CHRISTOPHER LACOMBE (13926)
ROGER R. FAIRBANKS (3792)
HARRY H. SOUVALL (4919)
Assistant Attorneys General
MARK SHURTLEFF (4666)
UTAH ATTORNEY GENERAL
5110 State Office Building
Post Office Box 142477
Salt Lake City, UT 84114-2477
clacombe@utah.gov
rfairbanks@utah.gov
hsouvall@utah.gov
Telephone: (801) 538-9687

Attorneys for Plaintiffs

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

WAYNE 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-00434-DN Judge: Honorable David Nuffer

Wayne County, Utah ("Wayne 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Section 8 of the Mining Act of 1866, 14 Stat. 251, 253, later codified as Revised Statutes 2477 and as 43 U.S.C. § 932 (repealed October 21, 1976, with savings provisions recognizing validity of rights-of-way already established) (hereinafter "R.S. 2477").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 eleven (11) geographic areas, each with approximately 16-57 roads. Each geographic area has been pleaded as a separate cause of action.

JURISDICTION AND VENUE

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

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

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

4. On or about November 21, 2011, the State filed a Notice of Intention to File Suit to Quiet Title to Certain Rights-of-Way in Wayne County, Utah, with the Secretary of Interior over the R.S. 2477 rights-of-way that are the subject of this action. A copy of this letter is attached as Exhibit 1. This 2011 Notice of Intent supplemented the State's prior Notice of Intent

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

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

PARTIES

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

37. However, Wayne 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). Wayne County has the sole obligation to manage, construct, and maintain its Class B roads to meet general travel standards established by State law. *See id.* §72-3-103(5).

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

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

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

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

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

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

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

AREA DESCRIPTIONS

44. In order to better organize the rights-of-way included in this amended complaint to fit within Utah's transportation system, the roads have been divided into eleven (11) areas: (1) Big Rocks Area; (2) North Mountain Area; (3) Wild Cat Area; (4) Teasdale Area; (5) Miners Mountain Area; (6) Caineville Area; (7) Notom Area: (8) Dugout Area; (9) Sand Slide Area; (10) Blackburn Wash Area; and the (11) Ekker Ranch Area (collectively, the "Eleven Areas").

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

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

47. Big Rocks Area is located in western Wayne County and is shown on Exhibit 3, attached hereto and incorporated herein.

48. Big Rocks Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Big Hollow Road, 24; (2) Big Rocks Road, 25; (3) Road to Don Edwards, 25A; (4) Black Point Road, 3; (5) Loa TV Tower Road, 4; (6) Jacksonville Road, 54; (7) Long Hollow/Hunts Road, 8; (8) Sage Draw Road, 9; (9) WYPM0325 Road, 24_3; (10) WYPM0012 Road, 24F; (11) Behind Big Rocks Road, 25_5; (12) Black Point Reservoir Road, 3_4; (13) WYPM0193 Road, 3_7; (14) WYPM0190 Road, 3_9; (15) WYPM0228 Road, 4_1; (16) WYPM0235 Road, 4_2; (17) WYPM0235a Road, 4_3; (18) West of TV Tower Road, 4_6; (19) CO_28_0007 Road, 6_5; and (20) WYPM0282 Road, 8_4.

49. North Mountain Area is located in northwestern Wayne County and is shown on Exhibit 4, attached hereto and incorporated herein.

50. North Mountain Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Fish Lake Road, 2; (2) Cabin Spring Road, 2A; (3) Fremont Road, 35; (4) Tidwell Road, 39; (5) Jakes Place Road, 40; (6) Mill Meadow Dirt Road, 43; (7) Vance Road, 44; (8) Mill Meadow Oil Road, 45; (9) Horse Valley Road, 46; (10) Peterson Road, 46A; (11) Forest Boundary Road, 47; (12) High Line Ditch Road, 48; (13) North Mountain Road, 5; (14) Saddle Pass Road, 56; (15) Foothill Drive Road, 56a; (16) Lyman Water Tank Road, 57; (17) Trail Hollow Road, 5A; (18) Cedar Draw Road, 5B; (19) WYPM0002 Road, 2_10a; (20) WYPM0001 Road, 2_11; (21) WYPM0011 Road, 2_2; (22) PTPM0005 Road, 2_21; (23) WYPM0013 Road, 2_3; (24) PTPM0008 Road, 2_5; (25) WYPM0010 Road,

2_6; (26) WYPM0004 Road, 2_7; (27) WYPM0023 Road, 2A_1; (28) WYPM0039 Road, 2A_10; (29) WYPM0041 Road, 2A_11; (30) WYPM0025 Road, 2A_2; (31) WYPM0032 Road, 2A_4; (32) CO_28_0013 Road, 2A_5; (33) WYPM0035 Road, 2A_6; (34) WYPM0034 Road, 2A_7; (35) WYPM0036 Road, 2A_8; (36) WYPM0038 Road, 2A_9; (37) WYPM0100 Road, 40_1; (38) WYPM0097 Road, 40_2; (39) WYPM0097a Road, 40_2a; (40) WYPM0103 Road, 40_3; (41) WYPM0127 Road, 40_8; (42) WYPM0117 Road, 44_1; (43) WYPM0119 Road, 44_2; (44) WYPM0119A Road, 44_3; (45) WYPM0109 Road, 44_4; (46) WYPM0119B Road, 44_5; (47) WYPM0158 Road, 46_2; (48) WYPM0159 Road, 46A_1; (49) Red Canyon Road, 47_1 (50) Old Red Canyon Road, 47_1A; (51) WYPM0054 Road, 5_3; (52) WYPM0058 Road, 5_4; (53) WYPM0057 Road, 5_5; (54) WYPM0015 Road, 5A_1; (55) Dog Flats Road, 5A_2; (56) WYPM0022 Road, 5A_3; and (57) WYPM0018 Road, 5A_4.

51. Wild Cat Area is located in southwestern Wayne County and is shown on Exhibit 5, attached hereto and incorporated herein.

52. Wild Cat Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Bull Roost Reservoir Road, 13; (2) Sky Reservoir Road, 15; (3) Flat Top Road, 17; (4) Tommy Hollow Road, 17a; (5) Dry Lake Road, 19; (6) Smooth Knoll Road, 20; (7) Wild Cat Road, 21; (8) Pine Creek Road, 23; (9) Dennis Road, 26; (10) Big Hollow Pit Road, 26a; (11) Bicknell Fish Hatchery Road, 27; (12) Jack King Road, 27A; (13) Chad's Road, 58; (14) Bicknell Pond Road, 59; (15) Carl Taft Road, 61; (16) Sunglow Road, 63A; (17) North Slope Road, 77; (18) WYPM0355 Road, 17_1; (19) WYPM0353 Road, 17_2; (20) WYPM0354 Road, 17_3; (21) WYPM0345 Road, 17A_1; (22) WYPM0381 Road, 2_12; (23) WYPM0390

Road, 20_10; (24) CO_28_0001 Road, 20_12; (25) WYPM0401 Road, 20_13; (26) WYPM0389 Road, 20_2; (27) WYPM0388 Road, 20_3; (28) WYPM0388a Road, 20_3a; (29) WYPM0381a Road, 20_8; (30) WYPM0381b Road, 21_1; (31) WYPM0378 Road, 21_4; (32) WYPM0398 Road, 21_7; (33) WYPM0393 Road, 21_8; (34) WYPM0420 Road, 59_3; (35) Middle Balsam Road, 8_1; and (36) WYPM0362 Road, 8_2A.

53. Teasdale Area is located in western Wayne County and is shown on Exhibit 6, attached hereto and incorporated herein.

54. Teasdale Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Brey Road, 29; (2) Teasdale TV Tower Road, 64; (3) Teasdale Road, 65; (4) Fish Creek Cove Road, 65E; (5) Teasdale Bench Road, 66; (6) Teasdale Powerline Road, 67; (7) Cigarette Hollow Road, 68; (8) Dick Pace Road, 71; (9) River View Drive Road, 73; (10) Chadburn Road, 73A; (11) Beas Lewis Flat Road, 76; (12) North Beas Lewis Flat Road, 76B; (13) Meadowbrook Road, 77A; (14) Sulphur Creek Road, 81; (15) WYPM0438 Road, 68_2; (16) Stone Road, 72_1; (17) WYPMO451 Road, 74_1; (18) Beas Lewis Flat South Road, 76_19; and (19) WYPM0459a Road, 80_1c.

55. Miners Mountain Area is located in southwestern Wayne County and is shown on Exhibit 7, attached hereto and incorporated herein.

56. Miners Mountain Area includes the following roads—listed by Common Road Name and County Unique Number: (1) East Miners Road, 139D; (2) Miners Mountain Road, 80; (3) North Miners Road, 80A; (4) WYPM0519 Road, 1390_1; (5) West Hollow Road, 77_1; (6) Lion Mountain Road, 78_2; (7) Hale Summer Theatre Road, 79_2; (8) East Grover Road, 80_1;

(9) WYPM0476 Road, 80_10; (10) WYPM0509 Road, 80_15; (11) WYPM0508 Road, 80_16; (12) Miners Mountain Road, 80_18; (13) Miners Mountain Road, 80_19; (14) WYPM0471 Road, 80_1a; (15) Miners Mountain Road, 80_20; (16) Miners Mountain Trail Road, 80_21; (17) WYPM0525 Road, 80_22; (18) WYPM0479 Road, 80_3; (19) WYPM0478 Road, 80_4; (20) WYPM0479a Road, 80_6; (21) WYPM0477 Road, 80_7; (22) WYPM0475 Road, 80_9; (23) WYPM0529 Road, 80A; (24) WYPM0530 Road, 80A_1; (25) WYPM0511 Road, 80A_1b; (26) WYPM0481 Road, 80A_3; (27) WYPM0530a Road, 80A_3a; (28) WYPM0515 Road, 80A_5; (29) WYPM0483 Road, 80A_6; and (30) WYPM0517 Road, 80A_7.

57. Caineville Area is located in north central Wayne County and is shown on Exhibit 8, attached hereto and incorporated herein.

58. Caineville Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Skyline View Road, 155D; (2) Hartnet-Cathedral Road, 82; (3) Jail House Road, 82A; (4) Temple of the Moon Road, 84; (5) Caineville Road, 88; (6) Cemetery Road, 88A; (7) Red Desert Road, 89; (8) Caineville Water Road, 89_1; (9) Caineville Reef Road, 90; (10) Factory Butte Road, 91; (11) Coal Mine Pit Road, 91_1; (12) Factory Bench Road, 91_3; (13) Caineville Gravel Pit Road, 91_4; (14) Caineville TV Tower Road, 91A; (15) 82_10 Road, 82_10; (16) Hartnet Draw Road, 82_4; (17) 82A_1 Road, 82A_1; (18) Hartnet Valley Road, 146D; and (19) Hartnet-Cathedral Road, 146D_4.

59. Notom Area is located in south central Wayne County and is shown on Exhibit 9, attached hereto and incorporated herein.

60. Notom Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Notom Road, 85; (2) Old Notom Road, 86; (3) Burro Wash Road, 87; (4) Burro Wash Road, 86; (5) East Notom Road, 149D; (6) Notom Bench East Road, 150D; (7) 150D_1 Road, 150D_1; (8) Notom Bench Pond Road, 150D_4; (9) Pleasant Creek Diversion Road, 151D; (10) Pleasant Creek Diversion Road, 151D_1; (11) Pleasant Creek Diversion Road, 151D_2; (12) Notom Cemetery Road, 85_13; (13) Notom Bench North Road, 85_17; (14) 85_23 Road, 85_23; (15) Back Road to Notom, 85_3; and (16) Pleasant Creek Road, 85_9.

61. Dugout Area is located in central and south central Wayne County and is shown on Exhibit 10, attached hereto and incorporated herein.

62. Dugout Area includes the following roads—listed by Common Road Name and County Unique Number: (1) South River Road, 108; (2) Blue Valley Road, 92; (3) Blue Valley Cemetery Road, 92A; (4) Giles Road, 92B; (5) Bert Avery Road, 93; (6) Dugout Road, 94; (7) Fairview Ranch Road, 95; (8) South Fairview Road, 96; (9) Back Road to Granite, 97; (10) Granite Ranch Road, 98; (11) East Gate Reservoir Road, 99; (12) Bull Wash Road, 180D; (13) Bull Wash 1 Road, 181D; (14) Pinto Hills Road, 182D; (15) Pinto Hills Road, 182D_3; (16) Pinto Hills South Road, 182D_5; (17) 182D_7 Road, 182D_7; (18) Jackson Pond Road, 92_18; (19) Jackson Water Line Road, 93_12; (20) 93_13 Road, 93_13; (21) 93_4 Road, 93_4; (22) 95_15 Road, 95_15; (23) Fairview Spur Road, 95_2; (24) 96_4 Road, 96_4; (25) Granite Ranch Road, 96_6; (26) 97_2 Road, 97_2; (27) 97_4 Road, 97_4; and (28) 97_7 Road, 97_7.

63. Sand Slide Area is located in south central Wayne County and is shown on Exhibit 11, attached hereto and incorporated herein.

64. Sand Slide Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Sand Slide Road, 100; (2) Sand Slide Overlook Road, 100_2; (3) Dell Seep Road, 101; (4) Burr Point Pond Road, 101_1; (5) Burr Point Overlook Road, 101A; (6) Dell Seep Cutoff Road, 102; (7) North Point Road, 103; (8) Oil Well Point, 104; (9) Road to Gravel Pit, 105; (10) East Hanksville Road, 105_1; (11) Mixing Pad Road, 105_2; (12) Hanksville Landfill Road, 106; (13) Hanksville TV Tower Road, 106_1; (14) Hanksville Cemetery Road, 106A; (15) Hanksville East Loop Road, 107; (16) Sand Slide Well Road, 184D; (17) 101_1 Road, 101_1; (18) 101_12 Road, 101_12; (19) 103_3 Road, 103_3; and (20) Poison Spring Road, 186D.

65. Blackburn Wash Area is located in northeastern Wayne County and is shown on Exhibit 12, attached hereto and incorporated herein.

66. Blackburn Wash Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Blackburn Wash Road, 111; (2) Blackburn Wash Spur Road, 111A; (3) The Square Road, 112; (4) San Rafael Road, 112_1; (5) Jeffrey Wells Road, 112_2; (6) South of the Square Road, 113; (7) River Overlook Road, 113_1; (8) North River Road, 109; (9) Cow Dung Road, 110; (10) 111_1 Road, 111_1; (11) Well Draw Road, 165D; (12) Well Draw Road, 165D_4; (13) Well Draw Road, 165D_6; (14) Old State Road, 167D; (15) Old State Road, 167D_1; (16) 156D_2 Road, 156D_2; and (17) Muddy River Road, 166D.

67. Ekker Ranch Area is located in eastern Wayne County and is shown on Exhibit 13, attached hereto and incorporated herein.

68. Ekker Ranch Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Roost Road, 114; (2) Lower San Rafael Road, 114A; (3) Oil Well Road/Roost House Road, 115; (4) Ekker Ranch Road, 116; (5) South Ekker Ranch Road, 117; (6) Angel Point Road, 118; (7) Sam's Mesa Road, 119; (8) Chad Moore's Well Road, 121; (9) Bull Pasture Overlook Road, 122; (10) Spur Road, 120; (11) Windy Peak Road, 120A; (12) Horseshoe Overlook Road, 209D; (13) 114_1 Road, 114_1; (14) 114_11 Road, 114_11; (15) Twin Corral Oil Well Road, 114_14; (16) 114_20 Road, 114_20; (17) 114_3 Road, 114_3; (18) 114_4 Road, 114_4; (19) 114_5 Road, 114_5; (20) 114_6 Road, 114_6; (21) 114_8 Road, 114_8; (22) 116_2 Road, 116_2; (23) 117_1 Road, 117_1; (24) Sam's Mesa Road, 119_3; (25) Well Road, 121_1; (26) Well Road, 121_2; (27) 122_2 Road, 122_2; (28) 122_3 Road, 122_3; (29) 122_4 Road, 122_4; (30) 122_6 Road, 122_6; (31) 114_19 Road, 114_19; (32) High Spur Road, 120_1; and (33) Spur Trail Road, 120_5; (34) HC_1 Road, HC_1; and (35) HC_3 Road, HC_3.

69. The surveyed centerline of the above-named roads in the Eleven Areas are displayed, respectively, as Exhibits 15-312, 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.

70. The information and documentation relevant to the above Eleven 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.

71. 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.

72. The USGS 7.5- and 15-minute quadrangle maps covering Wayne County evidence the existence, use, and acceptance of the rights-of-way in this action prior to 1976. See Exhibit 14 for detailed map information.

73. 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.

74. 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.

75. 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.

76. 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 15-312, 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.

77. 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

78. Wayne County encompasses approximately 2,500 square miles of land. Approximately 86% of the land within the County is federal land.

79. Due to the vast expanse of federal land in Wayne County, R.S. 2477 provides the sole legal basis for Wayne County to claim title to many of the rights-of-way that serve as roads and public highways in the county. All such roads that exist over R.S. 2477 rights-of-way and that are at issue in this suit were authorized, established, constructed, or accepted as R.S. 2477

rights-of-way on unreserved lands prior to October 21, 1976, or have vested as public highways, easements, and valid existing rights by law as set forth in the facts below.

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

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

82. The roads over R.S. 2477 rights-of-way have long served the vital function of linking communities, business operations, private land, and SITLA land and were historically established and constructed to facilitate settlement, commerce, and general public access to public lands and communities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

100. On June 15, 2000, the State of Utah sent a Notice of Intent to Sue ("2000 NOI") to the Secretary of the Interior indicating its intent to file suit to quiet title to roads over R.S.

2477 rights-of-way throughout Utah. Along with the NOI, the State included maps depicting the claimed roads in each county.

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

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

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

104. In 2011, the State of Utah amended and sent to Secretary Salazar a second set of NOIs ("2011 NOIs")—one NOI for each County that claims roads over R.S. 2477 rights-of-way in the State. The 2011 NOIs provided County-specific, detailed information regarding those roads.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

> Although R.S. 2477 was repealed nearly 30 years ago, controversies continue to arise about the existence and scope of the rights-of-way it granted. R.S. 2477 has been subject to inconsistent judicial and administrative interpretations through its history. Because R.S. 2477 did not require that the rights-of-way be recorded or otherwise documented, it is often difficult for Federal land managers, State, local and tribal governments and public land users to know which right-of-way claims are valid, where they are located and how they may be used.

Id. at 2.

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

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

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

Id. at 6.

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

121. The DOI Guidelines specify that

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

Id. at 9.

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

123. The DOI Press Release stated the following:

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

Id. (emphasis added).

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

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

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

127. According to a DOI Press Release dated April 9, 2003 and prepared by a spokesperson for the DOI, the MOU recognized "the uncertainty about existing rights-of-way claims on federal land … and [was negotiated to establish] … a process to resolve many of the long-standing disputes over Revised Statute 2477 (R.S. 2477) existing rights-of-way in Utah."

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

129. The MOU provided that DOI would implement a "State and County Road Acknowledgment Process" to "acknowledge the existence of certain R.S. 2477 rights-of-way on

[BLM] land within the State of Utah," and outlined the process DOI was to use to make such acknowledgments.

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

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

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

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

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

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

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

f. Most of the asserted R.S. 2477 rights-of-way that actually have been part of western states inventoried and maintained transportation infrastructure since before the enactment of the Federal Land Policy and Management Act (FLPMA)

in 1976 satisfy the statutory requirements of "construction" and "highway" under almost any interpretation of those statutory terms.

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

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

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

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

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

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

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

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

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

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

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

Id.

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

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

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

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

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

Id.

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

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

Id.

142. IM No. 2008-175 further states that

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

Id.

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

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

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

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

Id.

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

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

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

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

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

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

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

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

154. Because the State of Utah and Wayne County are not "holders" as defined by the BLM, they have only two options: (1) fail to maintain the roads over R.S. 2477 rights-of-way,

thus creating dangerous driving conditions, or (2) perform routine maintenance at their own risk, subjecting themselves to possible trespass actions by BLM.

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

156. Certain roads become impassable and dangerous without maintenance.

157. The BLM Manual also provides as follows:

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

BLM Manual 2801.6.C.

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

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

BLM Manual 2801.8.G.1.b.

159. The BLM Manual further states:

A. Types. The pre-FLPMA ROW laws consist of two types:

1. Discretionary. Those where the Secretary decided whether to issue a ROW, and

2. Ministerial. Those that were granted by the Congressional Act and the Secretary had no more than a ministerial duty. It is this type of pre-FLPMA ROW with which we are most concerned.

B. Regulations. Prior and current regulations shall be utilized to the extent they do not impair the rights of the holder. Regulations involving procedures such as abandonment and termination activities or methods of review of proposed major maintenance or reconstruction generally do not impair rights so long as the BLM acts promptly.

BLM Manual 2809.20, Special Considerations.

160. The BLM Manual further states:

.21 R.S. 2477, Highway ROW. This is an 1866 Act (14 Stat. 253) granting the ROW for the construction of highways over public land not reserved for a public use. No action by the Secretary was involved in the grant, although there have been occasions where the Secretary had opened otherwise unavailable land to the operation of R.S. 2477.

***

6. Reasonable Regulations [governing ROWs] are those which do not:

a. Impair rights the holder had under the pre-FLPMA law and regulations in effect at the time of the ROW grant, or

b. Increase the holder's liability for past conduct, or

c. Impose new duties to transactions already completed.

BLM Manual 2809.21.A.6, Special Considerations.

161. The BLM Manual further states:

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

BLM Manual 2809.21.B.1, Special Considerations.

