

Acceptance of the SP286 Road R.S. 2477 Right-of-way Prior to October 21, 1976

374. The SP286 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

375. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP286 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

376. The appearance of the SP286 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

377. The SP286 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 SP286 Road pursuant to the County's governmental right and authority.

378. Witnesses with personal knowledge of the history of the SP286 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

379. Currently known reputation in the community is that the SP286 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

380. Public motor vehicle use of the SP286 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

381. The SP286 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

382. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP286 Road.

383. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP286 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP289 Road

384. The SP289 Road is designated as county road number SPVM0289 and SGID road identification number RD200548 and is more or less .39 miles long.

385. Exhibit 27 (attached hereto and incorporated herein) contains certain information pertaining to the SP289 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

386. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP289 Road solely as it crosses United States public land as included and specifically described in Exhibit 27. The SP289 Road includes the segment of road specifically set forth in Exhibit 27 and as it exists on the ground.

Acceptance of the SP289 Road R.S. 2477 Right-of-way Prior to October 21, 1976

387. The SP289 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

388. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP289 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

389. The appearance of the SP289 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

390. The SP289 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 SP289 Road pursuant to the County's governmental right and authority.

391. Witnesses with personal knowledge of the history of the SP289 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

392. Currently known reputation in the community is that the SP289 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

393. Public motor vehicle use of the SP289 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

394. The SP289 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

395. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP289 Road.

396. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP289 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP290 Road

397. The SP290 Road is designated as county road number SPVM0290 and SGID road identification number RD200550 and is more or less .75 miles long.

398. Exhibit 28 (attached hereto and incorporated herein) contains certain information pertaining to the SP290 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

399. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP290 Road solely as it crosses United States public land as included and specifically described in Exhibit 28. The SP290 Road includes the segment of road specifically set forth in Exhibit 28 and as it exists on the ground.

Acceptance of the SP290 Road R.S. 2477 Right-of-way Prior to October 21, 1976

400. The SP290 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

401. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP290 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

402. The appearance of the SP290 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

403. The County confirmed its acceptance of the SP275 Road by 1974, 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 SP290 Road pursuant to the County's governmental right and authority.

404. Witnesses with personal knowledge of the history of the SP290 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

405. Currently known reputation in the community is that the SP290 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

406. Public motor vehicle use of the SP290 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

407. The SP290 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

408. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP290 Road.

409. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP290 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP293 Road

410. The SP293 Road is designated as county road number SPVM0293 and SGID road identification number RD200553 and is more or less 2.74 miles long.

411. Exhibit 29 (attached hereto and incorporated herein) contains certain information pertaining to the SP293 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

412. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP293 Road solely as it crosses United States public land as included and specifically described in Exhibit 29. The SP293 Road includes the segment of road specifically set forth in Exhibit 29 and as it exists on the ground.

Acceptance of the SP293 Road R.S. 2477 Right-of-way Prior to October 21, 1976

413. The SP293 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

414. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP293 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

415. The appearance of the SP293 Road on the Sterling (1966) and Manti (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

416. The SP293 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 SP293 Road pursuant to the County's governmental right and authority.

417. Witnesses with personal knowledge of the history of the SP293 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

418. Currently known reputation in the community is that the SP293 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

419. Public motor vehicle use of the SP293 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

420. The SP293 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

421. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP293 Road.

422. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP293 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP294 Road

423. The SP294 Road is designated as county road number SPVM0294 and SGID road identification number RD200555 and is more or less 1.93 miles long.

424. Exhibit 30 (attached hereto and incorporated herein) contains certain information pertaining to the SP294 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

425. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP294 Road solely as it crosses United States public land as included and

specifically described in Exhibit 30. The SP294 Road includes the segment of road specifically set forth in Exhibit 30 and as it exists on the ground.

Acceptance of the SP294 Road R.S. 2477 Right-of-way Prior to October 21, 1976

426. The SP294 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

427. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP294 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

428. The appearance of the SP294 Road on the Sterling (1966) and Manti (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

429. The SP294 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 SP294 Road pursuant to the County's governmental right and authority.

430. Witnesses with personal knowledge of the history of the SP294 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

431. Currently known reputation in the community is that the SP294 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

432. Public motor vehicle use of the SP294 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

433. The SP294 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

434. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP294 Road.

435. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP294 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP294a Road

436. The SP294a Road is designated as county road number SPVM0294a and SGID road identification number RD200556 and is more or less .48 miles long.

437. Exhibit 31 (attached hereto and incorporated herein) contains certain information pertaining to the SP294a Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

438. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP294a Road solely as it crosses United States public land as included and specifically described in Exhibit 31. The SP294a Road includes the segment of road specifically set forth in Exhibit 31 and as it exists on the ground.

Acceptance of the SP294a Road R.S. 2477 Right-of-way Prior to October 21, 1976

439. The SP294a 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP294a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

441. The appearance of the SP294a Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

442. The SP294a 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 SP294a Road pursuant to the County's governmental right and authority.

443. Witnesses with personal knowledge of the history of the SP294a Road confirm public use of this road as a public 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 SP294a Road has been open for all to come 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 SP294a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

446. The SP294a 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 SP294a Road.

448. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP294a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP295 Road

449. The SP295 Road is designated as county road number SPVM0295 and SGID road identification number RD200558 and is more or less 2.21 miles long.

450. Exhibit 32 (attached hereto and incorporated herein) contains certain information pertaining to the SP295 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

451. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP295 Road solely as it crosses United States public land as included and specifically described in Exhibit 32. The SP295 Road includes the segment of road specifically set forth in Exhibit 32 and as it exists on the ground.

Acceptance of the SP295 Road R.S. 2477 Right-of-way Prior to October 21, 1976

452. The SP295 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

453. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP295 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

454. The appearance of the SP295 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

455. The SP295 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 SP295 Road pursuant to the County's governmental right and authority.

456. Witnesses with personal knowledge of the history of the SP295 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

457. Currently known reputation in the community is that the SP295 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

458. Public motor vehicle use of the SP295 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

459. The SP295 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

460. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP295 Road.

461. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP295 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP311 Road

462. The SP311 Road is designated as county road number SPVM0311 and SGID road identification number RD200568 and is more or less .28 miles long.

463. Exhibit 33 (attached hereto and incorporated herein) contains certain information pertaining to the SP311 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

464. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP311 Road solely as it crosses United States public land as included and specifically described in Exhibit 33. The SP311 Road includes the segment of road specifically set forth in Exhibit 33 and as it exists on the ground.

Acceptance of the SP311 Road R.S. 2477 Right-of-way Prior to October 21, 1976

465. The SP311 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

466. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP311 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

467. The appearance of the SP311 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

468. The SP311 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 SP311 Road pursuant to the County's governmental right and authority.

469. Witnesses with personal knowledge of the history of the SP311 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

470. Currently known reputation in the community is that the SP311 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

471. Public motor vehicle use of the SP311 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

472. The SP311 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

473. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP311 Road.

474. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP311 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP315 Road

475. The SP315 Road is designated as county road number SPVM0315 and SGID road identification number RD200571 and is more or less 1.72 miles long.

476. Exhibit 34 (attached hereto and incorporated herein) contains certain information pertaining to the SP315 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

477. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP315 Road solely as it crosses United States public land as included and specifically described in Exhibit 34. The SP315 Road includes the segment of road specifically set forth in Exhibit 34 and as it exists on the ground.

Acceptance of the SP315 Road R.S. 2477 Right-of-way Prior to October 21, 1976

478. The SP315 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

479. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP315 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

480. The appearance of the SP315 Road on the Sterling (1966) and Gunnison (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

481. The SP315 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 SP315 Road pursuant to the County's governmental right and authority.

482. Witnesses with personal knowledge of the history of the SP315 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

483. Currently known reputation in the community is that the SP315 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

484. Public motor vehicle use of the SP315 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

485. The SP315 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

486. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP315 Road.

487. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP315 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP315a Road

488. The SP315a Road is designated as county road number SPVM0315a and SGID road identification number RD200572 and is more or less .46 miles long.

489. Exhibit 35 (attached hereto and incorporated herein) contains certain information pertaining to the SP315a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

490. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP315a Road solely as it crosses United States public land as included and specifically described in Exhibit 35. The SP315a Road includes the segment of road specifically set forth in Exhibit 35 and as it exists on the ground.

Acceptance of the SP315a Road R.S. 2477 Right-of-way Prior to October 21, 1976

491. The SP315a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

492. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP315a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

493. The appearance of the SP315a Road on the Sterling (1966) and Gunnison (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

494. The SP315a 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 SP315a Road pursuant to the County's governmental right and authority.

495. Witnesses with personal knowledge of the history of the SP315a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

496. Currently known reputation in the community is that the SP315a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

497. Public motor vehicle use of the SP315a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

498. The SP315a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

499. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP315a Road.

500. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP315a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP317 Road

501. The SP317 Road is designated as county road number SPVM0317 and SGID road identification number RD200574 and is more or less .73 miles long.

502. Exhibit 36 (attached hereto and incorporated herein) contains certain information pertaining to the SP317 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

503. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP317 Road solely as it crosses United States public land as included and specifically described in Exhibit 36. The SP317 Road includes the segment of road specifically set forth in Exhibit 36 and as it exists on the ground.

Acceptance of the SP317 Road R.S. 2477 Right-of-way Prior to October 21, 1976

504. The SP317 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

505. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP317 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

506. The appearance of the SP317 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

507. The SP317 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 SP317 Road pursuant to the County's governmental right and authority.

508. Witnesses with personal knowledge of the history of the SP317 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

509. Currently known reputation in the community is that the SP317 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

510. Public motor vehicle use of the SP317 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

511. The SP317 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

512. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP317 Road.

513. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP317 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP316 Road

514. The SP316 Road is designated as county road number SPVM316 and SGID road identification number RD200714 and is more or less .36 miles long.

515. Exhibit 37 (attached hereto and incorporated herein) contains certain information pertaining to the SP316 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

516. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP316 Road solely as it crosses United States public land as included and

specifically described in Exhibit 37. The SP316 Road includes the segment of road specifically set forth in Exhibit 37 and as it exists on the ground.

Acceptance of the SP316 Road R.S. 2477 Right-of-way Prior to October 21, 1976

517. The SP316 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

518. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP316 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

519. The appearance of the SP316 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

520. The SP316 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 SP316 Road pursuant to the County's governmental right and authority.

521. Witnesses with personal knowledge of the history of the SP316 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

522. Currently known reputation in the community is that the SP316 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

523. Public motor vehicle use of the SP316 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

524. The SP316 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

525. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP316 Road.

526. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP316 Road on lands owned 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
BIG HOLLOW AREA

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

528. The Big Hollow Area is located in northeastern Sanpete County. *See* Exhibit 4.

529. The Big Hollow Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Apple Tree Road, Sanp99: (2) Big Hollow Road, Sanp13; (3) Old 132 Road, Sanp166; (4) Water Hollow Road, Sanp14; (5) SP4 Road; (6)

SP469 Road; (7) SP473 Road; (8) SP474 Road; (9) SP476 Road; (10) SP477 Road; (11) SP478 Road; (12) SP479 Road; (13) SP480 Road; (14) SP481 Road; (15) SP482 Road; (16) SP484 Road; (17) SP485 Road; (18) SP486 Road; (19) SP489 Road; (20) SP490 Road; (21) SP493 Road; (22) SP494 Road; (23) SP496 Road; (24) SP499 Road; (25) SP504 Road; (26) SP507 Road; (27) SP511 Road; and (28) SP503 Road.

530. Each right-of-way claimed in the Big 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.

531. All rights-of-way claimed in the Big 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.

532. All rights-of-way claimed in the Big 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).

533. Prior to October 21, 1976, the State of Utah, Sanpete County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the

entire length and course of all roads as described herein, on public lands owned by the United States.

Apple Tree Road, Sanp99

534. The Apple Tree Road is designated as county road number Sanp99 and SGID road identification number RD200287 and is more or less 3.37 miles long.

535. Exhibit 38 (attached hereto and incorporated herein) contains certain information pertaining to the Apple Tree Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

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

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

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

538. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Apple Tree Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

539. The appearance of the Apple Tree Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

540. The County confirmed its acceptance of the Apple Tree Road by 1974, 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 Apple Tree Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

546. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Apple Tree Road on lands owned 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 Hollow Road, Sanp13

547. The Big Hollow Road is designated as county road number Sanp13 and SGID road identification number RD200034 and is more or less 14.10 miles long.

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

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

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

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

551. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Big Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

552. The appearance of the Big Hollow Road on the Moroni (1951) USGS 15 minute, and Indianola (1967) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

553. The County confirmed its acceptance of the Big Hollow Road by 1974, 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 Big Hollow Road using public funds pursuant to the County's governmental right and authority.

554. Witnesses with personal knowledge of the history of the Big 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.

555. Currently known reputation in the community is that the Big 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.

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

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

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

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

Old 132 Road, Sanp166

560. The Old 132 Road is designated as county road number Sanp166 and SGID road identification number RD200074 and is more or less 5.04 miles long.

561. Exhibit 40 (attached hereto and incorporated herein) contains certain information pertaining to the Old 132 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

562. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old 132 Road solely as it crosses United States public land as included and specifically described in Exhibit 40. The Old 132 Road includes the segment of road specifically set forth in Exhibit 40 and as it exists on the ground.

Acceptance of the Old 132 Road R.S. 2477 Right-of-way Prior to October 21, 1976

563. The Old 132 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

564. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Old 132 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

565. The appearance of the Old 132 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

566. The County confirmed its acceptance of the Old 132 Road by 1974, 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 132 Road using public funds pursuant to the County's governmental right and authority.

567. Witnesses with personal knowledge of the history of the Old 132 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

568. Currently known reputation in the community is that the Old 132 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

569. Public motor vehicle use of the Old 132 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

570. The Old 132 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

571. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 132 Road.

572. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old 132 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Water Hollow Road, Sanp14

573. The Water Hollow Road is designated as county road number Sanp14 and SGID road identification number RD200045 and is more or less 9.01 miles long.

574. Exhibit 41 (attached hereto and incorporated herein) contains certain information pertaining to the Water Hollow Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

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

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

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

577. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Water Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

578. The appearance of the Water Hollow Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

579. The County confirmed its acceptance of the Water Hollow Road by 1974, 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 Water Hollow Road using public funds pursuant to the County's governmental right and authority.

580. Witnesses with personal knowledge of the history of the Water 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.

581. Currently known reputation in the community is that the Water 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.

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

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

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

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

SP4 Road

586. The SP4 Road is designated as county road number SPMV4 and SGID road identification number RD200324 and is more or less 4.32 miles long.

587. Exhibit 42 (attached hereto and incorporated herein) contains certain information pertaining to the SP4 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

588. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP4 Road solely as it crosses United States public land as included and specifically described in Exhibit 42. The SP4 Road includes the segment of road specifically set forth in Exhibit 42 and as it exists on the ground.

Acceptance of the SP4 Road R.S. 2477 Right-of-way Prior to October 21, 1976

589. The SP4 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

590. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP4 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

591. The appearance of the SP4 Road on the Spencer Canyon (1979) USGS 7.5 minute and Santaquin Peak (1952) USGS 15-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

592. The County confirmed its acceptance of the Water Hollow Road by 1974, 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 SP4 Road pursuant to the County's governmental right and authority.

593. Witnesses with personal knowledge of the history of the SP4 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

594. Currently known reputation in the community is that the SP4 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

595. Public motor vehicle use of the SP4 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

596. The SP4 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

597. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP4 Road.

598. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP4 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP469 Road

599. The SP469 Road is designated as county road number SPVM0469 and SGID road identification number RD200658 and is more or less 2.54 miles long.

600. Exhibit 43 (attached hereto and incorporated herein) contains certain information pertaining to the SP469 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

601. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP469 Road solely as it crosses United States public land as included and specifically described in Exhibit 43. The SP469 Road includes the segment of road specifically set forth in Exhibit 43 and as it exists on the ground.

Acceptance of the SP469 Road R.S. 2477 Right-of-way Prior to October 21, 1976

602. The SP469 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 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP469 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

604. The appearance of the SP469 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

605. The SP469 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 SP469 Road pursuant to the County's governmental right and authority.

606. Witnesses with personal knowledge of the history of the SP469 Road confirm public use of this road as a public 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 SP469 Road has been open for all to come 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 SP469 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

609. The SP469 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 SP469 Road.

611. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP469 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP473 Road

612. The SP473 Road is designated as county road number SPVM0473 and SGID road identification number RD200659 and is more or less 4.97 miles long.

613. Exhibit 44 (attached hereto and incorporated herein) contains certain information pertaining to the SP473 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

614. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP473 Road solely as it crosses United States public land as included and specifically described in Exhibit 44. The SP473 Road includes the segment of road specifically set forth in Exhibit 44 and as it exists on the ground.

Acceptance of the SP473 Road R.S. 2477 Right-of-way Prior to October 21, 1976

615. The SP473 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

616. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP473 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

617. The appearance of the SP473 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

618. The SP473 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 SP473 Road pursuant to the County's governmental right and authority.

619. Witnesses with personal knowledge of the history of the SP473 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

620. Currently known reputation in the community is that the SP473 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

621. Public motor vehicle use of the SP473 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

622. The SP473 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

623. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP473 Road.

624. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP473 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP474 Road

625. The SP474 Road is designated as county road number SPVM0474 and SGID road identification number RD200660 and is more or less 1.66 miles long.

626. Exhibit 45 (attached hereto and incorporated herein) contains certain information pertaining to the SP474 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

627. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP474 Road solely as it crosses United States public land as included and

specifically described in Exhibit 45. The SP474 Road includes the segment of road specifically set forth in Exhibit 45 and as it exists on the ground.

Acceptance of the SP474 Road R.S. 2477 Right-of-way Prior to October 21, 1976

628. The SP474 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

629. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP474 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

630. The SP474 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 SP474 Road pursuant to the County's governmental right and authority.

631. Witnesses with personal knowledge of the history of the SP474 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

632. Currently known reputation in the community is that the SP474 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

633. Public motor vehicle use of the SP474 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

634. The SP474 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

635. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP474 Road.

636. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP474 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP476 Road

637. The SP476 Road is designated as county road number SPVM0476 and SGID road identification number RD200661 and is more or less .75 miles long.

638. Exhibit 46 (attached hereto and incorporated herein) contains certain information pertaining to the SP476 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

639. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP476 Road solely as it crosses United States public land as included and specifically described in Exhibit 46. The SP476 Road includes the segment of road specifically set forth in Exhibit 46 and as it exists on the ground.

Acceptance of the SP476 Road R.S. 2477 Right-of-way Prior to October 21, 1976

640. The SP476 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

641. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP476 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

642. The SP476 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 SP476 Road pursuant to the County's governmental right and authority.

643. Witnesses with personal knowledge of the history of the SP476 Road confirm public use of this road as a public 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 SP476 Road has been open for all to come 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 SP476 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

646. The SP476 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 SP476 Road.

648. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP476 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP477 Road

649. The SP477 Road is designated as county road number SPVM0477 and SGID road identification number RD200662 and is more or less 1.41 miles long.

650. Exhibit 47 (attached hereto and incorporated herein) contains certain information pertaining to the SP477 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

651. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP477 Road solely as it crosses United States public land as included and specifically described in Exhibit 47. The SP477 Road includes the segment of road specifically set forth in Exhibit 47 and as it exists on the ground.

Acceptance of the SP477 Road R.S. 2477 Right-of-way Prior to October 21, 1976

652. The SP477 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

653. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP477 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

654. The SP477 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 SP477 Road pursuant to the County's governmental right and authority.

655. Witnesses with personal knowledge of the history of the SP477 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

656. Currently known reputation in the community is that the SP477 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

657. Public motor vehicle use of the SP477 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

658. The SP477 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

659. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP477 Road.

660. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP477 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP478 Road

661. The SP478 Road is designated as county road number SPVM0478 and SGID road identification number RD200663 and is more or less .49 miles long.

662. Exhibit 48 (attached hereto and incorporated herein) contains certain information pertaining to the SP478 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

663. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP478 Road solely as it crosses United States public land as included and specifically described in Exhibit 48. The SP478 Road includes the segment of road specifically set forth in Exhibit 48 and as it exists on the ground.

Acceptance of the SP478 Road R.S. 2477 Right-of-way Prior to October 21, 1976

664. The SP478 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

665. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP478 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

666. The SP478 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 SP478 Road pursuant to the County's governmental right and authority.

667. Witnesses with personal knowledge of the history of the SP478 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

668. Currently known reputation in the community is that the SP478 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

669. Public motor vehicle use of the SP478 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

670. The SP478 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

671. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP478 Road.

672. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP478 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP479 Road

673. The SP479 Road is designated as county road number SPVM0479 and SGID road identification number RD200664 and is more or less 1.28 miles long.

674. Exhibit 49 (attached hereto and incorporated herein) contains certain information pertaining to the SP479 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

675. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP479 Road solely as it crosses United States public land as included and specifically described in Exhibit 49. The SP479 Road includes the segment of road specifically set forth in Exhibit 49 and as it exists on the ground.

Acceptance of the SP479 Road R.S. 2477 Right-of-way Prior to October 21, 1976

676. The SP479 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

677. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP479 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

678. The SP479 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 SP479 Road pursuant to the County's governmental right and authority.

679. Witnesses with personal knowledge of the history of the SP479 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

680. Currently known reputation in the community is that the SP479 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

681. Public motor vehicle use of the SP479 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

682. The SP479 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

683. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP479 Road.

684. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP479 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP480 Road

685. The SP480 Road is designated as county road number SPVM0480 and SGID road identification number RD200665 and is more or less .74 miles long.

686. Exhibit 50 (attached hereto and incorporated herein) contains certain information pertaining to the SP480 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

687. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP480 Road solely as it crosses United States public land as included and specifically described in Exhibit 50. The SP480 Road includes the segment of road specifically set forth in Exhibit 50 and as it exists on the ground.

Acceptance of the SP480 Road R.S. 2477 Right-of-way Prior to October 21, 1976

688. The SP480 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

689. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP480 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

690. The SP480 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 SP480 Road pursuant to the County's governmental right and authority.

691. Witnesses with personal knowledge of the history of the SP480 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

692. Currently known reputation in the community is that the SP480 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

693. Public motor vehicle use of the SP480 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

694. The SP480 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

695. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP480 Road.

696. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP480 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP481 Road

697. The SP481 Road is designated as county road number SPVM0481 and SGID road identification number RD200666 and is more or less .90 miles long.

698. Exhibit 51 (attached hereto and incorporated herein) contains certain information pertaining to the SP481 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

699. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP481 Road solely as it crosses United States public land as included and specifically described in Exhibit 51. The SP481 Road includes the segment of road specifically set forth in Exhibit 51 and as it exists on the ground.

Acceptance of the SP481 Road R.S. 2477 Right-of-way Prior to October 21, 1976

700. The SP481 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

701. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP481 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

702. The SP481 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 SP481 Road pursuant to the County's governmental right and authority.

703. Witnesses with personal knowledge of the history of the SP481 Road confirm public use of this road as a public 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 SP481 Road has been open for all to come 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 SP481 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

706. The SP481 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 SP481 Road.

708. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP481 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP482 Road

709. The SP482 Road is designated as county road number SPVM0482 and SGID road identification number RD200667 and is more or less 1.36 miles long.

710. Exhibit 52 (attached hereto and incorporated herein) contains certain information pertaining to the SP482 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

711. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP482 Road solely as it crosses United States public land as included and specifically described in Exhibit 52. The SP482 Road includes the segment of road specifically set forth in Exhibit 52 and as it exists on the ground.

Acceptance of the SP482 Road R.S. 2477 Right-of-way Prior to October 21, 1976

712. The SP482 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

713. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP482 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

714. The appearance of the SP482 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

715. The County confirmed its acceptance of the SP482 by 1974, 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 SP482 Road pursuant to the County's governmental right and authority.

716. Witnesses with personal knowledge of the history of the SP482 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

717. Currently known reputation in the community is that the SP482 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

718. Public motor vehicle use of the SP482 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

719. The SP482 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

720. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP482 Road.

721. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP482 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP484 Road

722. The SP484 Road is designated as county road number SPVM0484 and SGID road identification number RD200669 and is more or less .26 miles long.

723. Exhibit 53 (attached hereto and incorporated herein) contains certain information pertaining to the SP484 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

724. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP484 Road solely as it crosses United States public land as included and

specifically described in Exhibit 53. The SP484 Road includes the segment of road specifically set forth in Exhibit 53 and as it exists on the ground.

Acceptance of the SP484 Road R.S. 2477 Right-of-way Prior to October 21, 1976

725. The SP484 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

726. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP484 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

727. The SP484 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 SP484 Road pursuant to the County's governmental right and authority.

728. Witnesses with personal knowledge of the history of the SP484 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

729. Currently known reputation in the community is that the SP484 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

730. Public motor vehicle use of the SP484 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

731. The SP484 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

732. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP484 Road.

733. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP484 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP485 Road

734. The SP485 Road is designated as county road number SPVM0485 and SGID road identification number RD200670 and is more or less 3.83 miles long.

735. Exhibit 54 (attached hereto and incorporated herein) contains certain information pertaining to the SP485 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

736. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP485 Road solely as it crosses United States public land as included and specifically described in Exhibit 54. The SP485 Road includes the segment of road specifically set forth in Exhibit 54 and as it exists on the ground.

Acceptance of the SP485 Road R.S. 2477 Right-of-way Prior to October 21, 1976

737. The SP485 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

738. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP485 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

739. The appearance of the SP485 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

740. The County confirmed its acceptance of the SP485 by 1974, 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 SP485 Road pursuant to the County's governmental right and authority.

741. Witnesses with personal knowledge of the history of the SP485 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

742. Currently known reputation in the community is that the SP485 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

743. Public motor vehicle use of the SP485 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

744. The SP485 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

745. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP485 Road.

746. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP485 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP486 Road

747. The SP486 Road is designated as county road number SPVM0486 and SGID road identification number RD200671 and is more or less 1.90 miles long.

748. Exhibit 55 (attached hereto and incorporated herein) contains certain information pertaining to the SP486 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

749. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP486 Road solely as it crosses United States public land as included and

specifically described in Exhibit 55. The SP486 Road includes the segment of road specifically set forth in Exhibit 55 and as it exists on the ground.

Acceptance of the SP486 Road R.S. 2477 Right-of-way Prior to October 21, 1976

750. The SP486 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

751. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP486 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

752. The appearance of the SP486 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

753. The SP486 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 SP486 Road pursuant to the County's governmental right and authority.

754. Witnesses with personal knowledge of the history of the SP486 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

755. Currently known reputation in the community is that the SP486 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

756. Public motor vehicle use of the SP486 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

757. The SP486 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

758. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP486 Road.

759. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP486 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP489 Road

760. The SP489 Road is designated as county road number SPVM0489 and SGID road identification number RD200674 and is more or less 1.24 miles long.

761. Exhibit 56 (attached hereto and incorporated herein) contains certain information pertaining to the SP489 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

762. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP489 Road solely as it crosses United States public land as included and specifically described in Exhibit 56. The SP489 Road includes the segment of road specifically set forth in Exhibit 56 and as it exists on the ground.

Acceptance of the SP489 Road R.S. 2477 Right-of-way Prior to October 21, 1976

763. The SP489 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

764. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP489 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

765. The appearance of the SP489 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

766. The SP489 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 SP489 Road pursuant to the County's governmental right and authority.

767. Witnesses with personal knowledge of the history of the SP489 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

768. Currently known reputation in the community is that the SP489 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

769. Public motor vehicle use of the SP489 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

770. The SP489 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

771. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP489 Road.

772. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP489 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP490 Road

773. The SP490 Road is designated as county road number SPVM0490 and SGID road identification number RD200675 and is more or less 2.60 miles long.

774. Exhibit 57 (attached hereto and incorporated herein) contains certain information pertaining to the SP490 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

775. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP490 Road solely as it crosses United States public land as included and specifically described in Exhibit 57. The SP490 Road includes the segment of road specifically set forth in Exhibit 57 and as it exists on the ground.

Acceptance of the SP490 Road R.S. 2477 Right-of-way Prior to October 21, 1976

776. The SP490 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

777. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP490 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

778. The appearance of the SP490 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

779. The SP490 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 SP490 Road pursuant to the County's governmental right and authority.

780. Witnesses with personal knowledge of the history of the SP490 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

781. Currently known reputation in the community is that the SP490 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

782. Public motor vehicle use of the SP490 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

783. The SP490 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

784. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP490 Road.

785. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP490 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP493 Road

786. The SP493 Road is designated as county road number SPVM0493 and SGID road identification number RD200678 and is more or less .99 miles long.

787. Exhibit 58 (attached hereto and incorporated herein) contains certain information pertaining to the SP493 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

788. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP493 Road solely as it crosses United States public land as included and specifically described in Exhibit 58. The SP493 Road includes the segment of road specifically set forth in Exhibit 58 and as it exists on the ground.

Acceptance of the SP493 Road R.S. 2477 Right-of-way Prior to October 21, 1976

789. The SP493 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

790. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP493 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

791. The appearance of the SP493 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

792. The County confirmed its acceptance of the SP493 by 1974, 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 SP493 Road pursuant to the County's governmental right and authority.

793. Witnesses with personal knowledge of the history of the SP493 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

794. Currently known reputation in the community is that the SP493 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

795. Public motor vehicle use of the SP493 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

796. The SP493 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

797. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP493 Road.

798. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP493 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP494 Road

799. The SP494 Road is designated as county road number SPVM0494 and SGID road identification number RD200679 and is more or less .82 miles long.

800. Exhibit 59 (attached hereto and incorporated herein) contains certain information pertaining to the SP494 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

801. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP494 Road solely as it crosses United States public land as included and specifically described in Exhibit 59. The SP494 Road includes the segment of road specifically set forth in Exhibit 59 and as it exists on the ground.

Acceptance of the SP494 Road R.S. 2477 Right-of-way Prior to October 21, 1976

802. The SP494 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

803. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP494 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

804. The appearance of the SP494 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

805. The County confirmed its acceptance of the SP494 by 1974, 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 SP494 Road pursuant to the County's governmental right and authority.

806. Witnesses with personal knowledge of the history of the SP494 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

807. Currently known reputation in the community is that the SP494 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

808. Public motor vehicle use of the SP494 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

809. The SP494 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

810. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP494 Road.

811. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP494 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP496 Road

812. The SP496 Road is designated as county road number SPVM0496 and SGID road identification number RD200680 and is more or less .63 miles long.

813. Exhibit 60 (attached hereto and incorporated herein) contains certain information pertaining to the SP496 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

814. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP496 Road solely as it crosses United States public land as included and specifically described in Exhibit 60. The SP496 Road includes the segment of road specifically set forth in Exhibit 60 and as it exists on the ground.

Acceptance of the SP496 Road R.S. 2477 Right-of-way Prior to October 21, 1976

815. The SP496 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

816. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP496 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

817. The appearance of the SP496 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

818. The County confirmed its acceptance of the SP496 by 1974, 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 SP496 Road pursuant to the County's governmental right and authority.

819. Witnesses with personal knowledge of the history of the SP496 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

820. Currently known reputation in the community is that the SP496 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

821. Public motor vehicle use of the SP496 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

822. The SP496 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

823. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP496 Road.

824. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP496 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP499 Road

825. The SP499 Road is designated as county road number SPVM0499 and SGID road identification number RD200683 and is more or less .42 miles long.

826. Exhibit 61 (attached hereto and incorporated herein) contains certain information pertaining to the SP499 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

827. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP499 Road solely as it crosses United States public land as included and specifically described in Exhibit 61. The SP499 Road includes the segment of road specifically set forth in Exhibit 61 and as it exists on the ground.

Acceptance of the SP499 Road R.S. 2477 Right-of-way Prior to October 21, 1976

828. The SP499 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

829. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP499 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

830. The appearance of the SP499 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

831. The County confirmed its acceptance of the SP499 by 1974, 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 SP499 Road pursuant to the County's governmental right and authority.

832. Witnesses with personal knowledge of the history of the SP499 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

833. Currently known reputation in the community is that the SP499 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

834. Public motor vehicle use of the SP499 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

835. The SP499 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

836. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP499 Road.

837. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP499 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP504 Road

838. The SP504 Road is designated as county road number SPVM0504 and SGID road identification number RD200685 and is more or less .65 miles long.

839. Exhibit 62 (attached hereto and incorporated herein) contains certain information pertaining to the SP504 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

840. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP504 Road solely as it crosses United States public land as included and

specifically described in Exhibit 62. The SP504 Road includes the segment of road specifically set forth in Exhibit 62 and as it exists on the ground.

Acceptance of the SP504 Road R.S. 2477 Right-of-way Prior to October 21, 1976

841. The SP504 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

842. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP504 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

843. The appearance of the SP504 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

844. The County confirmed its acceptance of the SP504 by 1974, 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 SP504 Road pursuant to the County's governmental right and authority.

845. Witnesses with personal knowledge of the history of the SP504 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

846. Currently known reputation in the community is that the SP504 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

847. Public motor vehicle use of the SP504 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

848. The SP504 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

849. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP504 Road.

850. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP504 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP507 Road

851. The SP507 Road is designated as county road number SPVM0507 and SGID road identification number RD200687 and is more or less .17 miles long.

852. Exhibit 63 (attached hereto and incorporated herein) contains certain information pertaining to the SP507 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

853. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP507 Road solely as it crosses United States public land as included and specifically described in Exhibit 63. The SP507 Road includes the segment of road specifically set forth in Exhibit 63 and as it exists on the ground.

Acceptance of the SP507 Road R.S. 2477 Right-of-way Prior to October 21, 1976

854. The SP507 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

855. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP507 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

856. The appearance of the SP507 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

857. The County confirmed its acceptance of the SP507 by 1974, 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 SP504 Road pursuant to the County's governmental right and authority.

858. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, or improving the SP507 Road pursuant to the County's governmental right and authority.

859. Witnesses with personal knowledge of the history of the SP507 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

860. Currently known reputation in the community is that the SP507 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

861. Public motor vehicle use of the SP507 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

862. The SP507 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

863. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP507 Road.

864. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP507 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP511 Road

865. The SP511 Road is designated as county road number SPVM0511 and SGID road identification number RD200688 and is more or less 1.23 miles long.

866. Exhibit 64 (attached hereto and incorporated herein) contains certain information pertaining to the SP511 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

867. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP511 Road solely as it crosses United States public land as included and specifically described in Exhibit 64. The SP511 Road includes the segment of road specifically set forth in Exhibit 64 and as it exists on the ground.

Acceptance of the SP511 Road R.S. 2477 Right-of-way Prior to October 21, 1976

868. The SP511 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

869. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP511 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

870. The SP511 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 SP511 Road pursuant to the County's governmental right and authority.

871. Witnesses with personal knowledge of the history of the SP511 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

872. Currently known reputation in the community is that the SP511 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

873. Public motor vehicle use of the SP511 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

874. The SP511 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

875. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP511 Road.

876. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP511 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP503 Road

877. The SP503 Road is designated as county road number SPVM503 and SGID road identification number RD200719 and is more or less .76 miles long.

878. Exhibit 65 (attached hereto and incorporated herein) contains certain information pertaining to the SP503 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

879. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP503 Road solely as it crosses United States public land as included and specifically described in Exhibit 65. The SP503 Road includes the segment of road specifically set forth in Exhibit 65 and as it exists on the ground.

Acceptance of the SP503 Road R.S. 2477 Right-of-way Prior to October 21, 1976

880. The SP503 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

881. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP503 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

882. The appearance of the SP503 Road on the Moroni (1951) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

883. The SP503 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 SP503 Road pursuant to the County's governmental right and authority.

884. Witnesses with personal knowledge of the history of the SP503 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

885. Currently known reputation in the community is that the SP503 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

886. Public motor vehicle use of the SP503 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

887. The SP503 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

888. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP503 Road.

889. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP503 Road on lands owned 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
FLAT CANYON AREA

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

891. The Flat Canyon Area is located in central and eastern portion of Sanpete County. *See* Exhibit 5.

892. The Flat Canyon Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Flat Canyon Road, Sanp17; (2) Yuba Lake Road, Sanp210; (3) SP05 Road; (4) SP389 Road; (5) SP390 Road; (6) SP391 Road; (7) SP394 Road; (8) SP396 Road; (9) SP397 Road; (10) SP399 Road; (11) SP400 Road; (12) SP403 Road; (13) SP404 Road; (14) SP405 Road; (15) SP406 Road; (16) SP410 Road; (17) SP412 Road; (18) SP516 Road; (19) SP518 Road; (20) SP519 Road; (21) SP522 Road; (22) SP524 Road; (23) SP525 Road; (24) SP527 Road; (25) SP527a Road; (26) SP528 Road; (27) SP530 Road; (28) SP531 Road; (29) SP533a Road; (30) SP534 Road; (31) SP536 Road; (32) SP537 Road; and (33) SP538 Road.

893. Each right-of-way claimed in the Flat 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.

894. All rights-of-way claimed in the Flat 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.

895. All rights-of-way claimed in the Flat 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).

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

Flat Canyon Road, Sanp17

897. The Flat Canyon Road is designated as county road number Sanp17 and SGID road identification number RD200078 and is more or less 4.58 miles long.

898. Exhibit 66 (attached hereto and incorporated herein) contains certain information pertaining to the Flat Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

899. In this action, the State and County seek to quiet title to the public highway right-of-way for the Flat Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 66. The Flat Canyon Road includes the segment of road specifically set forth in Exhibit 66 and as it exists on the ground.

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

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

901. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Flat Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

902. The appearance of the Flat Canyon Road on the Hells Kitchen Canyon SW (1965), and Skinner Peaks (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

903. The County confirmed its acceptance of the Flat Canyon Road by 1974, 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 Flat Canyon Road using public funds pursuant to the County's governmental right and authority.

904. Witnesses with personal knowledge of the history of the Flat 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.

905. Currently known reputation in the community is that the Flat 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.

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

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

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

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

Yuba Lake Road Sanp210

910. The Yuba Lake Road is designated as county road number Sanp210 and SGID road identification number RD200124 and is more or less 1.69 miles long.

911. Exhibit 67 (attached hereto and incorporated herein) contains certain information pertaining to the Yuba Lake Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

912. In this action, the State and County seek to quiet title to the public highway right-of-way for the Yuba Lake Road solely as it crosses United States public land as included and specifically described in Exhibit 67. The Yuba Lake Road includes the segment of road specifically set forth in Exhibit 67 and as it exists on the ground.

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

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

914. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Yuba Lake Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

915. The appearance of the Yuba Lake Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

916. The County confirmed its acceptance of the Yuba Lake Road by 1974, 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 Yuba Lake Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

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

SP05 Road

923. The SP05 Road is designated as county road number SPMV5 and SGID road identification number RD200325 and is more or less .21 miles long.

924. Exhibit 68 (attached hereto and incorporated herein) contains certain information pertaining to the SP05 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

925. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP05 Road solely as it crosses United States public land as included and specifically described in Exhibit 68. The SP05 Road includes the segment of road specifically set forth in Exhibit 68 and as it exists on the ground.

Acceptance of the SP05 Road R.S. 2477 Right-of-way Prior to October 21, 1976

926. The SP05 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

927. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP05 Road as a public highway located on the land at

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

928. The appearance of the SP05 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

929. The SP05 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 SP05 Road pursuant to the County's governmental right and authority.

930. Witnesses with personal knowledge of the history of the SP05 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

931. Currently known reputation in the community is that the SP05 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

932. Public motor vehicle use of the SP05 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

933. The SP05 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

934. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP05 Road.

935. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP05 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP389 Road

936. The SP389 Road is designated as county road number SPVM0389 and SGID road identification number RD200603 and is more or less 1.15 miles long.

937. Exhibit 69 (attached hereto and incorporated herein) contains certain information pertaining to the SP389 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

938. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP389 Road solely as it crosses United States public land as included and specifically described in Exhibit 69. The SP389 Road includes the segment of road specifically set forth in Exhibit 69 and as it exists on the ground.

Acceptance of the SP389 Road R.S. 2477 Right-of-way Prior to October 21, 1976

939. The SP389 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

940. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP389 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

941. The appearance of the SP389 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

942. The SP389 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 SP389 Road pursuant to the County's governmental right and authority.

943. Witnesses with personal knowledge of the history of the SP389 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

944. Currently known reputation in the community is that the SP389 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

945. Public motor vehicle use of the SP389 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

946. The SP389 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

947. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP389 Road.

948. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP389 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP390 Road

949. The SP390 Road is designated as county road number SPVM0390 and SGID road identification number RD200604 and is more or less 1.66 miles long.

950. Exhibit 70 (attached hereto and incorporated herein) contains certain information pertaining to the SP390 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

951. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP390 Road solely as it crosses United States public land as included and specifically described in Exhibit 70. The SP390 Road includes the segment of road specifically set forth in Exhibit 70 and as it exists on the ground.

Acceptance of the SP390 Road R.S. 2477 Right-of-way Prior to October 21, 1976

952. The SP390 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

953. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP390 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

954. The appearance of the SP390 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

955. The County confirmed its acceptance of the SP390 by 1974, 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 SP390 Road pursuant to the County's governmental right and authority.

956. Witnesses with personal knowledge of the history of the SP390 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

957. Currently known reputation in the community is that the SP390 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

958. Public motor vehicle use of the SP390 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

959. The SP390 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

960. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP390 Road.

961. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP390 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP391 Road

962. The SP391 Road is designated as county road number SPVM0391 and SGID road identification number RD200605 and is more or less .47 miles long.

963. Exhibit 71 (attached hereto and incorporated herein) contains certain information pertaining to the SP391 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

964. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP391 Road solely as it crosses United States public land as included and

specifically described in Exhibit 71. The SP391 Road includes the segment of road specifically set forth in Exhibit 71 and as it exists on the ground.

Acceptance of the SP391 Road R.S. 2477 Right-of-way Prior to October 21, 1976

965. The SP391 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

966. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP391 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

967. The appearance of the SP391 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

968. The County confirmed its acceptance of the SP391 by 1974, 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 SP391 Road pursuant to the County's governmental right and authority.

969. Witnesses with personal knowledge of the history of the SP391 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

970. Currently known reputation in the community is that the SP391 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

971. Public motor vehicle use of the SP391 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

972. The SP391 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

973. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP391 Road.

974. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP391 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP394 Road

975. The SP394 Road is designated as county road number SPVM0394 and SGID road identification number RD200607 and is more or less .28 miles long.

976. Exhibit 72 (attached hereto and incorporated herein) contains certain information pertaining to the SP394 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

977. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP394 Road solely as it crosses United States public land as included and specifically described in Exhibit 72. The SP394 Road includes the segment of road specifically set forth in Exhibit 72 and as it exists on the ground.

Acceptance of the SP394 Road R.S. 2477 Right-of-way Prior to October 21, 1976

978. The SP394 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

979. Aerial photography from 1974and 1975confirms the historical use, existence, and acceptance of the right-of-way for the SP394 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

980. The appearance of the SP394 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

981. The SP394 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 SP394 Road pursuant to the County's governmental right and authority.

982. Witnesses with personal knowledge of the history of the SP394 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

983. Currently known reputation in the community is that the SP394 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

984. Public motor vehicle use of the SP394 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

985. The SP394 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

986. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP394 Road.

987. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP394 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP396 Road

988. The SP396 Road is designated as county road number SPVM0396 and SGID road identification number RD200608 and is more or less .26 miles long.

989. Exhibit 73 (attached hereto and incorporated herein) contains certain information pertaining to the SP396 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

990. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP396 Road solely as it crosses United States public land as included and specifically described in Exhibit 73. The SP396 Road includes the segment of road specifically set forth in Exhibit 73 and as it exists on the ground.

Acceptance of the SP396 Road R.S. 2477 Right-of-way Prior to October 21, 1976

991. The SP396 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

992. Aerial photography from 1974 and1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP396 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

993. The appearance of the SP396 Road on the Hells Kitchen Canyon SW (1965) and Hells Kitchen SE (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

994. The SP396 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 SP396 Road pursuant to the County's governmental right and authority.

995. Witnesses with personal knowledge of the history of the SP396 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

996. Currently known reputation in the community is that the SP396 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

997. Public motor vehicle use of the SP396 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

998. The SP396 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

999. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP396 Road.

1000. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP396 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP397 Road

1001. The SP397 Road is designated as county road number SPVM0397 and SGID road identification number RD200609 and is more or less .63 miles long.

1002. Exhibit 74 (attached hereto and incorporated herein) contains certain information pertaining to the SP397 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1003. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP397 Road solely as it crosses United States public land as included and specifically described in Exhibit 74. The SP397 Road includes the segment of road specifically set forth in Exhibit 74 and as it exists on the ground.

Acceptance of the SP397 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1004. The SP397 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1005. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP397 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1006. The County confirmed its acceptance of the SP397 by 1974, 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 SP397 Road pursuant to the County's governmental right and authority.

1007. Witnesses with personal knowledge of the history of the SP397 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1008. Currently known reputation in the community is that the SP397 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1009. Public motor vehicle use of the SP397 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1010. The SP397 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1011. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP397 Road.

1012. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP397 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP399 Road

1013. The SP399 Road is designated as county road number SPVM0399 and SGID road identification number RD200610 and is more or less .43 miles long.

1014. Exhibit 75 (attached hereto and incorporated herein) contains certain information pertaining to the SP399 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1015. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP399 Road solely as it crosses United States public land as included and specifically described in Exhibit 75. The SP399 Road includes the segment of road specifically set forth in Exhibit 75 and as it exists on the ground.

Acceptance of the SP399 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1016. The SP399 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP399 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1018. The appearance of the SP399 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1019. The County confirmed its acceptance of the SP399 by 1974, 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 SP399 Road pursuant to the County's governmental right and authority.

1020. Witnesses with personal knowledge of the history of the SP399 Road confirm public use of this road as a public 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 SP399 Road has been open for all to come 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 SP399 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1023. The SP399 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 SP399 Road.

1025. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP399 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP400 Road

1026. The SP400 Road is designated as county road number SPVM0400 and SGID road identification number RD200611 and is more or less .69 miles long.

1027. Exhibit 76 (attached hereto and incorporated herein) contains certain information pertaining to the SP400 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1028. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP400 Road solely as it crosses United States public land as included and specifically described in Exhibit 76. The SP400 Road includes the segment of road specifically set forth in Exhibit 76 and as it exists on the ground.

Acceptance of the SP400 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1029. The SP400 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1030. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP400 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1031. The appearance of the SP400 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1032. The SP400 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 SP400 Road pursuant to the County's governmental right and authority.

1033. Witnesses with personal knowledge of the history of the SP400 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1034. Currently known reputation in the community is that the SP400 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1035. Public motor vehicle use of the SP400 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1036. The SP400 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1037. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP400 Road.

1038. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP400 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP403 Road

1039. The SP403 Road is designated as county road number SPVM0403 and SGID road identification number RD200614 and is more or less 1.17 miles long.

1040. Exhibit 77 (attached hereto and incorporated herein) contains certain information pertaining to the SP403 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1041. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP403 Road solely as it crosses United States public land as included and specifically described in Exhibit 77. The SP403 Road includes the segment of road specifically set forth in Exhibit 77 and as it exists on the ground.

Acceptance of the SP403 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1042. The SP403 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1043. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP403 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1044. The appearance of the SP403 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1045. The SP403 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 SP403 Road pursuant to the County's governmental right and authority.

1046. Witnesses with personal knowledge of the history of the SP403 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1047. Currently known reputation in the community is that the SP403 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1048. Public motor vehicle use of the SP403 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1049. The SP403 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1050. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP403 Road.

1051. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP403 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP404 Road

1052. The SP404 Road is designated as county road number SPVM0404 and SGID road identification number RD200615 and is more or less .19 miles long.

1053. Exhibit 78 (attached hereto and incorporated herein) contains certain information pertaining to the SP404 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1054. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP404 Road solely as it crosses United States public land as included and specifically described in Exhibit 78. The SP404 Road includes the segment of road specifically set forth in Exhibit 78 and as it exists on the ground.

Acceptance of the SP404 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1055. The SP404 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1056. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP404 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1057. The appearance of the SP404 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1058. The SP404 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 SP404 Road pursuant to the County's governmental right and authority.

1059. Witnesses with personal knowledge of the history of the SP404 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1060. Currently known reputation in the community is that the SP404 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1061. Public motor vehicle use of the SP404 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1062. The SP404 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1063. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP404 Road.

1064. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP404 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP405 Road

1065. The SP405 Road is designated as county road number SPVM0405 and SGID road identification number RD200616 and is more or less 1.84 miles long.

1066. Exhibit 79 (attached hereto and incorporated herein) contains certain information pertaining to the SP405 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1067. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP405 Road solely as it crosses United States public land as included and

specifically described in Exhibit 79. The SP405 Road includes the segment of road specifically set forth in Exhibit 79 and as it exists on the ground.

Acceptance of the SP405 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1068. The SP405 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1069. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP405 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1070. The SP405 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 SP405 Road pursuant to the County's governmental right and authority.

1071. Witnesses with personal knowledge of the history of the SP405 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1072. Currently known reputation in the community is that the SP405 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1073. Public motor vehicle use of the SP405 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

1074. The SP405 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1075. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP405 Road.

1076. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP405 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP406 Road

1077. The SP406 Road is designated as county road number SPVM0406 and SGID road identification number RD200617 and is more or less 2.95 miles long.

1078. Exhibit 80 (attached hereto and incorporated herein) contains certain information pertaining to the SP406 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1079. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP406 Road solely as it crosses United States public land as included and specifically described in Exhibit 80. The SP406 Road includes the segment of road specifically set forth in Exhibit 80 and as it exists on the ground.

Acceptance of the SP406 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1080. The SP406 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1081. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP406 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1082. The appearance of the SP406 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1083. The SP406 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 SP406 Road pursuant to the County's governmental right and authority.

1084. Witnesses with personal knowledge of the history of the SP406 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1085. Currently known reputation in the community is that the SP406 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1086. Public motor vehicle use of the SP406 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1087. The SP406 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1088. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP406 Road.

1089. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP406 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP410 Road

1090. The SP410 Road is designated as county road number SPVM0410 and SGID road identification number RD200621 and is more or less 1.94 miles long.

1091. Exhibit 81 (attached hereto and incorporated herein) contains certain information pertaining to the SP410 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1092. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP410 Road solely as it crosses United States public land as included and

specifically described in Exhibit 81. The SP410 Road includes the segment of road specifically set forth in Exhibit 81 and as it exists on the ground.

Acceptance of the SP410 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1093. The SP410 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1094. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP410 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1095. The appearance of the SP410 Road on the Hells Kitchen Canyon SW (1965) and Hells Kitchen SE (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1096. The County confirmed its acceptance of the SP410 by 1974, 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 SP410 Road pursuant to the County's governmental right and authority.

1097. Witnesses with personal knowledge of the history of the SP410 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1098. Currently known reputation in the community is that the SP410 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1099. Public motor vehicle use of the SP410 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1100. The SP410 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1101. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP410 Road.

1102. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP410 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP412 Road

1103. The SP412 Road is designated as county road number SPVM0412 and SGID road identification number RD200622 and is more or less 3.22 miles long.

1104. Exhibit 82 (attached hereto and incorporated herein) contains certain information pertaining to the SP412 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1105. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP412 Road solely as it crosses United States public land as included and specifically described in Exhibit 82. The SP412 Road includes the segment of road specifically set forth in Exhibit 82 and as it exists on the ground.

Acceptance of the SP412 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1106. The SP412 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1107. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP412 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1108. The appearance of the SP412 Road on the Hells Kitchen Canyon SE (1965) and Chriss Canyon (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1109. The SP412 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 SP412 Road pursuant to the County's governmental right and authority.

1110. Witnesses with personal knowledge of the history of the SP412 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1111. Currently known reputation in the community is that the SP412 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1112. Public motor vehicle use of the SP412 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1113. The SP412 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1114. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP412 Road.

1115. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP412 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP516 Road

1116. The SP516 Road is designated as county road number SPVM0516 and SGID road identification number RD200690 and is more or less 1.44 miles long.

1117. Exhibit 83 (attached hereto and incorporated herein) contains certain information pertaining to the SP516 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1118. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP516 Road solely as it crosses United States public land as included and specifically described in Exhibit 83. The SP516 Road includes the segment of road specifically set forth in Exhibit 83 and as it exists on the ground.

Acceptance of the SP516 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1119. The SP516 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1120. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP516 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1121. The appearance of the SP516 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1122. The SP516 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 SP516 Road pursuant to the County's governmental right and authority.

1123. Witnesses with personal knowledge of the history of the SP516 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1124. Currently known reputation in the community is that the SP516 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1125. Public motor vehicle use of the SP516 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1126. The SP516 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1127. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP516 Road.

1128. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP516 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP518 Road

1129. The SP518 Road is designated as county road number SPVM0518 and SGID road identification number RD200692 and is more or less 1.63 miles long.

1130. Exhibit 84 (attached hereto and incorporated herein) contains certain information pertaining to the SP518 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1131. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP518 Road solely as it crosses United States public land as included and specifically described in Exhibit 84. The SP518 Road includes the segment of road specifically set forth in Exhibit 84 and as it exists on the ground.

Acceptance of the SP518 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1132. The SP518 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1133. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP518 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1134. The appearance of the SP518 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1135. The SP518 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 SP518 Road pursuant to the County's governmental right and authority.

1136. Witnesses with personal knowledge of the history of the SP518 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1137. Currently known reputation in the community is that the SP518 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1138. Public motor vehicle use of the SP518 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1139. The SP518 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1140. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP518 Road.

1141. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP518 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP519 Road

1142. The SP519 Road is designated as county road number SPVM0519 and SGID road identification number RD200693 and is more or less .23 miles long.

1143. Exhibit 85 (attached hereto and incorporated herein) contains certain information pertaining to the SP519 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1144. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP519 Road solely as it crosses United States public land as included and specifically described in Exhibit 85. The SP519 Road includes the segment of road specifically set forth in Exhibit 85 and as it exists on the ground.

Acceptance of the SP519 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1145. The SP519 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1146. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP519 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1147. The appearance of the SP519 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1148. The SP519 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 SP519 Road pursuant to the County's governmental right and authority.

1149. Witnesses with personal knowledge of the history of the SP519 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1150. Currently known reputation in the community is that the SP519 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1151. Public motor vehicle use of the SP519 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1152. The SP519 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1153. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP519 Road.

1154. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP519 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP522 Road

1155. The SP522 Road is designated as county road number SPVM0522 and SGID road identification number RD200695 and is more or less .51 miles long.

1156. Exhibit 86 (attached hereto and incorporated herein) contains certain information pertaining to the SP522 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1157. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP522 Road solely as it crosses United States public land as included and specifically described in Exhibit 86. The SP522 Road includes the segment of road specifically set forth in Exhibit 86 and as it exists on the ground.

Acceptance of the SP522 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1158. The SP522 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1159. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP522 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1160. The appearance of the SP522 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1161. The County confirmed its acceptance of the SP522 by 1974, 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 SP522 Road pursuant to the County's governmental right and authority.

1162. Witnesses with personal knowledge of the history of the SP522 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1163. Currently known reputation in the community is that the SP522 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1164. Public motor vehicle use of the SP522 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1165. The SP522 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1166. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP522 Road.

1167. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP522 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP524 Road

1168. The SP524 Road is designated as county road number SPVM0524 and SGID road identification number RD200697 and is more or less .56 miles long.

1169. Exhibit 87 (attached hereto and incorporated herein) contains certain information pertaining to the SP524 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1170. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP524 Road solely as it crosses United States public land as included and specifically described in Exhibit 87. The SP524 Road includes the segment of road specifically set forth in Exhibit 87 and as it exists on the ground.

Acceptance of the SP524 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1171. The SP524 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1172. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP524 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1173. The appearance of the SP524 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1174. The County confirmed its acceptance of the SP524 by 1974, 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 SP524 Road pursuant to the County's governmental right and authority.

1175. Witnesses with personal knowledge of the history of the SP524 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1176. Currently known reputation in the community is that the SP524 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1177. Public motor vehicle use of the SP524 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1178. The SP524 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1179. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP524 Road.

1180. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP524 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP525 Road

1181. The SP525 Road is designated as county road number SPVM0525 and SGID road identification number RD200698 and is more or less .34 miles long.

1182. Exhibit 88 (attached hereto and incorporated herein) contains certain information pertaining to the SP525 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1183. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP525 Road solely as it crosses United States public land as included and

specifically described in Exhibit 88. The SP525 Road includes the segment of road specifically set forth in Exhibit 88 and as it exists on the ground.

Acceptance of the SP525 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1184. The SP525 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1185. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP525 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1186. The appearance of the SP525 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1187. The SP525 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 SP525 Road pursuant to the County's governmental right and authority.

1188. Witnesses with personal knowledge of the history of the SP525 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1189. Currently known reputation in the community is that the SP525 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1190. Public motor vehicle use of the SP525 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1191. The SP525 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1192. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP525 Road.

1193. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP525 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP527 Road

1194. The SP527 Road is designated as county road number SPVM0527 and SGID road identification number RD200700 and is more or less 1.00 miles long.

1195. Exhibit 89 (attached hereto and incorporated herein) contains certain information pertaining to the SP527 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1196. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP527 Road solely as it crosses United States public land as included and specifically described in Exhibit 89. The SP527 Road includes the segment of road specifically set forth in Exhibit 89 and as it exists on the ground.

Acceptance of the SP527 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1197. The SP527 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1198. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP527 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1199. The appearance of the SP527 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1200. The County confirmed its acceptance of the SP527 by 1974, 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 SP527 Road pursuant to the County's governmental right and authority.

1201. Witnesses with personal knowledge of the history of the SP527 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1202. Currently known reputation in the community is that the SP527 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1203. Public motor vehicle use of the SP527 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1204. The SP527 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1205. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP527 Road.

1206. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP527 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP527a Road

1207. The SP527a Road is designated as county road number SPVM0527a and SGID road identification number RD200701 and is more or less .41 miles long.

1208. Exhibit 90 (attached hereto and incorporated herein) contains certain information pertaining to the SP527a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1209. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP527a Road solely as it crosses United States public land as included and specifically described in Exhibit 90. The SP527a Road includes the segment of road specifically set forth in Exhibit 90 and as it exists on the ground.

Acceptance of the SP527a Road R.S. 2477 Right-of-way Prior to October 21, 1976

1210. The SP527a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1211. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP527a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1212. The appearance of the SP527a Road on the Hells Kitchen Canyon SW (1965) and Skinner Peaks (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1213. The SP527a 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 SP527a Road pursuant to the County's governmental right and authority.

1214. Witnesses with personal knowledge of the history of the SP527a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1215. Currently known reputation in the community is that the SP527a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1216. Public motor vehicle use of the SP527a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1217. The SP527a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1218. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP527a Road.

1219. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP527a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP528 Road

1220. The SP528 Road is designated as county road number SPVM0528 and SGID road identification number RD200702 and is more or less 1.14 miles long.

1221. Exhibit 91 (attached hereto and incorporated herein) contains certain information pertaining to the SP528 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1222. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP528 Road solely as it crosses United States public land as included and specifically described in Exhibit 91. The SP528 Road includes the segment of road specifically set forth in Exhibit 91 and as it exists on the ground.

Acceptance of the SP528 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1223. The SP528 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP528 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1225. The appearance of the SP528 Road on the Hells Kitchen Canyon SW (1965) and Skinner's Peaks (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and

acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1226. The SP528 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 SP528 Road pursuant to the County's governmental right and authority.

1227. Witnesses with personal knowledge of the history of the SP528 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1228. Currently known reputation in the community is that the SP528 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1229. Public motor vehicle use of the SP528 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1230. The SP528 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1231. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP528 Road.

1232. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP528 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP530 Road

1233. The SP530 Road is designated as county road number SPVM0530 and SGID road identification number RD200703 and is more or less .64 miles long.

1234. Exhibit 92 (attached hereto and incorporated herein) contains certain information pertaining to the SP530 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1235. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP530 Road solely as it crosses United States public land as included and specifically described in Exhibit 92. The SP530 Road includes the segment of road specifically set forth in Exhibit 92 and as it exists on the ground.

Acceptance of the SP530 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1236. The SP530 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1237. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP530 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1238. The appearance of the SP530 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1239. The County confirmed its acceptance of the SP530 by 1974, 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 SP530 Road pursuant to the County's governmental right and authority.

1240. Witnesses with personal knowledge of the history of the SP530 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1241. Currently known reputation in the community is that the SP530 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1242. Public motor vehicle use of the SP530 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1243. The SP530 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1244. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP530 Road.

1245. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP530 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP531 Road

1246. The SP531 Road is designated as county road number SPVM0531 and SGID road identification number RD200704 and is more or less .30 miles long.

1247. Exhibit 93 (attached hereto and incorporated herein) contains certain information pertaining to the SP531 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1248. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP531 Road solely as it crosses United States public land as included and specifically described in Exhibit 93. The SP531 Road includes the segment of road specifically set forth in Exhibit 93 and as it exists on the ground.

Acceptance of the SP531 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1249. The SP531 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1250. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP531 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1251. The appearance of the SP531 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1252. The County confirmed its acceptance of the SP531 by 1974, 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 SP531 Road pursuant to the County's governmental right and authority.

1253. Witnesses with personal knowledge of the history of the SP531 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1254. Currently known reputation in the community is that the SP531 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1255. Public motor vehicle use of the SP531 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1256. The SP531 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1257. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP531 Road.

1258. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP531 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP533a Road

1259. The SP533a Road is designated as county road number SPVM0533a and SGID road identification number RD200705 and is more or less .61 miles long.

1260. Exhibit 94 (attached hereto and incorporated herein) contains certain information pertaining to the SP533a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1261. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP533a Road solely as it crosses United States public land as included and specifically described in Exhibit 94. The SP533a Road includes the segment of road specifically set forth in Exhibit 94 and as it exists on the ground.

Acceptance of the SP533a Road R.S. 2477 Right-of-way Prior to October 21, 1976

1262. The SP533a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1263. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP533a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1264. The appearance of the SP533a Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1265. The SP533a 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 SP533a Road pursuant to the County's governmental right and authority.

1266. Witnesses with personal knowledge of the history of the SP533a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1267. Currently known reputation in the community is that the SP533a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1268. Public motor vehicle use of the SP533a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1269. The SP533a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1270. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP533a Road.

1271. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP533a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP534 Road

1272. The SP534 Road is designated as county road number SPVM0534 and SGID road identification number RD200706 and is more or less .34 miles long.

1273. Exhibit 95 (attached hereto and incorporated herein) contains certain information pertaining to the SP534 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1274. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP534 Road solely as it crosses United States public land as included and

specifically described in Exhibit 95. The SP534 Road includes the segment of road specifically set forth in Exhibit 95 and as it exists on the ground.

Acceptance of the SP534 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1275. The SP534 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1276. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP534 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1277. The appearance of the SP534 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1278. The County confirmed its acceptance of the SP534 by 1974, 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 SP534 Road pursuant to the County's governmental right and authority.

1279. Witnesses with personal knowledge of the history of the SP534 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1280. Currently known reputation in the community is that the SP534 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1281. Public motor vehicle use of the SP534 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1282. The SP534 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1283. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP534 Road.

1284. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP534 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP536 Road

1285. The SP536 Road is designated as county road number SPVM0536 and SGID road identification number RD200708 and is more or less .14 miles long.

1286. Exhibit 96 (attached hereto and incorporated herein) contains certain information pertaining to the SP536 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1287. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP536 Road solely as it crosses United States public land as included and specifically described in Exhibit 96. The SP536 Road includes the segment of road specifically set forth in Exhibit 96 and as it exists on the ground.

Acceptance of the SP536 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1288. The SP536 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1289. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP536 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1290. The appearance of the SP536 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1291. The County confirmed its acceptance of the SP536 by 1974, 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 SP536 Road pursuant to the County's governmental right and authority.

1292. Witnesses with personal knowledge of the history of the SP536 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1293. Currently known reputation in the community is that the SP536 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1294. Public motor vehicle use of the SP536 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1295. The SP536 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1296. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP536 Road.

1297. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP536 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP537 Road

1298. The SP537 Road is designated as county road number SPVM0537 and SGID road identification number RD200709 and is more or less .16 miles long.

1299. Exhibit 97 (attached hereto and incorporated herein) contains certain information pertaining to the SP537 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1300. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP537 Road solely as it crosses United States public land as included and specifically described in Exhibit 97. The SP537 Road includes the segment of road specifically set forth in Exhibit 97 and as it exists on the ground.

Acceptance of the SP537 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1301. The SP537 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1302. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP537 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1303. The appearance of the SP537 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1304. The SP537 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 SP537 Road pursuant to the County's governmental right and authority.

1305. Witnesses with personal knowledge of the history of the SP537 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1306. Currently known reputation in the community is that the SP537 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1307. Public motor vehicle use of the SP537 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1308. The SP537 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1309. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP537 Road.

1310. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP537 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP538 Road

1311. The SP538 Road is designated as county road number SPVM0538 and SGID road identification number RD200710 and is more or less .73 miles long.

1312. Exhibit 98 (attached hereto and incorporated herein) contains certain information pertaining to the SP538 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1313. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP538 Road solely as it crosses United States public land as included and specifically described in Exhibit 98. The SP538 Road includes the segment of road specifically set forth in Exhibit 98 and as it exists on the ground.

Acceptance of the SP538 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1314. The SP538 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1315. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP538 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1316. The appearance of the SP538 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1317. The County confirmed its acceptance of the SP538 by 1974, 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 SP538 Road pursuant to the County's governmental right and authority.

1318. Witnesses with personal knowledge of the history of the SP538 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1319. Currently known reputation in the community is that the SP538 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1320. Public motor vehicle use of the SP538 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1321. The SP538 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1322. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP538 Road.

1323. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP538 Road on lands owned 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
JAPANESE VALLEY AREA

1324. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1325. The Japanese Valley Area is located in southern and westernmost portion of Sanpete County. *See* Exhibit 6.

1326. The Japanese Valley includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Chris Hollow Road, Sanp42; (2) Hayes Canyon Road, Sanp39; (3) Japanese Valley Road, Sanp290; (4) SP74 Road; (5) SP87 Road; (6) SP112 Road; (7) SP115 Road; (8) SP117 Road; (9) SP118a Road; (10) SP124 Road; (11) SP129 Road; (12) SP133 Road; (13) SP135 Road; (14) SP137 Road; (15) SP142 Road; (16) SP144 Road; (17) SP146 Road; (18) SP147 Road; (19) SP148 Road; (20) SP149 Road; (21) SP150 Road; (22) SP150a Road; (23) SP152 Road; (24) SP154 Road; (25) SP155 Road; (26) SP160 Road; (27) SP161 Road; (28) SP164 Road; (29) SP167 Road; (30) SP170 Road; (31) SP173 Road; (32) SP176 Road; (33) SP177 Road; (34) SP178 Road; (35) SP179 Road; (36) SP181 Road; and (37) SP182 Road.

1327. Each right-of-way claimed in the Japanese Valley 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.

1328. All rights-of-way claimed in the Japanese Valley 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.

1329. All rights-of-way claimed in the Japanese Valley 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).

1330. Prior to October 21, 1976, the State of Utah, Sanpete County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Chris Hollow Road, Sanp42

1331. The Chris Hollow Road is designated as county road number Sanp42 and SGID road identification number RD200224 and is more or less 4.99 miles long.

1332. Exhibit 99 (attached hereto and incorporated herein) contains certain information pertaining to the Chris Hollow Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1333. In this action, the State and County seek to quiet title to the public highway right-of-way for the Chris Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 99. The Chris Hollow Road includes the segment of road specifically set forth in Exhibit 99 and as it exists on the ground.

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

1334. The Chris Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1335. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Chris Hollow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1336. The appearance of the Chris Hollow Road on the Hayes Canyon (1966) USGS 7.5 minute, and Scipio North (1952) USGS 15-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1337. The County confirmed its acceptance of the Chris Hollow Road by 1974, 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 Chris Hollow Road using public funds pursuant to the County's governmental right and authority.

1338. Witnesses with personal knowledge of the history of the Chris 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.

1339. Currently known reputation in the community is that the Chris 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.

1340. Public motor vehicle use of the Chris Hollow Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1341. The Chris Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1342. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Chris Hollow Road.

1343. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Chris 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.

Hayes Canyon Road, Sanp39

1344. The Hayes Canyon Road is designated as county road number Sanp39 and SGID road identification number RD200220 and is more or less 4.50 miles long.

1345. Exhibit 100 (attached hereto and incorporated herein) contains certain information pertaining to the Hayes Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1346. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hayes Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 100. The Hayes Canyon Road includes the segment of road specifically set forth in Exhibit 100 and as it exists on the ground.

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

1347. The Hayes Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1348. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Hayes Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1349. The appearance of the Hayes Canyon Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1350. The County confirmed its acceptance of the Hayes Canyon Road by 1974, 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 Hayes Canyon Road using public funds pursuant to the County's governmental right and authority.

1351. Witnesses with personal knowledge of the history of the Hayes 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.

1352. Currently known reputation in the community is that the Hayes 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.

1353. Public motor vehicle use of the Hayes Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1354. The Hayes Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1355. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hayes Canyon Road.

1356. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hayes 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.

Japanese Valley Road, Sanp290

1357. The Japanese Valley Road is designated as county road number Sanp290 and SGID road identification number RD200291 and is more or less 11.48 miles long.

1358. Exhibit 101 (attached hereto and incorporated herein) contains certain information pertaining to the Japanese Valley Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1359. In this action, the State and County seek to quiet title to the public highway right-of-way for the Japanese Valley Road solely as it crosses United States public land as included and specifically described in Exhibit 101. The Japanese Valley Road includes the segment of road specifically set forth in Exhibit 101 and as it exists on the ground.

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

1360. The Japanese Valley Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1361. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Japanese Valley Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1362. The appearance of the Japanese Valley Road on the Hells Kitchen Canyon SW (1965), and Hayes Canyon (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1363. The Japanese Valley 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 Japanese Valley Road using public funds pursuant to the County's governmental right and authority.

1364. Witnesses with personal knowledge of the history of the Japanese Valley Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1365. Currently known reputation in the community is that the Japanese Valley Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1366. Public motor vehicle use of the Japanese Valley Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1367. The Japanese Valley Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1368. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Japanese Valley Road.

1369. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Japanese Valley Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP74 Road

1370. The SP74 Road is designated as county road number SPVM0074 and SGID road identification number RD200377 and is more or less 4.34 miles long.

1371. Exhibit 102 (attached hereto and incorporated herein) contains certain information pertaining to the SP74 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1372. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP74 Road solely as it crosses United States public land as included and

specifically described in Exhibit 102. The SP74 Road includes the segment of road specifically set forth in Exhibit 102 and as exists on the ground.

Acceptance of the SP74 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1373. The SP74 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1374. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP74 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1375. The appearance of the SP74 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1376. The County confirmed its acceptance of the SP74 by 1974, 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 SP74 Road pursuant to the County's governmental right and authority.

1377. Witnesses with personal knowledge of the history of the SP74 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1378. Currently known reputation in the community is that the SP74 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1379. Public motor vehicle use of the SP74 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1380. The SP74 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1381. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP74 Road.

1382. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP74 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP87 Road

1383. The SP87 Road is designated as county road number SPVM0087 and SGID road identification number RD200392 and is more or less 4.86 miles long.

1384. Exhibit 103 (attached hereto and incorporated herein) contains certain information pertaining to the SP87 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1385. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP87 Road solely as it crosses United States public land as included and specifically described in Exhibit 103. The SP87 Road includes the segment of road specifically set forth in Exhibit 103 and as exists on the ground.

Acceptance of the SP87 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1386. The SP87 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1387. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP87 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1388. The appearance of the SP87 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1389. The County confirmed its acceptance of the SP87 by 1974, 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 SP87 Road pursuant to the County's governmental right and authority.

1390. Witnesses with personal knowledge of the history of the SP87 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1391. Currently known reputation in the community is that the SP87 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1392. Public motor vehicle use of the SP87 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1393. The SP87 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1394. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP87 Road.

1395. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP87 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP112 Road

1396. The SP112 Road is designated as county road number SPVM0112 and SGID road identification number RD200407 and is more or less .61 miles long.

1397. Exhibit 104 (attached hereto and incorporated herein) contains certain information pertaining to the SP112 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1398. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP112 Road solely as it crosses United States public land as included and specifically described in Exhibit 104. The SP112 Road includes the segment of road specifically set forth in Exhibit 104 and as exists on the ground.

Acceptance of the SP112 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1399. The SP112 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP112 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1401. The appearance of the SP112 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1402. The SP112 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 SP112 Road pursuant to the County's governmental right and authority.

1403. Witnesses with personal knowledge of the history of the SP112 Road confirm public use of this road as a public 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 SP112 Road has been open for all to come 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 SP112 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1406. The SP112 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 SP112 Road.

1408. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP112 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP115 Road

1409. The SP115 Road is designated as county road number SPVM0115 and SGID road identification number RD200410 and is more or less .99 miles long.

1410. Exhibit 105 (attached hereto and incorporated herein) contains certain information pertaining to the SP115 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1411. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP115 Road solely as it crosses United States public land as included and specifically described in Exhibit 105. The SP115 Road includes the segment of road specifically set forth in Exhibit 105 and as exists on the ground.

Acceptance of the SP115 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1412. The SP115 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1413. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP115 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1414. The appearance of the SP115 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1415. The SP115 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 SP115 Road pursuant to the County's governmental right and authority.

1416. Witnesses with personal knowledge of the history of the SP115 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1417. Currently known reputation in the community is that the SP115 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1418. Public motor vehicle use of the SP115 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1419. The SP115 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1420. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP115 Road.

1421. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP115 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP117 Road

1422. The SP117 Road is designated as county road number SPVM0117 and SGID road identification number RD200411 and is more or less .25 miles long.

1423. Exhibit 106 (attached hereto and incorporated herein) contains certain information pertaining to the SP117 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1424. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP117 Road solely as it crosses United States public land as included and specifically described in Exhibit 106. The SP117 Road includes the segment of road specifically set forth in Exhibit 106 and as exists on the ground.

Acceptance of the SP117 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1425. The SP117 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1426. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP117 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1427. The appearance of the SP117 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1428. The SP117 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 SP117 Road pursuant to the County's governmental right and authority.

1429. Witnesses with personal knowledge of the history of the SP117 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1430. Currently known reputation in the community is that the SP117 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1431. Public motor vehicle use of the SP117 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1432. The SP117 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1433. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP117 Road.

1434. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP117 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP118a Road

1435. The SP118a Road is designated as county road number SPVM0118a and SGID road identification number RD200412 and is more or less .40 miles long.

1436. Exhibit 107 (attached hereto and incorporated herein) contains certain information pertaining to the SP118a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1437. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP118a Road solely as it crosses United States public land as included and specifically described in Exhibit 107. The SP118a Road includes the segment of road specifically set forth in Exhibit 107 and as exists on the ground.

Acceptance of the SP118a Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1438. The SP118a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1439. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP118a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1440. The appearance of the SP118a Road on the Hayes Canyon (1966) and Scipio South (1969) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1441. The SP118a 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 SP118a Road pursuant to the County's governmental right and authority.

1442. Witnesses with personal knowledge of the history of the SP118a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1443. Currently known reputation in the community is that the SP118a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1444. Public motor vehicle use of the SP118a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1445. The SP118a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1446. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP118a Road.

1447. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP118a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP124 Road

1448. The SP124 Road is designated as county road number SPVM0124 and SGID road identification number RD200416 and is more or less 1.54 miles long.

1449. Exhibit 108 (attached hereto and incorporated herein) contains certain information pertaining to the SP124 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1450. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP124 Road solely as it crosses United States public land as included and specifically described in Exhibit 108. The SP124 Road includes the segment of road specifically set forth in Exhibit 108 and as exists on the ground.

Acceptance of the SP124 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1451. The SP124 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP124 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1453. The appearance of the SP124 Road on the Scipio North (1952) USGS 15-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1454. The County confirmed its acceptance of the SP124 by 1974, 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 SP124 Road pursuant to the County's governmental right and authority.

1455. Witnesses with personal knowledge of the history of the SP124 Road confirm public use of this road as a public 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 SP124 Road has been open for all to come 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 SP124 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1458. The SP124 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 SP124 Road.

1460. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP124 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP129 Road

1461. The SP129 Road is designated as county road number SPVM0129 and SGID road identification number RD200421 and is more or less 2.08 miles long.

1462. Exhibit 109 (attached hereto and incorporated herein) contains certain information pertaining to the SP129 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1463. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP129 Road solely as it crosses United States public land as included and

specifically described in Exhibit 109. The SP129 Road includes the segment of road specifically set forth in Exhibit 109 and as exists on the ground.

Acceptance of the SP129 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1464. The SP129 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1465. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP129 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1466. The appearance of the SP129 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1467. The County confirmed its acceptance of the SP129 by 1974, 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 SP129 Road pursuant to the County's governmental right and authority.

1468. Witnesses with personal knowledge of the history of the SP129 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1469. Currently known reputation in the community is that the SP129 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1470. Public motor vehicle use of the SP129 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1471. The SP129 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1472. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP129 Road.

1473. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP129 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP133 Road

1474. The SP133 Road is designated as county road number SPVM0133 and SGID road identification number RD200422 and is more or less 1.18 miles long.

1475. Exhibit 110 (attached hereto and incorporated herein) contains certain information pertaining to the SP133 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1476. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP133 Road solely as it crosses United States public land as included and specifically described in Exhibit 110. The SP133 Road includes the segment of road specifically set forth in Exhibit 110 and as exists on the ground.

Acceptance of the SP133 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1477. The SP133 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1478. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP133 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1479. The appearance of the SP133 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1480. The SP133 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 SP133 Road pursuant to the County's governmental right and authority.

1481. Witnesses with personal knowledge of the history of the SP133 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1482. Currently known reputation in the community is that the SP133 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1483. Public motor vehicle use of the SP133 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1484. The SP133 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1485. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP133 Road.

1486. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP133 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP135 Road

1487. The SP135 Road is designated as county road number SPVM0135 and SGID road identification number RD200423 and is more or less 1.11 miles long.

1488. Exhibit 111 (attached hereto and incorporated herein) contains certain information pertaining to the SP135 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1489. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP135 Road solely as it crosses United States public land as included and specifically described in Exhibit 111. The SP135 Road includes the segment of road specifically set forth in Exhibit 111 and as exists on the ground.

Acceptance of the SP135 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1490. The SP135 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1491. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP135 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1492. The appearance of the SP135 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1493. The SP135 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 SP135 Road pursuant to the County's governmental right and authority.

1494. Witnesses with personal knowledge of the history of the SP135 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1495. Currently known reputation in the community is that the SP135 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1496. Public motor vehicle use of the SP135 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1497. The SP135 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1498. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP135 Road.

1499. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP135 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP137 Road

1500. The SP137 Road is designated as county road number SPVM0137 and SGID road identification number RD200424 and is more or less 6.46 miles long.

1501. Exhibit 112 (attached hereto and incorporated herein) contains certain information pertaining to the SP137 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1502. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP137 Road solely as it crosses United States public land as included and specifically described in Exhibit 112. The SP137 Road includes the segment of road specifically set forth in Exhibit 112 and as exists on the ground.

Acceptance of the SP137 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1503. The SP137 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1504. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP137 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1505. The appearance of the SP137 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1506. The SP137 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 SP137 Road pursuant to the County's governmental right and authority.

1507. Witnesses with personal knowledge of the history of the SP137 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1508. Currently known reputation in the community is that the SP137 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1509. Public motor vehicle use of the SP137 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1510. The SP137 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1511. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP137 Road.

1512. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP137 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP142 Road

1513. The SP142 Road is designated as county road number SPVM0142 and SGID road identification number RD200425 and is more or less .66 miles long.

1514. Exhibit 113 (attached hereto and incorporated herein) contains certain information pertaining to the SP142 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1515. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP142 Road solely as it crosses United States public land as included and specifically described in Exhibit 113. The SP142 Road includes the segment of road specifically set forth in Exhibit 113 and as exists on the ground.

Acceptance of the SP142 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1516. The SP142 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1517. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP142 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1518. The appearance of the SP142 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1519. The SP142 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 SP142 Road pursuant to the County's governmental right and authority.

1520. Witnesses with personal knowledge of the history of the SP142 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1521. Currently known reputation in the community is that the SP142 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1522. Public motor vehicle use of the SP142 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1523. The SP142 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1524. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP142 Road.

1525. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP142 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP144 Road

1526. The SP144 Road is designated as county road number SPVM0144 and SGID road identification number RD200426 and is more or less .58 miles long.

1527. Exhibit 114 (attached hereto and incorporated herein) contains certain information pertaining to the SP144 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1528. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP144 Road solely as it crosses United States public land as included and specifically described in Exhibit 114. The SP144 Road includes the segment of road specifically set forth in Exhibit 114 and as exists on the ground.

Acceptance of the SP144 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1529. The SP144 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1530. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP144 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1531. The appearance of the SP144 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1532. The SP144 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 SP144 Road pursuant to the County's governmental right and authority.

1533. Witnesses with personal knowledge of the history of the SP144 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1534. Currently known reputation in the community is that the SP144 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1535. Public motor vehicle use of the SP144 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1536. The SP144 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1537. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP144 Road.

1538. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP144 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP146 Road

1539. The SP146 Road is designated as county road number SPVM0146 and SGID road identification number RD200427 and is more or less .95 miles long.

1540. Exhibit 115 (attached hereto and incorporated herein) contains certain information pertaining to the SP146 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1541. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP146 Road solely as it crosses United States public land as included and specifically described in Exhibit 115. The SP146 Road includes the segment of road specifically set forth in Exhibit 115 and as exists on the ground.

Acceptance of the SP146 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1542. The SP146 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1543. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP146 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1544. The appearance of the SP146 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1545. The SP146 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 SP146 Road pursuant to the County's governmental right and authority.

1546. Witnesses with personal knowledge of the history of the SP146 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1547. Currently known reputation in the community is that the SP146 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1548. Public motor vehicle use of the SP146 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1549. The SP146 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1550. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP146 Road.

1551. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP146 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP147 Road

1552. The SP147 Road is designated as county road number SPVM0147 and SGID road identification number RD200428 and is more or less 6.57 miles long.

1553. Exhibit 116 (attached hereto and incorporated herein) contains certain information pertaining to the SP147 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1554. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP147 Road solely as it crosses United States public land as included and

specifically described in Exhibit 116. The SP147 Road includes the segment of road specifically set forth in Exhibit 116 and as exists on the ground.

Acceptance of the SP147 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1555. The SP147 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP147 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1557. The appearance of the SP147 Road on the Hells Kitchen Canyon SW (1965) and Hayes Canyon (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1558. The County confirmed its acceptance of the SP147 by 1974, 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 SP147 Road pursuant to the County's governmental right and authority.

1559. Witnesses with personal knowledge of the history of the SP147 Road confirm public use of this road as a public 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 SP147 Road has been open for all to come 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 SP147 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1562. The SP147 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 SP147 Road.

1564. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP147 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP148 Road

1565. The SP148 Road is designated as county road number SPVM0148 and SGID road identification number RD200432 and is more or less 1.11 miles long.

1566. Exhibit 117 (attached hereto and incorporated herein) contains certain information pertaining to the SP148 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1567. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP148 Road solely as it crosses United States public land as included and specifically described in Exhibit 117. The SP148 Road includes the segment of road specifically set forth in Exhibit 117 and as exists on the ground.

Acceptance of the SP148 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1568. The SP148 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1569. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP148 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1570. The appearance of the SP148 Road on the Hells Kitchen Canyon SW (1965) and Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1571. The SP148 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 SP148 Road pursuant to the County's governmental right and authority.

1572. Witnesses with personal knowledge of the history of the SP148 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1573. Currently known reputation in the community is that the SP148 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1574. Public motor vehicle use of the SP148 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1575. The SP148 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1576. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP148 Road.

1577. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP148 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP149 Road

1578. The SP149 Road is designated as county road number SPVM0149 and SGID road identification number RD200433 and is more or less 1.07 miles long.

1579. Exhibit 118 (attached hereto and incorporated herein) contains certain information pertaining to the SP149 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1580. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP149 Road solely as it crosses United States public land as included and specifically described in Exhibit 118. The SP149 Road includes the segment of road specifically set forth in Exhibit 118 and as exists on the ground.

Acceptance of the SP149 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1581. The SP149 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1582. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP149 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1583. The appearance of the SP149 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1584. The SP149 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 SP149 Road pursuant to the County's governmental right and authority.

1585. Witnesses with personal knowledge of the history of the SP149 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1586. Currently known reputation in the community is that the SP149 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1587. Public motor vehicle use of the SP149 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1588. The SP149 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1589. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP149 Road.

1590. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP149 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP150 Road

1591. The SP150 Road is designated as county road number SPVM0150 and SGID road identification number RD200434 and is more or less .57 miles long.

1592. Exhibit 119 (attached hereto and incorporated herein) contains certain information pertaining to the SP150 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1593. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP150 Road solely as it crosses United States public land as included and specifically described in Exhibit 119. The SP150 Road includes the segment of road specifically set forth in Exhibit 119 and as exists on the ground.

Acceptance of the SP150 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1594. The SP150 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1595. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP150 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1596. The appearance of the SP150 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1597. The County confirmed its acceptance of the SP150 by 1974, 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 SP150 Road pursuant to the County's governmental right and authority.

1598. Witnesses with personal knowledge of the history of the SP150 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1599. Currently known reputation in the community is that the SP150 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1600. Public motor vehicle use of the SP150 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1601. The SP150 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1602. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP150 Road.

1603. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP150 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP150a Road

1604. The SP150a Road is designated as county road number SPVM0150a and SGID road identification number RD200435 and is more or less .61 miles long.

1605. Exhibit 120 (attached hereto and incorporated herein) contains certain information pertaining to the SP150a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1606. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP150a Road solely as it crosses United States public land as included and specifically described in Exhibit 120. The SP150a Road includes the segment of road specifically set forth in Exhibit 120 and as exists on the ground.

Acceptance of the SP150a Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1607. The SP150a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1608. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP150a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1609. The appearance of the SP150a Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1610. The SP150a 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 SP150a Road pursuant to the County's governmental right and authority.

1611. Witnesses with personal knowledge of the history of the SP150a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1612. Currently known reputation in the community is that the SP150a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1613. Public motor vehicle use of the SP150a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1614. The SP150a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1615. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP150a Road.

1616. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP150a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP152 Road

1617. The SP152 Road is designated as county road number SPVM0152 and SGID road identification number RD200438 and is more or less 1.48 miles long.

1618. Exhibit 121 (attached hereto and incorporated herein) contains certain information pertaining to the SP152 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1619. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP152 Road solely as it crosses United States public land as included and specifically described in Exhibit 121. The SP152 Road includes the segment of road specifically set forth in Exhibit 121 and as exists on the ground.

Acceptance of the SP152 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1620. The SP152 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1621. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP152 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1622. The appearance of the SP152 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1623. The SP152 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 SP152 Road pursuant to the County's governmental right and authority.

1624. Witnesses with personal knowledge of the history of the SP152 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1625. Currently known reputation in the community is that the SP152 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1626. Public motor vehicle use of the SP152 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1627. The SP152 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1628. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP152 Road.

1629. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP152 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP154 Road

1630. The SP154 Road is designated as county road number SPVM0154 and SGID road identification number RD200441 and is more or less 2.87 miles long.

1631. Exhibit 122 (attached hereto and incorporated herein) contains certain information pertaining to the SP154 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1632. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP154 Road solely as it crosses United States public land as included and specifically described in Exhibit 122. The SP154 Road includes the segment of road specifically set forth in Exhibit 122 and as exists on the ground.