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

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

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

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

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

167. DOI's actions also have recently sparked numerous public highway lawsuits across the western states. DOI solicitors and BLM managers have decided that Plaintiffs have no

rights, title, or interest in these public highways crossing federal land unless and until Plaintiffs' rights-of-way are adjudicated in court.

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

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

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

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

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

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

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

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

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

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

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

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

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

181. In November of 2005, Kane County filed suit against the DOI (and BLM) under the Administrative Procedures Act, 5 U.S.C. § 551 et seq., and challenged the transportation provisions of the Monument Plan as being arbitrary and capricious. *See Kane County v.*

Kempthorne, 495 F. Supp. 1143 (D. Utah 2007), *aff'd* 562 F.3d 1077 (10th Cir. 2009) ("Monument lawsuit").

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

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

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

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

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

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

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

189. This letter notified the BLM that the State and Counties would begin maintenance and repair on Class B and D roads statewide and that this maintenance would include, as needed,

going outside the disturbed width of roads, but within the statutory right-of-way under Utah law of 66 feet for class D roads and 100 feet for class B roads.

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

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

191. In April 2012, Utah State BLM Director Juan Palma delivered a draft of a letter to Utah Public Lands Policy Coordinator Kathleen Clarke in which he stated that the BLM did not concede that Utah could undertake the actions detailed in its letter without prior consultation with the BLM.

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

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

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

195. The BLM refused to acknowledge Plaintiffs' right, title, and interest in these R.S. 2477 rights-of-way in the 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.

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

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

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

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

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

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

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

FIRST CAUSE OF ACTION - QUIET TITLE
BIG ROCKS AREA

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

204. The Big Rocks Area is located in western Wayne County. *See* Exhibit 3.

205. The Big Rocks Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Big Hollow Road, 24; (2) Big Rocks Road, 25; (3) Road to Don Edwards, 25A; (4) Black Point Road, 3; (5) Loa TV Tower Road, 4; (6) Jacksonville Road, 54; (7) Long Hollow/Hunts Road, 8; (8) Sage Draw Road, 9; (9) WYPM0325 Road, 24_3; (10) WYPM0012 Road, 24F; (11) Behind Big Rocks Road, 25_5; (12) Black Point Reservoir Road, 3_4; (13) WYPM0193 Road, 3_7; (14) WYPM0190 Road, 3_9; (15) WYPM0228 Road, 4_1; (16) WYPM0235 Road, 4_2; (17) WYPM0235a Road, 4_3; (18) West of TV Tower Road, 4_6; (19) CO_28_0007 Road, 6_5; and (20) WYPM0282 Road, 8_4.

206. Each right-of-way claimed in the Big Rocks Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding,

prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

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

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

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

Big Hollow Road, 24

210. The Big Hollow Road is designated as county road number 24 and SGID road identification number RD280305 and is more or less 5.76 miles long.

211. Exhibit 15 (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.

212. 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 15. The Big Hollow Road includes the segment of road specifically set forth in Exhibit 15 and as exists on the ground.

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

213. 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.

214. Aerial photography from 1976 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.

215. The Big Hollow Road appears on the Bicknell (1952) and Moroni Peak (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

217. 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.

218. 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.

219. 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.

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

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

222. 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.

Big Rocks Road, 25

223. The Big Rocks Road is designated as county road number 25 and SGID road identification number RD280306 and is more or less 7.68 miles long.

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

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

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

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

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

228. The Big Rocks Road appears on the Moroni Peak (1969), Bicknell (1952), and Loa (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and

acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

Road to Don Edwards, 25A

236. The Road to Don Edwards is designated as county road number 25A and SGID road identification number RD280308 and is more or less 0.26 miles long.

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

238. In this action, the State and County seek to quiet title to the public highway right-of-way for the Road to Don Edwards solely as it crosses United States public land as included and specifically described in Exhibit 18. The Road to Don Edwards includes the segment of road specifically set forth in Exhibit 17and as exists on the ground.

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

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

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

241. The Road to Don Edwards appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

245. Public motor vehicle use of The Road to Don Edwards as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

246. The Road to Don Edwards traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

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

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

Black Point Road, 3

249. The Black Point Road is designated as county road number 3 and State Geographic Information Database ("SGID") road identification number RD280315 and is more or less 11.86 miles long.

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

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

specifically described in Exhibit 18. The Black Point Road includes the segment of road specifically set forth in Exhibit 18 and as exists on the ground.

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

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

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

254. The Black Point Road appears on the Jakes Knoll (1969) and Abes Knoll (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

255. The County confirmed its acceptance of the Black Point Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. *See* UTAH CODE ANN. § 72-3-103(4) (2009). Following its confirmed acceptance of this road and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Black Point Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

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

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

Loa TV Tower Road, 4

262. The Loa TV Tower Road is designated as county road number 4 and SGID road identification number RD280318 and is more or less 7.15 miles long.

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

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

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

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

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

267. The Loa TV Tower Road appears on the Abes Knoll (1969), Loa (1969), and Moroni Peak (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

268. The County confirmed its acceptance of the Loa TV Tower Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Loa TV Tower Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

274. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Loa TV Tower Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jacksonville Road, 54

275. The Jacksonville Road is designated as county road number 54 and SGID road identification number RD280328 and is more or less 1.80 miles long.

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

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

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

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

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

280. The Jacksonville Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

Long Hollow/Hunts Road, 8

288. The Long Hollow/Hunts Road is designated as county road number 8 and SGID road identification number RD280353 and is more or less 25.43 miles long.

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

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

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

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

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

293. The Long Hollow/Hunts Road appears on the Jakes Knoll (1969), Moroni Peak (1969), Flossie Knoll (1969), and Smooth Knoll (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

298. The Long Hollow/Hunts Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

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

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

Sage Draw Road, 9

301. The Sage Draw Road is designated as county road number 9 and SGID road identification number RD280366 and is more or less 9.93 miles long.

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

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

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

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

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

306. The Sage Draw Road appears on the Jakes Knoll (1969) and Moroni Peak (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

WYPM0325 Road, 24_3

314. The WYPM0325 Road is designated as county road number 24_3 and SGID road identification number RD280433and is more or less 1.70 miles long.

315. Exhibit 23 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0325 Road including, a map depicting the road; township, range, and

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

316. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0325 Road solely as it crosses United States public land as included and specifically described in Exhibit 23. The WYPM0325 Road includes the segment of road specifically set forth in Exhibit 23 and as exists on the ground.

Acceptance of the WYPM0325 Road R.S. 2477 Right-of-way Prior to October 21, 1976

317. The WYPM0325 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

318. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0325 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

319. The WYPM0325 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0325 Road pursuant to the County's governmental right and authority.

320. Witnesses with personal knowledge of the history of the WYPM0325 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

321. Currently known reputation in the community is that the WYPM0325 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

322. Public motor vehicle use of the WYPM0325 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

323. The WYPM0325 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

324. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0325 Road.

325. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0325 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0012 Road, 24F

326. The WYPM0012 Road is designated as county road number 24F and SGID road identification number RD280440 and is more or less 0.65 miles long.

327. Exhibit 24 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0012 Road including, a map depicting the road; township, range, and

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

328. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0012 Road solely as it crosses United States public land as included and specifically described in Exhibit 24. The WYPM0012 Road includes the segment of road specifically set forth in Exhibit 24 and as exists on the ground.

Acceptance of the WYPM0012 Road R.S. 2477 Right-of-way Prior to October 21, 1976

329. The WYPM0012 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

330. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0012 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

331. The WYPM0012 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

332. The County confirmed its acceptance of the WYPM0012 Road by 1975 when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0012 Road pursuant to the County's governmental right and authority.

333. Witnesses with personal knowledge of the history of the WYPM0012 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

334. Currently known reputation in the community is that the WYPM0012 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

335. Public motor vehicle use of the WYPM0012 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

336. The WYPM0012 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

337. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0012 Road.

338. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0012 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Behind Big Rocks Road, 25_5

339. The Behind Big Rocks Road is designated as county road number 25_5 and SGID road identification number RD280445 and is more or less 0.75 miles long.

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

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

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

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

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

344. The Behind Big Rocks Road was accepted as a County highway at least 10 years prior to October21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-

way by managing, maintaining, and improving the Behind Big Rocks Road pursuant to the County's governmental right and authority.

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

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

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

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

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

350. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Behind Big Rocks Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Black Point Reservoir Road, 3_4

351. The Black Point Reservoir Road is designated as county road number 3_4 and SGID road identification number RD280472 and is more or less 8.75 miles long.

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

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

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

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

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

356. The Black Point Reservoir Road appears on Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

WYPM0193 Road, 3_7

364. The WYPM0193 Road is designated as county road number 3_7 and SGID road identification number RD280475 and is more or less 3.63 miles long.

365. Exhibit 27 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0193 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

366. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0193 Road solely as it crosses United States public land as included and specifically described in Exhibit 27. The WYPM0193 Road includes the segment of road specifically set forth in Exhibit 27 and as exists on the ground.

Acceptance of the WYPM0193 Road R.S. 2477 Right-of-way Prior to October 21, 1976

367. The WYPM0193 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

368. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0193 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

369. The WYPM0193 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

370. The WYPM0193 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0193 Road pursuant to the County's governmental right and authority.

371. Witnesses with personal knowledge of the history of the WYPM0193 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

372. Currently known reputation in the community is that the WYPM0193 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

373. Public motor vehicle use of the WYPM0193 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

374. The WYPM0193 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

375. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0193 Road.

376. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0193 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0190 Road, 3_9

377. The WYPM0190 Road is designated as county road number 3_9 and SGID road identification number RD280569 and is more or less 2.65 miles long.

378. Exhibit 28 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0190 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

379. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0190 Road solely as it crosses United States public land as included and

specifically described in Exhibit 28. The WYPM0190 Road includes the segment of road specifically set forth in Exhibit 28 and as exists on the ground.

Acceptance of the WYPM0190 Road R.S. 2477 Right-of-way Prior to October 21, 1976

380. The WYPM0190 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

381. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0190 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

382. The WYPM0190 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

383. The WYPM0190 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0190 Road pursuant to the County's governmental right and authority.

384. Witnesses with personal knowledge of the history of the WYPM0190 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

385. Currently known reputation in the community is that the WYPM0190 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

386. Public motor vehicle use of the WYPM0190 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

387. The WYPM0190 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

388. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0190 Road.

389. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0190 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0228 Road, 4_1

390. The WYPM0228 Road is designated as county road number 4_1 and SGID road identification number RD280483 and is more or less 2.58 miles long.

391. Exhibit 29 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0228 Road including, a map depicting the road; township, range, and

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

392. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0228 Road solely as it crosses United States public land as included and specifically described in Exhibit 29. The WYPM0228 Road includes the segment of road specifically set forth in Exhibit 29 and as exists on the ground.

Acceptance of the WYPM0228 Road R.S. 2477 Right-of-way Prior to October 21, 1976

393. The WYPM0228 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

394. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0228 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

395. The WYPM0228 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0228 Road pursuant to the County's governmental right and authority.

396. Witnesses with personal knowledge of the history of the WYPM0228 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

397. Currently known reputation in the community is that the WYPM0228 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

398. Public motor vehicle use of the WYPM0228 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

399. The WYPM0228 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

400. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0228 Road.

401. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0228 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0235 Road, 4_2

402. The WYPM0235 Road is designated as county road number 4_2 and SGID road identification number RD280484 and is more or less 1.71 miles long.

403. Exhibit 30 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0235 Road including, a map depicting the road; township, range, and

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

404. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0235 Road solely as it crosses United States public land as included and specifically described in Exhibit 30. The WYPM0235 Road includes the segment of road specifically set forth in Exhibit 30 and as exists on the ground.

Acceptance of the WYPM0235 Road R.S. 2477 Right-of-way Prior to October 21, 1976

405. The WYPM0235 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

406. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0235 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

407. The WYPM0235 Road appears on the Loa (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

408. The County confirmed its acceptance of the WYPM0235 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0235 Road pursuant to the County's governmental right and authority.

409. Witnesses with personal knowledge of the history of the WYPM0235 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

410. Currently known reputation in the community is that the WYPM0235 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

411. Public motor vehicle use of the WYPM0235 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

412. The WYPM0235 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

413. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0235 Road.

414. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0235 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0235a Road, 4_3

415. The WYPM0235a Road is designated as county road number 4_3 and SGID road identification number RD280485 and is more or less 0.47 miles long.

416. Exhibit 31 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0235a Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

417. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0235a Road solely as it crosses United States public land as included and specifically described in Exhibit 31. The WYPM0235a Road includes the segment of road specifically set forth in Exhibit 31 and as exists on the ground.

Acceptance of the WYPM0235a Road R.S. 2477 Right-of-way Prior to October 21, 1976

418. The WYPM0235a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

419. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0235a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

420. The WYPM0235a Road appears on the Loa (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

421. The WYPM0235a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0235a Road pursuant to the County's governmental right and authority.

422. Witnesses with personal knowledge of the history of the WYPM0235a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

423. Currently known reputation in the community is that the WYPM0235a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

424. Public motor vehicle use of the WYPM0235a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

425. The WYPM0235a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

426. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0235a Road.

427. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0235a Road on lands owned 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 of TV Tower Road, 4_6

428. The West of TV Tower Road is designated as county road number 4_6 and SGID road identification number RD280488 and is more or less 1.36 miles long.

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

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

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

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

432. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the West of TV Tower Road as a public highway located on

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

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

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

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

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

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

438. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 of TV Tower Road.

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

CO_28_0007 Road, 6_5

440. The CO_28_0007 Road is designated as county road number 6_5 and SGID road identification number RD280551 and is more or less 1.51 miles long.

441. Exhibit 33 (attached hereto and incorporated herein) contains certain information pertaining to the CO_28_0007 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

442. In this action, the State and County seek to quiet title to the public highway right-of-way for the CO_28_0007 Road solely as it crosses United States public land as included and specifically described in Exhibit 33. The CO_28_0007 Road includes the segment of road specifically set forth in Exhibit 33 and as exists on the ground.

Acceptance of the CO_28_0007 Road R.S. 2477 Right-of-way Prior to October 21, 1976

443. The CO_28_0007 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

444. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the CO_28_0007 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

445. The CO_28_0007 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the CO_28_0007 Road pursuant to the County's governmental right and authority.

446. Witnesses with personal knowledge of the history of the CO_28_0007 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

447. Currently known reputation in the community is that the CO_28_0007 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

448. Public motor vehicle use of the CO_28_0007 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

449. The CO_28_0007 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

450. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the CO_28_0007 Road.

451. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the CO_28_0007 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0282 Road, 8_4

452. The WYPM0282 Road is designated as county road number 8_4 and SGID road identification number RD280564 and is more or less 2.45 miles long.

453. Exhibit 34 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0282 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

454. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0282 Road solely as it crosses United States public land as included and specifically described in Exhibit 34. The WYPM0282 Road includes the segment of road specifically set forth in Exhibit 34 and as exists on the ground.

Acceptance of the WYPM0282 Road R.S. 2477 Right-of-way Prior to October 21, 1976

455. The WYPM0282 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

456. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0282 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

457. The WYPM0282 Road appears on the Moroni Peak (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

458. The WYPM0282 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0282 Road pursuant to the County's governmental right and authority.

459. Witnesses with personal knowledge of the history of the WYPM0282 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

460. Currently known reputation in the community is that the WYPM0282 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

461. Public motor vehicle use of the WYPM0282 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

462. The WYPM0282 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

463. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0282 Road.

464. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0282 Road on lands owned 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
NORTH MOUNTAIN AREA

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

466. The North Mountain Area is located in northwestern Wayne County. *See* Exhibit 4.

467. The North Mountain Area includes the following roads — listed by Common Road Name and County Unique Number: (1) Fish Lake Road, 2; (2) Cabin Spring Road, 2A; (3) Fremont Road, 35; (4) Tidwell Road, 39; (5) Jakes Place Road, 40; (6) Mill Meadow Dirt Road, 43; (7) Vance Road, 44; (8) Mill Meadow Oil Road, 45; (9) Horse Valley Road, 46; (10) Peterson Road, 46A; (11) Forest Boundary Road, 47; (12) High Line Ditch Road, 48; (13) North Mountain Road, 5; (14) Saddle Pass Road, 56; (15) Foothill Drive Road, 56a; (16) Lyman Water

Tank Road, 57; (17) Trail Hollow Road, 5A; (18) Cedar Draw Road, 5B; (19) WYPM0002 Road, 2_10a; (20) WYPM0001 Road, 2_11; (21) WYPM0011 Road, 2_2; (22) PTPM0005 Road, 2_21; (23) WYPM0013 Road, 2_3; (24) PTPM0008 Road, 2_5; (25) WYPM0010 Road, 2_6; (26) WYPM0004 Road, 2_7; (27) WYPM0023 Road, 2A_1; (28) WYPM0039 Road, 2A_10; (29) WYPM0041 Road, 2A_11; (30) WYPM0025 Road, 2A_2; (31) WYPM0032 Road, 2A_4; (32) CO_28_0013 Road, 2A_5; (33) WYPM0035 Road, 2A_6; (34) WYPM0034 Road, 2A_7; (35) WYPM0036 Road, 2A_8; (36) WYPM0038 Road, 2A_9; (37) WYPM0100 Road, 40_1; (38) WYPM0097 Road, 40_2; (39) WYPM0097a Road, 40_2a; (40) WYPM0103 Road, 40_3; (41) WYPM0127 Road, 40_8; (42) WYPM0117 Road, 44_1; (43) WYPM0119 Road, 44_2; (44) WYPM0119A Road, 44_3; (45) WYPM0109 Road, 44_4; (46) WYPM0119B Road, 44_5; (47) WYPM0158 Road, 46_2; (48) WYPM0159 Road, 46A_1; (49) Red Canyon Road, 47_1 (50) Old Red Canyon Road, 47_1A; (51) WYPM0054 Road, 5_3; (52) WYPM0058 Road, 5_4; (53) WYPM0057 Road, 5_5; (54) WYPM0015 Road, 5A_1; (55) Dog Flats Road, 5A_2; (56) WYPM0022 Road, 5A_3; and (57) WYPM0018 Road, 5A_4.

468. Each right-of-way claimed in the North Mountain 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.

469. All rights-of-way claimed in the North Mountain 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.

470. All rights-of-way claimed in the North Mountain 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).

471. Prior to October 21, 1976, the State of Utah, Wayne 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.

Fish Lake Road, 2

472. The Fish Lake Road is designated as county road number 2 and SGID road identification number RD280299 and is more or less 5.77 miles long.

473. Exhibit 35 (attached hereto and incorporated herein) contains certain information pertaining to the Fish 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.

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

specifically described in Exhibit 35. The Fish Lake Road includes the segment of road specifically set forth in Exhibit 35 and as exists on the ground.

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

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

476. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Fish 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.

477. The Fish Lake Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

479. Witnesses with personal knowledge of the history of the Fish 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.

480. Currently known reputation in the community is that the Fish 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.

481. Public motor vehicle use of the Fish 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.

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

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

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

Cabin Spring Road, 2A

485. The Cabin Spring Road is designated as county road number 2A and SGID road identification number RD280314 and is more or less 5.69 miles long.

486. Exhibit 36 (attached hereto and incorporated herein) contains certain information pertaining to the Cabin Spring Road including, a map depicting the road; township, range, and

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

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

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

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

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

490. The Cabin Spring Road appears on the Abes Knoll (1969), Loa (1969), and Fish Lake (1968) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

maintaining, and improving the Cabin Spring Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

497. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cabin Spring Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Fremont Road, 35

498. The Fremont Road is designated as county road number 35 and SGID road identification number RD280316 and is more or less 2.10 miles long.

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

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

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

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

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

503. The Fremont Road appears on the Loa (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

Tidwell Road, 39

511. The Tidwell Road is designated as county road number 39 and SGID road identification number RD280317 and is more or less 3.54 miles long.

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

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

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

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

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

516. The Tidwell Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

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

Jakes Place Road, 40

524. The Jakes Place Road is designated as county road number 40 and SGID road identification number RD280319 and is more or less 1.39 miles long.

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

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

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

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

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

529. The Jakes Place Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

Mill Meadow Dirt Road, 43

537. The Mill Meadow Dirt Road is designated as county road number 43 and SGID road identification number RD280320 and is more or less 2.27 miles long.

538. Exhibit 40 (attached hereto and incorporated herein) contains certain information pertaining to the Mill Meadow Dirt Road including, a map depicting the road; township, range,

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

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

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

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

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

542. The Mill Meadow Dirt Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

547. The Mill Meadow Dirt Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

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

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

Vance Road, 44

550. The Vance Road is designated as county road number 44 and SGID road identification number RD280321 and is more or less 2.28 miles long.

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

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

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

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

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

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

maintaining, and improving the Vance Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

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

Mill Meadow Oil Road, 45

562. The Mill Meadow Oil Road is designated as county road number 45 and SGID road identification number RD280322 and is more or less 2.63 miles long.

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

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

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

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

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

567. The Mill Meadow Oil Road appears on the Forsyth Reservoir (1968) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

572. The Mill Meadow Oil Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

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

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

Horse Valley Road, 46

575. The Horse Valley Road is designated as county road number 46 and SGID road identification number RD280323 and is more or less 3.68 miles long.

576. Exhibit 43 (attached hereto and incorporated herein) contains certain information pertaining to the Horse 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.

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

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

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

579. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Horse 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.

580. The Horse Valley Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

582. Witnesses with personal knowledge of the history of the Horse 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.

583. Currently known reputation in the community is that the Horse 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.

584. Public motor vehicle use of the Horse 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.

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

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

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

Peterson Road, 46A

588. The Peterson Road is designated as county road number 46A and SGID road identification number RD280324 and is more or less 0.40 miles long.

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

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

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

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

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

593. The Peterson Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

Forest Boundary Road, 47

601. The Forest Boundary Road is designated as county road number 47 and SGID road identification number RD280325 and is more or less 2.60 miles long.

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

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

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

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

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

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

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

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

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

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

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

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

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

High Line Ditch Road, 48

613. The High Line Ditch Road is designated as county road number 48 and SGID road identification number RD280326 and is more or less 1.92 miles long.

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

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

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

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

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

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

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

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

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

622. The High Line Ditch 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 High Line Ditch Road.

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

North Mountain Road, 5

625. The North Mountain Road is designated as county road number 5 and SGID road identification number RD280327 and is more or less 8.13 miles long.

626. Exhibit 47 (attached hereto and incorporated herein) contains certain information pertaining to the North 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.

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

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

628. The North Mountain 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North 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.

630. The North Mountain Road appears on the Loa (1969) and Fish Lake (1968) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

632. Witnesses with personal knowledge of the history of the North 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.

633. Currently known reputation in the community is that the North 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.

634. Public motor vehicle use of the North 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.

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

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

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

Saddle Pass Road, 56

638. The Saddle Pass Road is designated as county road number 56 and SGID road identification number RD280329 and is more or less 5.01 miles long.

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

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

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

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

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

643. The Saddle Pass Road appears on the Lyman (1952) USGS 7.5 minute and quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

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

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

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

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

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

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

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

Foothill Drive Road, 56a

651. The Foothill Drive Road is designated as county road number 56a and SGID road identification number RD280330 and is more or less 1.62 miles long.

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

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

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

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

655. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Foothill Drive Road as a public highway located on the

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

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

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

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

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

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

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

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

Lyman Water Tank Road, 57

663. The Lyman Water Tank Road is designated as county road number 57 and SGID road identification number RD280332 and is more or less 1.15 miles long.

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

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

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

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

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

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

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

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

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

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

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

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

Trail Hollow Road, 5A

675. The Trail Hollow Road is designated as county road number 5A SGID road identification number RD280336 and is more or less 2.36 miles long.

676. Exhibit 51 (attached hereto and incorporated herein) contains certain information pertaining to the Trail 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.

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

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

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

679. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Trail 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.

680. The Trail Hollow Road appears on the Loa (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

681. The County confirmed its acceptance of the Trail Hollow Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. *See* UTAH CODE ANN. § 72-3-103(4) (2009). Following its confirmed acceptance of this road and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Trail Hollow Road using public funds pursuant to the County's governmental right and authority.

682. Witnesses with personal knowledge of the history of the Trail 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.

683. Currently known reputation in the community is that the Trail 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.

684. Public motor vehicle use of the Trail 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.

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

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

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

Cedar Draw Road, 5B

688. The Cedar Draw Road is designated as county road number 5B and SGID road identification number RD280337 and is more or less 1.20 miles long.

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

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

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

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

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

693. The Cedar Draw Road appears on the Loa (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

694. The County confirmed its acceptance of the Cedar Draw Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. *See* UTAH CODE ANN. § 72-3-103(4) (2009). Following its confirmed acceptance of this road and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cedar Draw Road using public funds pursuant to the County's governmental right and authority.

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

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

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

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

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

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

WYPM0002 Road, 2_10a

701. The WYPM0002 Road is designated as county road number 2_10a and SGID road identification number RD280396 and is more or less 0.65 miles long.

702. Exhibit 53 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0002 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

703. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0002 Road solely as it crosses United States public land as included and specifically described in Exhibit 53. The WYPM0002 Road includes the segment of road specifically set forth in Exhibit 53 and as exists on the ground.

Acceptance of the WYPM0002 Road R.S. 2477 Right-of-way Prior to October 21, 1976

704. The WYPM0002 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

705. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0002 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

706. The WYPM0002 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the WYPM0002 Road pursuant to the County's governmental right and authority.

707. Witnesses with personal knowledge of the history of the WYPM0002 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

708. Currently known reputation in the community is that the WYPM0002 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

709. Public motor vehicle use of the WYPM0002 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

710. The WYPM0002 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

711. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0002 Road.

712. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0002 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0001 Road, 2_11

713. The WYPM0001 Road is designated as county road number 2_11 and SGID road identification number RD280397 and is more or less 3.87 miles long.

714. Exhibit 54 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0001 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

715. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0001 Road solely as it crosses United States public land as included and specifically described in Exhibit 54. The WYPM0001 Road includes the segment of road specifically set forth in Exhibit 54 and as exists on the ground.

Acceptance of the WYPM0001 Road R.S. 2477 Right-of-way Prior to October 21, 1976

716. The WYPM0001 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

717. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0001 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

718. The WYPM0001 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0001 Road pursuant to the County's governmental right and authority.

719. Witnesses with personal knowledge of the history of the WYPM0001 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

720. Currently known reputation in the community is that the WYPM0001 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

721. Public motor vehicle use of the WYPM0001 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

722. The WYPM0001 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

723. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0001 Road.

724. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0001 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0011 Road, 2_2

725. The WYPM0011 Road is designated as county road number 2_2 and SGID road identification number RD280399 and is more or less 2.92 miles long.

726. Exhibit 55 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0011 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

727. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0011 Road solely as it crosses United States public land as included and specifically described in Exhibit 55. The WYPM0011 Road includes the segment of road specifically set forth in Exhibit 55 and as exists on the ground.

Acceptance of the WYPM0011 Road R.S. 2477 Right-of-way Prior to October 21, 1976

728. The WYPM0011 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

729. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0011 Road as a public highway located on the land

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

730. The WYPM0011 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

731. The WYPM0011 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0011 Road pursuant to the County's governmental right and authority.

732. Witnesses with personal knowledge of the history of the WYPM0011 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

733. Currently known reputation in the community is that the WYPM0011 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

734. Public motor vehicle use of the WYPM0011 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

735. The WYPM0011 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

736. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0011 Road.

737. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0011 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

PTPM0005 Road, 2_21

738. The PTPM0005 Road is designated as county road number 2_21 and SGID road identification number RD280588 and is more or less 0.61 miles long.

739. Exhibit 56 (attached hereto and incorporated herein) contains certain information pertaining to the PTPM0005 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

740. In this action, the State and County seek to quiet title to the public highway right-of-way for the PTPM0005 Road solely as it crosses United States public land as included and specifically described in Exhibit 56. The PTPM0005 Road includes the segment of road specifically set forth in Exhibit 56 and as exists on the ground.

Acceptance of the PTPM0005 Road R.S. 2477 Right-of-way Prior to October 21, 1976

741. The PTPM0005 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

742. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the PTPM0005 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

743. The PTPM0005 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

744. The PTPM0005 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the PTPM0005 Road pursuant to the County's governmental right and authority.

745. Witnesses with personal knowledge of the history of the PTPM0005 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

746. Currently known reputation in the community is that the PTPM0005 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

747. Public motor vehicle use of the PTPM0005 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

748. The PTPM0005 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

749. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the PTPM0005 Road.

750. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the PTPM0005 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0013 Road, 2_3

751. The WYPM0013 Road is designated as county road number 2_3 and SGID road identification number RD280400 and is more or less 0.72 miles long.

752. Exhibit 57 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0013 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

753. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0013 Road solely as it crosses United States public land as included and specifically described in Exhibit 57. The WYPM0013 Road includes the segment of road specifically set forth in Exhibit 57 and as exists on the ground.

Acceptance of the WYPM0013 Road R.S. 2477 Right-of-way Prior to October 21, 1976

754. The WYPM0013 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

755. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0013 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

756. The WYPM0013 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0013 Road pursuant to the County's governmental right and authority.

757. Witnesses with personal knowledge of the history of the WYPM0013 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

758. Currently known reputation in the community is that the WYPM0013 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

759. Public motor vehicle use of the WYPM0013 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

760. The WYPM0013 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

761. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0013 Road.

762. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0013 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

PTPM0008 Road, 2_5

763. The PTPM0008 Road is designated as county road number 2_5 and SGID road identification number RD280402 and is more or less 0.68 miles long.

764. Exhibit 58 (attached hereto and incorporated herein) contains certain information pertaining to the PTPM0008 Road including, a map depicting the road; township, range, and

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

765. In this action, the State and County seek to quiet title to the public highway right-of-way for the PTPM0008 Road solely as it crosses United States public land as included and specifically described in Exhibit 58. The PTPM0008 Road includes the segment of road specifically set forth in Exhibit 58 and as exists on the ground.

Acceptance of the PTPM0008 Road R.S. 2477 Right-of-way Prior to October 21, 1976

766. The PTPM0008 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

767. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the PTPM0008 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

768. The PTPM0008 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the PTPM0008 Road pursuant to the County's governmental right and authority.

769. Witnesses with personal knowledge of the history of the PTPM0008 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

770. Currently known reputation in the community is that the PTPM0008 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

771. Public motor vehicle use of the PTPM0008 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

772. The PTPM0008 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

773. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the PTPM0008 Road.

774. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the PTPM0008 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0010 Road, 2_6

775. The WYPM0010 Road is designated as county road number 2_6 and SGID road identification number RD280403 and is more or less 2.00 miles long.

776. Exhibit 59 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0010 Road including, a map depicting the road; township, range, and

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

777. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0010 Road solely as it crosses United States public land as included and specifically described in Exhibit 59. The WYPM0010 Road includes the segment of road specifically set forth in Exhibit 59 and as exists on the ground.

Acceptance of the WYPM0010 Road R.S. 2477 Right-of-way Prior to October 21, 1976

778. The WYPM0010 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

779. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0010 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

780. The WYPM0010 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

781. The WYPM0010 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0010 Road pursuant to the County's governmental right and authority.

782. Witnesses with personal knowledge of the history of the WYPM0010 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

783. Currently known reputation in the community is that the WYPM0010 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

784. Public motor vehicle use of the WYPM0010 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

785. The WYPM0010 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

786. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0010 Road.

787. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0010 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0004 Road, 2_7

788. The WYPM0004 Road is designated as county road number 2_7 and SGID road identification number RD280404 and is more or less 0.41 miles long.

789. Exhibit 60 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0004 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

790. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0004 Road solely as it crosses United States public land as included and specifically described in Exhibit 60. The WYPM0004 Road includes the segment of road specifically set forth in Exhibit 60 and as exists on the ground.

Acceptance of the WYPM0004 Road R.S. 2477 Right-of-way Prior to October 21, 1976

791. The WYPM0004 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

792. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0004 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

793. The WYPM0004 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the WYPM0004 Road pursuant to the County's governmental right and authority.

794. Witnesses with personal knowledge of the history of the WYPM0004 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

795. Currently known reputation in the community is that the WYPM0004 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

796. Public motor vehicle use of the WYPM0004 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

797. The WYPM0004 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

798. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0004 Road.

799. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0004 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0023 Road, 2A_1

800. The WYPM0023 Road is designated as county road number 2A_1 and SGID road identification number RD280453 and is more or less 0.25 miles long.

801. Exhibit 61 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0023 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

802. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0023 Road solely as it crosses United States public land as included and specifically described in Exhibit 61. The WYPM0023 Road includes the segment of road specifically set forth in Exhibit 61 and as exists on the ground.

Acceptance of the WYPM0023 Road R.S. 2477 Right-of-way Prior to October 21, 1976

803. The WYPM0023 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

804. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0023 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

805. The WYPM0023 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0023 Road pursuant to the County's governmental right and authority.

806. Witnesses with personal knowledge of the history of the WYPM0023 Road confirm public use of this road as a public 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 WYPM0023 Road has been open for all to come 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 WYPM0023 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0023 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 WYPM0023 Road.

811. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0023 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0039 Road, 2A_10

812. The WYPM0039 Road is designated as county road number 2A_10 and SGID road identification number RD280454 and is more or less 2.38 miles long.

813. Exhibit 62 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0039 Road including, a map depicting the road; 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 WYPM0039 Road solely as it crosses United States public land as included and specifically described in Exhibit 62. The WYPM0039 Road includes the segment of road specifically set forth in Exhibit 62 and as exists on the ground.

Acceptance of the WYPM0039 Road R.S. 2477 Right-of-way Prior to October 21, 1976

815. The WYPM0039 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

816. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0039 Road as a public highway located on the land

at issue in this 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 WYPM0039 Road appears on the Loa (1969) and Fish Lake (1968) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

818. The WYPM0039 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0039 Road pursuant to the County's governmental right and authority.

819. Witnesses with personal knowledge of the history of the WYPM0039 Road confirm public use of this road as a public 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 WYPM0039 Road has been open for all to come 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 WYPM0039 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0039 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 WYPM0039 Road.

824. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0039 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0041 Road, 2A_11

825. The WYPM0041 Road is designated as county road number 2A_11 and SGID road identification number RD280455 and is more or less 1.14 miles long.

826. Exhibit 63 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0041 Road including, a map depicting the road; 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 WYPM0041 Road solely as it crosses United States public land as included and specifically described in Exhibit 63. The WYPM0041 Road includes the segment of road specifically set forth in Exhibit 63 and as exists on the ground.

Acceptance of the WYPM0041 Road R.S. 2477 Right-of-way Prior to October 21, 1976

828. The WYPM0041 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

829. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0041 Road as a public highway located on the land at issue in this 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 WYPM0041 Road appears on the Loa (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

831. The WYPM0041 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0041 Road pursuant to the County's governmental right and authority.

832. Witnesses with personal knowledge of the history of the WYPM0041 Road confirm public use of this road as a public 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 WYPM0041 Road has been open for all to come 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 WYPM0041 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0041 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 WYPM0041 Road.

837. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0041 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0025 Road, 2A_2

838. The WYPM0025 Road is designated as county road number 2A_2 and SGID road identification number RD280457 and is more or less 0.72 miles long.

839. Exhibit 64 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0025 Road including, a map depicting the road; 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 WYPM0025 Road solely as it crosses United States public land as included and specifically described in Exhibit 64. The WYPM0025 Road includes the segment of road specifically set forth in Exhibit 64 and as exists on the ground.

Acceptance of the WYPM0025 Road R.S. 2477 Right-of-way Prior to October 21, 1976

841. The WYPM0025 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0025 Road as a public highway located on the land at issue in this 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 WYPM0025 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

844. The WYPM0025 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0025 Road pursuant to the County's governmental right and authority.

845. Witnesses with personal knowledge of the history of the WYPM0025 Road confirm public use of this road as a public 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 WYPM0025 Road has been open for all to come 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 WYPM0025 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0025 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 WYPM0025 Road.

850. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0025 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0032 Road, 2A_4

851. The WYPM0032 Road is designated as county road number 2A_4 and SGID road identification number RD280459 and is more or less 0.76 miles long.

852. Exhibit 65 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0032 Road including, a map depicting the road; 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 WYPM0032 Road solely as it crosses United States public land as included and specifically described in Exhibit 65. The WYPM0032 Road includes the segment of road specifically set forth in Exhibit 65 and as exists on the ground.

Acceptance of the WYPM0032 Road R.S. 2477 Right-of-way Prior to October 21, 1976

854. The WYPM0032 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0032 Road as a public highway located on the land at issue in this 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 WYPM0032 Road appears on the Abes Knoll (1969) and Loa (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

857. The WYPM0032 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the WYPM0032 Road pursuant to the County's governmental right and authority.

858. Witnesses with personal knowledge of the history of the WYPM0032 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

859. Currently known reputation in the community is that the WYPM0032 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

860. Public motor vehicle use of the WYPM0032 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

861. The WYPM0032 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

862. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0032 Road.

863. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0032 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

CO_28_0013 Road, 2A_5

864. The CO_28_0013 Road is designated as county road number 2A_5 and SGID road identification number RD280460 and is more or less 0.37 miles long.

865. Exhibit 66 (attached hereto and incorporated herein) contains certain information pertaining to the CO_28_0013 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

866. In this action, the State and County seek to quiet title to the public highway right-of-way for the CO_28_0013 Road solely as it crosses United States public land as included and specifically described in Exhibit 66. The CO_28_0013 Road includes the segment of road specifically set forth in Exhibit 66 and as exists on the ground.

Acceptance of the CO_28_0013 Road R.S. 2477 Right-of-way Prior to October 21, 1976

867. The CO_28_0013 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

868. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the CO_28_0013 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

869. The CO_28_0013 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the CO_28_0013 Road pursuant to the County's governmental right and authority.

870. Witnesses with personal knowledge of the history of the CO_28_0013 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

871. Currently known reputation in the community is that the CO_28_0013 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

872. Public motor vehicle use of the CO_28_0013 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

873. The CO_28_0013 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

874. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the CO_28_0013 Road.

875. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the CO_28_0013 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0035 Road, 2A_6

876. The WYPM0035 Road is designated as county road number 2A_6 and SGID road identification number RD280461 and is more or less 0.71 miles long.

877. Exhibit 67 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0035 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

878. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0035 Road solely as it crosses United States public land as included and specifically described in Exhibit 67. The WYPM0035 Road includes the segment of road specifically set forth in Exhibit 67 and as exists on the ground.

Acceptance of the WYPM0035 Road R.S. 2477 Right-of-way Prior to October 21, 1976

879. The WYPM0035 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

880. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0035 Road as a public highway located on the land

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

881. The WYPM0035 Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

882. The WYPM0035 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0035 Road pursuant to the County's governmental right and authority.

883. Witnesses with personal knowledge of the history of the WYPM0035 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

884. Currently known reputation in the community is that the WYPM0035 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

885. Public motor vehicle use of the WYPM0035 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

886. The WYPM0035 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

887. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0035 Road.

888. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0035 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0034 Road, 2A_7

889. The WYPM0034 Road is designated as county road number 2A_7 and SGID road identification number RD280462 and is more or less 1.15 miles long.

890. Exhibit 68 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0034 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

891. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0034 Road solely as it crosses United States public land as included and specifically described in Exhibit 68. The WYPM0034 Road includes the segment of road specifically set forth in Exhibit 68 and as exists on the ground.

Acceptance of the WYPM0034 Road R.S. 2477 Right-of-way Prior to October 21, 1976

892. The WYPM0034 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

893. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0034 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

894. The WYPM0034 Road appears on (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

895. The WYPM0034 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0034 Road pursuant to the County's governmental right and authority.

896. Witnesses with personal knowledge of the history of the WYPM0034 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

897. Currently known reputation in the community is that the WYPM0034 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

898. Public motor vehicle use of the WYPM0034 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

899. The WYPM0034 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

900. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0034 Road.

901. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0034 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0036 Road, 2A_8

902. The WYPM0036 Road is designated as county road number 2A_8 and SGID road identification number RD280463 and is more or less 3.79 miles long.

903. Exhibit 69 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0036 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

904. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0036 Road solely as it crosses United States public land as included and specifically described in Exhibit 69. The WYPM0036 Road includes the segment of road specifically set forth in Exhibit 69 and as exists on the ground.

Acceptance of the WYPM0036 Road R.S. 2477 Right-of-way Prior to October 21, 1976

905. The WYPM0036 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

906. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0036 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

907. The WYPM0036 Road appears on (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

908. The WYPM0036 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0036 Road pursuant to the County's governmental right and authority.

909. Witnesses with personal knowledge of the history of the WYPM0036 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

910. Currently known reputation in the community is that the WYPM0036 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

911. Public motor vehicle use of the WYPM0036 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

912. The WYPM0036 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

913. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0036 Road.

914. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0036 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0038 Road, 2A_9

915. The WYPM0038 Road is designated as county road number 2A_9 and SGID road identification number RD280464 and is more or less 1.77 miles long.

916. Exhibit 70 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0038 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

917. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0038 Road solely as it crosses United States public land as included and specifically described in Exhibit 70. The WYPM0038 Road includes the segment of road specifically set forth in Exhibit 70 and as exists on the ground.

Acceptance of the WYPM0038 Road R.S. 2477 Right-of-way Prior to October 21, 1976

918. The WYPM0038 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

919. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0038 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

920. The WYPM0038 Road appears on the Fish Lake (1968) and Loa (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

921. The County confirmed its acceptance of the WYPM0038 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the WYPM0038 Road pursuant to the County's governmental right and authority.

922. Witnesses with personal knowledge of the history of the WYPM0038 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

923. Currently known reputation in the community is that the WYPM0038 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

924. Public motor vehicle use of the WYPM0038 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

925. The WYPM0038 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

926. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0038 Road.

927. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0038 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0100 Road, 40_1

928. The WYPM0100 Road is designated as county road number 40_1 and SGID road identification number RD280489 and is more or less 0.57 miles long.

929. Exhibit 71 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0100 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

930. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0100 Road solely as it crosses United States public land as included and specifically described in Exhibit 71. The WYPM0100 Road includes the segment of road specifically set forth in Exhibit 71 and as exists on the ground.

Acceptance of the WYPM0100 Road R.S. 2477 Right-of-way Prior to October 21, 1976

931. The WYPM0100 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

932. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0100 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

933. The WYPM0100 Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

934. The WYPM0100 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0100 Road pursuant to the County's governmental right and authority.

935. Witnesses with personal knowledge of the history of the WYPM0100 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

936. Currently known reputation in the community is that the WYPM0100 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

937. Public motor vehicle use of the WYPM0100 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

938. The WYPM0100 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

939. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0100 Road.

940. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0100 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0097 Road, 40_2

941. The WYPM0097 Road is designated as county road number 40_2 and SGID road identification number RD280492 and is more or less 2.20 miles long.

942. Exhibit 72 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0097 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

943. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0097 Road solely as it crosses United States public land as included and specifically described in Exhibit 72. The WYPM0097 Road includes the segment of road specifically set forth in Exhibit 72 and as exists on the ground.