Acceptance of the SP154 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1633. The SP154 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1634. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP154 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1635. The appearance of the SP154 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map and the Scipio North (1952) 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1636. The County confirmed its acceptance of the SP154 by 1974, 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 SP154 Road pursuant to the County's governmental right and authority.

1637. Witnesses with personal knowledge of the history of the SP154 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1638. Currently known reputation in the community is that the SP154 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1639. Public motor vehicle use of the SP154 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1640. The SP154 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1641. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP154 Road.

1642. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP154 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP155 Road

1643. The SP155 Road is designated as county road number SPVM0155 and SGID road identification number RD200442 and is more or less .43 miles long.

1644. Exhibit 123 (attached hereto and incorporated herein) contains certain information pertaining to the SP155 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1645. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP155 Road solely as it crosses United States public land as included and

specifically described in Exhibit 123. The SP155 Road includes the segment of road specifically set forth in Exhibit 123 and as exists on the ground.

Acceptance of the SP155 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1646. The SP155 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1647. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP155 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1648. The County confirmed its acceptance of the SP155 by 1974, 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 SP155 Road pursuant to the County's governmental right and authority.

1649. Witnesses with personal knowledge of the history of the SP155 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1650. Currently known reputation in the community is that the SP155 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1651. Public motor vehicle use of the SP155 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

1652. The SP155 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1653. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP155 Road.

1654. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP155 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP160 Road

1655. The SP160 Road is designated as county road number SPVM0160 and SGID road identification number RD200445 and is more or less 2.99 miles long.

1656. Exhibit 124 (attached hereto and incorporated herein) contains certain information pertaining to the SP160 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1657. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP160 Road solely as it crosses United States public land as included and specifically described in Exhibit 124. The SP160 Road includes the segment of road specifically set forth in Exhibit 124 and as exists on the ground.

Acceptance of the SP160 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1658. The SP160 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1659. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP160 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1660. The appearance of the SP160 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1661. The County confirmed its acceptance of the SP160 by 1974, 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 SP160 Road pursuant to the County's governmental right and authority.

1662. Witnesses with personal knowledge of the history of the SP160 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1663. Currently known reputation in the community is that the SP160 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1664. Public motor vehicle use of the SP160 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1665. The SP160 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1666. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP160 Road.

1667. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP160 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP161 Road

1668. The SP161 Road is designated as county road number SPVM0161 and SGID road identification number RD200446 and is more or less .94miles long.

1669. Exhibit 125 (attached hereto and incorporated herein) contains certain information pertaining to the SP161 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1670. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP161 Road solely as it crosses United States public land as included and

specifically described in Exhibit 125. The SP161 Road includes the segment of road specifically set forth in Exhibit 125 and as exists on the ground.

Acceptance of the SP161 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1671. The SP161 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1672. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP161 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1673. The appearance of the SP161 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1674. The County confirmed its acceptance of the SP161 by 1974, 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 SP161 Road pursuant to the County's governmental right and authority.

1675. Witnesses with personal knowledge of the history of the SP161 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1676. Currently known reputation in the community is that the SP161 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1677. Public motor vehicle use of the SP161 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1678. The SP161 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1679. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP161 Road.

1680. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP161 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP164 Road

1681. The SP164 Road is designated as county road number SPVM0164 and SGID road identification number RD200449 and is more or less .95 miles long.

1682. Exhibit 126 (attached hereto and incorporated herein) contains certain information pertaining to the SP164 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1683. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP164 Road solely as it crosses United States public land as included and specifically described in Exhibit 126. The SP164 Road includes the segment of road specifically set forth in Exhibit 126 and as exists on the ground.

Acceptance of the SP164 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1684. The SP164 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1685. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP164 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1686. The appearance of the SP164 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1687. The SP164 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 SP164 Road pursuant to the County's governmental right and authority.

1688. Witnesses with personal knowledge of the history of the SP164 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1689. Currently known reputation in the community is that the SP164 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1690. Public motor vehicle use of the SP164 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1691. The SP164 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1692. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP164 Road.

1693. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP164 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP167 Road

1694. The SP167 Road is designated as county road number SPVM0167 and SGID road identification number RD200453 and is more or less 3.46 miles long.

1695. Exhibit 127 (attached hereto and incorporated herein) contains certain information pertaining to the SP167 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1696. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP167 Road solely as it crosses United States public land as included and specifically described in Exhibit 127. The SP167 Road includes the segment of road specifically set forth in Exhibit 127 and as exists on the ground.

Acceptance of the SP167 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1697. The SP167 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1698. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP167 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1699. The appearance of the SP167 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1700. The County confirmed its acceptance of the SP167 by 1974, 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 SP167 Road pursuant to the County's governmental right and authority.

1701. Witnesses with personal knowledge of the history of the SP167 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1702. Currently known reputation in the community is that the SP167 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1703. Public motor vehicle use of the SP167 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1704. The SP167 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1705. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP167 Road.

1706. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP167 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP170 Road

1707. The SP170 Road is designated as county road number SPVM0170 and SGID road identification number RD200455 and is more or less 1.03 miles long.

1708. Exhibit 128 (attached hereto and incorporated herein) contains certain information pertaining to the SP170 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1709. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP170 Road solely as it crosses United States public land as included and specifically described in Exhibit 128. The SP170 Road includes the segment of road specifically set forth in Exhibit 128 and as exists on the ground.

Acceptance of the SP170 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1710. The SP170 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1711. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP170 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1712. The appearance of the SP170 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1713. The County confirmed its acceptance of the SP170 by 1974, 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 SP170 Road pursuant to the County's governmental right and authority.

1714. Witnesses with personal knowledge of the history of the SP170 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1715. Currently known reputation in the community is that the SP170 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1716. Public motor vehicle use of the SP170 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1717. The SP170 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1718. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP170 Road.

1719. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP170 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP173 Road

1720. The SP173 Road is designated as county road number SPVM0173 and SGID road identification number RD200458 and is more or less .84 miles long.

1721. Exhibit 129 (attached hereto and incorporated herein) contains certain information pertaining to the SP173 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1722. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP173 Road solely as it crosses United States public land as included and specifically described in Exhibit 129. The SP173 Road includes the segment of road specifically set forth in Exhibit 129 and as exists on the ground.

Acceptance of the SP173 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1723. The SP173 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1724. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP173 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1725. The appearance of the SP173 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1726. The County confirmed its acceptance of the SP173 by 1974, 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 SP173 Road pursuant to the County's governmental right and authority.

1727. Witnesses with personal knowledge of the history of the SP173 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1728. Currently known reputation in the community is that the SP173 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1729. Public motor vehicle use of the SP173 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1730. The SP173 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1731. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP173 Road.

1732. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP173 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP176 Road

1733. The SP176 Road is designated as county road number SPVM0176 and SGID road identification number RD200460 and is more or less 1.13 miles long.

1734. Exhibit 130 (attached hereto and incorporated herein) contains certain information pertaining to the SP176 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1735. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP176 Road solely as it crosses United States public land as included and specifically described in Exhibit 130. The SP176 Road includes the segment of road specifically set forth in Exhibit 130 and as exists on the ground.

Acceptance of the SP176 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1736. The SP176 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1737. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP176 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1738. The appearance of the SP176 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1739. The County confirmed its acceptance of the SP176 by 1974, 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 SP176 Road pursuant to the County's governmental right and authority.

1740. Witnesses with personal knowledge of the history of the SP176 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1741. Currently known reputation in the community is that the SP176 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1742. Public motor vehicle use of the SP176 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1743. The SP176 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1744. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP176 Road.

1745. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP176 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP177 Road

1746. The SP177 Road is designated as county road number SPVM0177 and SGID road identification number RD200461 and is more or less 1.04 miles long.

1747. Exhibit 131 (attached hereto and incorporated herein) contains certain information pertaining to the SP177 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1748. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP177 Road solely as it crosses United States public land as included and specifically described in Exhibit 131. The SP177 Road includes the segment of road specifically set forth in Exhibit 131 and as exists on the ground.

Acceptance of the SP177 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1749. The SP177 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1750. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP177 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1751. The appearance of the SP177 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1752. The SP177 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 SP177 Road pursuant to the County's governmental right and authority.

1753. Witnesses with personal knowledge of the history of the SP177 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1754. Currently known reputation in the community is that the SP177 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1755. Public motor vehicle use of the SP177 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1756. The SP177 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1757. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP177 Road.

1758. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP177 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP178 Road

1759. The SP178 Road is designated as county road number SPVM0178 and SGID road identification number RD200462 and is more or less 1.09 miles long.

1760. Exhibit 132 (attached hereto and incorporated herein) contains certain information pertaining to the SP178 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1761. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP178 Road solely as it crosses United States public land as included and

specifically described in Exhibit 132. The SP178 Road includes the segment of road specifically set forth in Exhibit 132 and as exists on the ground.

Acceptance of the SP178 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1762. The SP178 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1763. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP178 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1764. The appearance of the SP178 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1765. The SP178 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 SP178 Road pursuant to the County's governmental right and authority.

1766. Witnesses with personal knowledge of the history of the SP178 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1767. Currently known reputation in the community is that the SP178 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1768. Public motor vehicle use of the SP178 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1769. The SP178 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1770. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP178 Road.

1771. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP178 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP179 Road

1772. The SP179 Road is designated as county road number SPVM0179 and SGID road identification number RD200463 and is more or less 1.25 miles long.

1773. Exhibit 133 (attached hereto and incorporated herein) contains certain information pertaining to the SP179 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1774. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP179 Road solely as it crosses United States public land as included and specifically described in Exhibit 133. The SP179 Road includes the segment of road specifically set forth in Exhibit 133 and as exists on the ground.

Acceptance of the SP179 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1775. The SP179 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1776. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP179 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1777. The appearance of the SP179 Road on the Hells Kitchen Canyon SW (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1778. The County confirmed its acceptance of the SP179 by 1974, 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 SP179 Road pursuant to the County's governmental right and authority.

1779. Witnesses with personal knowledge of the history of the SP179 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1780. Currently known reputation in the community is that the SP179 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1781. Public motor vehicle use of the SP179 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1782. The SP179 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1783. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP179 Road.

1784. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP179 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP181 Road

1785. The SP181 Road is designated as county road number SPVM0181 and SGID road identification number RD200465 and is more or less .89 miles long.

1786. Exhibit 134 (attached hereto and incorporated herein) contains certain information pertaining to the SP181 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1787. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP181 Road solely as it crosses United States public land as included and specifically described in Exhibit 134. The SP181 Road includes the segment of road specifically set forth in Exhibit 134 and as exists on the ground.

Acceptance of the SP181 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1788. The SP181 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1789. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP181 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1790. The SP181 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 SP181 Road pursuant to the County's governmental right and authority.

1791. Witnesses with personal knowledge of the history of the SP181 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1792. Currently known reputation in the community is that the SP181 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1793. Public motor vehicle use of the SP181 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1794. The SP181 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1795. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP181 Road.

1796. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP181 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP182 Road

1797. The SP182 Road is designated as county road number SPVM0182 and SGID road identification number RD200466 and is more or less .48 miles long.

1798. Exhibit 135 (attached hereto and incorporated herein) contains certain information pertaining to the SP182 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1799. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP182 Road solely as it crosses United States public land as included and specifically described in Exhibit 135. The SP182 Road includes the segment of road specifically set forth in Exhibit 135 and as exists on the ground.

Acceptance of the SP182 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1800. The SP182 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1801. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP182 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1802. The SP182 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 SP182 Road pursuant to the County's governmental right and authority.

1803. Witnesses with personal knowledge of the history of the SP182 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1804. Currently known reputation in the community is that the SP182 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1805. Public motor vehicle use of the SP182 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1806. The SP182 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1807. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP182 Road.

1808. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP182 Road on lands owned 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
LONE CEDAR AREA

1809. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1810. The Lone Cedar Area is located in the south central portion of Sanpete County. *See* Exhibit 7.

1811. The Lone Cedar Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Lone Cedar Road, Sanp5; (2) SESR885 Road; (3) SESR889 Road; (4) SP1 Road; (5) SP2 Road; (6) SP3 Road; (7) SP3a Road; (8) SP5 Road; (9) SP7 Road; (10) SP8 Road; (11) SP10 Road; (12) SP12 Road; (13) SP13 Road; (14) SP15b Road; (15) SP16 Road; (16) SP17 Road; (17) SP18 Road; (18) SP20 Road; (19) SP22 Road; (20) SP23 Road; (21) SP26 Road; (22) SP27 Road; (23) SP28 Road; (24) SP32 Road; (25) SP33 Road; (26) SP36 Road; (27) SP42 Road; (28) SP46 Road; (29) SP47 Road; (30) SP49 Road; (31) SP52 Road; (32) SP53 Road; (33) SP54 Road; (34) SP55 Road; (35) SP56 Road; (36) SP57 Road;(37) SP58 Road; (38) SP60 Road; (39) SP61 Road; (40) SP62 Road; (41) SP64 Road; (42) SP65 Road; (43) SP68 Road; (44) SP73 Road; (45) SP76 Road; (46) SP77 Road; (47) SP78 Road; (48) SP81 Road; (49) SP82 Road; (50) SP84 Road; (51) SP86 Road; (52) SP88 Road; (53) SP88a Road; (54) SP90 Road; (55) SP91 Road; (56) SP92 Road; (57) SP100 Road; and (58) SP107 Road.

1812. Each right-of-way claimed in the Lone Cedar 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.

1813. All rights-of-way claimed in the Lone Cedar 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.

1814. All rights-of-way claimed in the Lone Cedar 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* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1815. Prior to October 21, 1976, the State of Utah, Sanpete County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Lone Cedar Road, Sanp5

1816. The Lone Cedar Road is designated as county road number Sanp5 and SGID road identification number RD200232 and is more or less 7.80 miles long.

1817. Exhibit 136 (attached hereto and incorporated herein) contains certain information pertaining to the Lone Cedar Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1818. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lone Cedar Road solely as it crosses United States public land as included and specifically described in Exhibit 136. The Lone Cedar Road includes the segment of road specifically set forth in Exhibit 136 and as it exists on the ground.

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

1819. The Lone Cedar Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1820. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Lone Cedar Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1821. The appearance of the Lone Cedar Road on the Scipio South (1969), Hayes Canyon (1966), and Redmond Canyon (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1822. The County confirmed its acceptance of the Lone Cedar Road by 1974, 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 Lone Cedar Road using public funds pursuant to the County's governmental right and authority.

1823. Witnesses with personal knowledge of the history of the Lone Cedar Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1824. Currently known reputation in the community is that the Lone Cedar Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1825. Public motor vehicle use of the Lone Cedar Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1826. The Lone Cedar Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1827. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lone Cedar Road.

1828. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lone Cedar Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SESR885 Road

1829. The SESR885 Road is designated as county road number SESR885 and SGID road identification number RD200314 and is more or less 0.89 miles long.

1830. Exhibit 137 (attached hereto and incorporated herein) contains certain information pertaining to the SESR885 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1831. In this action, the State and County seek to quiet title to the public highway right-of-way for the SESR885 Road solely as it crosses United States public land as included and specifically described in Exhibit 137. The SESR885 Road includes the segment of road specifically set forth in Exhibit 137 and as exists on the ground.

Acceptance of the SESR885 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1832. The SESR885 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1833. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SESR885 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1834. The appearance of the SESR885 Road on the Redmond Canyon (1966) 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1835. The County confirmed its acceptance of the SESR885 by 1974, 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 SESR885 Road pursuant to the County's governmental right and authority.

1836. Witnesses with personal knowledge of the history of the SESR885 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1837. Currently known reputation in the community is that the SESR885 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1838. Public motor vehicle use of the SESR885 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1839. The SESR885 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1840. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SESR885 Road.

1841. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SESR885 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SESR889 Road

1842. The SESR889 Road is designated as county road number SESR889 and SGID road identification number RD200315 and is more or less 0.43 miles long.

1843. Exhibit 138 (attached hereto and incorporated herein) contains certain information pertaining to the SESR889 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1844. In this action, the State and County seek to quiet title to the public highway right-of-way for the SESR889 Road solely as it crosses United States public land as included and specifically described in Exhibit 138. The SESR889 Road includes the segment of road specifically set forth in Exhibit 138 and as exists on the ground.

Acceptance of the SESR889 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1845. The SESR889 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1846. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SESR889 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1847. The appearance of the SESR889 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1848. The County confirmed its acceptance of the SESR889 by 1974, 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 SESR889 Road pursuant to the County's governmental right and authority.

1849. Witnesses with personal knowledge of the history of the SESR889 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1850. Currently known reputation in the community is that the SESR889 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1851. Public motor vehicle use of the SESR889 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1852. The SESR889 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1853. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SESR889 Road.

1854. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SESR889 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP1 Road

1855. The SP1 Road is designated as county road number SPVM0001 and SGID road identification number RD200326 and is more or less 0.27 miles long.

1856. Exhibit 139 (attached hereto and incorporated herein) contains certain information pertaining to the SP1 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1857. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP1 Road solely as it crosses United States public land as included and specifically described in Exhibit 139. The SP1 Road includes the segment of road specifically set forth in Exhibit 139 and as exists on the ground.

Acceptance of the SP1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1858. The SP1 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP1 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1860. The appearance of the SP1 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1861. The County confirmed its acceptance of the SP1 by 1974, 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 SP1 Road pursuant to the County's governmental right and authority.

1862. Witnesses with personal knowledge of the history of the SP1 Road confirm public use of this road as a public 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 SP1 Road has been open for all to come 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 SP1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1865. The SP1 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 SP1 Road.

1867. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP2 Road

1868. The SP2 Road is designated as county road number SPVM0002 and SGID road identification number RD200327 and is more or less 1.19 miles long.

1869. Exhibit 140 (attached hereto and incorporated herein) contains certain information pertaining to the SP2 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1870. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP2 Road solely as it crosses United States public land as included and specifically described in Exhibit 140. The SP2 Road includes the segment of road specifically set forth in Exhibit 140 and as exists on the ground.

Acceptance of the SP2 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1871. The SP2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1872. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP2 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1873. The appearance of the SP2 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1874. The County confirmed its acceptance of the SP2 by 1974, 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 SP2 Road pursuant to the County's governmental right and authority.

1875. Witnesses with personal knowledge of the history of the SP2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1876. Currently known reputation in the community is that the SP2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1877. Public motor vehicle use of the SP2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1878. The SP2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1879. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP2 Road.

1880. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP3 Road

1881. The SP3 Road is designated as county road number SPVM0003 and SGID road identification number RD200328 and is more or less 4.29 miles long.

1882. Exhibit 141 (attached hereto and incorporated herein) contains certain information pertaining to the SP3 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1883. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP3 Road solely as it crosses United States public land as included and

specifically described in Exhibit 141. The SP3 Road includes the segment of road specifically set forth in Exhibit 141 and as exists on the ground.

Acceptance of the SP3 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1884. The SP3 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1885. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP3 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1886. The appearance of the SP3 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1887. The County confirmed its acceptance of the SP3 by 1974, 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 SP3 Road pursuant to the County's governmental right and authority.

1888. Witnesses with personal knowledge of the history of the SP3 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1889. Currently known reputation in the community is that the SP3 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1890. Public motor vehicle use of the SP3 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1891. The SP3 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1892. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP3 Road.

1893. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP3 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP3a Road

1894. The SP3a Road is designated as county road number SPVM0003a and SGID road identification number RD200329 and is more or less 0.67 miles long.

1895. Exhibit 142 (attached hereto and incorporated herein) contains certain information pertaining to the SP3a Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1896. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP3a Road solely as it crosses United States public land as included and specifically described in Exhibit 142. The SP3a Road includes the segment of road specifically set forth in Exhibit 142 and as exists on the ground.

Acceptance of the SP3a Road R.S. 2477 Right-of-way Prior to October 21, 1976

1897. The SP3a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1898. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP3a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1899. The appearance of the SP3a Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1900. The County confirmed its acceptance of the SP3a by 1974, 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 SP3a Road pursuant to the County's governmental right and authority.

1901. Witnesses with personal knowledge of the history of the SP3a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1902. Currently known reputation in the community is that the SP3a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1903. Public motor vehicle use of the SP3a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1904. The SP3a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1905. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP3a Road.

1906. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP3a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP5 Road

1907. The SP5 Road is designated as county road number SPVM0005 and SGID road identification number RD200330 and is more or less 0.56 miles long.

1908. Exhibit 143 (attached hereto and incorporated herein) contains certain information pertaining to the SP5 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1909. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP5 Road solely as it crosses United States public land as included and specifically described in Exhibit 143. The SP5 Road includes the segment of road specifically set forth in Exhibit 143 and as exists on the ground.

Acceptance of the SP5 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1910. The SP5 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1911. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP5 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1912. The appearance of the SP5 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1913. The SP5 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 SP5 Road pursuant to the County's governmental right and authority.

1914. Witnesses with personal knowledge of the history of the SP5 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1915. Currently known reputation in the community is that the SP5 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1916. Public motor vehicle use of the SP5 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1917. The SP5 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1918. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP5 Road.

1919. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP5 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP7 Road

1920. The SP7 Road is designated as county road number SPVM0007 and SGID road identification number RD200332 and is more or less 2.37 miles long.

1921. Exhibit 144 (attached hereto and incorporated herein) contains certain information pertaining to the SP7 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1922. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP7 Road solely as it crosses United States public land as included and specifically described in Exhibit 144. The SP7 Road includes the segment of road specifically set forth in Exhibit 144 and as exists on the ground.

Acceptance of the SP7 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1923. The SP7 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1924. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP7 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1925. The appearance of the SP7 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1926. The County confirmed its acceptance of the SP7 by 1974, 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 SP7 Road pursuant to the County's governmental right and authority.

1927. Witnesses with personal knowledge of the history of the SP7 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1928. Currently known reputation in the community is that the SP7 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1929. Public motor vehicle use of the SP7 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1930. The SP7 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1931. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP7 Road.

1932. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP7 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP8 Road

1933. The SP8 Road is designated as county road number SPVM0008 and SGID road identification number RD200333 and is more or less 2.31miles long.

1934. Exhibit 145 (attached hereto and incorporated herein) contains certain information pertaining to the SP8 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1935. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP8 Road solely as it crosses United States public land as included and specifically described in Exhibit 145. The SP8 Road includes the segment of road specifically set forth in Exhibit 145 and as exists on the ground.

Acceptance of the SP8 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1936. The SP8 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1937. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP8 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1938. The appearance of the SP8 Road on the Redmond Canyon 1966 USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1939. The SP8 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 SP8 Road pursuant to the County's governmental right and authority.

1940. Witnesses with personal knowledge of the history of the SP8 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1941. Currently known reputation in the community is that the SP8 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1942. Public motor vehicle use of the SP8 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1943. The SP8 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1944. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP8 Road.

1945. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP8 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP10 Road

1946. The SP10 Road is designated as county road number SPVM0010 and SGID road identification number RD200334 and is more or less 7.29 miles long.

1947. Exhibit 146 (attached hereto and incorporated herein) contains certain information pertaining to the SP10 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1948. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP10 Road solely as it crosses United States public land as included and specifically described in Exhibit 146. The SP10 Road includes the segment of road specifically set forth in Exhibit 146 and as exists on the ground.

Acceptance of the SP10 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1949. The SP10 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1950. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP10 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1951. The appearance of the SP10 Road on the Redmond Canyon (1966) and the Hayes Canyon USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1952. The SP10 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 SP10 Road pursuant to the County's governmental right and authority.

1953. Witnesses with personal knowledge of the history of the SP10 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1954. Currently known reputation in the community is that the SP10 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1955. Public motor vehicle use of the SP10 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1956. The SP10 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1957. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP10 Road.

1958. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP10 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP12 Road

1959. The SP12 Road is designated as county road number SPVM0012 and SGID road identification number RD200335 and is more or less 4.05 miles long.

1960. Exhibit 147 (attached hereto and incorporated herein) contains certain information pertaining to the SP12 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1961. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP12 Road solely as it crosses United States public land as included and specifically described in Exhibit 147. The SP12 Road includes the segment of road specifically set forth in Exhibit 147 and as exists on the ground.

Acceptance of the SP12 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1962. The SP12 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1963. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP12 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1964. The appearance of the SP12 Road on the Redmond Canyon USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1965. The County confirmed its acceptance of the SP12 by 1974, 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 SP12 Road pursuant to the County's governmental right and authority.

1966. Witnesses with personal knowledge of the history of the SP12 Road confirm public use of this road as a public 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 SP12 Road has been open for all to come 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 SP12 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1969. The SP12 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 SP12 Road.

1971. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP12 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP13 Road

1972. The SP13 Road is designated as county road number SPVM0013 and SGID road identification number RD200336 and is more or less 0.73 miles long.

1973. Exhibit 148 (attached hereto and incorporated herein) contains certain information pertaining to the SP13 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1974. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP13 Road solely as it crosses United States public land as included and

specifically described in Exhibit 148. The SP13 Road includes the segment of road specifically set forth in Exhibit 148 and as exists on the ground.

Acceptance of the SP13 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1975. The SP13 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1976. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP13 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1977. The appearance of the SP13 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1978. The County confirmed its acceptance of the SP13 by 1974, 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 SP13 Road pursuant to the County's governmental right and authority.

1979. Witnesses with personal knowledge of the history of the SP13 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1980. Currently known reputation in the community is that the SP13 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1981. Public motor vehicle use of the SP13 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1982. The SP13 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1983. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP13 Road.

1984. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP13 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP15b Road

1985. The SP15b Road is designated as county road number SPVM0015b and SGID road identification number RD200338 and is more or less 0.17 miles long.

1986. Exhibit 149 (attached hereto and incorporated herein) contains certain information pertaining to the SP15b Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1987. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP15b Road solely as it crosses United States public land as included and specifically described in Exhibit 149. The SP15b Road includes the segment of road specifically set forth in Exhibit 149 and as exists on the ground.

Acceptance of the SP15b Road R.S. 2477 Right-of-way Prior to October 21, 1976

1988. The SP15b Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1989. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP15b Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1990. The appearance of the SP15b Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

1991. The County confirmed its acceptance of the SP15b by 1974, 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 SP15b Road pursuant to the County's governmental right and authority.

1992. Witnesses with personal knowledge of the history of the SP15b Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1993. Currently known reputation in the community is that the SP15b Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1994. Public motor vehicle use of the SP15b Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1995. The SP15b Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1996. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP15b Road.

1997. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP15b Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP16 Road

1998. The SP16 Road is designated as county road number SPVM0016 and SGID road identification number RD200339 and is more or less 1.63 miles long.

1999. Exhibit 150 (attached hereto and incorporated herein) contains certain information pertaining to the SP16 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2000. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP16 Road solely as it crosses United States public land as included and specifically described in Exhibit 150. The SP16 Road includes the segment of road specifically set forth in Exhibit 150 and as exists on the ground.

Acceptance of the SP16 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2001. The SP16 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2002. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP16 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2003. The appearance of the SP16 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2004. The SP16 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 SP16 Road pursuant to the County's governmental right and authority.

2005. Witnesses with personal knowledge of the history of the SP16 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2006. Currently known reputation in the community is that the SP16 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2007. Public motor vehicle use of the SP16 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2008. The SP16 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2009. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP16 Road.

2010. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP16 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP17 Road

2011. The SP17 Road is designated as county road number SPVM0017 and SGID road identification number RD200340 and is more or less 1.52 miles long.

2012. Exhibit 151 (attached hereto and incorporated herein) contains certain information pertaining to the SP17 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2013. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP17 Road solely as it crosses United States public land as included and specifically described in Exhibit 151. The SP17 Road includes the segment of road specifically set forth in Exhibit 151 and as exists on the ground.

Acceptance of the SP17 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2014. The SP17 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2015. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP17 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2016. The appearance of the SP17 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2017. The County confirmed its acceptance of the SP17 by 1974, 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 SP17 Road pursuant to the County's governmental right and authority.

2018. Witnesses with personal knowledge of the history of the SP17 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2019. Currently known reputation in the community is that the SP17 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2020. Public motor vehicle use of the SP17 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2021. The SP17 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2022. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP17 Road.

2023. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP17 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP18 Road

2024. The SP18 Road is designated as county road number SPVM0018 and SGID road identification number RD200341 and is more or less 4.28 miles long.

2025. Exhibit 152 (attached hereto and incorporated herein) contains certain information pertaining to the SP18 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2026. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP18 Road solely as it crosses United States public land as included and specifically described in Exhibit 152. The SP18 Road includes the segment of road specifically set forth in Exhibit 152 and as exists on the ground.

Acceptance of the SP18 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2027. The SP18 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2028. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP18 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2029. The appearance of the SP18 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2030. The County confirmed its acceptance of the SP18 by 1974, 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 SP18 Road pursuant to the County's governmental right and authority.

2031. Witnesses with personal knowledge of the history of the SP18 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2032. Currently known reputation in the community is that the SP18 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2033. Public motor vehicle use of the SP18 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2034. The SP18 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2035. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP18 Road.

2036. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP18 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP20 Road

2037. The SP20 Road is designated as county road number SPVM0020 and SGID road identification number RD200342 and is more or less 0.96 miles long.

2038. Exhibit 153 (attached hereto and incorporated herein) contains certain information pertaining to the SP20 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2039. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP20 Road solely as it crosses United States public land as included and specifically described in Exhibit 153. The SP20 Road includes the segment of road specifically set forth in Exhibit 153 and as exists on the ground.