Acceptance of the WYPM0097 Road R.S. 2477 Right-of-way Prior to October 21, 1976

944. The WYPM0097 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

945. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0097 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

946. The WYPM0097 Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

947. The WYPM0097 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0097 Road pursuant to the County's governmental right and authority.

948. Witnesses with personal knowledge of the history of the WYPM0097 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

949. Currently known reputation in the community is that the WYPM0097 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

950. Public motor vehicle use of the WYPM0097 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

951. The WYPM0097 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

952. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0097 Road.

953. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0097 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0097a Road, 40_2a

954. The WYPM0097a Road is designated as county road number 40_2a and SGID road identification number RD280688 and is more or less 0.22 miles long.

955. Exhibit 73 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0097a Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

956. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0097a Road solely as it crosses United States public land as included and

specifically described in Exhibit 73. The WYPM0097a Road includes the segment of road specifically set forth in Exhibit 73 and as exists on the ground.

Acceptance of the WYPM0097a Road R.S. 2477 Right-of-way Prior to October 21, 1976

957. The WYPM0097a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

958. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0097a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

959. The WYPM0097a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0097a Road pursuant to the County's governmental right and authority.

960. Witnesses with personal knowledge of the history of the WYPM0097a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

961. Currently known reputation in the community is that the WYPM0097a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

962. Public motor vehicle use of the WYPM0097a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

963. The WYPM0097a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

964. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0097a Road.

965. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0097a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0103 Road, 40_3

966. The WYPM0103 Road is designated as county road number 40_3 and SGID road identification number RD280493 and is more or less 0.70 miles long.

967. Exhibit 74 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0103 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

968. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0103 Road solely as it crosses United States public land as included and specifically described in Exhibit 74. The WYPM0103 Road includes the segment of road specifically set forth in Exhibit 74 and as exists on the ground.

Acceptance of the WYPM0103 Road R.S. 2477 Right-of-way Prior to October 21, 1976

969. The WYPM0103 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

970. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0103 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

971. The WYPM0103 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0103 Road pursuant to the County's governmental right and authority.

972. Witnesses with personal knowledge of the history of the WYPM0103 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

973. Currently known reputation in the community is that the WYPM0103 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

974. Public motor vehicle use of the WYPM0103 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

975. The WYPM0103 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

976. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0103 Road.

977. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0103 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0127 Road, 40_8

978. The WYPM0127 Road is designated as county road number 40_8 and SGID road identification number RD280498 and is more or less 0.50 miles long.

979. Exhibit 75 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0127 Road including, a map depicting the road; township, range, and

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

980. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0127 Road solely as it crosses United States public land as included and specifically described in Exhibit 75. The WYPM0127 Road includes the segment of road specifically set forth in Exhibit 75 and as exists on the ground.

Acceptance of the WYPM0127 Road R.S. 2477 Right-of-way Prior to October 21, 1976

981. The WYPM0127 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

982. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0127 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

983. The WYPM0127 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0127 Road pursuant to the County's governmental right and authority.

984. Witnesses with personal knowledge of the history of the WYPM0127 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

985. Currently known reputation in the community is that the WYPM0127 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

986. Public motor vehicle use of the WYPM0127 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

987. The WYPM0127 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

988. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0127 Road.

989. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0127 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0117 Road, 44_1

990. The WYPM0117 Road is designated as county road number 44_1 and SGID road identification number RD280500 and is more or less 1.35 miles long.

991. Exhibit 76 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0117 Road including, a map depicting the road; township, range, and

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

992. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0117 Road solely as it crosses United States public land as included and specifically described in Exhibit 76. The WYPM0117 Road includes the segment of road specifically set forth in Exhibit 76 and as exists on the ground.

Acceptance of the WYPM0117 Road R.S. 2477 Right-of-way Prior to October 21, 1976

993. The WYPM0117 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

994. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0117 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

995. The WYPM0117 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0117 Road pursuant to the County's governmental right and authority.

996. Witnesses with personal knowledge of the history of the WYPM0117 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

997. Currently known reputation in the community is that the WYPM0117 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

998. Public motor vehicle use of the WYPM0117 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

999. The WYPM0117 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1000. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0117 Road.

1001. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0117 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0119 Road, 44_2

1002. The WYPM0119 Road is designated as county road number 44_2 and SGID road identification number RD280501 and is more or less 1.00 miles long.

1003. Exhibit 77 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0119 Road including, a map depicting the road; township, range, and

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

1004. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0119 Road solely as it crosses United States public land as included and specifically described in Exhibit 77. The WYPM0119 Road includes the segment of road specifically set forth in Exhibit 77 and as exists on the ground.

Acceptance of the WYPM0119 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1005. The WYPM0119 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1006. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0119 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1007. The WYPM0119 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0119 Road pursuant to the County's governmental right and authority.

1008. Witnesses with personal knowledge of the history of the WYPM0119 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1009. Currently known reputation in the community is that the WYPM0119 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1010. Public motor vehicle use of the WYPM0119 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1011. The WYPM0119 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1012. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0119 Road.

1013. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0119 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0119A Road, 44_3

1014. The WYPM0119A Road is designated as county road number 44_3 and SGID road identification number RD280502 and is more or less 0.99 miles long.

1015. Exhibit 78 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0119A Road including, a map depicting the road; township, range, and

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

1016. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0119A Road solely as it crosses United States public land as included and specifically described in Exhibit 78. The WYPM0119A Road includes the segment of road specifically set forth in Exhibit 78 and as exists on the ground.

Acceptance of the WYPM0119A Road R.S. 2477 Right-of-way Prior to October 21, 1976

1017. The WYPM0119A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1018. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0119A Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1019. The WYPM0119A Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1020. The WYPM0119A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0119A Road pursuant to the County's governmental right and authority.

1021. Witnesses with personal knowledge of the history of the WYPM0119A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1022. Currently known reputation in the community is that the WYPM0119A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1023. Public motor vehicle use of the WYPM0119A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1024. The WYPM0119A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1025. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0119A Road.

1026. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0119A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0109 Road, 44_4

1027. The WYPM0109 Road is designated as county road number 44_4 and SGID road identification number RD280503 and is more or less 1.61 miles long.

1028. Exhibit 79 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0109 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1029. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0109 Road solely as it crosses United States public land as included and specifically described in Exhibit 79. The WYPM0109 Road includes the segment of road specifically set forth in Exhibit 79 and as exists on the ground.

Acceptance of the WYPM0109 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1030. The WYPM0109 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1031. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0109 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1032. The WYPM0109 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the WYPM0109 Road pursuant to the County's governmental right and authority.

1033. Witnesses with personal knowledge of the history of the WYPM0109 Road confirm public use of this road as a public 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 WYPM0109 Road has been open for all to come 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 WYPM0109 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0109 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 WYPM0109 Road.

1038. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0109 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0119B Road, 44_5

1039. The WYPM0119B Road is designated as county road number 44_5 and SGID road identification number RD280572 and is more or less 1.08 miles long.

1040. Exhibit 80 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0119B Road including, a map depicting the road; 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 WYPM0119B Road solely as it crosses United States public land as included and specifically described in Exhibit 80. The WYPM0119B Road includes the segment of road specifically set forth in Exhibit 80 and as exists on the ground.

Acceptance of the WYPM0119B Road R.S. 2477 Right-of-way Prior to October 21, 1976

1042. The WYPM0119B 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0119B Road as a public highway located on the land at issue in this 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 WYPM0119B Road appears on the Forsyth Reservoir (1968) and Lyman (1952) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1045. The WYPM0119B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0119B Road pursuant to the County's governmental right and authority.

1046. Witnesses with personal knowledge of the history of the WYPM0119B Road confirm public use of this road as a public 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 WYPM0119B Road has been open for all to come 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 WYPM0119B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0119B 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 WYPM0119B Road.

1051. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0119B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0158 Road, 46_2

1052. The WYPM0158 Road is designated as county road number 46_2 and SGID road identification number RD280505 and is more or less 0.93 miles long.

1053. Exhibit 81 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0158 Road including, a map depicting the road; 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 WYPM0158 Road solely as it crosses United States public land as included and specifically described in Exhibit 81. The WYPM0158 Road includes the segment of road specifically set forth in Exhibit 81 and as exists on the ground.

Acceptance of the WYPM0158 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1055. The WYPM0158 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0158 Road as a public highway located on the land at issue in this 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 WYPM0158 Road appears on the Lyman (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1058. The WYPM0158 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0158 Road pursuant to the County's governmental right and authority.

1059. Witnesses with personal knowledge of the history of the WYPM0158 Road confirm public use of this road as a public 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 WYPM0158 Road has been open for all to come 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 WYPM0158 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 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 WYPM0158 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 WYPM0158 Road.

1064. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0158 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0159 Road, 46A_1

1065. The WYPM0159 Road is designated as county road number 46A_1 and SGID road identification number RD280511 and is more or less 1.36 miles long.

1066. Exhibit 82 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0159 Road including, a map depicting the road; 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 WYPM0159 Road solely as it crosses United States public land as included and

specifically described in Exhibit 82. The WYPM0159 Road includes the segment of road specifically set forth in Exhibit 82 and as exists on the ground.

Acceptance of the WYPM0159 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1068. The WYPM0159 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0159 Road as a public highway located on the land at issue in this 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 WYPM0159 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0159 Road pursuant to the County's governmental right and authority.

1071. Witnesses with personal knowledge of the history of the WYPM0159 Road confirm public use of this road as a public 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 WYPM0159 Road has been open for all to come 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 WYPM0159 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0159 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 WYPM0159 Road.

1076. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0159 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Canyon Road, 47_1

1077. The Red Canyon Road is designated as county road number 47_1 and SGID road identification number RD280515 and is more or less 0.53 miles long.

1078. Exhibit 83 (attached hereto and incorporated herein) contains certain information pertaining to the Red 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.

1079. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 83. The Red Canyon Road includes the segment of road specifically set forth in Exhibit 83 and as exists on the ground.

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

1080. The Red Canyon 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Red 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.

1082. The appearance of the Red Canyon Road on the Lyman (1952) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1083. The Red Canyon Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Canyon Road pursuant to the County's governmental right and authority.

1084. Witnesses with personal knowledge of the history of the Red 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.

1085. Currently known reputation in the community is that the Red 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.

1086. Public motor vehicle use of the Red 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.

1087. The Red Canyon 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 Red Canyon Road.

1089. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Old Red Canyon Road, 47_1A

1090. The Old Red Canyon Road is designated as county road number 47_1A and SGID road identification number RD280516 and is more or less 2.45 miles long.

1091. Exhibit 84 (attached hereto and incorporated herein) contains certain information pertaining to the Old Red 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.

1092. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old Red Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 84. The Old Red Canyon Road includes the segment of road specifically set forth in Exhibit 84 and as exists on the ground.

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

1093. The Old Red Canyon 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Old Red 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.

1095. The Old Red Canyon Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Old Red Canyon Road pursuant to the County's governmental right and authority.

1096. Witnesses with personal knowledge of the history of the Old Red 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.

1097. Currently known reputation in the community is that the Old Red 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.

1098. Public motor vehicle use of the Old Red 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.

1099. The Old Red Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1100. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Red Canyon Road.

1101. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old Red 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.

WYPM0054 Road, 5_3

1102. The WYPM0054 Road is designated as county road number 5_3 and SGID road identification number RD280529 and is more or less 1.00 miles long.

1103. Exhibit 85 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0054 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1104. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0054 Road solely as it crosses United States public land as included and specifically described in Exhibit 85. The WYPM0054 Road includes the segment of road specifically set forth in Exhibit 85 and as exists on the ground.

Acceptance of the WYPM0054 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1105. The WYPM0054 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1106. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0054 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1107. The WYPM0054 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0054 Road pursuant to the County's governmental right and authority.

1108. Witnesses with personal knowledge of the history of the WYPM0054 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

1109. Currently known reputation in the community is that the WYPM0054 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1110. Public motor vehicle use of the WYPM0054 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1111. The WYPM0054 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1112. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0054 Road.

1113. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0054 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0058 Road, 5_4

1114. The WYPM0058 Road is designated as county road number 5_4 and SGID road identification number RD280530 and is more or less 1.33 miles long.

1115. Exhibit 86 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0058 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1116. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0058 Road solely as it crosses United States public land as included and specifically described in Exhibit 86. The WYPM0058 Road includes the segment of road specifically set forth in Exhibit 86 and as exists on the ground.

Acceptance of the WYPM0058 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1117. The WYPM0058 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1118. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0058 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1119. The WYPM0058 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0058 Road pursuant to the County's governmental right and authority.

1120. Witnesses with personal knowledge of the history of the WYPM0058 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

1121. Currently known reputation in the community is that the WYPM0058 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1122. Public motor vehicle use of the WYPM0058 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1123. The WYPM0058 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1124. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0058 Road.

1125. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0058 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0057 Road, 5_5

1126. The WYPM0057 Road is designated as county road number 5_5 and SGID road identification number RD280531 and is more or less 0.75 miles long.

1127. Exhibit 87 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0057 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1128. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0057 Road solely as it crosses United States public land as included and specifically described in Exhibit 87. The WYPM0057 Road includes the segment of road specifically set forth in Exhibit 87 and as exists on the ground.

Acceptance of the WYPM0057 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1129. The WYPM0057 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1130. Aerial photography from 1976 confirms historical use, existence, and acceptance of the right-of-way for the WYPM0057 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1131. The WYPM0057 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0057 Road pursuant to the County's governmental right and authority.

1132. Witnesses with personal knowledge of the history of the WYPM0057 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

1133. Currently known reputation in the community is that the WYPM0057 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1134. Public motor vehicle use of the WYPM0057 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1135. The WYPM0057 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1136. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0057 Road.

1137. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0057 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0015 Road, 5A_1

1138. The WYPM0015 Road is designated as county road number 5A_1 and SGID road identification number RD280663 and is more or less 1.13 miles long.

1139. Exhibit 88 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0015 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1140. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0015 Road solely as it crosses United States public land as included and specifically described in Exhibit 88. The WYPM0015 Road includes the segment of road specifically set forth in Exhibit 88 and as exists on the ground.

Acceptance of the WYPM0015 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1141. The WYPM0015 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1142. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0015 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1143. The WYPM0015 Road appears on the Abes Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1144. The WYPM0015 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the WYPM0015 Road pursuant to the County's governmental right and authority.

1145. Witnesses with personal knowledge of the history of the WYPM0015 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1146. Currently known reputation in the community is that the WYPM0015 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1147. Public motor vehicle use of the WYPM0015 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1148. The WYPM0015 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1149. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0015 Road.

1150. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0015 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dog Flats Road, 5A_2

1151. The Dog Flats Road is designated as county road number 5A_2 and SGID road identification number RD280543 and is more or less 2.50 miles long.

1152. Exhibit 89 (attached hereto and incorporated herein) contains certain information pertaining to the Dog Flats Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1153. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dog Flats Road solely as it crosses United States public land as included and specifically described in Exhibit 89. The Dog Flats Road includes the segment of road specifically set forth in Exhibit 89 and as exists on the ground.

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

1154. The Dog Flats Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1155. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dog Flats Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1156. The Dog Flats Road appears on the Abes Knoll (1969) and Loa (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1157. The Dog Flats Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dog Flats Road pursuant to the County's governmental right and authority.

1158. Witnesses with personal knowledge of the history of the Dog Flats Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1159. Currently known reputation in the community is that the Dog Flats Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1160. Public motor vehicle use of the Dog Flats Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1161. The Dog Flats Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1162. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dog Flats Road.

1163. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dog Flats Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0022 Road, 5A_3

1164. The WYPM0022 Road is designated as county road number 5A_3 and SGID road identification number RD280544 and is more or less 1.27 miles long.

1165. Exhibit 90 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0022 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1166. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0022 Road solely as it crosses United States public land as included and specifically described in Exhibit 90. The WYPM0022 Road includes the segment of road specifically set forth in Exhibit 90 and as exists on the ground.

Acceptance of the WYPM0022 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1167. The WYPM0022 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1168. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0022 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1169. The WYPM0022 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0022 Road pursuant to the County's governmental right and authority.

1170. Witnesses with personal knowledge of the history of the WYPM0022 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1171. Currently known reputation in the community is that the WYPM0022 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1172. Public motor vehicle use of the WYPM0022 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1173. The WYPM0022 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1174. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0022 Road.

1175. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0022 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0018 Road, 5A_4

1176. The WYPM0018 Road is designated as county road number 5A_4 and SGID road identification number RD280545 and is more or less 0.87 miles long.

1177. Exhibit 91 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0018 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1178. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0018 Road solely as it crosses United States public land as included and specifically described in Exhibit 91. The WYPM0018 Road includes the segment of road specifically set forth in Exhibit 91 and as exists on the ground.

Acceptance of the WYPM0018 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1179. The WYPM0018 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1180. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0018 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1181. The WYPM0018 Road appears on the Abes Knoll (1969) and Loa (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1182. The WYPM0018 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0018 Road pursuant to the County's governmental right and authority.

1183. Witnesses with personal knowledge of the history of the WYPM0018 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1184. Currently known reputation in the community is that the WYPM0018 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1185. Public motor vehicle use of the WYPM0018 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1186. The WYPM0018 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1187. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0018 Road.

1188. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0018 Road on lands owned 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
WILD CAT AREA

1189. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1190. The Wild Cat Area is located in southwestern Wayne County. *See* Exhibit 5.

1191. The Wild Cat Area includes the following roads — listed by Common Road Name and County Unique Number: (1) Bull Roost Reservoir Road, 13; (2) Sky Reservoir Road, 15; (3) Flat Top Road, 17; (4) Tommy Hollow Road, 17a; (5) Dry Lake Road, 19; (6) Smooth Knoll Road, 20; (7) Wild Cat Road, 21; (8) Pine Creek Road, 23; (9) Dennis Road, 26; (10) Big Hollow Pit Road, 26a; (11) Bicknell Fish Hatchery Road, 27; (12) Jack King Road, 27A; (13) Chad's Road, 58; (14) Bicknell Pond Road, 59; (15) Carl Taft Road, 61; (16) Sunglow Road, 63A; (17) North Slope Road, 77; (18) WYPM0355 Road, 17_1; (19) WYPM0353 Road, 17_2;

(20) WYPM0354 Road, 17_3; (21) WYPM0345 Road, 17A_1; (22) WYPM0381 Road, 2_12; (23) WYPM0390 Road, 20_10; (24) CO_28_0001 Road, 20_12; (25) WYPM0401 Road, 20_13; (26) WYPM0389 Road, 20_2; (27) WYPM0388 Road, 20_3; (28) WYPM0388a Road, 20_3a; (29) WYPM0381a Road, 20_8; (30) WYPM0381b Road, 21_1; (31) WYPM0378 Road, 21_4; (32) WYPM0398 Road, 21_7; (33) WYPM0393 Road, 21_8; (34) WYPM0420 Road, 59_3; (35) Middle Balsam Road, 8_1; and (36) WYPM0362 Road, 8_2A.

1192. Each right-of-way claimed in the Wild Cat 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.

1193. All rights-of-way claimed in the Wild Cat 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.

1194. All rights-of-way claimed in the Wild Cat 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).

1195. Prior to October 21, 1976, the State of Utah, Wayne 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.

Bull Roost Reservoir Road, 13

1196. The Bull Roost Reservoir Road is designated as county road number 13 and SGID road identification number RD280291 and is more or less 1.30 miles long.

1197. Exhibit 92 (attached hereto and incorporated herein) contains certain information pertaining to the Bull Roost Reservoir Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1198. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bull Roost Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 92. The Bull Roost Reservoir Road includes the segment of road specifically set forth in Exhibit 92 and as exists on the ground.

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

1199. The Bull Roost Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1200. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Bull Roost Reservoir Road as a public highway located on

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

1201. The Bull Roost Reservoir Road appears on the Smooth Knoll (1969) and Moroni Peak (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1202. The County confirmed its acceptance of the Bull Roost Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Bull Roost Reservoir Road using public funds pursuant to the County's governmental right and authority.

1203. Witnesses with personal knowledge of the history of the Bull Roost Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1204. Currently known reputation in the community is that the Bull Roost Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1205. Public motor vehicle use of the Bull Roost Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or

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

1206. The Bull Roost Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1207. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bull Roost Reservoir Road.

1208. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bull Roost Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sky Reservoir Road, 15

1209. The Sky Reservoir Road is designated as county road number 15 and SGID road identification number RD280293 and is more or less 5.03 miles long.

1210. Exhibit 93 (attached hereto and incorporated herein) contains certain information pertaining to the Sky Reservoir Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1211. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sky Reservoir Road solely as it crosses United States public land as included and

specifically described in Exhibit 93. The Sky Reservoir Road includes the segment of road specifically set forth in Exhibit 93 and as exists on the ground.

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

1212. The Sky Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1213. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Sky Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1214. The County confirmed its acceptance of the Sky Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sky Reservoir Road using public funds pursuant to the County's governmental right and authority.

1215. Witnesses with personal knowledge of the history of the Sky Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1216. Currently known reputation in the community is that the Sky Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1217. Public motor vehicle use of the Sky Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1218. The Sky Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1219. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sky Reservoir Road.

1220. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sky Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Flat Top Road, 17

1221. The Flat Top Road is designated as county road number 17 and SGID road identification number RD280295 and is more or less 8.11 miles long.

1222. Exhibit 94 (attached hereto and incorporated herein) contains certain information pertaining to the Flat Top Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1223. In this action, the State and County seek to quiet title to the public highway right-of-way for the Flat Top Road solely as it crosses United States public land as included and specifically described in Exhibit 94. The Flat Top Road includes the segment of road specifically set forth in Exhibit 94 and as exists on the ground.

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

1224. The Flat Top Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1225. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Flat Top Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1226. The Flat Top Road appears on the Smooth Knoll (1969), Moroni Peak (1969), and Bicknell (1952) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1227. The County confirmed its acceptance of the Flat Top Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Flat Top Road using public funds pursuant to the County's governmental right and authority.