Acceptance of the SP20 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2040. The SP20 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2041. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP20 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2042. The appearance of the SP20 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2043. The County confirmed its acceptance of the SP20 by 1974, 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 SP20 Road pursuant to the County's governmental right and authority.

2044. Witnesses with personal knowledge of the history of the SP20 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2045. Currently known reputation in the community is that the SP20 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2046. Public motor vehicle use of the SP20 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2047. The SP20 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2048. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP20 Road.

2049. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP20 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP22 Road

2050. The SP22 Road is designated as county road number SPVM0022 and SGID road identification number RD200344 and is more or less 1.96 miles long.

2051. Exhibit 154 (attached hereto and incorporated herein) contains certain information pertaining to the SP22 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2052. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP22 Road solely as it crosses United States public land as included and specifically described in Exhibit 154. The SP22 Road includes the segment of road specifically set forth in Exhibit 154 and as exists on the ground.

Acceptance of the SP22 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2053. The SP22 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2054. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP22 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2055. The appearance of the SP22 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2056. The County confirmed its acceptance of the SP22 by 1974, 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 SP22 Road pursuant to the County's governmental right and authority.

2057. Witnesses with personal knowledge of the history of the SP22 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2058. Currently known reputation in the community is that the SP22 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2059. Public motor vehicle use of the SP22 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2060. The SP22 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2061. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP22 Road.

2062. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP22 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP23 Road

2063. The SP23 Road is designated as county road number SPVM0023 and SGID road identification number RD200345 and is more or less 1.42 miles long.

2064. Exhibit 155 (attached hereto and incorporated herein) contains certain information pertaining to the SP23 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2065. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP23 Road solely as it crosses United States public land as included and

specifically described in Exhibit 155. The SP23 Road includes the segment of road specifically set forth in Exhibit 155 and as exists on the ground.

Acceptance of the SP23 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2066. The SP23 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2067. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP23 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2068. The appearance of the SP23 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2069. The County confirmed its acceptance of the SP23 by 1974, 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 SP23 Road pursuant to the County's governmental right and authority.

2070. Witnesses with personal knowledge of the history of the SP23 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2071. Currently known reputation in the community is that the SP23 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2072. Public motor vehicle use of the SP23 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2073. The SP23 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2074. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP23 Road.

2075. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP23 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP26 Road

2076. The SP26 Road is designated as county road number SPVM0026 and SGID road identification number RD200346 and is more or less 3.08 miles long.

2077. Exhibit 156 (attached hereto and incorporated herein) contains certain information pertaining to the SP26 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2078. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP26 Road solely as it crosses United States public land as included and specifically described in Exhibit 156. The SP26 Road includes the segment of road specifically set forth in Exhibit 156 and as exists on the ground.

Acceptance of the SP26 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2079. The SP26 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP26 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2081. The appearance of the SP26 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2082. The County confirmed its acceptance of the SP26 by 1974, 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 SP26 Road pursuant to the County's governmental right and authority.

2083. Witnesses with personal knowledge of the history of the SP26 Road confirm public use of this road as a public 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 SP26 Road has been open for all to come 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 SP26 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2086. The SP26 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 SP26 Road.

2088. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP26 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP27 Road

2089. The SP27 Road is designated as county road number SPVM0027 and SGID road identification number RD200347 and is more or less 0.60 miles long.

2090. Exhibit 157 (attached hereto and incorporated herein) contains certain information pertaining to the SP27 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2091. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP27 Road solely as it crosses United States public land as included and specifically described in Exhibit 157. The SP27 Road includes the segment of road specifically set forth in Exhibit 157 and as exists on the ground.

Acceptance of the SP27 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2092. The SP27 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2093. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP27 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2094. The appearance of the SP27 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2095. The SP27 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 SP27 Road pursuant to the County's governmental right and authority.

2096. Witnesses with personal knowledge of the history of the SP27 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2097. Currently known reputation in the community is that the SP27 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2098. Public motor vehicle use of the SP27 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2099. The SP27 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2100. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP27 Road.

2101. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP27 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP28 Road

2102. The SP28 Road is designated as county road number SPVM0028 and SGID road identification number RD200348 and is more or less 1.34 miles long.

2103. Exhibit 158 (attached hereto and incorporated herein) contains certain information pertaining to the SP28 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2104. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP28 Road solely as it crosses United States public land as included and specifically described in Exhibit 158. The SP28 Road includes the segment of road specifically set forth in Exhibit 158 and as exists on the ground.

Acceptance of the SP28 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2105. The SP28 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2106. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP28 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2107. The appearance of the SP28 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2108. The SP28 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 SP28 Road pursuant to the County's governmental right and authority.

2109. Witnesses with personal knowledge of the history of the SP28 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2110. Currently known reputation in the community is that the SP28 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2111. Public motor vehicle use of the SP28 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2112. The SP28 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2113. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP28 Road.

2114. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP28 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP32 Road

2115. The SP32 Road is designated as county road number SPVM0032 and SGID road identification number RD200350 and is more or less 3.40 miles long.

2116. Exhibit 159 (attached hereto and incorporated herein) contains certain information pertaining to the SP32 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2117. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP32 Road solely as it crosses United States public land as included and specifically described in Exhibit 159. The SP32 Road includes the segment of road specifically set forth in Exhibit 159 and as exists on the ground.

Acceptance of the SP32 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2118. The SP32 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2119. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP32 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2120. The appearance of the SP32 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2121. The County confirmed its acceptance of the SP32 by 1974, 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 SP32 Road pursuant to the County's governmental right and authority.

2122. Witnesses with personal knowledge of the history of the SP32 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2123. Currently known reputation in the community is that the SP32 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2124. Public motor vehicle use of the SP32 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2125. The SP32 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2126. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP32 Road.

2127. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP32 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP33 Road

2128. The SP33 Road is designated as county road number SPVM0033 and SGID road identification number RD200353 and is more or less 1.29 miles long.

2129. Exhibit 160 (attached hereto and incorporated herein) contains certain information pertaining to the SP33 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2130. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP33 Road solely as it crosses United States public land as included and specifically described in Exhibit 160. The SP33 Road includes the segment of road specifically set forth in Exhibit 160 and as exists on the ground.

Acceptance of the SP33 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2131. The SP33 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2132. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP33 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2133. The appearance of the SP33 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2134. The SP33 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 SP33 Road pursuant to the County's governmental right and authority.

2135. Witnesses with personal knowledge of the history of the SP33 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2136. Currently known reputation in the community is that the SP33 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2137. Public motor vehicle use of the SP33 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2138. The SP33 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2139. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP33 Road.

2140. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP33 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP36 Road

2141. The SP36 Road is designated as county road number SPVM0036 and SGID road identification number RD200355 and is more or less 0.56 miles long.

2142. Exhibit 161 (attached hereto and incorporated herein) contains certain information pertaining to the SP36 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2143. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP36 Road solely as it crosses United States public land as included and specifically described in Exhibit 161. The SP36 Road includes the segment of road specifically set forth in Exhibit 161 and as exists on the ground.

Acceptance of the SP36 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2144. The SP36 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2145. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP36 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2146. The appearance of the SP36 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2147. The County confirmed its acceptance of the SP36 by 1974, 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 SP36 Road pursuant to the County's governmental right and authority.

2148. Witnesses with personal knowledge of the history of the SP36 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2149. Currently known reputation in the community is that the SP36 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2150. Public motor vehicle use of the SP36 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2151. The SP36 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2152. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP36 Road.

2153. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP36 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP42 Road

2154. The SP42 Road is designated as county road number SPVM0042 and SGID road identification number RD200356 and is more or less 2.46 miles long.

2155. Exhibit 162 (attached hereto and incorporated herein) contains certain information pertaining to the SP42 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2156. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP42 Road solely as it crosses United States public land as included and

specifically described in Exhibit 162. The SP42 Road includes the segment of road specifically set forth in Exhibit 162 and as exists on the ground.

Acceptance of the SP42 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2157. The SP42 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2158. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP42 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2159. The appearance of the SP42 Road on the Redmond Canyon (1966) and the Hayes Canyon (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2160. The County confirmed its acceptance of the SP42 by 1974, 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 SP42 Road pursuant to the County's governmental right and authority.

2161. Witnesses with personal knowledge of the history of the SP42 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2162. Currently known reputation in the community is that the SP42 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2163. Public motor vehicle use of the SP42 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2164. The SP42 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2165. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP42 Road.

2166. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP42 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP46 Road

2167. The SP46 Road is designated as county road number SPVM0046 and SGID road identification number RD200357 and is more or less 1.53 miles long.

2168. Exhibit 163 (attached hereto and incorporated herein) contains certain information pertaining to the SP46 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2169. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP46 Road solely as it crosses United States public land as included and specifically described in Exhibit 163. The SP46 Road includes the segment of road specifically set forth in Exhibit 163 and as exists on the ground.

Acceptance of the SP46 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2170. The SP46 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2171. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP46 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2172. The appearance of the SP46 Road on the Scipio Lake (1969) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2173. The County confirmed its acceptance of the SP46 by 1974, 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 SP46 Road pursuant to the County's governmental right and authority.

2174. Witnesses with personal knowledge of the history of the SP46 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2175. Currently known reputation in the community is that the SP46 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2176. Public motor vehicle use of the SP46 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2177. The SP46 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2178. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP46 Road.

2179. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP46 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP47 Road

2180. The SP47 Road is designated as county road number SPVM0047 and SGID road identification number RD200358 and is more or less 1.09 miles long.

2181. Exhibit 164 (attached hereto and incorporated herein) contains certain information pertaining to the SP47 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2182. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP47 Road solely as it crosses United States public land as included and specifically described in Exhibit 164. The SP47 Road includes the segment of road specifically set forth in Exhibit 164 and as exists on the ground.

Acceptance of the SP47 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2183. The SP47 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2184. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP47 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2185. The appearance of the SP47 Road on the Redmond Canyon (1966) and the Scipio Lake (1969) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2186. The County confirmed its acceptance of the SP47 by 1974, 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 SP47 Road pursuant to the County's governmental right and authority.

2187. Witnesses with personal knowledge of the history of the SP47 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2188. Currently known reputation in the community is that the SP47 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2189. Public motor vehicle use of the SP47 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2190. The SP47 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2191. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP47 Road.

2192. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP47 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP49 Road

2193. The SP49 Road is designated as county road number SPVM0049 and SGID road identification number RD200360 and is more or less 3.61 miles long.

2194. Exhibit 165 (attached hereto and incorporated herein) contains certain information pertaining to the SP49 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2195. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP49 Road solely as it crosses United States public land as included and specifically described in Exhibit 165. The SP49 Road includes the segment of road specifically set forth in Exhibit 165 and as exists on the ground.

Acceptance of the SP49 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2196. The SP49 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2197. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP49 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2198. The appearance of the SP49 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2199. The County confirmed its acceptance of the SP49 by 1974, 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 SP49 Road pursuant to the County's governmental right and authority.

2200. Witnesses with personal knowledge of the history of the SP49 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2201. Currently known reputation in the community is that the SP49 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2202. Public motor vehicle use of the SP49 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2203. The SP49 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2204. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP49 Road.

2205. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP49 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP52 Road

2206. The SP52 Road is designated as county road number SPVM0052 and SGID road identification number RD200361 and is more or less 0.35 miles long.

2207. Exhibit 166 (attached hereto and incorporated herein) contains certain information pertaining to the SP52 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2208. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP52 Road solely as it crosses United States public land as included and specifically described in Exhibit 166. The SP52 Road includes the segment of road specifically set forth in Exhibit 166 and as exists on the ground.

Acceptance of the SP52 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2209. The SP52 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2210. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP52 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2211. The appearance of the SP52 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2212. The SP52 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 SP52 Road pursuant to the County's governmental right and authority.

2213. Witnesses with personal knowledge of the history of the SP52 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2214. Currently known reputation in the community is that the SP52 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2215. Public motor vehicle use of the SP52 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2216. The SP52 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2217. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP52 Road.

2218. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP52 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP53 Road

2219. The SP53 Road is designated as county road number SPVM0053 and SGID road identification number RD200362 and is more or less 1.25 miles long.

2220. Exhibit 167 (attached hereto and incorporated herein) contains certain information pertaining to the SP53 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2221. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP53 Road solely as it crosses United States public land as included and specifically described in Exhibit 167. The SP53 Road includes the segment of road specifically set forth in Exhibit 167 and as exists on the ground.

Acceptance of the SP53 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2222. The SP53 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2223. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP53 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2224. The appearance of the SP53 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2225. The SP53 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 SP53 Road pursuant to the County's governmental right and authority.

2226. Witnesses with personal knowledge of the history of the SP53 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2227. Currently known reputation in the community is that the SP53 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2228. Public motor vehicle use of the SP53 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2229. The SP53 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2230. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP53 Road.

2231. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP53 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP54 Road

2232. The SP54 Road is designated as county road number SPVM0054 and SGID road identification number RD200363 and is more or less 1.65 miles long.

2233. Exhibit 168 (attached hereto and incorporated herein) contains certain information pertaining to the SP54 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2234. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP54 Road solely as it crosses United States public land as included and specifically described in Exhibit 168. The SP54 Road includes the segment of road specifically set forth in Exhibit 168 and as exists on the ground.

Acceptance of the SP54 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2235. The SP54 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP54 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2237. The appearance of the SP54 Road on the Redmond Canyon (1966) and the Hayes Canyon (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2238. The SP54 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 SP54 Road pursuant to the County's governmental right and authority.

2239. Witnesses with personal knowledge of the history of the SP54 Road confirm public use of this road as a public 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 SP54 Road has been open for all to come 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 SP54 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2242. The SP54 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 SP54 Road.

2244. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP54 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP55 Road

2245. The SP55 Road is designated as county road number SPVM0055 and SGID road identification number RD200365 and is more or less 0.49 miles long.

2246. Exhibit 169 (attached hereto and incorporated herein) contains certain information pertaining to the SP55 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2247. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP55 Road solely as it crosses United States public land as included and

specifically described in Exhibit 169. The SP55 Road includes the segment of road specifically set forth in Exhibit 169 and as exists on the ground.

Acceptance of the SP55 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2248. The SP55 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2249. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP55 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2250. The appearance of the SP55 Road on the Redmond Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2251. The SP55 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 SP55 Road pursuant to the County's governmental right and authority.

2252. Witnesses with personal knowledge of the history of the SP55 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2253. Currently known reputation in the community is that the SP55 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2254. Public motor vehicle use of the SP55 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2255. The SP55 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2256. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP55 Road.

2257. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP55 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP56 Road

2258. The SP56 Road is designated as county road number SPVM0056 and SGID road identification number RD200366 and is more or less 1.99 miles long.

2259. Exhibit 170 (attached hereto and incorporated herein) contains certain information pertaining to the SP56 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2260. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP56 Road solely as it crosses United States public land as included and specifically described in Exhibit 170. The SP56 Road includes the segment of road specifically set forth in Exhibit 170 and as exists on the ground.

Acceptance of the SP56 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2261. The SP56 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2262. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP56 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2263. The appearance of the SP56 Road on the Redmond Canyon (1966) and the Hayes Canyon (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2264. The County confirmed its acceptance of the SP56 by 1974, 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 SP56 Road pursuant to the County's governmental right and authority.

2265. Witnesses with personal knowledge of the history of the SP56 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2266. Currently known reputation in the community is that the SP56 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2267. Public motor vehicle use of the SP56 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2268. The SP56 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2269. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP56 Road.

2270. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP56 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP57 Road

2271. The SP57 Road is designated as county road number SPVM0057 and SGID road identification number RD200367 and is more or less 0.84 miles long.

2272. Exhibit 171 (attached hereto and incorporated herein) contains certain information pertaining to the SP57 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2273. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP57 Road solely as it crosses United States public land as included and specifically described in Exhibit 171. The SP57 Road includes the segment of road specifically set forth in Exhibit 171 and as exists on the ground.

Acceptance of the SP57 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2274. The SP57 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2275. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP57 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2276. The appearance of the SP57 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2277. The SP57 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 SP57 Road pursuant to the County's governmental right and authority.

2278. Witnesses with personal knowledge of the history of the SP57 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2279. Currently known reputation in the community is that the SP57 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2280. Public motor vehicle use of the SP57 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2281. The SP57 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2282. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP57 Road.

2283. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP57 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP58 Road

2284. The SP58 Road is designated as county road number SPVM0058 and SGID road identification number RD200368 and is more or less 0.37 miles long.

2285. Exhibit 172 (attached hereto and incorporated herein) contains certain information pertaining to the SP58 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2286. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP58 Road solely as it crosses United States public land as included and specifically described in Exhibit 172. The SP58 Road includes the segment of road specifically set forth in Exhibit 172 and as exists on the ground.

Acceptance of the SP58 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2287. The SP58 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2288. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP58 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2289. The appearance of the SP58 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2290. The SP58 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 SP58 Road pursuant to the County's governmental right and authority.

2291. Witnesses with personal knowledge of the history of the SP58 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2292. Currently known reputation in the community is that the SP58 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2293. Public motor vehicle use of the SP58 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2294. The SP58 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2295. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP58 Road.

2296. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP58 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP60 Road

2297. The SP60 Road is designated as county road number SPVM0060 and SGID road identification number RD200370 and is more or less 1.82 miles long.

2298. Exhibit 173 (attached hereto and incorporated herein) contains certain information pertaining to the SP60 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2299. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP60 Road solely as it crosses United States public land as included and specifically described in Exhibit 173. The SP60 Road includes the segment of road specifically set forth in Exhibit 173 and as exists on the ground.

Acceptance of the SP60 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2300. The SP60 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2301. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP60 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2302. The appearance of the SP60 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2303. The County confirmed its acceptance of the SP60 by 1974, 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 SP60 Road pursuant to the County's governmental right and authority.

2304. Witnesses with personal knowledge of the history of the SP60 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2305. Currently known reputation in the community is that the SP60 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2306. Public motor vehicle use of the SP60 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2307. The SP60 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2308. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP60 Road.

2309. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP60 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP61 Road

2310. The SP61 Road is designated as county road number SPVM0061 and SGID road identification number RD200371 and is more or less 1.43 miles long.

2311. Exhibit 174 (attached hereto and incorporated herein) contains certain information pertaining to the SP61 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2312. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP61 Road solely as it crosses United States public land as included and specifically described in Exhibit 174. The SP61 Road includes the segment of road specifically set forth in Exhibit 174 and as exists on the ground.

Acceptance of the SP61 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2313. The SP61 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2314. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP61 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2315. The appearance of the SP61 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2316. The SP61 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 SP61 Road pursuant to the County's governmental right and authority.

2317. Witnesses with personal knowledge of the history of the SP61 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2318. Currently known reputation in the community is that the SP61 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2319. Public motor vehicle use of the SP61 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2320. The SP61 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2321. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP61 Road.

2322. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP61 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP62 Road

2323. The SP62 Road is designated as county road number SPVM0062 and SGID road identification number RD200372 and is more or less 1.49 miles long.

2324. Exhibit 175 (attached hereto and incorporated herein) contains certain information pertaining to the SP62 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2325. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP62 Road solely as it crosses United States public land as included and specifically described in Exhibit 175. The SP62 Road includes the segment of road specifically set forth in Exhibit 175 and as exists on the ground.

Acceptance of the SP62 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2326. The SP62 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2327. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP62 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2328. The appearance of the SP62 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 11for more detailed map information.

2329. The SP62 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 SP62 Road pursuant to the County's governmental right and authority.

2330. Witnesses with personal knowledge of the history of the SP62 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2331. Currently known reputation in the community is that the SP62 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2332. Public motor vehicle use of the SP62 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2333. The SP62 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2334. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP62 Road.

2335. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP62 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP64 Road

2336. The SP64 Road is designated as county road number SPVM0064 and SGID road identification number RD200373 and is more or less 5.42 miles long.

2337. Exhibit 176 (attached hereto and incorporated herein) contains certain information pertaining to the SP64 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2338. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP64 Road solely as it crosses United States public land as included and

specifically described in Exhibit 176. The SP64 Road includes the segment of road specifically set forth in Exhibit 176 and as exists on the ground.

Acceptance of the SP64 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2339. The SP64 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP64 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2341. The appearance of the SP64 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2342. The SP64 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 SP64 Road pursuant to the County's governmental right and authority.

2343. Witnesses with personal knowledge of the history of the SP64 Road confirm public use of this road as a public 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 SP64 Road has been open for all to come 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 SP64 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2346. The SP64 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 SP64 Road.

2348. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP64 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP65 Road

2349. The SP65 Road is designated as county road number SPVM0065 and SGID road identification number RD200374 and is more or less 1.09 miles long.

2350. Exhibit 177 (attached hereto and incorporated herein) contains certain information pertaining to the SP65 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2351. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP65 Road solely as it crosses United States public land as included and specifically described in Exhibit 177. The SP65 Road includes the segment of road specifically set forth in Exhibit 177 and as exists on the ground.

Acceptance of the SP65 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2352. The SP65 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2353. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP65 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2354. The appearance of the SP65 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2355. The County confirmed its acceptance of the SP65 by 1974, 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 SP65 Road pursuant to the County's governmental right and authority.

2356. Witnesses with personal knowledge of the history of the SP65 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2357. Currently known reputation in the community is that the SP65 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2358. Public motor vehicle use of the SP65 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2359. The SP65 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2360. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP65 Road.

2361. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP65 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP68 Road

2362. The SP68 Road is designated as county road number SPVM0068 and SGID road identification number RD200375 and is more or less 1.12 miles long.

2363. Exhibit 178 (attached hereto and incorporated herein) contains certain information pertaining to the SP68 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2364. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP68 Road solely as it crosses United States public land as included and specifically described in Exhibit 178. The SP68 Road includes the segment of road specifically set forth in Exhibit 178 and as exists on the ground.

Acceptance of the SP68 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2365. The SP68 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2366. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP68 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2367. The appearance of the SP68 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2368. The County confirmed its acceptance of the SP68 by 1974, 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 SP68 Road pursuant to the County's governmental right and authority.

2369. Witnesses with personal knowledge of the history of the SP68 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2370. Currently known reputation in the community is that the SP68 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2371. Public motor vehicle use of the SP68 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2372. The SP68 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2373. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP68 Road.

2374. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP68 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP73 Road

2375. The SP73 Road is designated as county road number SPVM0073 and SGID road identification number RD200376 and is more or less 0.94 miles long.

2376. Exhibit 179 (attached hereto and incorporated herein) contains certain information pertaining to the SP73 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2377. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP73 Road solely as it crosses United States public land as included and specifically described in Exhibit 179. The SP73 Road includes the segment of road specifically set forth in Exhibit 179 and as exists on the ground.

Acceptance of the SP73 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2378. The SP73 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2379. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP73 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2380. The appearance of the SP73 Road on the Scipio South (1969) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2381. The SP73 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 SP73 Road pursuant to the County's governmental right and authority.

2382. Witnesses with personal knowledge of the history of the SP73 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2383. Currently known reputation in the community is that the SP73 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2384. Public motor vehicle use of the SP73 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2385. The SP73 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2386. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP73 Road.

2387. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP73 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP76 Road

2388. The SP76 Road is designated as county road number SPVM0076 and SGID road identification number RD200378 and is more or less 1.70 miles long.

2389. Exhibit 180 (attached hereto and incorporated herein) contains certain information pertaining to the SP76 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2390. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP76 Road solely as it crosses United States public land as included and specifically described in Exhibit 180. The SP76 Road includes the segment of road specifically set forth in Exhibit 180 and as exists on the ground.

Acceptance of the SP76 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2391. The SP76 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2392. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP76 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2393. The appearance of the SP76 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2394. The County confirmed its acceptance of the SP76 by 1974, 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 SP76 Road pursuant to the County's governmental right and authority.

2395. Witnesses with personal knowledge of the history of the SP76 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2396. Currently known reputation in the community is that the SP76 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2397. Public motor vehicle use of the SP76 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2398. The SP76 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2399. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP76 Road.

2400. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP76 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP77 Road

2401. The SP77 Road, parts of which were formerly known as SPVM0077 and SPVM0077 (SGID road identification number 200381), is designated as county road number SPVM0077 and SGID road identification number RD200379 and is more or less 1.33 miles long.

2402. Exhibit 181 (attached hereto and incorporated herein) contains certain information pertaining to the SP77 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2403. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP77 Road solely as it crosses United States public land as included and specifically described in Exhibit 181. The SP77 Road includes the segment of road specifically set forth in Exhibit 181 and as exists on the ground.

Acceptance of the SP77 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2404. The SP77 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2405. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP77 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2406. The appearance of the SP77 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2407. The SP77 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 SP77 Road pursuant to the County's governmental right and authority.

2408. Witnesses with personal knowledge of the history of the SP77 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2409. Currently known reputation in the community is that the SP77 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2410. Public motor vehicle use of the SP77 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2411. The SP77 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2412. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP77 Road.

2413. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP77 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP78 Road

2414. The SP78 Road is designated as county road number SPVM0078 and SGID road identification number RD200385 and is more or less 0.61 miles long.

2415. Exhibit 182 (attached hereto and incorporated herein) contains certain information pertaining to the SP78 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2416. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP78 Road solely as it crosses United States public land as included and specifically described in Exhibit 182. The SP78 Road includes the segment of road specifically set forth in Exhibit 182 and as exists on the ground.

Acceptance of the SP78 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2417. The SP78 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2418. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP78 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2419. The appearance of the SP78 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2420. The County confirmed its acceptance of the SP78 by 1974, 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 SP78 Road pursuant to the County's governmental right and authority.

2421. Witnesses with personal knowledge of the history of the SP78 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2422. Currently known reputation in the community is that the SP78 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2423. Public motor vehicle use of the SP78 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2424. The SP78 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2425. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP78 Road.

2426. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP78 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP81 Road

2427. The SP81 Road is designated as county road number SPVM0081 and SGID road identification number RD200387 and is more or less 2.57 miles long.

2428. Exhibit 183 (attached hereto and incorporated herein) contains certain information pertaining to the SP81 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2429. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP81 Road solely as it crosses United States public land as included and

specifically described in Exhibit 183. The SP81 Road includes the segment of road specifically set forth in Exhibit 183 and as exists on the ground.

Acceptance of the SP81 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2430. The SP81 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2431. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP81 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2432. The appearance of the SP81 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2433. The County confirmed its acceptance of the SP81 by 1974, 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 SP81 Road pursuant to the County's governmental right and authority.

2434. Witnesses with personal knowledge of the history of the SP81 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2435. Currently known reputation in the community is that the SP81 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2436. Public motor vehicle use of the SP81 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2437. The SP81 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2438. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP81 Road.

2439. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP81 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP82 Road

2440. The SP82 Road is designated as county road number SPVM0082 and SGID road identification number RD200388 and is more or less 1.16 miles long.

2441. Exhibit 184 (attached hereto and incorporated herein) contains certain information pertaining to the SP82 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2442. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP82 Road solely as it crosses United States public land as included and specifically described in Exhibit 184. The SP82 Road includes the segment of road specifically set forth in Exhibit 184 and as exists on the ground.

Acceptance of the SP82 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2443. The SP82 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2444. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP82 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2445. The appearance of the SP82 Road on the Hayes Canyon (1966) and South Scipio (1969) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2446. The County confirmed its acceptance of the SP82 by 1974, 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 SP82 Road pursuant to the County's governmental right and authority.

2447. Witnesses with personal knowledge of the history of the SP82 Road confirm public use of this road as a public 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 SP82 Road has been open for all to come 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 SP82 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2450. The SP82 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 SP82 Road.

2452. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP82 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP84 Road

2453. The SP84 Road is designated as county road number SPVM0084 and SGID road identification number RD200390 and is more or less 0.17 miles long.

2454. Exhibit 185 (attached hereto and incorporated herein) contains certain information pertaining to the SP84 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2455. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP84 Road solely as it crosses United States public land as included and specifically described in Exhibit 185. The SP84 Road includes the segment of road specifically set forth in Exhibit 185 and as exists on the ground.

Acceptance of the SP84 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2456. The SP84 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2457. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP84 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2458. The appearance of the SP84 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2459. The SP84 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 SP84 Road pursuant to the County's governmental right and authority.

2460. Witnesses with personal knowledge of the history of the SP84 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2461. Currently known reputation in the community is that the SP84 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2462. Public motor vehicle use of the SP84 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2463. The SP84 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2464. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP84 Road.

2465. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP84 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP86 Road

2466. The SP86 Road is designated as county road number SPVM0086 and SGID road identification number RD200391 and is more or less 0.35 miles long.

2467. Exhibit 186 (attached hereto and incorporated herein) contains certain information pertaining to the SP86 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2468. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP86 Road solely as it crosses United States public land as included and specifically described in Exhibit 186. The SP86 Road includes the segment of road specifically set forth in Exhibit 186 and as exists on the ground.

Acceptance of the SP86 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2469. The SP86 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2470. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP86 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2471. The appearance of the SP86 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2472. The SP86 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 SP86 Road pursuant to the County's governmental right and authority.

2473. Witnesses with personal knowledge of the history of the SP86 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2474. Currently known reputation in the community is that the SP86 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2475. Public motor vehicle use of the SP86 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2476. The SP86 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2477. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP86 Road.

2478. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP86 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP88 Road

2479. The SP88 Road is designated as county road number SPVM0088 and SGID road identification number RD200393 and is more or less 0.59 miles long.