1228. Witnesses with personal knowledge of the history of the Flat Top Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1229. Currently known reputation in the community is that the Flat Top Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1230. Public motor vehicle use of the Flat Top Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1231. The Flat Top Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1232. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Flat Top Road.

1233. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Flat Top Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Tommy Hollow Road, 17a

1234. The Tommy Hollow Road is designated as county road number 17a and SGID road identification number RD280296 and is more or less 4.30 miles long.

1235. Exhibit 95 (attached hereto and incorporated herein) contains certain information pertaining to the Tommy 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.

1236. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tommy Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 95. The Tommy Hollow Road includes the segment of road specifically set forth in Exhibit 95 and as exists on the ground.

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

1237. The Tommy Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1238. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Tommy 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.

1239. The Tommy Hollow Road appears on the Moroni Peak (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1240. The Tommy Hollow Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-

way by managing, maintaining, and improving the Tommy Hollow Road using public funds pursuant to the County's governmental right and authority.

1241. Witnesses with personal knowledge of the history of the Tommy 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.

1242. Currently known reputation in the community is that the Tommy 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.

1243. Public motor vehicle use of the Tommy 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.

1244. The Tommy Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1245. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tommy Hollow Road.

1246. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Tommy 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.

Dry Lake Road, 19

1247. The Dry Lake Road is designated as county road number 19 and SGID road identification number RD280298 and is more or less 0.67 miles long.

1248. Exhibit 96 (attached hereto and incorporated herein) contains certain information pertaining to the Dry 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.

1249. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dry Lake Road solely as it crosses United States public land as included and specifically described in Exhibit 96. The Dry Lake Road includes the segment of road specifically set forth in Exhibit 96 and as exists on the ground.

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

1250. The Dry Lake Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1251. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dry 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.

1252. The Dry Lake Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1253. The County confirmed its acceptance of the Dry Lake Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dry Lake Road using public funds pursuant to the County's governmental right and authority.

1254. Witnesses with personal knowledge of the history of the Dry 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.

1255. Currently known reputation in the community is that the Dry 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.

1256. Public motor vehicle use of the Dry 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.

1257. The Dry Lake Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1258. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dry Lake Road.

1259. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dry 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.

Smooth Knoll Road, 20

1260. The Smooth Knoll Road is designated as county road number 20 and SGID road identification number RD280300 and is more or less 15.51 miles long.

1261. Exhibit 97 (attached hereto and incorporated herein) contains certain information pertaining to the Smooth Knoll Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1262. In this action, the State and County seek to quiet title to the public highway right-of-way for the Smooth Knoll Road solely as it crosses United States public land as included and specifically described in Exhibit 97. The Smooth Knoll Road includes the segment of road specifically set forth in Exhibit 97 and as exists on the ground.

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

1263. The Smooth Knoll Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1264. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Smooth Knoll Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1265. The Smooth Knoll Road appears on the Smooth Knoll (1969) and Bicknell (1952) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1266. The County confirmed its acceptance of the Smooth Knoll Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Smooth Knoll Road using public funds pursuant to the County's governmental right and authority.

1267. Witnesses with personal knowledge of the history of the Smooth Knoll Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1268. Currently known reputation in the community is that the Smooth Knoll Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1269. Public motor vehicle use of the Smooth Knoll Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1270. The Smooth Knoll Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1271. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Smooth Knoll Road.

1272. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Smooth Knoll Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wild Cat Road, 21

1273. The Wild Cat Road is designated as county road number 21 and SGID road identification number RD280302 and is more or less 15.37 miles long.

1274. Exhibit 98 (attached hereto and incorporated herein) contains certain information pertaining to the Wild Cat Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1275. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wild Cat Road solely as it crosses United States public land as included and

specifically described in Exhibit 98. The Wild Cat Road includes the segment of road specifically set forth in Exhibit 98 and as exists on the ground.

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

1276. The Wild Cat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1277. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Wild Cat Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1278. The Wild Cat Road appears on the Flossie Knoll (1969), Smooth Knoll (1969), Moroni Peak (1969), and Bicknell (1952) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1279. The County confirmed its acceptance of the Wild Cat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wild Cat Road using public funds pursuant to the County's governmental right and authority.

1280. Witnesses with personal knowledge of the history of the Wild Cat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1281. Currently known reputation in the community is that the Wild Cat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1282. Public motor vehicle use of the Wild Cat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1283. The Wild Cat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1284. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wild Cat Road.

1285. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wild Cat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pine Creek Road, 23

1286. The Pine Creek Road is designated as county road number 23 and SGID road identification number RD280304 and is more or less 1.61 miles long.

1287. Exhibit 99 (attached hereto and incorporated herein) contains certain information pertaining to the Pine Creek Road including, a map depicting the road; township, range, and

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

1288. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pine Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 99. The Pine Creek Road includes the segment of road specifically set forth in Exhibit 99 and as exists on the ground.

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

1289. The Pine Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1290. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Pine Creek Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1291. The Pine Creek Road appears on the Bicknell (1952) and Government Point (1952) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1292. The County confirmed its acceptance of the Pine Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pine Creek Road using public funds pursuant to the County's governmental right and authority.

1293. Witnesses with personal knowledge of the history of the Pine Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1294. Currently known reputation in the community is that the Pine Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1295. Public motor vehicle use of the Pine Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1296. The Pine Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1297. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pine Creek Road.

1298. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pine Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dennis Road, 26

1299. The Dennis Road is designated as county road number26 and SGID road identification number RD280309 and is more or less 3.11 miles long.

1300. Exhibit 100 (attached hereto and incorporated herein) contains certain information pertaining to the Dennis Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1301. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dennis Road solely as it crosses United States public land as included and specifically described in Exhibit 100. The Dennis Road includes the segment of road specifically set forth in Exhibit 100 and as exists on the ground.

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

1302. The Dennis Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1303. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dennis Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1304. The Dennis Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1305. The County confirmed its acceptance of the Dennis Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dennis Road using public funds pursuant to the County's governmental right and authority.

1306. Witnesses with personal knowledge of the history of the Dennis Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1307. Currently known reputation in the community is that the Dennis Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1308. Public motor vehicle use of the Dennis Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1309. The Dennis Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1310. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dennis Road.

1311. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dennis Road on lands owned 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 Pit Road, 26a

1312. The Big Hollow Pit Road is designated as county road number 26a and SGID road identification number RD280310 and is more or less 1.23 miles long.

1313. Exhibit 101 (attached hereto and incorporated herein) contains certain information pertaining to the Big Hollow Pit Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1314. In this action, the State and County seek to quiet title to the public highway right-of-way for the Big Hollow Pit Road solely as it crosses United States public land as included and specifically described in Exhibit 101. The Big Hollow Pit Road includes the segment of road specifically set forth in Exhibit 101 and as exists on the ground.

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

1315. The Big Hollow Pit Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1316. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Big Hollow Pit Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1317. The Big Hollow Pit Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1318. The County confirmed its acceptance of the Big Hollow Pit Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Big Hollow Pit Road using public funds pursuant to the County's governmental right and authority.

1319. Witnesses with personal knowledge of the history of the Big Hollow Pit Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1320. Currently known reputation in the community is that the Big Hollow Pit Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1321. Public motor vehicle use of the Big Hollow Pit Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1322. The Big Hollow Pit Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1323. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Pit Road.

1324. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Big Hollow Pit Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bicknell Fish Hatchery Road, 27

1325. The Bicknell Fish Hatchery Road is designated as county road number 27 and SGID road identification number RD280311 and is more or less 6.70 miles long.

1326. Exhibit 102 (attached hereto and incorporated herein) contains certain information pertaining to the Bicknell Fish Hatchery Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1327. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bicknell Fish Hatchery Road solely as it crosses United States public land as included and specifically described in Exhibit 102. The Bicknell Fish Hatchery Road includes the segment of road specifically set forth in Exhibit 102 and as exists on the ground.

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

1328. The Bicknell Fish Hatchery Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1329. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Bicknell Fish Hatchery Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1330. The Bicknell Fish Hatchery Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1331. The County confirmed its acceptance of the Bicknell Fish Hatchery Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Bicknell Fish Hatchery Road using public funds pursuant to the County's governmental right and authority.

1332. Witnesses with personal knowledge of the history of the Bicknell Fish Hatchery Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1333. Currently known reputation in the community is that the Bicknell Fish Hatchery Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1334. Public motor vehicle use of the Bicknell Fish Hatchery Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or

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

1335. The Bicknell Fish Hatchery Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1336. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bicknell Fish Hatchery Road.

1337. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bicknell Fish Hatchery Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jack King Road, 27A

1338. The Jack King Road is designated as county road number 27A and SGID road identification number RD280312 and is more or less 1.83 miles long.

1339. Exhibit 103 (attached hereto and incorporated herein) contains certain information pertaining to the Jack King Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1340. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jack King Road solely as it crosses United States public land as included and

specifically described in Exhibit 103. The Jack King Road includes the segment of road specifically set forth in Exhibit 103 and as exists on the ground.

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

1341. The Jack King Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1342. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Jack King Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1343. The Jack King Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1344. The Jack King Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Jack King Road using public funds pursuant to the County's governmental right and authority.

1345. Witnesses with personal knowledge of the history of the Jack King Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1346. Currently known reputation in the community is that the Jack King Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1347. Public motor vehicle use of the Jack King Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1348. The Jack King Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1349. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Jack King Road.

1350. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jack King Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Chad's Road, 58

1351. The Chad's Road is designated as county road number 58 and SGID road identification number RD280333 and is more or less 1.03 miles long.

1352. Exhibit 104 (attached hereto and incorporated herein) contains certain information pertaining to the Chad's Road including, a map depicting the road; township, range, and section

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

1353. In this action, the State and County seek to quiet title to the public highway right-of-way for the Chad's Road solely as it crosses United States public land as included and specifically described in Exhibit 104. The Chad's Road includes the segment of road specifically set forth in Exhibit 104 and as exists on the ground.

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

1354. The Chad's Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1355. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Chad's Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1356. The Chad's Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1357. The County confirmed its acceptance of the Chad's Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Chad's Road using public funds pursuant to the County's governmental right and authority.

1358. Witnesses with personal knowledge of the history of the Chad's Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1359. Currently known reputation in the community is that the Chad's Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1360. Public motor vehicle use of the Chad's Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1361. The Chad's Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1362. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Chad's Road.

1363. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Chad's Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bicknell Pond Road, 59

1364. The Bicknell Pond Road is designated as county road number 59 and SGID road identification number RD280335 and is more or less 0.36 miles long.

1365. Exhibit 105 (attached hereto and incorporated herein) contains certain information pertaining to the Bicknell Pond Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1366. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bicknell Pond Road solely as it crosses United States public land as included and specifically described in Exhibit 105. The Bicknell Pond Road includes the segment of road specifically set forth in Exhibit 105 and as exists on the ground.

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

1367. The Bicknell Pond Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1368. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Bicknell Pond Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1369. The Bicknell Pond Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Bicknell Pond Road using public funds pursuant to the County's governmental right and authority.

1370. Witnesses with personal knowledge of the history of the Bicknell Pond Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

1371. Currently known reputation in the community is that the Bicknell Pond Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1372. Public motor vehicle use of the Bicknell Pond Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1373. The Bicknell Pond Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1374. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bicknell Pond Road.

1375. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bicknell Pond Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Carl Taft Road, 61

1376. The Carl Taft Road is designated as county road number 61 and SGID road identification number RD280338 and is more or less 2.91 miles long.

1377. Exhibit 106 (attached hereto and incorporated herein) contains certain information pertaining to the Carl Taft Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1378. In this action, the State and County seek to quiet title to the public highway right-of-way for the Carl Taft Road solely as it crosses United States public land as included and specifically described in Exhibit 106. The Carl Taft Road includes the segment of road specifically set forth in Exhibit 106 and as exists on the ground.

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

1379. The Carl Taft Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1380. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Carl Taft Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1381. The Carl Taft Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1382. The County confirmed its acceptance of the Carl Taft Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Carl Taft Road using public funds pursuant to the County's governmental right and authority.

1383. Witnesses with personal knowledge of the history of the Carl Taft Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1384. Currently known reputation in the community is that the Carl Taft Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1385. Public motor vehicle use of the Carl Taft Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1386. The Carl Taft Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1387. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Carl Taft Road.

1388. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Carl Taft Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sunglow Road, 63A

1389. The Sunglow Road is designated as county road number 63A and SGID road identification number RD280339 and is more or less 1.34 miles long.

1390. Exhibit 107 (attached hereto and incorporated herein) contains certain information pertaining to the Sunglow Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1391. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sunglow Road solely as it crosses United States public land as included and specifically described in Exhibit 107. The Sunglow Road includes the segment of road specifically set forth in Exhibit 107 and as exists on the ground.

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

1392. The Sunglow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1393. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Sunglow Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1394. The Sunglow Road appears on the Bicknell (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1395. The County confirmed its acceptance of the Sunglow Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sunglow Road using public funds pursuant to the County's governmental right and authority.

1396. Witnesses with personal knowledge of the history of the Sunglow Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1397. Currently known reputation in the community is that the Sunglow Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1398. Public motor vehicle use of the Sunglow Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1399. The Sunglow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1400. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sunglow Road.

1401. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sunglow Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Slope Road, 77

1402. The North Slope Road, part of which is formerly known as the 1400 W (Grover) Road, is designated as county road number 77 and SGID road identification number RD280351 and is more or less 1.61 miles long.

1403. Exhibit 108 (attached hereto and incorporated herein) contains certain information pertaining to the North Slope Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1404. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Slope Road solely as it crosses United States public land as included and specifically described in Exhibit 108. The North Slope Road includes the segment of road specifically set forth in Exhibit 108 and as exists on the ground.

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

1405. The North Slope Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1406. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North Slope Road as a public highway located on the land

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

1407. The North Slope Road appears on the Blind Lake (1952) and Grover (1952) USGS 7.5 minute quadrangle maps, and Grover (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1408. The County confirmed its acceptance of the North Slope Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Slope Road using public funds pursuant to the County's governmental right and authority.

1409. Witnesses with personal knowledge of the history of the North Slope Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1410. Currently known reputation in the community is that the North Slope Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1411. Public motor vehicle use of the North Slope Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1412. The North Slope Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1413. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Slope Road.

1414. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Slope Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0355 Road, 17_1

1415. The WYPM0355 Road is designated as county road number 17_1 and SGID road identification number RD280390 and is more or less 0.63 miles long.

1416. Exhibit 109 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0355 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1417. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0355 Road solely as it crosses United States public land as included and

specifically described in Exhibit 109. The WYPM0355 Road includes the segment of road specifically set forth in Exhibit 109 and as exists on the ground.

Acceptance of the WYPM0355 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1418. The WYPM0355 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1419. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0355 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1420. The WYPM0355 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0355 Road pursuant to the County's governmental right and authority.

1421. Witnesses with personal knowledge of the history of the WYPM0355 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1422. Currently known reputation in the community is that the WYPM0355 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1423. Public motor vehicle use of the WYPM0355 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1424. The WYPM0355 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1425. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0355 Road.

1426. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0355 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0353 Road, 17_2

1427. The WYPM0353 Road is designated as county road number 17_2 and SGID road identification number RD280576 and is more or less 0.48 miles long.

1428. Exhibit 110 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0353 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1429. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0353 Road solely as it crosses United States public land as included and specifically described in Exhibit 110. The WYPM0353 Road includes the segment of road specifically set forth in Exhibit 110 and as exists on the ground.

Acceptance of the WYPM0353 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1430. The WYPM0353 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1431. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0353 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1432. The WYPM0353 Road appears on the Moroni Peak (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1433. The WYPM0353 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0353 Road pursuant to the County's governmental right and authority.

1434. Witnesses with personal knowledge of the history of the WYPM0353 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

1435. Currently known reputation in the community is that the WYPM0353 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1436. Public motor vehicle use of the WYPM0353 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1437. The WYPM0353 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1438. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0353 Road.

1439. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0353 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0354 Road, 17_3

1440. The WYPM0354 Road is designated as county road number 17_3 and SGID road identification number RD280392 and is more or less 0.92 miles long.

1441. Exhibit 111 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0354 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1442. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0354 Road solely as it crosses United States public land as included and specifically described in Exhibit 111. The WYPM0354 Road includes the segment of road specifically set forth in Exhibit 111 and as exists on the ground.

Acceptance of the WYPM0354 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1443. The WYPM0354 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1444. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0354 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1445. The WYPM0354 Road appears on the Moroni Peak (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1446. The WYPM0354 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the WYPM0354 Road pursuant to the County's governmental right and authority.

1447. Witnesses with personal knowledge of the history of the WYPM0354 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1448. Currently known reputation in the community is that the WYPM0354 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1449. Public motor vehicle use of the WYPM0354 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1450. The WYPM0354 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1451. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0354 Road.

1452. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0354 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0345 Road, 17A_1

1453. The WYPM0345 Road is designated as county road number 17A_1 and SGID road identification number RD280394 and is more or less 1.19 miles long.

1454. Exhibit 112 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0345 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1455. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0345 Road solely as it crosses United States public land as included and specifically described in Exhibit 112. The WYPM0345 Road includes the segment of road specifically set forth in Exhibit 112 and as exists on the ground.

Acceptance of the WYPM0345 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1456. The WYPM0345 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1457. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0345 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1458. The WYPM0345 Road appears on the Moroni Peak (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1459. The WYPM0345 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0345 Road pursuant to the County's governmental right and authority.

1460. Witnesses with personal knowledge of the history of the WYPM0345 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1461. Currently known reputation in the community is that the WYPM0345 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1462. Public motor vehicle use of the WYPM0345 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1463. The WYPM0345 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1464. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0345 Road.

1465. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0345 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0381 Road, 2_12

1466. The WYPM0381 Road is designated as county road number 2_12 and SGID road identification number RD280398 and is more or less 2.41 miles long.

1467. Exhibit 113 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0381 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1468. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0381 Road solely as it crosses United States public land as included and specifically described in Exhibit 113. The WYPM0381 Road includes the segment of road specifically set forth in Exhibit 113 and as exists on the ground.

Acceptance of the WYPM0381 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1469. The WYPM0381 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1470. The WYPM0381 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1471. The WYPM0381 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0381 Road pursuant to the County's governmental right and authority.

1472. Witnesses with personal knowledge of the history of the WYPM0381 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1473. Currently known reputation in the community is that the WYPM0381 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1474. Public motor vehicle use of the WYPM0381 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1475. The WYPM0381 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1476. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0381 Road.

1477. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0381 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0390 Road, 20_10

1478. The WYPM0390 Road is designated as county road number 20_10 and SGID road identification number RD280408 and is more or less 1.66 miles long.

1479. Exhibit 114 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0390 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1480. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0390 Road solely as it crosses United States public land as included and specifically described in Exhibit 114. The WYPM0390 Road includes the segment of road specifically set forth in Exhibit 114 and as exists on the ground.

Acceptance of the WYPM0390 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1481. The WYPM0390 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1482. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0390 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1483. The WYPM0390 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1484. The County confirmed its acceptance of the WYPM0390 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0390 Road pursuant to the County's governmental right and authority.

1485. Witnesses with personal knowledge of the history of the WYPM0390 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1486. Currently known reputation in the community is that the WYPM0390 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1487. Public motor vehicle use of the WYPM0390 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1488. The WYPM0390 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1489. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0390 Road.

1490. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0390 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

CO_28_0001 Road, 20_12

1491. The CO_28_0001 Road is designated as county road number 20_12 and SGID road identification number RD280410 and is more or less 0.52 miles long.

1492. Exhibit 115 (attached hereto and incorporated herein) contains certain information pertaining to the CO_28_0001 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1493. In this action, the State and County seek to quiet title to the public highway right-of-way for the CO_28_0001 Road solely as it crosses United States public land as included and

specifically described in Exhibit 115. The CO_28_0001 Road includes the segment of road specifically set forth in Exhibit 115 and as exists on the ground.

Acceptance of the CO_28_0001 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1494. The CO_28_0001 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1495. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the CO_28_0001 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1496. The CO_28_0001 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1497. The CO_28_0001 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the CO_28_0001 Road pursuant to the County's governmental right and authority.

1498. Witnesses with personal knowledge of the history of the CO_28_0001 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1499. Currently known reputation in the community is that the CO_28_0001 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1500. Public motor vehicle use of the CO_28_0001 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1501. The CO_28_0001 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1502. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the CO_28_0001 Road.

1503. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the CO_28_0001 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0401 Road, 20_13

1504. The WYPM0401 Road is designated as county road number 20_13 and SGID road identification number RD280411 and is more or less 4.33 miles long.

1505. Exhibit 116 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0401 Road including, a map depicting the road; township, range, and

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

1506. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0401 Road solely as it crosses United States public land as included and specifically described in Exhibit 116. The WYPM0401 Road includes the segment of road specifically set forth in Exhibit 116 and as exists on the ground.

Acceptance of the WYPM0401 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1507. The WYPM0401 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1508. Aerial photography from 1976 photography or earlier confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0401 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1509. The WYPM0401 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1510. The WYPM0401 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0401 Road pursuant to the County's governmental right and authority.

1511. Witnesses with personal knowledge of the history of the WYPM0401 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1512. Currently known reputation in the community is that the WYPM0401 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1513. Public motor vehicle use of the WYPM0401 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1514. The WYPM0401 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1515. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0401 Road.

1516. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0401 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0389 Road, 20_2

1517. The WYPM0389 Road is designated as county road number 20_2 and SGID road identification number RD280412 and is more or less 0.72 miles long.

1518. Exhibit 117 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0389 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1519. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0389 Road solely as it crosses United States public land as included and specifically described in Exhibit 117. The WYPM0389 Road includes the segment of road specifically set forth in Exhibit 117 and as exists on the ground.