2480. Exhibit 187 (attached hereto and incorporated herein) contains certain information pertaining to the SP88 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2481. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP88 Road solely as it crosses United States public land as included and specifically described in Exhibit 187. The SP88 Road includes the segment of road specifically set forth in Exhibit 187 and as exists on the ground.

Acceptance of the SP88 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2482. The SP88 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2483. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP88 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2484. The appearance of the SP88 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2485. The SP88 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 SP88 Road pursuant to the County's governmental right and authority.

2486. Witnesses with personal knowledge of the history of the SP88 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2487. Currently known reputation in the community is that the SP88 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2488. Public motor vehicle use of the SP88 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2489. The SP88 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2490. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP88 Road.

2491. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP88 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP88aRoad

2492. The SP88aRoad is designated as county road number SPVM0088a and SGID road identification number RD200394 and is more or less 0.19 miles long.

2493. Exhibit 188 (attached hereto and incorporated herein) contains certain information pertaining to the SP88aRoad including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2494. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP88aRoad solely as it crosses United States public land as included and specifically described in Exhibit 188. The SP88aRoad includes the segment of road specifically set forth in Exhibit 188 and as exists on the ground.

Acceptance of the SP88aRoad R.S. 2477 Right-of-way Prior to October 21, 1976

2495. The SP88aRoad has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2496. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP88aRoad as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2497. The appearance of the SP88aRoad on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2498. The SP88aRoad 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 SP88aRoad pursuant to the County's governmental right and authority.

2499. Witnesses with personal knowledge of the history of the SP88aRoad confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2500. Currently known reputation in the community is that the SP88aRoad has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2501. Public motor vehicle use of the SP88aRoad as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2502. The SP88aRoad traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2503. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP88aRoad.

2504. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP88aRoad on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP90 Road

2505. The SP90 Road is designated as county road number SPVM0090 and SGID road identification number RD200395 and is more or less 3.36 miles long.

2506. Exhibit 189 (attached hereto and incorporated herein) contains certain information pertaining to the SP90 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2507. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP90 Road solely as it crosses United States public land as included and specifically described in Exhibit 189. The SP90 Road includes the segment of road specifically set forth in Exhibit 189 and as exists on the ground.

Acceptance of the SP90 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2508. The SP90 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2509. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP90 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2510. The appearance of the SP90 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2511. The County confirmed its acceptance of the SP90 by 1974, 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 SP90 Road pursuant to the County's governmental right and authority.

2512. Witnesses with personal knowledge of the history of the SP90 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2513. Currently known reputation in the community is that the SP90 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2514. Public motor vehicle use of the SP90 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2515. The SP90 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2516. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP90 Road.

2517. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP90 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP91 Road

2518. The SP91 Road is designated as county road number SPVM0091 and SGID road identification number RD200396 and is more or less 2.60 miles long.

2519. Exhibit 190 (attached hereto and incorporated herein) contains certain information pertaining to the SP91 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2520. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP91 Road solely as it crosses United States public land as included and

specifically described in Exhibit 190. The SP91 Road includes the segment of road specifically set forth in Exhibit 190 and as exists on the ground.

Acceptance of the SP91 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2521. The SP91 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2522. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP91 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2523. The appearance of the SP91 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2524. The SP91 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 SP91 Road pursuant to the County's governmental right and authority.

2525. Witnesses with personal knowledge of the history of the SP91 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2526. Currently known reputation in the community is that the SP91 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2527. Public motor vehicle use of the SP91 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2528. The SP91 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2529. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP91 Road.

2530. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP91 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP92 Road

2531. The SP92 Road is designated as county road number SPVM0092 and SGID road identification number RD200397 and is more or less 1.49 miles long.

2532. Exhibit 191 (attached hereto and incorporated herein) contains certain information pertaining to the SP92 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2533. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP92 Road solely as it crosses United States public land as included and specifically described in Exhibit 191. The SP92 Road includes the segment of road specifically set forth in Exhibit 191 and as exists on the ground.

Acceptance of the SP92 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2534. The SP92 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2535. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP92 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2536. The appearance of the SP92 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2537. The SP92 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 SP92 Road pursuant to the County's governmental right and authority.

2538. Witnesses with personal knowledge of the history of the SP92 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2539. Currently known reputation in the community is that the SP92 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2540. Public motor vehicle use of the SP92 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2541. The SP92 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2542. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP92 Road.

2543. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP92 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP100 Road

2544. The SP100 Road is designated as county road number SPVM0100 and SGID road identification number RD200403 and is more or less 0.40 miles long.

2545. Exhibit 192 (attached hereto and incorporated herein) contains certain information pertaining to the SP100 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2546. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP100 Road solely as it crosses United States public land as included and specifically described in Exhibit 192. The SP100 Road includes the segment of road specifically set forth in Exhibit 192 and as exists on the ground.

Acceptance of the SP100 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2547. The SP100 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2548. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP100 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2549. The appearance of the SP100 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2550. The SP100 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 SP100 Road pursuant to the County's governmental right and authority.

2551. Witnesses with personal knowledge of the history of the SP100 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2552. Currently known reputation in the community is that the SP100 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2553. Public motor vehicle use of the SP100 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2554. The SP100 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2555. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP100 Road.

2556. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP100 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP107 Road

2557. The SP107 Road is designated as county road number SPVM0107 and SGID road identification number RD200406 and is more or less 1.01 miles long.

2558. Exhibit 193 (attached hereto and incorporated herein) contains certain information pertaining to the SP107 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2559. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP107 Road solely as it crosses United States public land as included and specifically described in Exhibit 193. The SP107 Road includes the segment of road specifically set forth in Exhibit 193 and as exists on the ground.

Acceptance of the SP107 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2560. The SP107 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2561. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP107 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2562. The appearance of the SP107 Road on the Hayes Canyon (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2563. The SP107 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 SP107 Road pursuant to the County's governmental right and authority.

2564. Witnesses with personal knowledge of the history of the SP107 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2565. Currently known reputation in the community is that the SP107 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2566. Public motor vehicle use of the SP107 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2567. The SP107 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2568. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP107 Road.

2569. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP107 Road on lands owned 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
MAIN CANYON AREA

2570. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2571. The Main Canyon Area is located in northernmost and western portion of Sanpete County. *See* Exhibit 8.

2572. The Main Canyon Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Dry Canyon Road, Sanp19, (2) Left Hand Fork Road, Sanp43, (3) Main Canyon Road, Sanp8, (4) SP416 Road; (5) SP417a Road; (6) SP422 Road; (7) SP423 Road; (8) SP427 Road; (9) SP428 Road; (10) SP434 Road; (11) SP436 Road; (12) SP438 Road; (13) SP441 Road; (14) SP447 Road; (15) SP448 Road; (16) SP449 Road; (17) SP451 Road; (18) SP453 Road; (19) SP460 Road; and (20) SP461 Road.

2573. Each right-of-way claimed in the Main 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.

2574. All rights-of-way claimed in the Main 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.

2575. All rights-of-way claimed in the Main 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* UTAH CODE ANN. § 72-5-302(4) (b) (2003).

2576. Prior to October 21, 1976, the State of Utah, Sanpete County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Dry Canyon Road, Sanp19

2577. The Dry Canyon Road is designated as county road number Sanp19 and SGID road identification number RD200100 and is more or less 6.63 miles long.

2578. Exhibit 194 (attached hereto and incorporated herein) contains certain information pertaining to the Dry Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2579. 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 194. The Dry Canyon Road includes the segment of road specifically set forth in Exhibit 194 and as it exists on the ground.

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

2580. The Dry Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2581. Aerial photography from 1975 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. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2582. The appearance of the Dry Canyon Road on the Manti (1965), and Wales (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2583. The County confirmed its acceptance of the Dry Canyon Road by 1974, 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.

2584. 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.

2585. 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.

2586. 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 underlying this road.

2587. The Dry Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2588. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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.

2589. 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.

Left Hand Fork Road, Sanp43

2590. The Left Hand Fork Road is designated as county road number Sanp43 and SGID road identification number RD200225 and is more or less 5.93 miles long.

2591. Exhibit 195 (attached hereto and incorporated herein) contains certain information pertaining to the Left Hand Fork Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2592. In this action, the State and County seek to quiet title to the public highway right-of-way for the Left Hand Fork Road solely as it crosses United States public land as included and specifically described in Exhibit 195. The Left Hand Fork Road includes the segment of road specifically set forth in Exhibit 195 and as it exists on the ground.

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

2593. The Left Hand Fork Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2594. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Left Hand Fork Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2595. The appearance of the Left Hand Fork Road on the Manti (1965), and Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2596. The Left Hand Fork 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 Left Hand Fork Road using public funds pursuant to the County's governmental right and authority.

2597. Witnesses with personal knowledge of the history of the Left Hand Fork Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2598. Currently known reputation in the community is that the Left Hand Fork Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2599. Public motor vehicle use of the Left Hand Fork Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2600. The Left Hand Fork Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2601. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Left Hand Fork Road.

2602. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Left Hand Fork Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Main Canyon Road, Sanp8

2603. The Main Canyon Road is designated as county road number Sanp8 and SGID road identification number RD200266 and is more or less 9.55 miles long.

2604. Exhibit 196 (attached hereto and incorporated herein) contains certain information pertaining to the Main Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2605. In this action, the State and County seek to quiet title to the public highway right-of-way for the Main Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 196. The Main Canyon Road includes the segment of road specifically set forth in Exhibit 196 and as it exists on the ground.

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

2606. The Main Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2607. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Main Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2608. The appearance of the Main Canyon Road on the Manti (1965), Hells Kitchen Canyon SE (1965), and Chriss Canyon (1965) USGS 7.5-minute quadrangle maps evidences the

existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2609. The County confirmed its acceptance of the Main Canyon Road by 1974, 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 Main Canyon Road using public funds pursuant to the County's governmental right and authority.

2610. Witnesses with personal knowledge of the history of the Main 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.

2611. Currently known reputation in the community is that the Main 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.

2612. Public motor vehicle use of the Main Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2613. The Main Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2614. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Main Canyon Road.

2615. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Main 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.

SP416 Road

2616. The SP416 Road is designated as county road number SPVM0416 and SGID road identification number RD200624 and is more or less .52 miles long.

2617. Exhibit 197 (attached hereto and incorporated herein) contains certain information pertaining to the SP416 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2618. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP416 Road solely as it crosses United States public land as included and specifically described in Exhibit 197. The SP416 Road includes the segment of road specifically set forth in Exhibit 197 and as exists on the ground.

Acceptance of the SP416 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2619. The SP416 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2620. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP416 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2621. The appearance of the SP416 Road on the Manti (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2622. The SP416 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 SP416 Road pursuant to the County's governmental right and authority.

2623. Witnesses with personal knowledge of the history of the SP416 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2624. Currently known reputation in the community is that the SP416 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2625. Public motor vehicle use of the SP416 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2626. The SP416 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2627. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP416 Road.

2628. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP416 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP417a Road

2629. The SP417a Road is designated as county road number SPVM0417a and SGID road identification number RD200625 and is more or less .43 miles long.

2630. Exhibit 198 (attached hereto and incorporated herein) contains certain information pertaining to the SP417a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2631. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP417a Road solely as it crosses United States public land as included and specifically described in Exhibit 198. The SP417a Road includes the segment of road specifically set forth in Exhibit 198 and as exists on the ground.

Acceptance of the SP417a Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2632. The SP417a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2633. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP417a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2634. The appearance of the SP417a Road on the Manti (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2635. The SP417a 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 SP417a Road pursuant to the County's governmental right and authority.

2636. Witnesses with personal knowledge of the history of the SP417a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2637. Currently known reputation in the community is that the SP417a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2638. Public motor vehicle use of the SP417a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2639. The SP417a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2640. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP417a Road.

2641. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP417a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP422 Road

2642. The SP422 Road is designated as county road number SPVM0422 and SGID road identification number RD200626 and is more or less 1.02 miles long.

2643. Exhibit 199 (attached hereto and incorporated herein) contains certain information pertaining to the SP422 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2644. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP422 Road solely as it crosses United States public land as included and

specifically described in Exhibit 199. The SP422 Road includes the segment of road specifically set forth in Exhibit 199 and as exists on the ground.

Acceptance of the SP422 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2645. The SP422 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 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP422 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2647. The appearance of the SP422 Road on the Manti (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2648. The SP422 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 SP422 Road pursuant to the County's governmental right and authority.

2649. Witnesses with personal knowledge of the history of the SP422 Road confirm public use of this road as a public 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 SP422 Road has been open for all to come 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 SP422 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2652. The SP422 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 SP422 Road.

2654. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP422 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP423 Road

2655. The SP423 Road is designated as county road number SPVM0423 and SGID road identification number RD200627 and is more or less .75 miles long.

2656. Exhibit 200 (attached hereto and incorporated herein) contains certain information pertaining to the SP423 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2657. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP423 Road solely as it crosses United States public land as included and specifically described in Exhibit 200. The SP423 Road includes the segment of road specifically set forth in Exhibit 200 and as exists on the ground.

Acceptance of the SP423 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2658. The SP423 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2659. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP423 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2660. The appearance of the SP423 Road on the Manti (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2661. The SP423 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 SP423 Road pursuant to the County's governmental right and authority.

2662. Witnesses with personal knowledge of the history of the SP423 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2663. Currently known reputation in the community is that the SP423 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2664. Public motor vehicle use of the SP423 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2665. The SP423 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2666. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP423 Road.

2667. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP423 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP427 Road

2668. The SP427 Road is designated as county road number SPVM0427 and SGID road identification number RD200628 and is more or less 1.17 miles long.

2669. Exhibit 201 (attached hereto and incorporated herein) contains certain information pertaining to the SP427 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2670. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP427 Road solely as it crosses United States public land as included and specifically described in Exhibit 201. The SP427 Road includes the segment of road specifically set forth in Exhibit 201 and as exists on the ground.

Acceptance of the SP427 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2671. The SP427 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2672. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP427 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2673. The appearance of the SP427 Road on the Manti (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2674. The SP427 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 SP427 Road pursuant to the County's governmental right and authority.

2675. Witnesses with personal knowledge of the history of the SP427 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2676. Currently known reputation in the community is that the SP427 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2677. Public motor vehicle use of the SP427 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2678. The SP427 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2679. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP427 Road.

2680. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP427 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP428 Road

2681. The SP428 Road is designated as county road number SPVM0428 and SGID road identification number RD200629 and is more or less 1.22 miles long.

2682. Exhibit 202 (attached hereto and incorporated herein) contains certain information pertaining to the SP428 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2683. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP428 Road solely as it crosses United States public land as included and specifically described in Exhibit 202. The SP428 Road includes the segment of road specifically set forth in Exhibit 202 and as exists on the ground.

Acceptance of the SP428 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2684. The SP428 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2685. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP428 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2686. The appearance of the SP428 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2687. The SP428 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 SP428 Road pursuant to the County's governmental right and authority.

2688. Witnesses with personal knowledge of the history of the SP428 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2689. Currently known reputation in the community is that the SP428 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2690. Public motor vehicle use of the SP428 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2691. The SP428 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2692. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP428 Road.

2693. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP428 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP434 Road

2694. The SP434 Road is designated as county road number SPVM0434 and SGID road identification number RD200635 and is more or less 2.86 miles long.

2695. Exhibit 203 (attached hereto and incorporated herein) contains certain information pertaining to the SP434 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2696. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP434 Road solely as it crosses United States public land as included and specifically described in Exhibit 203. The SP434 Road includes the segment of road specifically set forth in Exhibit 203 and as exists on the ground.

Acceptance of the SP434 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2697. The SP434 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2698. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP434 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2699. The appearance of the SP434 Road on the Manti (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2700. The SP434 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 SP434 Road pursuant to the County's governmental right and authority.

2701. Witnesses with personal knowledge of the history of the SP434 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2702. Currently known reputation in the community is that the SP434 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2703. Public motor vehicle use of the SP434 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2704. The SP434 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2705. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP434 Road.

2706. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP434 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP436 Road

2707. The SP436 Road is designated as county road number SPVM0436 and SGID road identification number RD200636 and is more or less .56 miles long.

2708. Exhibit 204 (attached hereto and incorporated herein) contains certain information pertaining to the SP436 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2709. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP436 Road solely as it crosses United States public land as included and specifically described in Exhibit 204. The SP436 Road includes the segment of road specifically set forth in Exhibit 204 and as exists on the ground.

Acceptance of the SP436 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2710. The SP436 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2711. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP436 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2712. The SP436 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 SP436 Road pursuant to the County's governmental right and authority.

2713. Witnesses with personal knowledge of the history of the SP436 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2714. Currently known reputation in the community is that the SP436 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2715. Public motor vehicle use of the SP436 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2716. The SP436 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2717. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP436 Road.

2718. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP436 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP438 Road

2719. The SP438 Road is designated as county road number SPVM0438 and SGID road identification number RD200637 and is more or less 2.21 miles long.

2720. Exhibit 205 (attached hereto and incorporated herein) contains certain information pertaining to the SP438 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2721. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP438 Road solely as it crosses United States public land as included and specifically described in Exhibit 205. The SP438 Road includes the segment of road specifically set forth in Exhibit 205 and as exists on the ground.

Acceptance of the SP438 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2722. The SP438 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2723. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP438 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2724. The appearance of the SP438 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2725. The County confirmed its acceptance of the SP438 by 1974, 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 SP438 Road pursuant to the County's governmental right and authority.

2726. Witnesses with personal knowledge of the history of the SP438 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2727. Currently known reputation in the community is that the SP438 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2728. Public motor vehicle use of the SP438 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2729. The SP438 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2730. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP438 Road.

2731. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP438 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP441 Road

2732. The SP441 Road is designated as county road number SPVM0441 and SGID road identification number RD200639 and is more or less .71 miles long.

2733. Exhibit 206 (attached hereto and incorporated herein) contains certain information pertaining to the SP441 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2734. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP441 Road solely as it crosses United States public land as included and specifically described in Exhibit 206. The SP441 Road includes the segment of road specifically set forth in Exhibit 206 and as exists on the ground.

Acceptance of the SP441 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2735. The SP441 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2736. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP441 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2737. The appearance of the SP441 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2738. The County confirmed its acceptance of the SP441 by 1974, 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 SP441 Road pursuant to the County's governmental right and authority.

2739. Witnesses with personal knowledge of the history of the SP441 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2740. Currently known reputation in the community is that the SP441 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2741. Public motor vehicle use of the SP441 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2742. The SP441 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2743. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP441 Road.

2744. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP441 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP447 Road

2745. The SP447 Road is designated as county road number SPVM0447 and SGID road identification number RD200643 and is more or less .81 miles long.

2746. Exhibit 207 (attached hereto and incorporated herein) contains certain information pertaining to the SP447 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2747. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP447 Road solely as it crosses United States public land as included and

specifically described in Exhibit 207. The SP447 Road includes the segment of road specifically set forth in Exhibit 207 and as exists on the ground.

Acceptance of the SP447 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2748. The SP447 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2749. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP447 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2750. The appearance of the SP447 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2751. The County confirmed its acceptance of the SP447 by 1974, 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 SP447 Road pursuant to the County's governmental right and authority.

2752. Witnesses with personal knowledge of the history of the SP447 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2753. Currently known reputation in the community is that the SP447 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2754. Public motor vehicle use of the SP447 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2755. The SP447 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2756. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP447 Road.

2757. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP447 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP448 Road

2758. The SP448 Road is designated as county road number SPVM0448 and SGID road identification number RD200644 and is more or less .16 miles long.

2759. Exhibit 208 (attached hereto and incorporated herein) contains certain information pertaining to the SP448 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2760. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP448 Road solely as it crosses United States public land as included and specifically described in Exhibit 208. The SP448 Road includes the segment of road specifically set forth in Exhibit 208 and as exists on the ground.

Acceptance of the SP448 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2761. The SP448 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2762. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP448 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2763. The appearance of the SP448 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2764. The SP448 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 SP448 Road pursuant to the County's governmental right and authority.

2765. Witnesses with personal knowledge of the history of the SP448 Road confirm public use of this road as a public 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 SP448 Road has been open for all to come 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 SP448 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2768. The SP448 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 SP448 Road.

2770. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP448 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP449 Road

2771. The SP449 Road is designated as county road number SPVM0449 and SGID road identification number RD200645 and is more or less .40 miles long.

2772. Exhibit 209 (attached hereto and incorporated herein) contains certain information pertaining to the SP449 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2773. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP449 Road solely as it crosses United States public land as included and specifically described in Exhibit 209. The SP449 Road includes the segment of road specifically set forth in Exhibit 209 and as exists on the ground.

Acceptance of the SP449 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2774. The SP449 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2775. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP449 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2776. The appearance of the SP449 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2777. The SP449 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 SP449 Road pursuant to the County's governmental right and authority.

2778. Witnesses with personal knowledge of the history of the SP449 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2779. Currently known reputation in the community is that the SP449 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2780. Public motor vehicle use of the SP449 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2781. The SP449 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2782. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP449 Road.

2783. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP449 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP451 Road

2784. The SP451 Road is designated as county road number SPVM0451 and SGID road identification number RD200646 and is more or less 2.75 miles long.

2785. Exhibit 210 (attached hereto and incorporated herein) contains certain information pertaining to the SP451 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2786. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP451 Road solely as it crosses United States public land as included and specifically described in Exhibit 210. The SP451 Road includes the segment of road specifically set forth in Exhibit 210 and as exists on the ground.

Acceptance of the SP451 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2787. The SP451 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2788. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP451 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2789. The appearance of the SP451 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2790. The County confirmed its acceptance of the SP451 by 1974, 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 SP451 Road pursuant to the County's governmental right and authority.

2791. Witnesses with personal knowledge of the history of the SP451 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2792. Currently known reputation in the community is that the SP451 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2793. Public motor vehicle use of the SP451 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2794. The SP451 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2795. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP451 Road.

2796. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP451 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP453 Road

2797. The SP453 Road is designated as county road number SPVM0453 and SGID road identification number RD200647 and is more or less 1.88 miles long.

2798. Exhibit 211 (attached hereto and incorporated herein) contains certain information pertaining to the SP453 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2799. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP453 Road solely as it crosses United States public land as included and specifically described in Exhibit 211. The SP453 Road includes the segment of road specifically set forth in Exhibit 211 and as exists on the ground.

Acceptance of the SP453 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2800. The SP453 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2801. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP453 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2802. The appearance of the SP453 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2803. The County confirmed its acceptance of the SP453 by 1974, 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 SP453 Road pursuant to the County's governmental right and authority.

2804. Witnesses with personal knowledge of the history of the SP453 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2805. Currently known reputation in the community is that the SP453 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2806. Public motor vehicle use of the SP453 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2807. The SP453 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2808. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP453 Road.

2809. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP453 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP460 Road

2810. The SP460 Road is designated as county road number SPVM0460 and SGID road identification number RD200653 and is more or less 1.23 miles long.

2811. Exhibit 212 (attached hereto and incorporated herein) contains certain information pertaining to the SP460 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2812. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP460 Road solely as it crosses United States public land as included and specifically described in Exhibit 212. The SP460 Road includes the segment of road specifically set forth in Exhibit 212 and as exists on the ground.

Acceptance of the SP460 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2813. The SP460 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2814. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP460 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2815. The appearance of the SP460 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2816. The County confirmed its acceptance of the SP460 by 1974, 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 SP460 Road pursuant to the County's governmental right and authority.

2817. Witnesses with personal knowledge of the history of the SP460 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2818. Currently known reputation in the community is that the SP460 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2819. Public motor vehicle use of the SP460 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2820. The SP460 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2821. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP460 Road.

2822. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP460 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP461 Road

2823. The SP461 Road is designated as county road number SPVM0461 and SGID road identification number RD200654 and is more or less 2.27 miles long.

2824. Exhibit 213 (attached hereto and incorporated herein) contains certain information pertaining to the SP461 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2825. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP461 Road solely as it crosses United States public land as included and specifically described in Exhibit 213. The SP461 Road includes the segment of road specifically set forth in Exhibit 213 and as exists on the ground.

Acceptance of the SP461 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2826. The SP461 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2827. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP461 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2828. The appearance of the SP461 Road on the Wales (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2829. The County confirmed its acceptance of the SP461 by 1974, 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 SP461 Road pursuant to the County's governmental right and authority.

2830. Witnesses with personal knowledge of the history of the SP461 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2831. Currently known reputation in the community is that the SP461 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2832. Public motor vehicle use of the SP461 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2833. The SP461 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2834. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP461 Road.

2835. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP461 Road on lands owned 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
MELLOR CANYON AREA

2836. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2837. The Mellor Canyon Area is located in southwestern portion of Sanpete County. *See* Exhibit 9.

2838. The Mellor Canyon Area includes the following roads -listed by Common Road Name (if applicable) and County Unique Number: (1) Mellor Canyon Road, Sanp18, (2) Sanpitch Dairy Road, Sanp238, (3) SP297 Road, (4) SP299 Road, (5) SP306 Road, (6) SP307 Road, (7) SP310 Road, (8) SP314 Road, (9) SP319 Road, (10) SP321 Road, (11) SP327 Road,

(12) SP333 Road, (13) SP334 Road, (14) SP340 Road, (15) SP349 Road, (16) SP352 Road, (17) SP355 Road, (18) SP357 Road, (19) SP360 Road, and (20) SP367 Road.

2839. Each right-of-way claimed in the Mellor 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.

2840. All rights-of-way claimed in the Mellor 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.

2841. All rights-of-way claimed in the Mellor 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).

2842. Prior to October 21, 1976, the State of Utah, Sanpete County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Mellor Canyon Road, Sanp18

2843. The Mellor Canyon Road is designated as county road number Sanp18 and SGID road identification number RD200089 and is more or less 4.55 miles long.

2844. Exhibit 214 (attached hereto and incorporated herein) contains certain information pertaining to the Mellor Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2845. In this action, the State and County seek to quiet title to the public highway right-of-way for the Mellor Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 214. The Mellor Canyon Road includes the segment of road specifically set forth in Exhibit 214 and as it exists on the ground.

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

2846. The Mellor Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2847. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the Mellor Canyon Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2848. The appearance of the Mellor Canyon Road on the Gunnison (1966) and Hells Kitchen Canyon SE (19565) USGS 7.5-minute quadrangle maps evidences the existence, use,

and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2849. The County confirmed its acceptance of the Mellor Canyon Road by 1974, 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 Mellor Canyon Road using public funds pursuant to the County's governmental right and authority.

2850. Witnesses with personal knowledge of the history of the Mellor 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.

2851. Currently known reputation in the community is that the Mellor 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.

2852. Public motor vehicle use of the Mellor Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2853. The Mellor Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2854. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Mellor Canyon Road.

2855. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Mellor 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.

Sanpitch Dairy Road, Sanp238

2856. The Sanpitch Dairy Road is designated as county road number Sanp238 and SGID road identification number RD200154 and is more or less 1.32 miles long.

2857. Exhibit 215 (attached hereto and incorporated herein) contains certain information pertaining to the Sanpitch Dairy Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2858. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sanpitch Dairy Road solely as it crosses United States public land as included and specifically described in Exhibit 215. The Sanpitch Dairy Road includes the segment of road specifically set forth in Exhibit 215 and as it exists on the ground.

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

2859. The Sanpitch Dairy Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2860. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the Sanpitch Dairy Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2861. The appearance of the Sanpitch Dairy Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2862. The County confirmed its acceptance of the Sanpitch Dairy Road by 1974, 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 Sanpitch Dairy Road using public funds pursuant to the County's governmental right and authority.

2863. Witnesses with personal knowledge of the history of the Sanpitch Dairy Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2864. Currently known reputation in the community is that the Sanpitch Dairy Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2865. Public motor vehicle use of the Sanpitch Dairy Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

2866. The Sanpitch Dairy Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2867. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sanpitch Dairy Road.

2868. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sanpitch Dairy Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP297 Road

2869. The SP297 Road is designated as county road number SPVM0297 and SGID road identification number RD200559 and is more or less .88 miles long.

2870. Exhibit 216 (attached hereto and incorporated herein) contains certain information pertaining to the SP297 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2871. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP297 Road solely as it crosses United States public land as included and

specifically described in Exhibit 216. The SP297 Road includes the segment of road specifically set forth in Exhibit 216 and as exists on the ground.

Acceptance of the SP297 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2872. The SP297 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2873. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP297 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2874. The appearance of the SP297 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2875. The County confirmed its acceptance of the SP297 by 1974, 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 SP297 Road pursuant to the County's governmental right and authority.

2876. Witnesses with personal knowledge of the history of the SP297 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2877. Currently known reputation in the community is that the SP297 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2878. Public motor vehicle use of the SP297 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2879. The SP297 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2880. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP297 Road.

2881. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP297 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP299 Road

2882. The SP299 Road is designated as county road number SPVM0299 and SGID road identification number RD200563 and is more or less 1.25 miles long.

2883. Exhibit 217 (attached hereto and incorporated herein) contains certain information pertaining to the SP299 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2884. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP299 Road solely as it crosses United States public land as included and specifically described in Exhibit 217. The SP299 Road includes the segment of road specifically set forth in Exhibit 217 and as exists on the ground.

Acceptance of the SP299 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2885. The SP299 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2886. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP299 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2887. The appearance of the SP299 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2888. The County confirmed its acceptance of the SP299 by 1974, 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 SP299 Road pursuant to the County's governmental right and authority.

2889. Witnesses with personal knowledge of the history of the SP299 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2890. Currently known reputation in the community is that the SP299 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2891. Public motor vehicle use of the SP299 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2892. The SP299 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2893. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP299 Road.

2894. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP299 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP306 Road

2895. The SP306 Road is designated as county road number SPVM0306 and SGID road identification number RD200564 and is more or less .58 miles long.

2896. Exhibit 218 (attached hereto and incorporated herein) contains certain information pertaining to the SP306 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2897. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP306 Road solely as it crosses United States public land as included and specifically described in Exhibit 218. The SP306 Road includes the segment of road specifically set forth in Exhibit 218 and as exists on the ground.

Acceptance of the SP306 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2898. The SP306 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2899. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP306 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2900. The appearance of the SP306 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2901. The SP306 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 SP306 Road pursuant to the County's governmental right and authority.

2902. Witnesses with personal knowledge of the history of the SP306 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2903. Currently known reputation in the community is that the SP306 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2904. Public motor vehicle use of the SP306 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2905. The SP306 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2906. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP306 Road.

2907. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP306 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP307 Road

2908. The SP307 Road is designated as county road number SPVM0307 and SGID road identification number RD200565 and is more or less 3.40 miles long.

2909. Exhibit 219 (attached hereto and incorporated herein) contains certain information pertaining to the SP307 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2910. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP307 Road solely as it crosses United States public land as included and specifically described in Exhibit 219. The SP307 Road includes the segment of road specifically set forth in Exhibit 219 and as exists on the ground.

Acceptance of the SP307 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2911. The SP307 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2912. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP307 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2913. The appearance of the SP307 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2914. The County confirmed its acceptance of the SP307 by 1974, 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 SP307 Road pursuant to the County's governmental right and authority.

2915. Witnesses with personal knowledge of the history of the SP307 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2916. Currently known reputation in the community is that the SP307 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2917. Public motor vehicle use of the SP307 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2918. The SP307 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2919. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP307 Road.

2920. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP307 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP310 Road

2921. The SP310 Road is designated as county road number SPVM0310 and SGID road identification number RD200566 and is more or less 1.72 miles long.

2922. Exhibit 220 (attached hereto and incorporated herein) contains certain information pertaining to the SP310 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2923. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP310 Road solely as it crosses United States public land as included and specifically described in Exhibit 220. The SP310 Road includes the segment of road specifically set forth in Exhibit 220 and as exists on the ground.

Acceptance of the SP310 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2924. The SP310 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2925. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP310 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2926. The appearance of the SP310 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2927. The SP310 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 SP310 Road pursuant to the County's governmental right and authority.

2928. Witnesses with personal knowledge of the history of the SP310 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2929. Currently known reputation in the community is that the SP310 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2930. Public motor vehicle use of the SP310 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2931. The SP310 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2932. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP310 Road.

2933. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP310 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP314 Road

2934. The SP314 Road is designated as county road number SPVM0314 and SGID road identification number RD200570 and is more or less 2.72 miles long.

2935. Exhibit 221 (attached hereto and incorporated herein) contains certain information pertaining to the SP314 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2936. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP314 Road solely as it crosses United States public land as included and specifically described in Exhibit 221. The SP314 Road includes the segment of road specifically set forth in Exhibit 221 and as exists on the ground.

Acceptance of the SP314 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2937. The SP314 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2938. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP314 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2939. The appearance of the SP314 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2940. The SP314 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 SP314 Road pursuant to the County's governmental right and authority.

2941. Witnesses with personal knowledge of the history of the SP314 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2942. Currently known reputation in the community is that the SP314 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2943. Public motor vehicle use of the SP314 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2944. The SP314 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2945. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP314 Road.

2946. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP314 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP319 Road

2947. The SP319 Road is designated as county road number SPVM0319 and SGID road identification number RD200575 and is more or less .84 miles long.

2948. Exhibit 222 (attached hereto and incorporated herein) contains certain information pertaining to the SP319 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2949. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP319 Road solely as it crosses United States public land as included and specifically described in Exhibit 222. The SP319 Road includes the segment of road specifically set forth in Exhibit 222 and as exists on the ground.

Acceptance of the SP319 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2950. The SP319 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2951. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP319 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2952. The appearance of the SP319 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2953. The County confirmed its acceptance of the SP319 by 1974, 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 SP319 Road pursuant to the County's governmental right and authority.

2954. Witnesses with personal knowledge of the history of the SP319 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2955. Currently known reputation in the community is that the SP319 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2956. Public motor vehicle use of the SP319 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2957. The SP319 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2958. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP319 Road.

2959. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP319 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP321 Road

2960. The SP321 Road is designated as county road number SPVM0321 and SGID road identification number RD200576 and is more or less 2.07 miles long.

2961. Exhibit 223 (attached hereto and incorporated herein) contains certain information pertaining to the SP321 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2962. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP321 Road solely as it crosses United States public land as included and

specifically described in Exhibit 223. The SP321 Road includes the segment of road specifically set forth in Exhibit 223 and as exists on the ground.

Acceptance of the SP321 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2963. The SP321 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2964. The appearance of the SP321 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2965. The SP321 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 SP321 Road pursuant to the County's governmental right and authority.

2966. Witnesses with personal knowledge of the history of the SP321 Road confirm public use of this road as a public 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 SP321 Road has been open for all to come 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 SP321 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

2969. The SP321 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 SP321 Road.

2971. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP321 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP327 Road

2972. The SP327 Road is designated as county road number SPVM0327 and SGID road identification number RD200578 and is more or less 3.11 miles long.

2973. Exhibit 224 (attached hereto and incorporated herein) contains certain information pertaining to the SP327 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2974. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP327 Road solely as it crosses United States public land as included and specifically described in Exhibit 224. The SP327 Road includes the segment of road specifically set forth in Exhibit 224 and as exists on the ground.

Acceptance of the SP327 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2975. The SP327 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2976. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP327 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2977. The appearance of the SP327 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2978. The County confirmed its acceptance of the SP327 by 1974, 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 SP327 Road pursuant to the County's governmental right and authority.

2979. Witnesses with personal knowledge of the history of the SP327 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2980. Currently known reputation in the community is that the SP327 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2981. Public motor vehicle use of the SP327 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2982. The SP327 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2983. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP327 Road.

2984. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP327 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP333 Road

2985. The SP333 Road is designated as county road number SPVM0333 and SGID road identification number RD200579 and is more or less .56 miles long.

2986. Exhibit 225 (attached hereto and incorporated herein) contains certain information pertaining to the SP333 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2987. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP333 Road solely as it crosses United States public land as included and

specifically described in Exhibit 225. The SP333 Road includes the segment of road specifically set forth in Exhibit 225 and as exists on the ground.

Acceptance of the SP333 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2988. The SP333 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2989. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP333 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2990. The appearance of the SP333 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

2991. The SP333 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 SP333 Road pursuant to the County's governmental right and authority.

2992. Witnesses with personal knowledge of the history of the SP333 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2993. Currently known reputation in the community is that the SP333 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2994. Public motor vehicle use of the SP333 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2995. The SP333 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2996. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP333 Road.

2997. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP333 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP334 Road

2998. The SP334 Road is designated as county road number SPVM0334 and SGID road identification number RD200580 and is more or less 1.48 miles long.

2999. Exhibit 226 (attached hereto and incorporated herein) contains certain information pertaining to the SP334 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3000. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP334 Road solely as it crosses United States public land as included and specifically described in Exhibit 226. The SP334 Road includes the segment of road specifically set forth in Exhibit 226 and as exists on the ground.

Acceptance of the SP334 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3001. The SP334 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3002. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP334 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3003. The appearance of the SP334 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3004. The County confirmed its acceptance of the SP334 by 1974, 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 SP334 Road pursuant to the County's governmental right and authority.

3005. Witnesses with personal knowledge of the history of the SP334 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3006. Currently known reputation in the community is that the SP334 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3007. Public motor vehicle use of the SP334 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3008. The SP334 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3009. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP334 Road.

3010. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP334 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP340 Road

3011. The SP340 Road is designated as county road number SPVM0340 and SGID road identification number RD200581 and is more or less .74 miles long.

3012. Exhibit 227 (attached hereto and incorporated herein) contains certain information pertaining to the SP340 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3013. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP340 Road solely as it crosses United States public land as included and specifically described in Exhibit 227. The SP340 Road includes the segment of road specifically set forth in Exhibit 227 and as exists on the ground.

Acceptance of the SP340 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3014. The SP340 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3015. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP340 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3016. The appearance of the SP340 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3017. The SP340 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 SP340 Road pursuant to the County's governmental right and authority.

3018. Witnesses with personal knowledge of the history of the SP340 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3019. Currently known reputation in the community is that the SP340 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3020. Public motor vehicle use of the SP340 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3021. The SP340 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3022. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP340 Road.

3023. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP340 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP349 Road

3024. The SP349 Road is designated as county road number SPVM0349 and SGID road identification number RD200582 and is more or less 2.90 miles long.

3025. Exhibit 228 (attached hereto and incorporated herein) contains certain information pertaining to the SP349 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3026. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP349 Road solely as it crosses United States public land as included and specifically described in Exhibit 228. The SP349 Road includes the segment of road specifically set forth in Exhibit 228 and as exists on the ground.

Acceptance of the SP349 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3027. The SP349 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3028. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP349 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3029. The appearance of the SP349 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3030. The SP349 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 SP349 Road pursuant to the County's governmental right and authority.

3031. Witnesses with personal knowledge of the history of the SP349 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3032. Currently known reputation in the community is that the SP349 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3033. Public motor vehicle use of the SP349 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3034. The SP349 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3035. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP349 Road.

3036. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP349 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP352 Road

3037. The SP352 Road is designated as county road number SPVM0352 and SGID road identification number RD200583 and is more or less 2.51 miles long.

3038. Exhibit 229 (attached hereto and incorporated herein) contains certain information pertaining to the SP352 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3039. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP352 Road solely as it crosses United States public land as included and specifically described in Exhibit 229. The SP352 Road includes the segment of road specifically set forth in Exhibit 229 and as exists on the ground.

Acceptance of the SP352 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3040. The SP352 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3041. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP352 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3042. The appearance of the SP352 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3043. The SP352 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 SP352 Road pursuant to the County's governmental right and authority.

3044. Witnesses with personal knowledge of the history of the SP352 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3045. Currently known reputation in the community is that the SP352 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3046. Public motor vehicle use of the SP352 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3047. The SP352 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3048. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP352 Road.

3049. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP352 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP355 Road

3050. The SP355 Road is designated as county road number SPVM0355 and SGID road identification number RD200584 and is more or less 1.10 miles long.

3051. Exhibit 230 (attached hereto and incorporated herein) contains certain information pertaining to the SP355 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3052. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP355 Road solely as it crosses United States public land as included and specifically described in Exhibit 230. The SP355 Road includes the segment of road specifically set forth in Exhibit 230 and as exists on the ground.

Acceptance of the SP355 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3053. The SP355 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3054. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP355 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3055. The appearance of the SP355 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3056. The County confirmed its acceptance of the SP355 by 1974, 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 SP355 Road pursuant to the County's governmental right and authority.

3057. Witnesses with personal knowledge of the history of the SP355 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3058. Currently known reputation in the community is that the SP355 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3059. Public motor vehicle use of the SP355 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3060. The SP355 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3061. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP355 Road.

3062. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP355 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP357 Road

3063. The SP357 Road is designated as county road number SPVM0357 and SGID road identification number RD200585 and is more or less .94 miles long.

3064. Exhibit 231 (attached hereto and incorporated herein) contains certain information pertaining to the SP357 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3065. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP357 Road solely as it crosses United States public land as included and specifically described in Exhibit 231. The SP357 Road includes the segment of road specifically set forth in Exhibit 231 and as exists on the ground.

Acceptance of the SP357 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3066. The SP357 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3067. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP357 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3068. The appearance of the SP357 Road on the Gunnison (1966) and Hells Kitchen SE (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3069. The County confirmed its acceptance of the SP357 by 1974, 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 SP357 Road pursuant to the County's governmental right and authority.

3070. Witnesses with personal knowledge of the history of the SP357 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3071. Currently known reputation in the community is that the SP357 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3072. Public motor vehicle use of the SP357 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3073. The SP357 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3074. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP357 Road.

3075. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP357 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP360 Road

3076. The SP360 Road is designated as county road number SPVM0360 and SGID road identification number RD200588 and is more or less .87 miles long.

3077. Exhibit 232 (attached hereto and incorporated herein) contains certain information pertaining to the SP360 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3078. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP360 Road solely as it crosses United States public land as included and

specifically described in Exhibit 232. The SP360 Road includes the segment of road specifically set forth in Exhibit 232 and as exists on the ground.

Acceptance of the SP360 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3079. The SP360 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3080. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP360 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3081. The appearance of the SP360 Road on the Gunnison (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3082. The County confirmed its acceptance of the SP360 by 1974, 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 SP360 Road pursuant to the County's governmental right and authority.

3083. Witnesses with personal knowledge of the history of the SP360 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3084. Currently known reputation in the community is that the SP360 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3085. Public motor vehicle use of the SP360 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3086. The SP360 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3087. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP360 Road.

3088. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP360 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP367 Road

3089. The SP367 Road is designated as county road number SPVM0367 and SGID road identification number RD200589 and is more or less 3.17 miles long.

3090. Exhibit 233 (attached hereto and incorporated herein) contains certain information pertaining to the SP367 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3091. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP367 Road solely as it crosses United States public land as included and specifically described in Exhibit 233. The SP367 Road includes the segment of road specifically set forth in Exhibit 233 and as exists on the ground.

Acceptance of the SP367 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

3092. The SP367 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3093. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP367 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3094. The appearance of the SP367 Road on the Gunnison (1966), Hells Kitchen Canyon SE (1965), and Sterling (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3095. The County confirmed its acceptance of the SP367 by 1974, 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 SP367 Road pursuant to the County's governmental right and authority.

3096. Witnesses with personal knowledge of the history of the SP367 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3097. Currently known reputation in the community is that the SP367 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3098. Public motor vehicle use of the SP367 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3099. The SP367 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3100. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP367 Road.

3101. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP367 Road on lands owned 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
SKYLINE AREA

3102. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

3103. The Skyline Area is located in west central Sanpete County. *See* Exhibit 10.

3104. The Skyline Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Skyline West Mountain Road, Sanp4; (2) SP298 Road; (3) SP359a Road; (4) SP359b Road; (5) SP374 Road; (6) SP375 Road; (7) SP382 Road; (8) SP385 Road; (9) SP386 Road; (10) SP407 Road; (11) SP408 Road; and (12) SP409 Road.

3105. Each right-of-way claimed in the Skyline 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.

3106. All rights-of-way claimed in the Skyline 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.

3107. All rights-of-way claimed in the Skyline 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* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

3108. Prior to October 21, 1976, the State of Utah, Sanpete County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the

entire length and course of all roads as described herein, on public lands owned by the United States.

Skyline West Mountain Road, Sanp4

3109. The Skyline West Mountain Road is designated as county road number Sanp4 and SGID road identification number RD200221 and is more or less 49.68 miles long.

3110. Exhibit 234 (attached hereto and incorporated herein) contains certain information pertaining to the Skyline West Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3111. In this action, the State and County seek to quiet title to the public highway right-of-way for the Skyline West Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 234. The Skyline West Mountain Road includes the segment of road specifically set forth in Exhibit 234 and as it exists on the ground.

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

3112. The Skyline West Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3113. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Skyline West Mountain Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3114. The appearance of the Skyline West Mountain Road on the Moroni (1951) USGS 15 minute, and Wales (1965), Chriss Canyon (1965), Hells Kitchen Canyon SE (1965), and Gunnison (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3115. The County confirmed its acceptance of the Skyline West Mountain Road by 1974, 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 Skyline West Mountain Road using public funds pursuant to the County's governmental right and authority.

3116. Witnesses with personal knowledge of the history of the Skyline West 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.

3117. Currently known reputation in the community is that the Skyline West 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.

3118. Public motor vehicle use of the Skyline West Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3119. The Skyline West Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3120. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Skyline West Mountain Road.

3121. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Skyline West 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.

SP298 Road

3122. The SP298 Road is designated as county road number SPVM0298 and SGID road identification number RD200561 and is more or less 5.00 miles long.

3123. Exhibit 235 (attached hereto and incorporated herein) contains certain information pertaining to the SP298 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3124. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP298 Road solely as it crosses United States public land as included and specifically described in Exhibit 235. The SP298 Road includes the segment of road specifically set forth in Exhibit 235 and as exists on the ground.

Acceptance of the SP298 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3125. The SP298 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3126. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP298 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3127. The appearance of the SP298 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3128. The County confirmed its acceptance of the SP298 Road by 1974, 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 SP298 Road pursuant to the County's governmental right and authority.

3129. Witnesses with personal knowledge of the history of the SP298 Road confirm public use of this road as a public 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 SP298 Road has been open for all to come 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 SP298 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3132. The SP298 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 SP298 Road.

3134. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP298 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP359a Road

3135. The SP359a Road is designated as county road number SPVM0359a and SGID road identification number RD200586 and is more or less 1.06 miles long.

3136. Exhibit 236 (attached hereto and incorporated herein) contains certain information pertaining to the SP359a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3137. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP359a Road solely as it crosses United States public land as included and

specifically described in Exhibit 236. The SP359a Road includes the segment of road specifically set forth in Exhibit 236 and as exists on the ground.

Acceptance of the SP359a Road R.S. 2477 Right-of-way Prior to October 21, 1976

3138. The SP359a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3139. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP359a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3140. The appearance of the SP359a Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3141. The SP359a 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 SP359a Road pursuant to the County's governmental right and authority.

3142. Witnesses with personal knowledge of the history of the SP359a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3143. Currently known reputation in the community is that the SP359a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3144. Public motor vehicle use of the SP359a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3145. The SP359a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3146. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP359a Road.

3147. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP359a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP359b Road

3148. The SP359b Road is designated as county road number SPVM0359b and SGID road identification number RD200587 and is more or less 1.22 miles long.

3149. Exhibit 237 (attached hereto and incorporated herein) contains certain information pertaining to the SP359b Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3150. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP359b Road solely as it crosses United States public land as included and specifically described in Exhibit 237. The SP359b Road includes the segment of road specifically set forth in Exhibit 237 and as exists on the ground.

Acceptance of the SP359b Road R.S. 2477 Right-of-way Prior to October 21, 1976

3151. The SP359b Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3152. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP359b Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3153. The appearance of the SP359b Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3154. The SP359b 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 SP359b Road pursuant to the County's governmental right and authority.

3155. Witnesses with personal knowledge of the history of the SP359b Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3156. Currently known reputation in the community is that the SP359b Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3157. Public motor vehicle use of the SP359b Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3158. The SP359b Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3159. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP359b Road.

3160. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP359b Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP374 Road

3161. The SP374 Road is designated as county road number SPVM0374 and SGID road identification number RD200591 and is more or less 2.20 miles long.

3162. Exhibit 238 (attached hereto and incorporated herein) contains certain information pertaining to the SP374 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3163. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP374 Road solely as it crosses United States public land as included and specifically described in Exhibit 238. The SP374 Road includes the segment of road specifically set forth in Exhibit 238and as exists on the ground.

Acceptance of the SP374 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3164. The SP374 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3165. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP374 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3166. The appearance of the SP374 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3167. The County confirmed its acceptance of the SP374 Road by 1974, 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 SP374 Road pursuant to the County's governmental right and authority.

3168. Witnesses with personal knowledge of the history of the SP374 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3169. Currently known reputation in the community is that the SP374 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3170. Public motor vehicle use of the SP374 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3171. The SP374 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3172. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP374 Road.

3173. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP374 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP375 Road

3174. The SP375 Road is designated as county road number SPVM0375 and SGID road identification number RD200592 and is more or less 1.21 miles long.

3175. Exhibit 239 (attached hereto and incorporated herein) contains certain information pertaining to the SP375 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3176. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP375 Road solely as it crosses United States public land as included and specifically described in Exhibit 239. The SP375 Road includes the segment of road specifically set forth in Exhibit 239 and as exists on the ground.

Acceptance of the SP375 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3177. The SP375 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3178. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP375 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3179. The SP375 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 SP375 Road pursuant to the County's governmental right and authority.

3180. Witnesses with personal knowledge of the history of the SP375 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3181. Currently known reputation in the community is that the SP375 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3182. Public motor vehicle use of the SP375 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3183. The SP375 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3184. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP375 Road.

3185. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP375 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP382 Road

3186. The SP382 Road is designated as county road number SPVM0382 and SGID road identification number RD200598 and is more or less 1.66 miles long.

3187. Exhibit 240 (attached hereto and incorporated herein) contains certain information pertaining to the SP382 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3188. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP382 Road solely as it crosses United States public land as included and specifically described in Exhibit 240. The SP382 Road includes the segment of road specifically set forth in Exhibit 240 and as exists on the ground.

Acceptance of the SP382 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3189. The SP382 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3190. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP382 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3191. The appearance of the SP382 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3192. The SP382 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 SP382 Road pursuant to the County's governmental right and authority.

3193. Witnesses with personal knowledge of the history of the SP382 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3194. Currently known reputation in the community is that the SP382 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3195. Public motor vehicle use of the SP382 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3196. The SP382 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3197. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP382 Road.

3198. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP382 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP385 Road

3199. The SP385 Road is designated as county road number SPVM0385 and SGID road identification number RD200600 and is more or less 1.33 miles long.

3200. Exhibit 241 (attached hereto and incorporated herein) contains certain information pertaining to the SP385 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3201. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP385 Road solely as it crosses United States public land as included and specifically described in Exhibit 241. The SP385 Road includes the segment of road specifically set forth in Exhibit 241 and as exists on the ground.

Acceptance of the SP385 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3202. The SP385 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3203. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP385 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3204. The appearance of the SP385 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3205. The County confirmed its acceptance of the SP385 by 1974, 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 SP385 Road pursuant to the County's governmental right and authority.

3206. Witnesses with personal knowledge of the history of the SP385 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3207. Currently known reputation in the community is that the SP385 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3208. Public motor vehicle use of the SP385 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3209. The SP385 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3210. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP385 Road.

3211. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP385 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP386 Road

3212. The SP386 Road is designated as county road number SPVM0386 and SGID road identification number RD200601 and is more or less 0.82 miles long.

3213. Exhibit 242 (attached hereto and incorporated herein) contains certain information pertaining to the SP386 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3214. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP386 Road solely as it crosses United States public land as included and specifically described in Exhibit 242. The SP386 Road includes the segment of road specifically set forth in Exhibit 242 and as exists on the ground.

Acceptance of the SP386 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3215. The SP386 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 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP386 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3217. The appearance of the SP386 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3218. The County confirmed its acceptance of the SP386 by 1974, 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 SP386 Road pursuant to the County's governmental right and authority.

3219. Witnesses with personal knowledge of the history of the SP386 Road confirm public use of this road as a public 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 SP386 Road has been open for all to come 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 SP386 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3222. The SP386 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 SP386 Road.

3224. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP386 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP407 Road

3225. The SP407 Road is designated as county road number SPVM0407 and SGID road identification number RD200618 and is more or less 2.37 miles long.

3226. Exhibit 243 (attached hereto and incorporated herein) contains certain information pertaining to the SP407 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3227. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP407 Road solely as it crosses United States public land as included and specifically described in Exhibit 243. The SP407 Road includes the segment of road specifically set forth in Exhibit 243 and as exists on the ground.

Acceptance of the SP407 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3228. The SP407 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3229. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP407 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3230. The appearance of the SP407 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3231. The County confirmed its acceptance of the SP407 by 1974, 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 SP407 Road pursuant to the County's governmental right and authority.

3232. Witnesses with personal knowledge of the history of the SP407 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3233. Currently known reputation in the community is that the SP407 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3234. Public motor vehicle use of the SP407 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3235. The SP407 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3236. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP407 Road.

3237. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP407 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP408 Road

3238. The SP408 Road is designated as county road number SPVM0408 and SGID road identification number RD200619 and is more or less 1.78 miles long.

3239. Exhibit 244 (attached hereto and incorporated herein) contains certain information pertaining to the SP408 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3240. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP408 Road solely as it crosses United States public land as included and

specifically described in Exhibit 244. The SP408 Road includes the segment of road specifically set forth in Exhibit 244 and as exists on the ground.

Acceptance of the SP408 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3241. The SP408 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3242. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP408 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3243. The appearance of the SP408 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3244. The County confirmed its acceptance of the SP408 by 1974, 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 SP408 Road pursuant to the County's governmental right and authority.

3245. Witnesses with personal knowledge of the history of the SP408 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3246. Currently known reputation in the community is that the SP408 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3247. Public motor vehicle use of the SP408 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3248. The SP408 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3249. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP408 Road.

3250. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP408 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP409 Road

3251. The SP409 Road is designated as county road number SPVM0409 and SGID road identification number RD200620 and is more or less 1.77 miles long.

3252. Exhibit 245 (attached hereto and incorporated herein) contains certain information pertaining to the SP409 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3253. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP409 Road solely as it crosses United States public land as included and specifically described in Exhibit 245. The SP409 Road includes the segment of road specifically set forth in Exhibit 245 and as exists on the ground.

Acceptance of the SP409 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3254. The SP409 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3255. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP409 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3256. The appearance of the SP409 Road on the Hells Kitchen Canyon SE (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3257. The County confirmed its acceptance of the SP409 by 1974, 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 SP409 Road pursuant to the County's governmental right and authority.

3258. Witnesses with personal knowledge of the history of the SP409 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3259. Currently known reputation in the community is that the SP409 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3260. Public motor vehicle use of the SP409 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3261. The SP409 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3262. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP409 Road.

3263. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP409 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

NINTH CAUSE OF ACTION – QUIET TITLE SOUTHFIELD AREA

3264. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

3265. The Southfield Area is located in southern Sanpete County. *See* Exhibit 11.

3266. The Southfield Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Landfill Road, Sanp288; (2) Southfield Road, Sanp289; (3) SP186 Road; (4) SP187 Road; (5) SP188 Road; (6) SP193 Road; (7) SP194 Road; (8) SP199 Road; (9) SP201 Road; (10) SP202 Road; (11) SP208 Road; (12) SP210 Road; (13) SP213 Road; (14) SP215 Road; (15) SP216 Road; (16) SP218b Road; (17) SP219 Road; (18) SP222 Road; (19) SP230 Road; (20) SP231a Road; (21) SP232 Road; (22) SP233 Road; (23) SP243 Road; (24) SP246 Road; (25) SP247 Road; (26) SP250 Road; (27) SP255 Road; and (28) SP259 Road.

3267. Each right-of-way claimed in the Southfield 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.

3268. All rights-of-way claimed in the Southfield 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.

3269. All rights-of-way claimed in the Southfield 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).

3270. Prior to October 21, 1976, the State of Utah, Sanpete County, and the public, through continuous use, accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Landfill Road, Sanp288

3271. The Landfill Road is designated as county road number Sanp288 and SGID road identification number RD200290 and is more or less 1.95 miles long.

3272. Exhibit 246 (attached hereto and incorporated herein) contains certain information pertaining to the Landfill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3273. In this action, the State and County seek to quiet title to the public highway right-of-way for the Landfill Road solely as it crosses United States public land as included and specifically described in Exhibit 246. The Landfill Road includes the segment of road specifically set forth in Exhibit 246 and as it exists on the ground.

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

3274. The Landfill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3275. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Landfill Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3276. The appearance of the Landfill Road on the Sterling (1966), and Gunnison (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3277. The County confirmed its acceptance of the Landfill Road by 1974, 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 Landfill Road using public funds pursuant to the County's governmental right and authority.

3278. Witnesses with personal knowledge of the history of the Landfill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3279. Currently known reputation in the community is that the Landfill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3280. Public motor vehicle use of the Landfill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3281. The Landfill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3282. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Landfill Road.

3283. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Landfill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Southfield Road, Sanp289

3284. The Southfield Road is designated as county road number Sanp289 and SGID road identification number RD200289 and is more or less 5.78 miles long.

3285. Exhibit 247 (attached hereto and incorporated herein) contains certain information pertaining to the Southfield Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3286. In this action, the State and County seek to quiet title to the public highway right-of-way for the Southfield Road solely as it crosses United States public land as included and specifically described in Exhibit 247. The Southfield Road includes the segment of road specifically set forth in Exhibit 247 and as it exists on the ground.

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

3287. The Southfield Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3288. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the Southfield Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3289. The appearance of the Southfield Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3290. The County confirmed its acceptance of the Southfield Road by 1974, 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 Southfield Road using public funds pursuant to the County's governmental right and authority.

3291. Witnesses with personal knowledge of the history of the Southfield Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3292. Currently known reputation in the community is that the Southfield Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3293. Public motor vehicle use of the Southfield Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3294. The Southfield Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3295. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Southfield Road.

3296. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Southfield Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP186 Road

3297. The SP186 Road is designated as county road number SPVM0186 and SGID road identification number RD200467 and is more or less 0.96 miles long.

3298. Exhibit 248 (attached hereto and incorporated herein) contains certain information pertaining to the SP186 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3299. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP186 Road solely as it crosses United States public land as included and specifically described in Exhibit 248. The SP186 Road includes the segment of road specifically set forth in Exhibit 248 and as exists on the ground.

Acceptance of the SP186 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3300. The SP186 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3301. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP186 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3302. The appearance of the SP186 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3303. The SP186 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 SP186 Road pursuant to the County's governmental right and authority.