Acceptance of the WYPM0389 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1520. The WYPM0389 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1521. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0389 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1522. The WYPM0389 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1523. The WYPM0389 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0389 Road pursuant to the County's governmental right and authority.

1524. Witnesses with personal knowledge of the history of the WYPM0389 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1525. Currently known reputation in the community is that the WYPM0389 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1526. Public motor vehicle use of the WYPM0389 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1527. The WYPM0389 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1528. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0389 Road.

1529. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0389 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0388 Road, 20_3

1530. The WYPM0388 Road is designated as county road number 20_3 and SGID road identification number RD280413 and is more or less 0.77 miles long.

1531. Exhibit 118 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0388 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1532. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0388 Road solely as it crosses United States public land as included and specifically described in Exhibit 118. The WYPM0388 Road includes the segment of road specifically set forth in Exhibit 118 and as exists on the ground.

Acceptance of the WYPM0388 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1533. The WYPM0388 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1534. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0388 Road as a public highway located on the land

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

1535. The WYPM0388 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1536. The WYPM0388 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0388 Road pursuant to the County's governmental right and authority.

1537. Witnesses with personal knowledge of the history of the WYPM0388 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1538. Currently known reputation in the community is that the WYPM0388 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1539. Public motor vehicle use of the WYPM0388 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1540. The WYPM0388 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1541. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0388 Road.

1542. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0388 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0388a Road, 20_3a

1543. The WYPM0388a Road is designated as county road number 20_3a and SGID road identification number RD280693 and is more or less 1.89 miles long.

1544. Exhibit 119 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0388a Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1545. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0388a Road solely as it crosses United States public land as included and specifically described in Exhibit 119. The WYPM0388a Road includes the segment of road specifically set forth in Exhibit 119 and as exists on the ground.

Acceptance of the WYPM0388a Road R.S. 2477 Right-of-way Prior to October 21, 1976

1546. The WYPM0388a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1547. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0388a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1548. The WYPM0388a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0388a Road pursuant to the County's governmental right and authority.

1549. Witnesses with personal knowledge of the history of the WYPM0388a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1550. Currently known reputation in the community is that the WYPM0388a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1551. Public motor vehicle use of the WYPM0388a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1552. The WYPM0388a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1553. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0388a Road.

1554. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0388a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0381a Road, 20_8

1555. The WYPM0381a Road is designated as county road number 20_8 and SGID road identification number RD280417 and is more or less 0.84 miles long.

1556. Exhibit 120 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0381a Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1557. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0381a Road solely as it crosses United States public land as included and

specifically described in Exhibit 120. The WYPM0381a Road includes the segment of road specifically set forth in Exhibit 120 and as exists on the ground.

Acceptance of the WYPM0381a Road R.S. 2477 Right-of-way Prior to October 21, 1976

1558. The WYPM0381a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1559. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0381a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1560. The WYPM0381a Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1561. The WYPM0381a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0381a Road pursuant to the County's governmental right and authority.

1562. Witnesses with personal knowledge of the history of the WYPM0381a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1563. Currently known reputation in the community is that the WYPM0381a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1564. Public motor vehicle use of the WYPM0381a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1565. The WYPM0381a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1566. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0381a Road.

1567. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0381a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0381b Road, 21_1

1568. The WYPM0381b Road is designated as county road number 21_1 and SGID road identification number RD280419 and is more or less 1.81 miles long.

1569. Exhibit 121 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0381b Road including, a map depicting the road; township, range, and

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

1570. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0381b Road solely as it crosses United States public land as included and specifically described in Exhibit 121. The WYPM0381b Road includes the segment of road specifically set forth in Exhibit 121 and as exists on the ground.

Acceptance of the WYPM0381b Road R.S. 2477 Right-of-way Prior to October 21, 1976

1571. The WYPM0381b Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1572. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0381b Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1573. The WYPM0381b Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1574. The WYPM0381b Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0381b Road pursuant to the County's governmental right and authority.

1575. Witnesses with personal knowledge of the history of the WYPM0381b Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1576. Currently known reputation in the community is that the WYPM0381b Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1577. Public motor vehicle use of the WYPM0381b Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1578. The WYPM0381b Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1579. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0381b Road.

1580. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0381b Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0378 Road, 21_4

1581. The WYPM0378 Road is designated as county road number 21_4 and SGID road identification number RD280425 and is more or less 1.18 miles long.

1582. Exhibit 122 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0378 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1583. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0378 Road solely as it crosses United States public land as included and specifically described in Exhibit 122. The WYPM0378 Road includes the segment of road specifically set forth in Exhibit 122 and as exists on the ground.

Acceptance of the WYPM0378 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1584. The WYPM0378 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1585. The WYPM0378 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1586. The WYPM0378 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0378 Road pursuant to the County's governmental right and authority.

1587. Witnesses with personal knowledge of the history of the WYPM0378 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1588. Currently known reputation in the community is that the WYPM0378 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1589. Public motor vehicle use of the WYPM0378 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1590. The WYPM0378 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1591. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0378 Road.

1592. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0378 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0398 Road, 21_7

1593. The WYPM0398 Road is designated as county road number 21_7 and SGID road identification number RD280428 and is more or less 1.68 miles long.

1594. Exhibit 123 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0398 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1595. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0398 Road solely as it crosses United States public land as included and specifically described in Exhibit 123. The WYPM0398 Road includes the segment of road specifically set forth in Exhibit 123 and as exists on the ground.

Acceptance of the WYPM0398 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1596. The WYPM0398 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1597. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0398 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1598. The WYPM0398 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1599. The WYPM0398 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0398 Road pursuant to the County's governmental right and authority.

1600. Witnesses with personal knowledge of the history of the WYPM0398 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1601. Currently known reputation in the community is that the WYPM0398 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1602. Public motor vehicle use of the WYPM0398 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1603. The WYPM0398 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1604. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0398 Road.

1605. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0398 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0393 Road, 21_8

1606. The WYPM0393 Road is designated as county road number 21_8 and SGID road identification number RD280429 and is more or less 2.19 miles long.

1607. Exhibit 124 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0393 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1608. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0393 Road solely as it crosses United States public land as included and specifically described in Exhibit 124. The WYPM0393 Road includes the segment of road specifically set forth in Exhibit 124 and as exists on the ground.

Acceptance of the WYPM0393 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1609. The WYPM0393 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1610. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0393 Road as a public highway located on the

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

1611. The WYPM0393 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1612. The WYPM0393 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0393 Road pursuant to the County's governmental right and authority.

1613. Witnesses with personal knowledge of the history of the WYPM0393 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1614. Currently known reputation in the community is that the WYPM0393 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1615. Public motor vehicle use of the WYPM0393 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1616. The WYPM0393 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1617. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0393 Road.

1618. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0393 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0420 Road, 59_3

1619. The WYPM0420 Road is designated as county road number 59_3 and SGID road identification number RD280541 and is more or less 0.22 miles long.

1620. Exhibit 125 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0420 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1621. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0420 Road solely as it crosses United States public land as included and specifically described in Exhibit 125. The WYPM0420 Road includes the segment of road specifically set forth in Exhibit 125 and as exists on the ground.

Acceptance of the WYPM0420 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1622. The WYPM0420 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1623. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0420 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1624. The WYPM0420 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0420 Road pursuant to the County's governmental right and authority.

1625. Witnesses with personal knowledge of the history of the WYPM0420 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1626. Currently known reputation in the community is that the WYPM0420 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1627. Public motor vehicle use of the WYPM0420 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1628. The WYPM0420 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1629. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0420 Road.

1630. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0420 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Middle Balsam Road, 8_1

1631. The Middle Balsam Road is designated as county road number 8_1 and SGID road identification number RD280560 and is more or less 0.91 miles long.

1632. Exhibit 126 (attached hereto and incorporated herein) contains certain information pertaining to the Middle Balsam Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1633. In this action, the State and County seek to quiet title to the public highway right-of-way for the Middle Balsam Road solely as it crosses United States public land as included and

specifically described in Exhibit 126. The Middle Balsam Road includes the segment of road specifically set forth in Exhibit 126 and as exists on the ground.

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

1634. The Middle Balsam Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1635. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Middle Balsam Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1636. The Middle Balsam Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1637. The County confirmed its acceptance of the Middle Balsam Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Middle Balsam Road using public funds pursuant to the County's governmental right and authority.

1638. Witnesses with personal knowledge of the history of the Middle Balsam Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1639. Currently known reputation in the community is that the Middle Balsam Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1640. Public motor vehicle use of the Middle Balsam Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1641. The Middle Balsam Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1642. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Middle Balsam Road.

1643. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Middle Balsam Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0362 Road, 8_2A

1644. The WYPM0362 Road is designated as county road number 8_2A and SGID road identification number RD280562 and is more or less 0.52 miles long.

1645. Exhibit 127 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0362 Road including, a map depicting the road; township, range, and

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

1646. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0362 Road solely as it crosses United States public land as included and specifically described in Exhibit 127. The WYPM0362 Road includes the segment of road specifically set forth in Exhibit 127 and as exists on the ground.

Acceptance of the WYPM0362 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1647. The WYPM0362 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1648. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0362 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1649. The WYPM0362 Road appears on the Smooth Knoll (1969) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1650. The County confirmed its acceptance of the WYPM0362 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0362 Road using public funds pursuant to the County's governmental right and authority.

1651. Witnesses with personal knowledge of the history of the WYPM0362 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1652. Currently known reputation in the community is that the WYPM0362 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1653. Public motor vehicle use of the WYPM0362 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1654. The WYPM0362 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1655. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0362 Road.

1656. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0362 Road on lands owned 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
TEASDALE AREA

1657. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1658. The Teasdale Area is located in western Wayne County. *See* Exhibit 6.

1659. The Teasdale Area includes the following roads — listed by Common Road Name (if applicable) and County Unique Number: (1) Brey Road, 29; (2) Teasdale TV Tower Road, 64; (3) Teasdale Road, 65; (4) Fish Creek Cove Road, 65E; (5) Teasdale Bench Road, 66; (6) Teasdale Powerline Road, 67; (7) Cigarette Hollow Road, 68; (8) Dick Pace Road, 71; (9) River View Drive Road, 73; (10) Chadburn Road, 73A; (11) Beas Lewis Flat Road, 76; (12) North Beas Lewis Flat Road, 76B; (13) Meadowbrook Road, 77A; (14) Sulphur Creek Road, 81; (15) WYPM0438 Road, 68_2; (16) Stone Road, 72_1; (17) WYPMO451 Road, 74_1; (18) Beas Lewis Flat South Road, 76_19; and (19) WYPM0459a Road, 80_1c.

1660. Each right-of-way claimed in the Teasdale 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.

1661. All rights-of-way claimed in the Teasdale 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.

1662. All rights-of-way claimed in the Teasdale 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).

1663. Prior to October 21, 1976, the State of Utah, Wayne 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.

Brey Road, 29

1664. The Brey Road is designated as county road number 29 and SGID road identification number RD280313 and is more or less 1.43 miles long.

1665. Exhibit 128 (attached hereto and incorporated herein) contains certain information pertaining to the Brey Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1666. In this action, the State and County seek to quiet title to the public highway right-of-way for the Brey Road solely as it crosses United States public land as included and specifically described in Exhibit 128. The Brey Road includes the segment of road specifically set forth in Exhibit 128 and as exists on the ground.

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

1667. The Brey Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1668. The County confirmed its acceptance of the Brey Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Brey Road using public funds pursuant to the County's governmental right and authority.

1669. Witnesses with personal knowledge of the history of the Brey Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1670. Currently known reputation in the community is that the Brey Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1671. Public motor vehicle use of the Brey Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1672. The Brey Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1673. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Brey Road.

1674. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Brey Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Teasdale TV Tower Road, 64

1675. The Teasdale TV Tower Road is designated as county road number 64 and SGID road identification number RD280340 and is more or less 3.32 miles long.

1676. Exhibit 129 (attached hereto and incorporated herein) contains certain information pertaining to the Teasdale TV Tower Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1677. In this action, the State and County seek to quiet title to the public highway right-of-way for the Teasdale TV Tower Road solely as it crosses United States public land as included and specifically described in Exhibit 129. The Teasdale TV Tower Road includes the segment of road specifically set forth in Exhibit 129 and as exists on the ground.

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

1678. The Teasdale TV Tower Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1679. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Teasdale TV Tower Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1680. The Teasdale TV Tower Road appears on the Bicknell (1952) and Torrey (1952) USGS 7.5 minute quadrangle maps, and Torrey (1952) 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1681. The County confirmed its acceptance of the Teasdale TV Tower Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Teasdale TV Tower Road using public funds pursuant to the County's governmental right and authority.

1682. Witnesses with personal knowledge of the history of the Teasdale TV Tower Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1683. Currently known reputation in the community is that the Teasdale TV Tower Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1684. Public motor vehicle use of the Teasdale TV Tower Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1685. The Teasdale TV Tower Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1686. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Teasdale TV Tower Road.

1687. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Teasdale TV Tower Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Teasdale Road, 65

1688. The Teasdale Road is designated as county road number 65 and SGID road identification number RD280341 and is more or less 6.96 miles long.

1689. Exhibit 130 (attached hereto and incorporated herein) contains certain information pertaining to the Teasdale Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1690. In this action, the State and County seek to quiet title to the public highway right-of-way for the Teasdale Road solely as it crosses United States public land as included and specifically described in Exhibit 130. The Teasdale Road includes the segment of road specifically set forth in Exhibit 130 and as exists on the ground.

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

1691. The Teasdale Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1692. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Teasdale Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1693. The Teasdale Road appears on the Torrey (1952) and Blind Lake (1952) USGS 7.5 minute quadrangle maps, and Torrey (1952) and Grover (1952) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1694. The County confirmed its acceptance of the Teasdale Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Teasdale Road using public funds pursuant to the County's governmental right and authority.

1695. Witnesses with personal knowledge of the history of the Teasdale Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1696. Currently known reputation in the community is that the Teasdale Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1697. Public motor vehicle use of the Teasdale Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1698. The Teasdale Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1699. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Teasdale Road.

1700. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Teasdale Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Fish Creek Cove Road, 65E

1701. The Fish Creek Cove Road is designated as county road number 65E and SGID road identification number RD280342 and is more or less 1.73 miles long.

1702. Exhibit 131 (attached hereto and incorporated herein) contains certain information pertaining to the Fish Creek Cove Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1703. In this action, the State and County seek to quiet title to the public highway right-of-way for the Fish Creek Cove Road solely as it crosses United States public land as included and specifically described in Exhibit 131. The Fish Creek Cove Road includes the segment of road specifically set forth in Exhibit 131 and as exists on the ground.

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

1704. The Fish Creek Cove Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1705. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Fish Creek Cove Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1706. The Fish Creek Cove Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Fish Creek Cove Road using public funds pursuant to the County's governmental right and authority.

1707. Witnesses with personal knowledge of the history of the Fish Creek Cove Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

1708. Currently known reputation in the community is that the Fish Creek Cove Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1709. Public motor vehicle use of the Fish Creek Cove Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1710. The Fish Creek Cove Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1711. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Fish Creek Cove Road.

1712. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Fish Creek Cove Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Teasdale Bench Road, 66

1713. The Teasdale Bench Road is designated as county road number 66 and SGID road identification number RD280343 and is more or less 1.35 miles long.

1714. Exhibit 132 (attached hereto and incorporated herein) contains certain information pertaining to the Teasdale Bench Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1715. In this action, the State and County seek to quiet title to the public highway right-of-way for the Teasdale Bench Road solely as it crosses United States public land as included and specifically described in Exhibit 132. The Teasdale Bench Road includes the segment of road specifically set forth in Exhibit 132 and as exists on the ground.

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

1716. The Teasdale Bench Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1717. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Teasdale Bench Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1718. The Teasdale Bench Road appears on the Torrey (1952) USGS 7.5 minute quadrangle map and Torrey (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1719. The County confirmed its acceptance of the Teasdale Bench Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

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

1720. Witnesses with personal knowledge of the history of the Teasdale Bench Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1721. Currently known reputation in the community is that the Teasdale Bench Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1722. Public motor vehicle use of the Teasdale Bench Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1723. The Teasdale Bench Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1724. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Teasdale Bench Road.

1725. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Teasdale Bench Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Teasdale Powerline Road, 67

1726. The Teasdale Powerline Road is designated as county road number 67 and SGID road identification number RD280344 and is more or less 0.71 miles long.

1727. Exhibit 133 (attached hereto and incorporated herein) contains certain information pertaining to the Teasdale Powerline Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1728. In this action, the State and County seek to quiet title to the public highway right-of-way for the Teasdale Powerline Road solely as it crosses United States public land as included and specifically described in Exhibit 133. The Teasdale Powerline Road includes the segment of road specifically set forth in Exhibit 133 and as exists on the ground.

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

1729. The Teasdale Powerline Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1730. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Teasdale Powerline Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1731. The County confirmed its acceptance of the Teasdale Powerline Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Teasdale Powerline Road using public funds pursuant to the County's governmental right and authority.

1732. Witnesses with personal knowledge of the history of the Teasdale Powerline Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1733. Currently known reputation in the community is that the Teasdale Powerline Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1734. Public motor vehicle use of the Teasdale Powerline Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1735. The Teasdale Powerline Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1736. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Teasdale Powerline Road.

1737. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Teasdale Powerline Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cigarette Hollow Road, 68

1738. The Cigarette Hollow Road is designated as county road number 68 and SGID road identification number RD280345 and is more or less 0.55 miles long.

1739. Exhibit 134 (attached hereto and incorporated herein) contains certain information pertaining to the Cigarette 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.

1740. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cigarette Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 134. The Cigarette Hollow Road includes the segment of road specifically set forth in Exhibit 134 and as exists on the ground.

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

1741. The Cigarette Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1742. The Cigarette Hollow Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-

way by managing, maintaining, and improving the Cigarette Hollow Road using public funds pursuant to the County's governmental right and authority.

1743. Witnesses with personal knowledge of the history of the Cigarette 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.

1744. Currently known reputation in the community is that the Cigarette 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.

1745. Public motor vehicle use of the Cigarette 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.

1746. The Cigarette Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1747. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cigarette Hollow Road.

1748. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cigarette 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.

Dick Pace Road, 71

1749. The Dick Pace Road is designated as county road number 71 and SGID road identification number RD280346 and is more or less 0.31 miles long.

1750. Exhibit 135 (attached hereto and incorporated herein) contains certain information pertaining to the Dick Pace Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1751. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dick Pace Road solely as it crosses United States public land as included and specifically described in Exhibit 135. The Dick Pace Road includes the segment of road specifically set forth in Exhibit 135 and as exists on the ground.

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

1752. The Dick Pace Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1753. The Dick Pace Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dick Pace Road using public funds pursuant to the County's governmental right and authority.

1754. Witnesses with personal knowledge of the history of the Dick Pace Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1755. Currently known reputation in the community is that the Dick Pace Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1756. Public motor vehicle use of the Dick Pace Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1757. The Dick Pace Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1758. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dick Pace Road.

1759. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dick Pace Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

River View Drive Road, 73

1760. The River View Drive Road is designated as county road number 73 and SGID road identification number RD280347 and is more or less 2.62 miles long.

1761. Exhibit 136 (attached hereto and incorporated herein) contains certain information pertaining to the River View Drive Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1762. In this action, the State and County seek to quiet title to the public highway right-of-way for the River View Drive Road solely as it crosses United States public land as included and specifically described in Exhibit 136. The River View Drive Road includes the segment of road specifically set forth in Exhibit 136 and as exists on the ground.

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

1763. The River View Drive Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1764. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the River View Drive Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1765. The River View Drive Road appears on the Torrey (1952) USGS 7.5 minute quadrangle map and Torrey (1952) USGS 15 minute quadrangle map, which evidence the

existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1766. The County confirmed its acceptance of the River View Drive Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the River View Drive Road using public funds pursuant to the County's governmental right and authority.

1767. Witnesses with personal knowledge of the history of the River View Drive Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1768. Currently known reputation in the community is that the River View Drive Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1769. Public motor vehicle use of the River View Drive Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1770. The River View Drive Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1771. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the River View Drive Road.

1772. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the River View Drive Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Chadburn Road, 73A

1773. The Chadburn Road is designated as county road number 73A and SGID road identification number RD280348 and is more or less 0.90 miles long.

1774. Exhibit 137 (attached hereto and incorporated herein) contains certain information pertaining to the Chadburn Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1775. In this action, the State and County seek to quiet title to the public highway right-of-way for the Chadburn Road solely as it crosses United States public land as included and specifically described in Exhibit 137. The Chadburn Road includes the segment of road specifically set forth in Exhibit 137 and as exists on the ground.

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

1776. The Chadburn Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1777. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Chadburn Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1778. The Chadburn Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Chadburn Road using public funds pursuant to the County's governmental right and authority.

1779. Witnesses with personal knowledge of the history of the Chadburn Road confirm public use of this road as a public 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 Chadburn Road has been open for all to come 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 Chadburn Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 Chadburn 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 Chadburn Road.

1784. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Chadburn Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Beas Lewis Flat Road, 76

1785. The Beas Lewis Flat Road is designated as county road number 76 and SGID road identification number RD280349 and is more or less 5.02 miles long.

1786. Exhibit 138 (attached hereto and incorporated herein) contains certain information pertaining to the Beas Lewis Flat Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1787. In this action, the State and County seek to quiet title to the public highway right-of-way for the Beas Lewis Flat Road solely as it crosses United States public land as included and specifically described in Exhibit 138. The Beas Lewis Flat Road includes the segment of road specifically set forth in Exhibit 138 and as exists on the ground.

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

1788. The Beas Lewis Flat 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Beas Lewis Flat Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1790. The Beas Lewis Flat Road appears on the Torrey (1952) and Twin Rocks (1952) USGS 7.5 minute quadrangle maps, and Torrey (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1791. The Beas Lewis Flat Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Beas Lewis Flat Road using public funds pursuant to the County's governmental right and authority.