3304. Witnesses with personal knowledge of the history of the SP186 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3305. Currently known reputation in the community is that the SP186 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3306. Public motor vehicle use of the SP186 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3307. The SP186 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3308. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP186 Road.

3309. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP186 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP187 Road

3310. The SP187 Road is designated as county road number SPVM0187 and SGID road identification number RD200468 and is more or less 1.65 miles long.

3311. Exhibit 249 (attached hereto and incorporated herein) contains certain information pertaining to the SP187 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3312. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP187 Road solely as it crosses United States public land as included and specifically described in Exhibit 249. The SP187 Road includes the segment of road specifically set forth in Exhibit 249 and as exists on the ground.

Acceptance of the SP187 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3313. The SP187 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3314. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP187 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3315. The appearance of the SP187 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3316. The SP187 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 SP187 Road pursuant to the County's governmental right and authority.

3317. Witnesses with personal knowledge of the history of the SP187 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3318. Currently known reputation in the community is that the SP187 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3319. Public motor vehicle use of the SP187 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3320. The SP187 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3321. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP187 Road.

3322. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP187 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP188 Road

3323. The SP188 Road is designated as county road number SPVM0190 and SGID road identification number RD200469 and is more or less 0.80 miles long.

3324. Exhibit 250 (attached hereto and incorporated herein) contains certain information pertaining to the SP188 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3325. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP188 Road solely as it crosses United States public land as included and specifically described in Exhibit 250. The SP188 Road includes the segment of road specifically set forth in Exhibit 250 and as exists on the ground.

Acceptance of the SP188 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3326. The SP188 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3327. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP188 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3328. The appearance of the SP188 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3329. The SP188 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 SP188 Road pursuant to the County's governmental right and authority.

3330. Witnesses with personal knowledge of the history of the SP188 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3331. Currently known reputation in the community is that the SP188 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3332. Public motor vehicle use of the SP188 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3333. The SP188 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3334. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP188 Road.

3335. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP188 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP193 Road

3336. The SP193 Road is designated as county road number SPVM0193 and SGID road identification number RD200472 and is more or less 0.65 miles long.

3337. Exhibit 251 (attached hereto and incorporated herein) contains certain information pertaining to the SP193 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3338. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP193 Road solely as it crosses United States public land as included and specifically described in Exhibit 251. The SP193 Road includes the segment of road specifically set forth in Exhibit 251 and as exists on the ground.

Acceptance of the SP193 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3339. The SP193 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3340. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP193 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3341. The appearance of the SP193 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3342. The County confirmed its acceptance of the SP193 by 1974, 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 SP193 Road pursuant to the County's governmental right and authority.

3343. Witnesses with personal knowledge of the history of the SP193 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3344. Currently known reputation in the community is that the SP193 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3345. Public motor vehicle use of the SP193 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3346. The SP193 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3347. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP193 Road.

3348. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP193 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP194 Road

3349. The SP194 Road is designated as county road number SPVM0194 and SGID road identification number RD200474 and is more or less 0.77 miles long.

3350. Exhibit 252 (attached hereto and incorporated herein) contains certain information pertaining to the SP194 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3351. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP194 Road solely as it crosses United States public land as included and specifically described in Exhibit 252. The SP194 Road includes the segment of road specifically set forth in Exhibit 252 and as exists on the ground.

Acceptance of the SP194 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3352. The SP194 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3353. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP194 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3354. The appearance of the SP194 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3355. The SP194 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 SP194 Road pursuant to the County's governmental right and authority.

3356. Witnesses with personal knowledge of the history of the SP194 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3357. Currently known reputation in the community is that the SP194 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3358. Public motor vehicle use of the SP194 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3359. The SP194 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3360. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP194 Road.

3361. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP194 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP199 Road

3362. The SP199 Road is designated as county road number SPVM0199 and SGID road identification number RD200476 and is more or less 2.11 miles long.

3363. Exhibit 253 (attached hereto and incorporated herein) contains certain information pertaining to the SP199 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3364. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP199 Road solely as it crosses United States public land as included and specifically described in Exhibit 253. The SP199 Road includes the segment of road specifically set forth in Exhibit 253 and as exists on the ground.

Acceptance of the SP199 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3365. The SP199 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3366. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP199 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3367. The appearance of the SP199 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3368. The SP199 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 SP199 Road pursuant to the County's governmental right and authority.

3369. Witnesses with personal knowledge of the history of the SP199 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3370. Currently known reputation in the community is that the SP199 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3371. Public motor vehicle use of the SP199 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3372. The SP199 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3373. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP199 Road.

3374. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP199 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP201 Road

3375. The SP201 Road is designated as county road number SPVM0201 and SGID road identification number RD200477 and is more or less 2.61 miles long.

3376. Exhibit 254 (attached hereto and incorporated herein) contains certain information pertaining to the SP201 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3377. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP201 Road solely as it crosses United States public land as included and specifically described in Exhibit 254. The SP201 Road includes the segment of road specifically set forth in Exhibit 254 and as exists on the ground.

Acceptance of the SP201 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3378. The SP201 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3379. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP201 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3380. The SP201 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 SP201 Road pursuant to the County's governmental right and authority.

3381. Witnesses with personal knowledge of the history of the SP201 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3382. Currently known reputation in the community is that the SP201 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3383. Public motor vehicle use of the SP201 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3384. The SP201 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3385. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP201 Road.

3386. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP201 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP202 Road

3387. The SP202 Road is designated as county road number SPVM0202 and SGID road identification number RD200478 and is more or less 1.31 miles long.

3388. Exhibit 255 (attached hereto and incorporated herein) contains certain information pertaining to the SP202 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3389. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP202 Road solely as it crosses United States public land as included and specifically described in Exhibit 255. The SP202 Road includes the segment of road specifically set forth in Exhibit 255 and as exists on the ground.

Acceptance of the SP202 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3390. The SP202 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3391. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP202 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3392. The SP202 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 SP202 Road pursuant to the County's governmental right and authority.

3393. Witnesses with personal knowledge of the history of the SP202 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3394. Currently known reputation in the community is that the SP202 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3395. Public motor vehicle use of the SP202 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3396. The SP202 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3397. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP202 Road.

3398. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP202 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP208 Road

3399. The SP208 Road is designated as county road number SPVM0208 and SGID road identification number RD200484 and is more or less 1.48 miles long.

3400. Exhibit 256 (attached hereto and incorporated herein) contains certain information pertaining to the SP208 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3401. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP208 Road solely as it crosses United States public land as included and specifically described in Exhibit 256. The SP208 Road includes the segment of road specifically set forth in Exhibit 256 and as exists on the ground.

Acceptance of the SP208 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3402. The SP208 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3403. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP208 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3404. The appearance of the SP208 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3405. The SP208 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 SP208 Road pursuant to the County's governmental right and authority.

3406. Witnesses with personal knowledge of the history of the SP208 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3407. Currently known reputation in the community is that the SP208 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3408. Public motor vehicle use of the SP208 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3409. The SP208 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3410. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP208 Road.

3411. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP208 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP210 Road

3412. The SP210 Road is designated as county road number SPVM0210 and SGID road identification number RD200486 and is more or less 0.83 miles long.

3413. Exhibit 257 (attached hereto and incorporated herein) contains certain information pertaining to the SP210 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3414. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP210 Road solely as it crosses United States public land as included and

specifically described in Exhibit 257. The SP210 Road includes the segment of road specifically set forth in Exhibit 257 and as exists on the ground.

Acceptance of the SP210 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3415. The SP210 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3416. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP210 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3417. The appearance of the SP210 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3418. The SP210 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 SP210 Road pursuant to the County's governmental right and authority.

3419. Witnesses with personal knowledge of the history of the SP210 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3420. Currently known reputation in the community is that the SP210 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3421. Public motor vehicle use of the SP210 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3422. The SP210 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3423. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP210 Road.

3424. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP210 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP213 Road

3425. The SP213 Road is designated as county road number SPVM0213 and SGID road identification number RD200488 and is more or less 2.34 miles long.

3426. Exhibit 258 (attached hereto and incorporated herein) contains certain information pertaining to the SP213 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3427. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP213 Road solely as it crosses United States public land as included and specifically described in Exhibit 258. The SP213 Road includes the segment of road specifically set forth in Exhibit 258 and as exists on the ground.

Acceptance of the SP213 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3428. The SP213 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3429. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP213 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3430. The appearance of the SP213 Road on the Redmond (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3431. The County confirmed its acceptance of the SP213 by 1974, 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 SP213 Road pursuant to the County's governmental right and authority.

3432. Witnesses with personal knowledge of the history of the SP213 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3433. Currently known reputation in the community is that the SP213 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3434. Public motor vehicle use of the SP213 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3435. The SP213 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3436. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP213 Road.

3437. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP213 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP215 Road

3438. The SP215 Road is designated as county road number SPVM0215 and SGID road identification number RD200490 and is more or less 2.77 miles long.

3439. Exhibit 259 (attached hereto and incorporated herein) contains certain information pertaining to the SP215 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3440. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP215 Road solely as it crosses United States public land as included and specifically described in Exhibit 259. The SP215 Road includes the segment of road specifically set forth in Exhibit 259 and as exists on the ground.

Acceptance of the SP215 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3441. The SP215 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3442. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP215 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3443. The appearance of the SP215 Road on the Redmond (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3444. The SP215 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 SP215 Road pursuant to the County's governmental right and authority.

3445. Witnesses with personal knowledge of the history of the SP215 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3446. Currently known reputation in the community is that the SP215 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3447. Public motor vehicle use of the SP215 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3448. The SP215 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3449. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP215 Road.

3450. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP215 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP216 Road

3451. The SP216 Road is designated as county road number SPVM0216 and SGID road identification number RD200492 and is more or less 1.92 miles long.

3452. Exhibit 260 (attached hereto and incorporated herein) contains certain information pertaining to the SP216 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3453. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP216 Road solely as it crosses United States public land as included and specifically described in Exhibit 260. The SP216 Road includes the segment of road specifically set forth in Exhibit 260 and as exists on the ground.

Acceptance of the SP216 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3454. The SP216 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 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP216 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3456. The appearance of the SP216 Road on the Redmond (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3457. The SP216 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 SP216 Road pursuant to the County's governmental right and authority.

3458. Witnesses with personal knowledge of the history of the SP216 Road confirm public use of this road as a public 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 SP216 Road has been open for all to come 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 SP216 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3461. The SP216 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 SP216 Road.

3463. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP216 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP218b Road

3464. The SP218b Road is designated as county road number SPVM0218b and SGID road identification number RD200494 and is more or less 2.31 miles long.

3465. Exhibit 261 (attached hereto and incorporated herein) contains certain information pertaining to the SP218b Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3466. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP218b Road solely as it crosses United States public land as included and specifically described in Exhibit 261. The SP218b Road includes the segment of road specifically set forth in Exhibit 261 and as exists on the ground.

Acceptance of the SP218b Road R.S. 2477 Right-of-way Prior to October 21, 1976

3467. The SP218b Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3468. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP218b Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3469. The appearance of the SP218b Road on the Redmond (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3470. The SP218b 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 SP218b Road pursuant to the County's governmental right and authority.

3471. Witnesses with personal knowledge of the history of the SP218b Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3472. Currently known reputation in the community is that the SP218b Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3473. Public motor vehicle use of the SP218b Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3474. The SP218b Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3475. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP218b Road.

3476. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP218b Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP219 Road

3477. The SP219 Road is designated as county road number SPVM0219 and SGID road identification number RD200495 and is more or less 1.84 miles long.

3478. Exhibit 262 (attached hereto and incorporated herein) contains certain information pertaining to the SP219 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3479. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP219 Road solely as it crosses United States public land as included and specifically described in Exhibit 262. The SP219 Road includes the segment of road specifically set forth in Exhibit 262 and as exists on the ground.

Acceptance of the SP219 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3480. The SP219 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3481. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP219 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3482. The appearance of the SP219 Road on the Redmond (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3483. The County confirmed its acceptance of the SP219 by 1974, 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 SP219 Road pursuant to the County's governmental right and authority.

3484. Witnesses with personal knowledge of the history of the SP219 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3485. Currently known reputation in the community is that the SP219 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3486. Public motor vehicle use of the SP219 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3487. The SP219 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3488. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP219 Road.

3489. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP219 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP222 Road

3490. The SP222 Road is designated as county road number SPVM0222 and SGID road identification number RD200498 and is more or less 1.58 miles long.

3491. Exhibit 263 (attached hereto and incorporated herein) contains certain information pertaining to the SP222 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3492. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP222 Road solely as it crosses United States public land as included and specifically described in Exhibit 263. The SP222 Road includes the segment of road specifically set forth in Exhibit 263 and as exists on the ground.

Acceptance of the SP222 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3493. The SP222 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3494. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP222 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3495. The appearance of the SP222 Road on the Redmond (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3496. The SP222 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 SP222 Road pursuant to the County's governmental right and authority.

3497. Witnesses with personal knowledge of the history of the SP222 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3498. Currently known reputation in the community is that the SP222 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3499. Public motor vehicle use of the SP222 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3500. The SP222 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3501. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP222 Road.

3502. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP222 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP230 Road

3503. The SP230 Road is designated as county road number SPVM0230 and SGID road identification number RD200506 and is more or less 1.98 miles long.

3504. Exhibit 264 (attached hereto and incorporated herein) contains certain information pertaining to the SP230 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3505. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP230 Road solely as it crosses United States public land as included and

specifically described in Exhibit 264. The SP230 Road includes the segment of road specifically set forth in Exhibit 264 and as exists on the ground.

Acceptance of the SP230 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3506. The SP230 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3507. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP230 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3508. The appearance of the SP230 Road on the Redmond (1966) and Mayfield (1965) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3509. The SP230 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 SP230 Road pursuant to the County's governmental right and authority.

3510. Witnesses with personal knowledge of the history of the SP230 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3511. Currently known reputation in the community is that the SP230 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3512. Public motor vehicle use of the SP230 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3513. The SP230 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3514. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP230 Road.

3515. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP230 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP231a Road

3516. The SP231a Road is designated as county road number SPVM0231a and SGID road identification number RD200508 and is more or less 1.76 miles long.

3517. Exhibit 265 (attached hereto and incorporated herein) contains certain information pertaining to the SP231a Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3518. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP231a Road solely as it crosses United States public land as included and specifically described in Exhibit 265. The SP231a Road includes the segment of road specifically set forth in Exhibit 265 and as exists on the ground.

Acceptance of the SP231a Road R.S. 2477 Right-of-way Prior to October 21, 1976

3519. The SP231a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3520. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP231a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3521. The SP231a 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 SP231a Road pursuant to the County's governmental right and authority.

3522. Witnesses with personal knowledge of the history of the SP231a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3523. Currently known reputation in the community is that the SP231a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3524. Public motor vehicle use of the SP231a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3525. The SP231a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3526. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP231a Road.

3527. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP231a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP232 Road

3528. The SP232 Road is designated as county road number SPVM0232 and SGID road identification number RD200509 and is more or less 0.60 miles long.

3529. Exhibit 266 (attached hereto and incorporated herein) contains certain information pertaining to the SP232 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3530. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP232 Road solely as it crosses United States public land as included and specifically described in Exhibit 266. The SP232 Road includes the segment of road specifically set forth in Exhibit 266 and as exists on the ground.

Acceptance of the SP232 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3531. The SP232 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3532. Aerial photography from 1974 confirms the historical use, existence, and acceptance of the right-of-way for the SP232 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3533. The appearance of the SP232 Road on the Redmond (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3534. The SP232 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 SP232 Road pursuant to the County's governmental right and authority.

3535. Witnesses with personal knowledge of the history of the SP232 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3536. Currently known reputation in the community is that the SP232 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3537. Public motor vehicle use of the SP232 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3538. The SP232 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3539. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP232 Road.

3540. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP232 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP233 Road

3541. The SP233 Road is designated as county road number SPVM0233 and SGID road identification number RD200510 and is more or less 1.57 miles long.

3542. Exhibit 267 (attached hereto and incorporated herein) contains certain information pertaining to the SP233 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3543. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP233 Road solely as it crosses United States public land as included and specifically described in Exhibit 267. The SP233 Road includes the segment of road specifically set forth in Exhibit 267 and as exists on the ground.

Acceptance of the SP233 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3544. The SP233 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3545. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP233 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3546. The SP233 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 SP233 Road pursuant to the County's governmental right and authority.

3547. Witnesses with personal knowledge of the history of the SP233 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3548. Currently known reputation in the community is that the SP233 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3549. Public motor vehicle use of the SP233 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3550. The SP233 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3551. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP233 Road.

3552. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP233 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP243 Road

3553. The SP243 Road is designated as county road number SPVM0243 and SGID road identification number RD200514 and is more or less 1.04 miles long.

3554. Exhibit 268 (attached hereto and incorporated herein) contains certain information pertaining to the SP243 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3555. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP243 Road solely as it crosses United States public land as included and specifically described in Exhibit 268. The SP243 Road includes the segment of road specifically set forth in Exhibit 268 and as exists on the ground.

Acceptance of the SP243 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3556. The SP243 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3557. Aerial photography from 1974 and 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP243 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3558. The appearance of the SP243 Road on the Gunnison (1966) and Sterling (1966) USGS 7.5-minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3559. The County confirmed its acceptance of the SP243 by 1974, 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 SP243 Road pursuant to the County's governmental right and authority.

3560. Witnesses with personal knowledge of the history of the SP243 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3561. Currently known reputation in the community is that the SP243 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3562. Public motor vehicle use of the SP243 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3563. The SP243 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3564. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP243 Road.

3565. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP243 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP246 Road

3566. The SP246 Road is designated as county road number SPVM0246 and SGID road identification number RD200515 and is more or less 1.75 miles long.

3567. Exhibit 269 (attached hereto and incorporated herein) contains certain information pertaining to the SP246 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3568. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP246 Road solely as it crosses United States public land as included and specifically described in Exhibit 269. The SP246 Road includes the segment of road specifically set forth in Exhibit 269 and as exists on the ground.

Acceptance of the SP246 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3569. The SP246 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3570. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP246 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3571. The appearance of the SP246 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3572. The SP246 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 SP246 Road pursuant to the County's governmental right and authority.

3573. Witnesses with personal knowledge of the history of the SP246 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3574. Currently known reputation in the community is that the SP246 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3575. Public motor vehicle use of the SP246 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3576. The SP246 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3577. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP246 Road.

3578. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP246 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP247 Road

3579. The SP247 Road is designated as county road number SPVM0247 and SGID road identification number RD200516 and is more or less 3.97 miles long.

3580. Exhibit 270 (attached hereto and incorporated herein) contains certain information pertaining to the SP247 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3581. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP247 Road solely as it crosses United States public land as included and specifically described in Exhibit 270. The SP247 Road includes the segment of road specifically set forth in Exhibit 270 and as exists on the ground.

Acceptance of the SP247 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3582. The SP247 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3583. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP247 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3584. The appearance of the SP247 Road on the Mayfield (1965) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3585. The SP247 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 SP247 Road pursuant to the County's governmental right and authority.

3586. Witnesses with personal knowledge of the history of the SP247 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3587. Currently known reputation in the community is that the SP247 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3588. Public motor vehicle use of the SP247 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3589. The SP247 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3590. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP247 Road.

3591. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP247 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP250 Road

3592. The SP250 Road is designated as county road number SPVM0250 and SGID road identification number RD200517 and is more or less 1.24 miles long.

3593. Exhibit 271 (attached hereto and incorporated herein) contains certain information pertaining to the SP250 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3594. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP250 Road solely as it crosses United States public land as included and specifically described in Exhibit 271. The SP250 Road includes the segment of road specifically set forth in Exhibit 271 and as exists on the ground.

Acceptance of the SP250 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3595. The SP250 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3596. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP250 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3597. The appearance of the SP250 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3598. The SP250 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 SP250 Road pursuant to the County's governmental right and authority.

3599. Witnesses with personal knowledge of the history of the SP250 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3600. Currently known reputation in the community is that the SP250 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3601. Public motor vehicle use of the SP250 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3602. The SP250 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3603. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP250 Road.

3604. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP250 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP255 Road

3605. The SP255 Road is designated as county road number SPVM0255 and SGID road identification number RD200521 and is more or less 2.03 miles long.

3606. Exhibit 272 (attached hereto and incorporated herein) contains certain information pertaining to the SP255 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3607. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP255 Road solely as it crosses United States public land as included and specifically described in Exhibit 272. The SP255 Road includes the segment of road specifically set forth in Exhibit 272 and as exists on the ground.

Acceptance of the SP255 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3608. The SP255 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3609. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP255 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3610. The appearance of the SP255 Road on the Sterling (1966) USGS 7.5-minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 12 for more detailed map information.

3611. The SP255 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 SP255 Road pursuant to the County's governmental right and authority.

3612. Witnesses with personal knowledge of the history of the SP255 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3613. Currently known reputation in the community is that the SP255 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3614. Public motor vehicle use of the SP255 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3615. The SP255 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3616. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP255 Road.

3617. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP255 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SP259 Road

3618. The SP259 Road is designated as county road number SPVM0259 and SGID road identification number RD200527 and is more or less 1.02 miles long.

3619. Exhibit 273 (attached hereto and incorporated herein) contains certain information pertaining to the SP259 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3620. In this action, the State and County seek to quiet title to the public highway right-of-way for the SP259 Road solely as it crosses United States public land as included and

specifically described in Exhibit 273. The SP259 Road includes the segment of road specifically set forth in Exhibit 273 and as exists on the ground.

Acceptance of the SP259 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3621. The SP259 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3622. Aerial photography from 1975 confirms the historical use, existence, and acceptance of the right-of-way for the SP259 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3623. The SP259 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 SP259 Road pursuant to the County's governmental right and authority.

3624. Witnesses with personal knowledge of the history of the SP259 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3625. Currently known reputation in the community is that the SP259 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3626. Public motor vehicle use of the SP259 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3627. The SP259 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3628. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the SP259 Road.

3629. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the SP259 Road on lands owned 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 – Antelope Valley Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Antelope Valley Road, Sanp12; (2) West Valley Road, Sanp201; (3) SP264 Road; (4) SP266 Road; (5) SP267 Road; (6) SP271 Road; (7) SP272 Road; (8) SP273 Road; (9) SP274 Road; (10) SP275 Road; (11) SP278 Road; (12) SP283 Road; (13) SP284 Road; (14) SP286 Road; (15) SP289 Road; (16) SP290 Road; (17) SP293 Road; (18) SP294 Road; (19) SP294a Road; (20) SP295 Road; (21) SP311 Road; (22) SP315 Road; (23) SP315a Road; (24) SP317 Road; and (25) SP316 Road;

2. On its Second Cause of Action – Big Hollow Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Apple Tree Road,

Sanp99: (2) Big Hollow Road, Sanp13; (3) Old 132 Road, Sanp166; (4) Water Hollow Road, Sanp14; (5) SP4 Road; (6) SP469 Road; (7) SP473 Road; (8) SP474 Road; (9) SP476 Road; (10) SP477 Road; (11) SP478 Road; (12) SP479 Road; (13) SP480 Road; (14) SP481 Road; (15) SP482 Road; (16) SP484 Road; (17) SP485 Road; (18) SP486 Road; (19) SP489 Road; (20) SP490 Road; (21) SP493 Road; (22) SP494 Road; (23) SP496 Road; (24) SP499 Road; (25) SP504 Road; (26) SP507 Road; (27) SP511 Road; and (28) SP503 Road;

3. On its Third Cause of Action – Flat Canyon Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Flat Canyon Road, Sanp17; (2) Yuba Lake Road, Sanp210; (3) SP05 Road; (4) SP389 Road; (5) SP390 Road; (6) SP391 Road; (7) SP394 Road; (8) SP396 Road; (9) SP397 Road; (10) SP399 Road; (11) SP400 Road; (12) SP403 Road; (13) SP404 Road; (14) SP405 Road; (15) SP406 Road; (16) SP410 Road; (17) SP412 Road; (18) SP516 Road; (19) SP518 Road; (20) SP519 Road; (21) SP522 Road; (22) SP524 Road; (23) SP525 Road; (24) SP527 Road; (25) SP527a Road; (26) SP528 Road; (27) SP530 Road; (28) SP531 Road; (29) SP533a Road; (30) SP534 Road; (31) SP536 Road; (32) SP537 Road; and (33) SP538 Road;

4. On its Fourth Cause of Action – Japanese Valley Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Chris Hollow Road, Sanp42; (2) Hayes Canyon Road, Sanp39; (3) Japanese Valley Road, Sanp290; (4) SP74 Road; (5) SP87 Road; (6) SP112 Road; (7) SP115 Road; (8) SP117 Road; (9) SP118a Road; (10) SP124 Road; (11) SP129 Road; (12) SP133 Road; (13) SP135 Road; (14) SP137 Road; (15) SP142 Road; (16) SP144 Road; (17) SP146 Road; (18) SP147 Road; (19) SP148 Road; (20)

SP149 Road; (21) SP150 Road; (22) SP150a Road; (23) SP152 Road; (24) SP154 Road; (25) SP155 Road; (26) SP160 Road; (27) SP161 Road; (28) SP164 Road; (29) SP167 Road; (30) SP170 Road; (31) SP173 Road; (32) SP176 Road; (33) SP177 Road; (34) SP178 Road; (35) SP179 Road; (36) SP181 Road; and (37) SP182 Road;

5. On its Fifth Cause of Action – Lone Cedar Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Lone Cedar Road, Sanp5; (2) SESR885 Road; (3) SESR889 Road; (4) SP1 Road; (5) SP2 Road; (6) SP3 Road; (7) SP3a Road; (8) SP5 Road; (9) SP7 Road; (10) SP8 Road; (11) SP10 Road; (12) SP12 Road; (13) SP13 Road; (14) SP15b Road; (15) SP16 Road; (16) SP17 Road; (17) SP18 Road; (18) SP20 Road; (19) SP22 Road; (20) SP23 Road; (21) SP26 Road; (22) SP27 Road; (23) SP28 Road; (24) SP32 Road; (25) SP33 Road; (26) SP36 Road; (27) SP42 Road; (28) SP46 Road; (29) SP47 Road; (30) SP49 Road; (31) SP52 Road; (32) SP53 Road; (33) SP54 Road; (34) SP55 Road; (35) SP56 Road; (36) SP57 Road;(37) SP58 Road; (38) SP60 Road; (39) SP61 Road; (40) SP62 Road; (41) SP64 Road; (42) SP65 Road; (43) SP68 Road; (44) SP73 Road; (45) SP76 Road; (46) SP77 Road; (47) SP78 Road; (48) SP81 Road; (49) SP82 Road; (50) SP84 Road; (51) SP86 Road; (52) SP88 Road; (53) SP88a Road; (54) SP90 Road; (55) SP91 Road; (56) SP92 Road; (57) SP100 Road; and (58) SP107 Road;

6. On its Sixth Cause of Action – Main Canyon Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Dry Canyon Road, Sanp19, (2) Left Hand Fork Road, Sanp43, (3) Main Canyon Road, Sanp8, (4) SP416 Road; (5) SP417a Road; (6) SP422 Road; (7) SP423 Road; (8) SP427 Road; (9) SP428 Road; (10) SP434

Road; (11) SP436 Road; (12) SP438 Road; (13) SP441 Road; (14) SP447 Road; (15) SP448 Road; (16) SP449 Road; (17) SP451 Road; (18) SP453 Road; (19) SP460 Road; and (20) SP461 Road;

7. On its Seventh Cause of Action – Mellor Canyon Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Mellor Canyon Road, Sanp18, (2) Sanpitch Dairy Road, Sanp238, (3) SP297 Road, (4) SP299 Road, (5) SP306 Road, (6) SP307 Road, (7) SP310 Road, (8) SP314 Road, (9) SP319 Road, (10) SP321 Road, (11) SP327 Road, (12) SP333 Road, (13) SP334 Road, (14) SP340 Road, (15) SP349 Road, (16) SP352 Road, (17) SP355 Road, (18) SP357 Road, (19) SP360 Road, and (20) SP367 Road;

8. On its Eighth Cause of Action – Skyline Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Skyline West Mountain Road, Sanp4; (2) SP298 Road; (3) SP359a Road; (4) SP359b Road; (5) SP374 Road; (6) SP375 Road; (7) SP382 Road; (8) SP385 Road; (9) SP386 Road; (10) SP407 Road; (11) SP408 Road; and (12) SP409 Road;

9. On its Ninth Cause of Action – Southfield Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Landfill Road, Sanp288; (2) Southfield Road, Sanp289; (3) SP186 Road; (4) SP187 Road; (5) SP188 Road; (6) SP193 Road; (7) SP194 Road; (8) SP199 Road; (9) SP201 Road; (10) SP202 Road; (11) SP208 Road; (12) SP210 Road; (13) SP213 Road; (14) SP215 Road; (15) SP216 Road; (16) SP218b Road; (17) SP219 Road; (18) SP222 Road; (19) SP230 Road; (20) SP231a Road; (21) SP232 Road;

(22) SP233 Road; (23) SP243 Road; (24) SP246 Road; (25) SP247 Road; (26) SP250 Road; (27) SP255 Road; and (28) SP259 Road;

10. An order awarding costs and fees, specifically including, but not limited to, reasonable attorney fees to the extent permitted by law; and

11. An order granting such further and other relief as may be appropriate.

Respectfully submitted this 23rd day of August, 2012.

/s/ Harry Souvall
Assistant Attorney General