1792. Witnesses with personal knowledge of the history of the Beas Lewis Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1793. Currently known reputation in the community is that the Beas Lewis Flat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1794. Public motor vehicle use of the Beas Lewis Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1795. The Beas Lewis Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1796. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Beas Lewis Flat Road.

1797. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Beas Lewis Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Beas Lewis Flat Road, 76B

1798. The North Beas Lewis Flat Road is designated as county road number 76B and SGID road identification number RD280350 and is more or less 3.79 miles long.

1799. Exhibit 139 (attached hereto and incorporated herein) contains certain information pertaining to the North Beas Lewis Flat Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1800. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Beas Lewis Flat Road solely as it crosses United States public land as

included and specifically described in Exhibit 139. The North Beas Lewis Flat Road includes the segment of road specifically set forth in Exhibit 139 and as exists on the ground.

Acceptance of the North Beas Lewis Flat Road R.S. 2477 Right-of-way Prior to October 21, 1976

1801. The North Beas Lewis Flat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1802. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North Beas Lewis Flat Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1803. The North Beas Lewis Flat Road appears on the Twin Rocks (1952) USGS 7.5 minute quadrangle map and Torrey (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1804. The North Beas Lewis Flat Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Beas Lewis Flat Road using public funds pursuant to the County's governmental right and authority.

1805. Witnesses with personal knowledge of the history of the North Beas Lewis Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1806. Currently known reputation in the community is that the North Beas Lewis Flat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1807. Public motor vehicle use of the North Beas Lewis Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1808. The North Beas Lewis Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1809. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Beas Lewis Flat Road.

1810. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Beas Lewis Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Meadowbrook Road, 77A

1811. The Meadowbrook Road is designated as county road number 77A and SGID road identification number RD280352 and is more or less 1.28 miles long.

1812. Exhibit 140 (attached hereto and incorporated herein) contains certain information pertaining to the Meadowbrook Road including, a map depicting the road; township, range, and

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

1813. In this action, the State and County seek to quiet title to the public highway right-of-way for the Meadowbrook Road solely as it crosses United States public land as included and specifically described in Exhibit 140. The Meadowbrook Road includes the segment of road specifically set forth in Exhibit 140 and as exists on the ground.

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

1814. The Meadowbrook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1815. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Meadowbrook Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1816. The Meadowbrook Road appears on the Torrey (1952) and Blind Lake (1952) USGS 7.5 minute quadrangle maps, and Grover (1952) and Torrey (1952) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1817. The County confirmed its acceptance of the Meadowbrook Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Meadowbrook Road using public funds pursuant to the County's governmental right and authority.

1818. Witnesses with personal knowledge of the history of the Meadowbrook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1819. Currently known reputation in the community is that the Meadowbrook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1820. Public motor vehicle use of the Meadowbrook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1821. The Meadowbrook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1822. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Meadowbrook Road.

1823. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Meadowbrook Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sulphur Creek Road, 81

1824. The Sulphur Creek Road is designated as county road number 81 and SGID road identification number RD280356 and is more or less 3.77 miles long.

1825. Exhibit 141 (attached hereto and incorporated herein) contains certain information pertaining to the Sulphur Creek Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1826. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sulphur Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 141. The Sulphur Creek Road includes the segment of road specifically set forth in Exhibit 141 and as exists on the ground.

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

1827. The Sulphur Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1828. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Sulphur Creek Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1829. The Sulphur Creek Road appears on the Torrey (1952) and Twin Rocks (1952) USGS 7.5 minute quadrangle maps, and Torrey (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1830. The County confirmed its acceptance of the Sulphur Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sulphur Creek Road using public funds pursuant to the County's governmental right and authority.

1831. Witnesses with personal knowledge of the history of the Sulphur Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1832. Currently known reputation in the community is that the Sulphur Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1833. Public motor vehicle use of the Sulphur Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1834. The Sulphur Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1835. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sulphur Creek Road.

1836. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sulphur Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0438 Road, 68_2

1837. The WYPM0438 Road is designated as county road number 68_2 and SGID road identification number RD280558 and is more or less 1.19 miles long.

1838. Exhibit 142 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0438 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1839. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0438 Road solely as it crosses United States public land as included and specifically described in Exhibit 142. The WYPM0438 Road includes the segment of road specifically set forth in Exhibit 142 and as exists on the ground.

Acceptance of the WYPM0438 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1840. The WYPM0438 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1841. The WYPM0438 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0438 Road pursuant to the County's governmental right and authority.

1842. Witnesses with personal knowledge of the history of the WYPM0438 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1843. Currently known reputation in the community is that the WYPM0438 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1844. Public motor vehicle use of the WYPM0438 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1845. The WYPM0438 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1846. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0438 Road.

1847. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0438 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Stone Road, 72_1

1848. The Stone Road is designated as county road number 72_1 and SGID road identification number RD280785 and is more or less 0.45 miles long.

1849. Exhibit 143 (attached hereto and incorporated herein) contains certain information pertaining to the Stone Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1850. In this action, the State and County seek to quiet title to the public highway right-of-way for the Stone Road solely as it crosses United States public land as included and specifically described in Exhibit 143. The Stone Road includes the segment of road specifically set forth in Exhibit 143 and as exists on the ground.

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

1851. The Stone Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1852. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Stone Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1853. The Stone Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Stone Road pursuant to the County's governmental right and authority.

1854. Witnesses with personal knowledge of the history of the Stone Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1855. Currently known reputation in the community is that the Stone Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1856. Public motor vehicle use of the Stone Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1857. The Stone Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1858. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Stone Road.

1859. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Stone Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPMO451 Road, 74_1

1860. The WYPMO451 Road is designated as county road number 74_1 and SGID road identification number RD280786 and is more or less 0.49 miles long.

1861. Exhibit 144 (attached hereto and incorporated herein) contains certain information pertaining to the WYPMO451 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1862. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPMO451 Road solely as it crosses United States public land as included and specifically described in Exhibit 144. The WYPMO451 Road includes the segment of road specifically set forth in Exhibit 144 and as exists on the ground.

Acceptance of the WYPMO451 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1863. The WYPMO451 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1864. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPMO451 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1865. The WYPMO451 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPMO451 Road pursuant to the County's governmental right and authority.

1866. Witnesses with personal knowledge of the history of the WYPMO451 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1867. Currently known reputation in the community is that the WYPMO451 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1868. Public motor vehicle use of the WYPMO451 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1869. The WYPMO451 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1870. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPMO451 Road.

1871. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPMO451 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Beas Lewis Flat South Road, 76_19

1872. The Beas Lewis Flat South Road is designated as county road number 76_19 and SGID road identification number RD280791 and is more or less 0.97 miles long.

1873. Exhibit 145 (attached hereto and incorporated herein) contains certain information pertaining to the Beas Lewis Flat South Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1874. In this action, the State and County seek to quiet title to the public highway right-of-way for the Beas Lewis Flat South Road solely as it crosses United States public land as included and specifically described in Exhibit 145. The Beas Lewis Flat South Road includes the segment of road specifically set forth in Exhibit 145 and as exists on the ground.

Acceptance of the Beas Lewis Flat South Road R.S. 2477 Right-of-way Prior to October 21, 1976

1875. The Beas Lewis Flat South Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1876. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Beas Lewis Flat South Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1877. The appearance of the Beas Lewis Flat South Road on the Twin Rocks (1952) USGS 7.5 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1878. The Beas Lewis Flat South Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Beas Lewis Flat South Road pursuant to the County's governmental right and authority.

1879. Witnesses with personal knowledge of the history of the Beas Lewis Flat South Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1880. Currently known reputation in the community is that the Beas Lewis Flat South Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1881. Public motor vehicle use of the Beas Lewis Flat South Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or

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

1882. The Beas Lewis Flat South Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1883. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Beas Lewis Flat South Road.

1884. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Beas Lewis Flat South Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0459a Road, 80_1c

1885. The WYPM0459a Road is designated as county road number 80_1c and SGID road identification number RD280812 and is more or less 1.18 miles long.

1886. Exhibit 146 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0459a Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1887. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0459a Road solely as it crosses United States public land as included and

specifically described in Exhibit 146. The WYPM0459a Road includes the segment of road specifically set forth in Exhibit 146 and as exists on the ground.

Acceptance of the WYPM0459a Road R.S. 2477 Right-of-way Prior to October 21, 1976

1888. The WYPM0459a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1889. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0459a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1890. The WYPM0459a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0459a Road pursuant to the County's governmental right and authority.

1891. Witnesses with personal knowledge of the history of the WYPM0459a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1892. Currently known reputation in the community is that the WYPM0459a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1893. Public motor vehicle use of the WYPM0459a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1894. The WYPM0459a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1895. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0459a Road.

1896. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0459a Road on lands owned 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
MINERS MOUNTAIN AREA

1897. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1898. The Miners Mountain Area is located in southwestern Wayne County. *See* Exhibit 7.

1899. The Miners Mountain Area includes the following roads — listed by Common Road Name and County Unique Number: (1) East Miners Road, 139D; (2) Miners Mountain Road, 80; (3) North Miners Road, 80A; (4) WYPM0519 Road, 1390_1; (5) West Hollow Road, 77_1; (6) Lion Mountain Road, 78_2; (7) Hale Summer Theatre Road, 79_2; (8) East Grover

Road, 80_1; (9) WYPM0476 Road, 80_10; (10) WYPM0509 Road, 80_15; (11) WYPM0508 Road, 80_16; (12) Miners Mountain Road, 80_18; (13) Miners Mountain Road, 80_19; (14) WYPM0471 Road, 80_1a; (15) Miners Mountain Road, 80_20; (16) Miners Mountain Trail Road, 80_21; (17) WYPM0525 Road, 80_22; (18) WYPM0479 Road, 80_3; (19) WYPM0478 Road, 80_4; (20) WYPM0479a Road, 80_6; (21) WYPM0477 Road, 80_7; (22) WYPM0475 Road, 80_9; (23) WYPM0529 Road, 80A; (24) WYPM0530 Road, 80A_1; (25) WYPM0511 Road, 80A_1b; (26) WYPM0481 Road, 80A_3; (27) WYPM0530a Road, 80A_3a; (28) WYPM0515 Road, 80A_5; (29) WYPM0483 Road, 80A_6; and (30) WYPM0517 Road, 80A_7.

1900. Each right-of-way claimed in the Miners Mountain 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.

1901. All rights-of-way claimed in the Miners Mountain 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.

1902. All rights-of-way claimed in the Miners Mountain 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).

1903. Prior to October 21, 1976, the State of Utah, Wayne 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.

East Miners Road, 139D

1904. The East Miners Road is designated as county road number 139D and SGID road identification number RD280292 and is more or less 2.13 miles long.

1905. Exhibit 147 (attached hereto and incorporated herein) contains certain information pertaining to the East Miners Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1906. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Miners Road solely as it crosses United States public land as included and specifically described in Exhibit 147. The East Miners Road includes the segment of road specifically set forth in Exhibit 147 and as exists on the ground.

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

1907. The East Miners Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1908. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the East Miners Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1909. The East Miners Road appears on the Grover (1952) USGS 7.5 minute quadrangle map and the Grover (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1910. The East Miners Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Miners Road using public funds pursuant to the County's governmental right and authority.

1911. Witnesses with personal knowledge of the history of the East Miners Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1912. Currently known reputation in the community is that the East Miners Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1913. Public motor vehicle use of the East Miners Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

1914. The East Miners Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1915. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Miners Road.

1916. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Miners Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Miners Mountain Road, 80

1917. The Miners Mountain Road, 80 is designated as county road number 80 and SGID road identification number RD280354 and is more or less 9.70 miles long.

1918. Exhibit 148 (attached hereto and incorporated herein) contains certain information pertaining to the Miners Mountain Road, 80 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1919. In this action, the State and County seek to quiet title to the public highway right-of-way for the Miners Mountain Road, 80 solely as it crosses United States public land as

included and specifically described in Exhibit 148. The Miners Mountain Road, 80 includes the segment of road specifically set forth in Exhibit 148 and as exists on the ground.

Acceptance of the Miners Mountain Road, 80 R.S. 2477 Right-of-way Prior to October 21, 1976

1920. The Miners Mountain Road, 80 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1921. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Miners Mountain Road, 80 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1922. The Miners Mountain Road, 80 appears on the Grover (1952) USGS 7.5 minute quadrangle map and Grover (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1923. The County confirmed its acceptance of the Miners Mountain Road, 80 by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Miners Mountain Road, 80 using public funds pursuant to the County's governmental right and authority.

1924. Witnesses with personal knowledge of the history of the Miners Mountain Road, 80 confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

1925. Currently known reputation in the community is that the Miners Mountain Road, 80 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1926. Public motor vehicle use of the Miners Mountain Road, 80 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1927. The Miners Mountain Road, 80 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1928. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Miners Mountain Road, 80.

1929. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Miners Mountain Road, 80 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Miners Road, 80A

1930. The North Miners Road is designated as county road number 80A and SGID road identification number RD280355 and is more or less 2.55 miles long.

1931. Exhibit 149 (attached hereto and incorporated herein) contains certain information pertaining to the North Miners Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1932. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Miners Road solely as it crosses United States public land as included and specifically described in Exhibit 149. The North Miners Road includes the segment of road specifically set forth in Exhibit 149 and as exists on the ground.

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

1933. The North Miners Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1934. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North Miners Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1935. The North Miners Road appears on the Grover (1952) USGS 7.5 minute quadrangle map and Grover (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1936. The County confirmed its acceptance of the North Miners Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

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

1937. Witnesses with personal knowledge of the history of the North Miners Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1938. Currently known reputation in the community is that the North Miners Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1939. Public motor vehicle use of the North Miners Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1940. The North Miners Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1941. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Miners Road.

1942. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Miners Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0519 Road, 1390_1

1943. The WYPM0519 Road is designated as county road number 1390_1 and SGID road identification number RD280736 and is more or less 1.60 miles long.

1944. Exhibit 150 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0519 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1945. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0519 Road solely as it crosses United States public land as included and specifically described in Exhibit 150. The WYPM0519 Road includes the segment of road specifically set forth in Exhibit 150 and as exists on the ground.

Acceptance of the WYPM0519 Road R.S. 2477 Right-of-way Prior to October 21, 1976

1946. The WYPM0519 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1947. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0519 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1948. The WYPM0519 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0519 Road pursuant to the County's governmental right and authority.

1949. Witnesses with personal knowledge of the history of the WYPM0519 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1950. Currently known reputation in the community is that the WYPM0519 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1951. Public motor vehicle use of the WYPM0519 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1952. The WYPM0519 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1953. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0519 Road.

1954. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0519 Road on lands owned 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 Hollow Road, 77_1

1955. The West Hollow Road is designated as county road number 77_1 and SGID road identification number RD280795 and is more or less 0.93 miles long.

1956. Exhibit 151 (attached hereto and incorporated herein) contains certain information pertaining to the West 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.

1957. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Hollow Road solely as it crosses United States public land as included and specifically described in Exhibit 151. The West Hollow Road includes the segment of road specifically set forth in Exhibit 151 and as exists on the ground.

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

1958. The West Hollow Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1959. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the West 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.

1960. The West Hollow Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Hollow Road pursuant to the County's governmental right and authority.

1961. Witnesses with personal knowledge of the history of the West 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.

1962. Currently known reputation in the community is that the West 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.

1963. Public motor vehicle use of the West 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.

1964. The West Hollow Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1965. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Hollow Road.

1966. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West 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.

Lion Mountain Road, 78_2

1967. The Lion Mountain Road is designated as county road number 78_2 and SGID road identification number RD280799 and is more or less 0.86 miles long.

1968. Exhibit 152 (attached hereto and incorporated herein) contains certain information pertaining to the Lion 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.

1969. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lion Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 152. The Lion Mountain Road includes the segment of road specifically set forth in Exhibit 152 and as exists on the ground.

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

1970. The Lion Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1971. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lion 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.

1972. The Lion Mountain Road appears on the Grover (1952) USGS 7.5 minute quadrangle map and Grover (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1973. The Lion Mountain Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lion Mountain Road pursuant to the County's governmental right and authority.

1974. Witnesses with personal knowledge of the history of the Lion 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.

1975. Currently known reputation in the community is that the Lion 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.

1976. Public motor vehicle use of the Lion 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.

1977. The Lion Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1978. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lion Mountain Road.

1979. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lion 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.

Hale Summer Theatre Road, 79_2

1980. The Hale Summer Theatre Road is designated as county road number 79_2 and SGID road identification number RD280800 and is more or less 2.95 miles long.

1981. Exhibit 153 (attached hereto and incorporated herein) contains certain information pertaining to the Hale Summer Theatre Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1982. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hale Summer Theatre Road solely as it crosses United States public land as

included and specifically described in Exhibit 153. The Hale Summer Theatre Road includes the segment of road specifically set forth in Exhibit 153 and as exists on the ground.

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

1983. The Hale Summer Theatre Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1984. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hale Summer Theatre Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1985. The appearance of the Hale Summer Theatre Road on the Grover (1952) and Twin Rocks (1952) USGS 7.5 minute quadrangle maps and the Grover (1952) and Torrey (1952) USGS 15 minute quadrangle maps evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

1986. The Hale Summer Theatre Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hale Summer Theatre Road pursuant to the County's governmental right and authority.

1987. Witnesses with personal knowledge of the history of the Hale Summer Theatre Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1988. Currently known reputation in the community is that the Hale Summer Theatre Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1989. Public motor vehicle use of the Hale Summer Theatre Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1990. The Hale Summer Theatre Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1991. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hale Summer Theatre Road.

1992. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hale Summer Theatre Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Grover Road, 80_1

1993. The East Grover Road is designated as county road number 80_1 and SGID road identification number RD280801 and is more or less 4.20 miles long.

1994. Exhibit 154 (attached hereto and incorporated herein) contains certain information pertaining to the East Grover Road including: a map depicting the road; township, range and

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

1995. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Grover Road solely as it crosses United States public land as included and specifically described in Exhibit 154. The East Grover Road includes the segment of road specifically set forth in Exhibit 154 and as exists on the ground.

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

1996. The East Grover Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1997. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the East Grover Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1998. The East Grover Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Grover Road pursuant to the County's governmental right and authority.

1999. Witnesses with personal knowledge of the history of the East Grover Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2000. Currently known reputation in the community is that the East Grover Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2001. Public motor vehicle use of the East Grover Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2002. The East Grover Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2003. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Grover Road.

2004. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Grover Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0476 Road, 80_10

2005. The WYPM0476 Road is designated as county road number 80_10 and SGID road identification number RD280802 and is more or less 2.56 miles long.

2006. Exhibit 155 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0476 Road including: a map depicting the road; township, range and

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

2007. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0476 Road solely as it crosses United States public land as included and specifically described in Exhibit 155. The WYPM0476 Road includes the segment of road specifically set forth in Exhibit 155 and as exists on the ground.

Acceptance of the WYPM0476 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2008. The WYPM0476 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2009. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0476 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2010. The WYPM0476 Road appears on the Twin Rocks (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2011. The WYPM0476 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0476 Road pursuant to the County's governmental right and authority.

2012. Witnesses with personal knowledge of the history of the WYPM0476 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2013. Currently known reputation in the community is that the WYPM0476 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2014. Public motor vehicle use of the WYPM0476 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2015. The WYPM0476 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2016. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0476 Road.

2017. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0476 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0509 Road, 80_15

2018. The WYPM0509 Road is designated as county road number 80_15 and SGID road identification number RD280805 and is more or less 0.69 miles long.

2019. Exhibit 156 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0509 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2020. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0509 Road solely as it crosses United States public land as included and specifically described in Exhibit 156. The WYPM0509 Road includes the segment of road specifically set forth in Exhibit 156 and as exists on the ground.

Acceptance of the WYPM0509 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2021. The WYPM0509 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2022. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0509 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2023. The WYPM0509 Road appears on the Grover (1952) USGS 7.5 minute quadrangle map and Grover (1952) USGS 15 minute quadrangle map, which evidence the

existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2024. The WYPM0509 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0509 Road pursuant to the County's governmental right and authority.

2025. Witnesses with personal knowledge of the history of the WYPM0509 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2026. Currently known reputation in the community is that the WYPM0509 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2027. Public motor vehicle use of the WYPM0509 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2028. The WYPM0509 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2029. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0509 Road.

2030. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0509 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0508 Road, 80_16

2031. The WYPM0508 Road is designated as county road number 80_16 and SGID road identification number RD280806 and is more or less 1.06 miles long.

2032. Exhibit 157 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0508 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2033. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0508 Road solely as it crosses United States public land as included and specifically described in Exhibit 157. The WYPM0508 Road includes the segment of road specifically set forth in Exhibit 157 and as exists on the ground.

Acceptance of the WYPM0508 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2034. The WYPM0508 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2035. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0508 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2036. The WYPM0508 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0508 Road pursuant to the County's governmental right and authority.

2037. Witnesses with personal knowledge of the history of the WYPM0508 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2038. Currently known reputation in the community is that the WYPM0508 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2039. Public motor vehicle use of the WYPM0508 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2040. The WYPM0508 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2041. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0508 Road.

2042. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0508 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Miners Mountain Road, 80_18

2043. The Miners Mountain Road is designated as county road number 80_18 and SGID road identification number RD280808 and is more or less 0.52 miles long.

2044. Exhibit 158 (attached hereto and incorporated herein) contains certain information pertaining to the Miners Mountain Road, 80_18 including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2045. In this action, the State and County seek to quiet title to the public highway right-of-way for the Miners Mountain Road, 80_18 solely as it crosses United States public land as included and specifically described in Exhibit 158. The Miners Mountain Road, 80_18 includes the segment of road specifically set forth in Exhibit 158 and as exists on the ground.

Acceptance of the Miners Mountain Road, 80_18 R.S. 2477 Right-of-way Prior to October 21, 1976

2046. The Miners Mountain Road, 80_18 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2047. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Miners Mountain Road, 80_18 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2048. The Miners Mountain Road, 80_18 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Miners Mountain Road, 80_18 pursuant to the County's governmental right and authority.

2049. Witnesses with personal knowledge of the history of the Miners Mountain Road, 80_18 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2050. Currently known reputation in the community is that the Miners Mountain Road, 80_18 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2051. Public motor vehicle use of the Miners Mountain Road, 80_18 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2052. The Miners Mountain Road, 80_18 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2053. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Miners Mountain Road, 80_18.

2054. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Miners Mountain Road, 80_18 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Miners Mountain Road, 80_19

2055. The Miners Mountain Road is designated as county road number 80_19 and SGID road identification number RD280809 and is more or less 0.30 miles long.

2056. Exhibit 159 (attached hereto and incorporated herein) contains certain information pertaining to the Miners Mountain Road, 80_19 including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2057. In this action, the State and County seek to quiet title to the public highway right-of-way for the Miners Mountain Road, 80_19 solely as it crosses United States public land as included and specifically described in Exhibit 159. The Miners Mountain Road, 80_19 includes the segment of road specifically set forth in Exhibit 159 and as exists on the ground.

Acceptance of the Miners Mountain Road, 80_19 R.S. 2477 Right-of-way Prior to October 21, 1976

2058. The Miners Mountain Road, 80_19 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2059. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Miners Mountain Road, 80_19 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2060. The Miners Mountain Road, 80_19 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Miners Mountain Road, 80_19 pursuant to the County's governmental right and authority.

2061. Witnesses with personal knowledge of the history of the Miners Mountain Road, 80_19 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2062. Currently known reputation in the community is that the Miners Mountain Road, 80_19 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2063. Public motor vehicle use of the Miners Mountain Road, 80_19 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2064. The Miners Mountain Road, 80_19 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2065. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Miners Mountain Road, 80_19.

2066. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Miners Mountain Road, 80_19 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0471 Road, 80_1a

2067. The WYPM0471 Road is designated as county road number 80_1a and SGID road identification number RD280810 and is more or less 1.04 miles long.

2068. Exhibit 160 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0471 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2069. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0471 Road solely as it crosses United States public land as included and specifically described in Exhibit 160. The WYPM0471 Road includes the segment of road specifically set forth in Exhibit 160 and as exists on the ground.

Acceptance of the WYPM0471 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2070. The WYPM0471 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2071. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0471 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2072. The WYPM0471 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0471 Road pursuant to the County's governmental right and authority.

2073. Witnesses with personal knowledge of the history of the WYPM0471 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2074. Currently known reputation in the community is that the WYPM0471 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2075. Public motor vehicle use of the WYPM0471 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2076. The WYPM0471 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2077. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0471 Road.

2078. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0471 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Miners Mountain Road, 80_20

2079. The Miners Mountain Road is designated as county road number 80_20 and SGID road identification number RD280813 and is more or less 0.96 miles long.

2080. Exhibit 161 (attached hereto and incorporated herein) contains certain information pertaining to the Miners Mountain Road, 80_20 including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2081. In this action, the State and County seek to quiet title to the public highway right-of-way for the Miners Mountain Road, 80_20 solely as it crosses United States public land as included and specifically described in Exhibit 161. The Miners Mountain Road, 80_20 includes the segment of road specifically set forth in Exhibit 161 and as exists on the ground.

Acceptance of the Miners Mountain Road, 80_20 R.S. 2477 Right-of-way Prior to October 21, 1976

2082. The Miners Mountain Road, 80_20 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2083. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Miners Mountain Road, 80_20 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2084. The Miners Mountain Road, 80_20 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Miners Mountain Road, 80_20 pursuant to the County's governmental right and authority.

2085. Witnesses with personal knowledge of the history of the Miners Mountain Road, 80_20 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2086. Currently known reputation in the community is that the Miners Mountain Road, 80_20 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2087. Public motor vehicle use of the Miners Mountain Road, 80_20 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2088. The Miners Mountain Road, 80_20 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2089. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Miners Mountain Road, 80_20.

2090. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Miners Mountain Road, 80_20 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Miners Mountain Trail Road, 80_21

2091. The Miners Mountain Trail Road is designated as county road number 80_21 and SGID road identification number RD280815 and is more or less 0.96 miles long.

2092. Exhibit 162 (attached hereto and incorporated herein) contains certain information pertaining to the Miners Mountain Trail Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2093. In this action, the State and County seek to quiet title to the public highway right-of-way for the Miners Mountain Trail Road solely as it crosses United States public land as included and specifically described in Exhibit 162. The Miners Mountain Trail Road includes the segment of road specifically set forth in Exhibit 162 and as exists on the ground.

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

2094. The Miners Mountain Trail Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2095. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Miners Mountain Trail Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2096. The Miners Mountain Trail Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Miners Mountain Trail Road pursuant to the County's governmental right and authority.

2097. Witnesses with personal knowledge of the history of the Miners Mountain Trail Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2098. Currently known reputation in the community is that the Miners Mountain Trail Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2099. Public motor vehicle use of the Miners Mountain Trail Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2100. The Miners Mountain Trail Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2101. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Miners Mountain Trail Road.

2102. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Miners Mountain Trail Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0525 Road, 80_22

2103. The WYPM0525 Road is designated as county road number 80_22 and SGID road identification number RD280816 and is more or less 1.89 miles long.

2104. Exhibit 163 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0525 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2105. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0525 Road solely as it crosses United States public land as included and specifically described in Exhibit 163. The WYPM0525 Road includes the segment of road specifically set forth in Exhibit 163 and as exists on the ground.

Acceptance of the WYPM0525 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2106. The WYPM0525 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2107. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0525 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2108. The WYPM0525 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0525 Road pursuant to the County's governmental right and authority.

2109. Witnesses with personal knowledge of the history of the WYPM0525 Road confirm public use of this road as a public 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 WYPM0525 Road has been open for all to come 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 WYPM0525 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 WYPM0525 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 WYPM0525 Road.

2114. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0525 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0479 Road, 80_3

2115. The WYPM0479 Road is designated as county road number 80_3 and SGID road identification number RD280817 and is more or less 0.93 miles long.

2116. Exhibit 164 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0479 Road including: a map depicting the road; 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 WYPM0479 Road solely as it crosses United States public land as included and specifically described in Exhibit 164. The WYPM0479 Road includes the segment of road specifically set forth in Exhibit 164 and as exists on the ground.

Acceptance of the WYPM0479 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2118. The WYPM0479 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0479 Road as a public highway located on the land at issue in this 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 WYPM0479 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0479 Road pursuant to the County's governmental right and authority.

2121. Witnesses with personal knowledge of the history of the WYPM0479 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2122. Currently known reputation in the community is that the WYPM0479 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2123. Public motor vehicle use of the WYPM0479 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2124. The WYPM0479 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2125. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0479 Road.

2126. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0479 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0478 Road, 80_4

2127. The WYPM0478 Road is designated as county road number 80_4 and SGID road identification number RD280818 and is more or less 3.34 miles long.

2128. Exhibit 165 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0478 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2129. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0478 Road solely as it crosses United States public land as included and specifically described in Exhibit 165. The WYPM0478 Road includes the segment of road specifically set forth in Exhibit 165 and as exists on the ground.

Acceptance of the WYPM0478 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2130. The WYPM0478 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2131. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0478 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2132. The WYPM0478 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0478 Road pursuant to the County's governmental right and authority.

2133. Witnesses with personal knowledge of the history of the WYPM0478 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2134. Currently known reputation in the community is that the WYPM0478 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2135. Public motor vehicle use of the WYPM0478 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2136. The WYPM0478 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2137. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0478 Road.

2138. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0478 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0479a Road, 80_6

2139. The WYPM0479a Road is designated as county road number 80_6 and SGID road identification number RD280819 and is more or less 0.42 miles long.

2140. Exhibit 166 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0479a Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2141. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0479a Road solely as it crosses United States public land as included and specifically described in Exhibit 166. The WYPM0479a Road includes the segment of road specifically set forth in Exhibit 166 and as exists on the ground.

Acceptance of the WYPM0479a Road R.S. 2477 Right-of-way Prior to October 21, 1976

2142. The WYPM0479a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2143. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0479a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2144. The WYPM0479a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0479a Road pursuant to the County's governmental right and authority.

2145. Witnesses with personal knowledge of the history of the WYPM0479a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2146. Currently known reputation in the community is that the WYPM0479a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2147. Public motor vehicle use of the WYPM0479a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2148. The WYPM0479a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2149. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0479a Road.

2150. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0479a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0477 Road, 80_7

2151. The WYPM0477 Road is designated as county road number 80_7 and SGID road identification number RD280820 and is more or less 1.57 miles long.

2152. Exhibit 167 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0477 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2153. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0477 Road solely as it crosses United States public land as included and specifically described in Exhibit 167. The WYPM0477 Road includes the segment of road specifically set forth in Exhibit 167 and as exists on the ground.

Acceptance of the WYPM0477 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2154. The WYPM0477 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2155. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0477 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2156. The WYPM0477 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0477 Road pursuant to the County's governmental right and authority.

2157. Witnesses with personal knowledge of the history of the WYPM0477 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2158. Currently known reputation in the community is that the WYPM0477 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2159. Public motor vehicle use of the WYPM0477 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2160. The WYPM0477 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2161. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0477 Road.

2162. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0477 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0475 Road, 80_9

2163. The WYPM0475 Road is designated as county road number 80_9 and SGID road identification number RD280821 and is more or less 0.86 miles long.

2164. Exhibit 168 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0475 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2165. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0475 Road solely as it crosses United States public land as included and specifically described in Exhibit 168. The WYPM0475 Road includes the segment of road specifically set forth in Exhibit 168 and as exists on the ground.

Acceptance of the WYPM0475 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2166. The WYPM0475 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2167. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0475 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2168. The WYPM0475 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0475 Road pursuant to the County's governmental right and authority.

2169. Witnesses with personal knowledge of the history of the WYPM0475 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2170. Currently known reputation in the community is that the WYPM0475 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2171. Public motor vehicle use of the WYPM0475 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2172. The WYPM0475 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2173. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0475 Road.

2174. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0475 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0529 Road, 80A

2175. The WYPM0529 Road is designated as county road number 80A and SGID road identification number RD280822 and is more or less 4.60 miles long.

2176. Exhibit 169 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0529 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2177. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0529 Road solely as it crosses United States public land as included and specifically described in Exhibit 169. The WYPM0529 Road includes the segment of road specifically set forth in Exhibit 169 and as exists on the ground.

Acceptance of the WYPM0529 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2178. The WYPM0529 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2179. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0529 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2180. The appearance of the WYPM0529 Road on the Grover (1952) USGS 7.5 minute quadrangle map and the Grover (1952) USGS 15 minute quadrangle map evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2181. The WYPM0529 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0529 Road pursuant to the County's governmental right and authority.

2182. Witnesses with personal knowledge of the history of the WYPM0529 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2183. Currently known reputation in the community is that the WYPM0529 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2184. Public motor vehicle use of the WYPM0529 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

2185. The WYPM0529 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2186. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0529 Road.

2187. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0529 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0530 Road, 80A_1

2188. The WYPM0530 Road is designated as county road number 80A_1 and SGID road identification number RD280823 and is more or less 4.58 miles long.

2189. Exhibit 170 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0530 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2190. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0530 Road solely as it crosses United States public land as included and

specifically described in Exhibit 170. The WYPM0530 Road includes the segment of road specifically set forth in Exhibit 170 and as exists on the ground.

Acceptance of the WYPM0530 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2191. The WYPM0530 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2192. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0530 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2193. The WYPM0530 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0530 Road pursuant to the County's governmental right and authority.

2194. Witnesses with personal knowledge of the history of the WYPM0530 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2195. Currently known reputation in the community is that the WYPM0530 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2196. Public motor vehicle use of the WYPM0530 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2197. The WYPM0530 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2198. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0530 Road.

2199. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0530 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0511 Road, 80A_1b

2200. The WYPM0511 Road is designated as county road number 80A_1b and SGID road identification number RD280824 and is more or less 0.58 miles long.

2201. Exhibit 171 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0511 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2202. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0511 Road solely as it crosses United States public land as included and specifically described in Exhibit 171. The WYPM0511 Road includes the segment of road specifically set forth in Exhibit 171 and as exists on the ground.

Acceptance of the WYPM0511 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2203. The WYPM0511 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2204. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0511 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2205. The WYPM0511 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0511 Road pursuant to the County's governmental right and authority.

2206. Witnesses with personal knowledge of the history of the WYPM0511 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2207. Currently known reputation in the community is that the WYPM0511 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2208. Public motor vehicle use of the WYPM0511 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2209. The WYPM0511 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2210. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0511 Road.

2211. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0511 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0481 Road, 80A_3

2212. The WYPM0481 Road is designated as county road number 80A_3 and SGID road identification number RD280826 and is more or less 1.11 miles long.

2213. Exhibit 172 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0481 Road including: a map depicting the road; township, range and

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

2214. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0481 Road solely as it crosses United States public land as included and specifically described in Exhibit 172. The WYPM0481 Road includes the segment of road specifically set forth in Exhibit 172 and as exists on the ground.

Acceptance of the WYPM0481 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2215. The WYPM0481 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2216. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0481 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2217. The WYPM0481 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0481 Road pursuant to the County's governmental right and authority.

2218. Witnesses with personal knowledge of the history of the WYPM0481 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2219. Currently known reputation in the community is that the WYPM0481 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2220. Public motor vehicle use of the WYPM0481 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2221. The WYPM0481 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2222. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0481 Road.

2223. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0481 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0530a Road, 80A_3a

2224. The WYPM0530a Road is designated as county road number 80A_3a and SGID road identification number RD280827 and is more or less 0.50 miles long.

2225. Exhibit 173 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0530a Road including, a map depicting the road; township, range, and

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

2226. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0530a Road solely as it crosses United States public land as included and specifically described in Exhibit 173. The WYPM0530a Road includes the segment of road specifically set forth in Exhibit 173 and as exists on the ground.

Acceptance of the WYPM0530a Road R.S. 2477 Right-of-way Prior to October 21, 1976

2227. The WYPM0530a Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2228. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0530a Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2229. The WYPM0530a Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0530a Road pursuant to the County's governmental right and authority.

2230. Witnesses with personal knowledge of the history of the WYPM0530a Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2231. Currently known reputation in the community is that the WYPM0530a Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2232. Public motor vehicle use of the WYPM0530a Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2233. The WYPM0530a Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2234. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0530a Road.

2235. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0530a Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0515 Road, 80A_5

2236. The WYPM0515 Road is designated as county road number 80A_5 and SGID road identification number RD280829 and is more or less 0.40 miles long.

2237. Exhibit 174 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0515 Road including: a map depicting the road; township, range and

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

2238. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0515 Road solely as it crosses United States public land as included and specifically described in Exhibit 174. The WYPM0515 Road includes the segment of road specifically set forth in Exhibit 174 and as exists on the ground.

Acceptance of the WYPM0515 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2239. The WYPM0515 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2240. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0515 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2241. The WYPM0515 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0515 Road pursuant to the County's governmental right and authority.

2242. Witnesses with personal knowledge of the history of the WYPM0515 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2243. Currently known reputation in the community is that the WYPM0515 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2244. Public motor vehicle use of the WYPM0515 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2245. The WYPM0515 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2246. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0515 Road.

2247. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0515 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0483 Road, 80A_6

2248. The WYPM0483 Road is designated as county road number 80A_6 and SGID road identification number RD280830 and is more or less 0.53 miles long.

2249. Exhibit 175 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0483 Road including: a map depicting the road; township, range and

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

2250. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0483 Road solely as it crosses United States public land as included and specifically described in Exhibit 175. The WYPM0483 Road includes the segment of road specifically set forth in Exhibit 175 and as exists on the ground.

Acceptance of the WYPM0483 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2251. The WYPM0483 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2252. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0483 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2253. The WYPM0483 Road appears on the Grover (1952) USGS 7.5 minute quadrangle map and Grover (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2254. The WYPM0483 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the WYPM0483 Road pursuant to the County's governmental right and authority.

2255. Witnesses with personal knowledge of the history of the WYPM0483 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2256. Currently known reputation in the community is that the WYPM0483 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2257. Public motor vehicle use of the WYPM0483 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2258. The WYPM0483 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2259. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0483 Road.

2260. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0483 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

WYPM0517 Road, 80A_7

2261. The WYPM0517 Road is designated as county road number 80A_7 and SGID road identification number RD280831 and is more or less 0.61 miles long.

2262. Exhibit 176 (attached hereto and incorporated herein) contains certain information pertaining to the WYPM0517 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2263. In this action, the State and County seek to quiet title to the public highway right-of-way for the WYPM0517 Road solely as it crosses United States public land as included and specifically described in Exhibit 176. The WYPM0517 Road includes the segment of road specifically set forth in Exhibit 176 and as exists on the ground.

Acceptance of the WYPM0517 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2264. The WYPM0517 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2265. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the WYPM0517 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2266. The WYPM0517 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the WYPM0517 Road pursuant to the County's governmental right and authority.

2267. Witnesses with personal knowledge of the history of the WYPM0517 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2268. Currently known reputation in the community is that the WYPM0517 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2269. Public motor vehicle use of the WYPM0517 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2270. The WYPM0517 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2271. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the WYPM0517 Road.

2272. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the WYPM0517 Road on lands owned 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
CAINEVILLE AREA

2273. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2274. The Caineville Area is located in north central Wayne County. *See* Exhibit 8.

2275. The Caineville Area includes the following roads — listed by Common Road Name (if applicable) and County Unique Number: (1) Skyline View Road, 155D; (2) Hartnet-Cathedral Road, 82; (3) Jail House Road, 82A; (4) Temple of the Moon Road, 84; (5) Caineville Road, 88; (6) Cemetery Road, 88A; (7) Red Desert Road, 89; (8) Caineville Water Road, 89_1; (9) Caineville Reef Road, 90; (10) Factory Butte Road, 91; (11) Coal Mine Pit Road, 91_1; (12) Factory Bench Road, 91_3; (13) Caineville Gravel Pit Road, 91_4; (14) Caineville TV Tower Road, 91A; (15) 82_10 Road, 82_10; (16) Hartnet Draw Road, 82_4; (17) 82A_1 Road, 82A_1; (18) Hartnet Valley Road, 146D; and (19) Hartnet-Cathedral Road, 146D_4.

2276. Each right-of-way claimed in the Caineville 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.

2277. All rights-of-way claimed in the Caineville 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.

2278. All rights-of-way claimed in the Caineville 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).

2279. Prior to October 21, 1976, the State of Utah, Wayne 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 View Road, 155D

2280. The Skyline View Road is designated as county road number 155D and SGID road identification number RD280294 and is more or less 7.22 miles long.

2281. Exhibit 177 (attached hereto and incorporated herein) contains certain information pertaining to the Skyline View Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2282. In this action, the State and County seek to quiet title to the public highway right-of-way for the Skyline View Road solely as it crosses United States public land as included and

specifically described in Exhibit 177. The Skyline View Road includes the segment of road specifically set forth in Exhibit 177 and as exists on the ground.

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

2283. The Skyline View Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2284. The Skyline View Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Skyline View Road pursuant to the County's governmental right and authority.

2285. Witnesses with personal knowledge of the history of the Skyline View Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2286. Currently known reputation in the community is that the Skyline View Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2287. Public motor vehicle use of the Skyline View Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2288. The Skyline View Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2289. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 View Road.

2290. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Skyline View Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hartnet-Cathedral Road, 82

2291. The Hartnet-Cathedral Road is designated as county road number 82 and SGID road identification number RD280357 and is more or less 57.85 miles long.

2292. Exhibit 178 (attached hereto and incorporated herein) contains certain information pertaining to the Hartnet-Cathedral Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2293. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hartnet-Cathedral Road solely as it crosses United States public land as included and specifically described in Exhibit 178. The Hartnet-Cathedral Road includes the segment of road specifically set forth in Exhibit 178 and as exists on the ground.

2294. Approximately 1.7 miles of the Hartnet-Cathedral Road crosses into Emery County, as depicted on the map in Exhibit 196. However, Emery County has assigned all right to and interest in the Hartnet-Cathedral Road, including maintenance, to Wayne County.

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

2295. The Hartnet-Cathedral Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2296. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hartnet-Cathedral Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2297. The Hartnet-Cathedral Road appears on the Caineville (1952), Cane Springs (1952, and Solomons Temple (1968) USGS 7.5 minute quadrangle maps, and Fruita (1954) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2298. The County confirmed its acceptance of the Hartnet-Cathedral Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hartnet-Cathedral Road using public funds pursuant to the County's governmental right and authority.

2299. Witnesses with personal knowledge of the history of the Hartnet-Cathedral Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

2300. Currently known reputation in the community is that the Hartnet-Cathedral Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2301. Public motor vehicle use of the Hartnet-Cathedral Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2302. The Hartnet-Cathedral Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2303. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hartnet-Cathedral Road.

2304. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hartnet-Cathedral Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jail House Road, 82A

2305. The Jail House Road is designated as county road number 82A and SGID road identification number RD280358 and is more or less 1.11 miles long.

2306. Exhibit 179 (attached hereto and incorporated herein) contains certain information pertaining to the Jail House Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2307. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jail House Road solely as it crosses United States public land as included and specifically described in Exhibit 179. The Jail House Road includes the segment of road specifically set forth in Exhibit 179 and as exists on the ground.

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

2308. The Jail House Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2309. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Jail House Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2310. The County confirmed its acceptance of the Jail House Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Jail House Road using public funds pursuant to the County's governmental right and authority.

2311. Witnesses with personal knowledge of the history of the Jail House Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2312. Currently known reputation in the community is that the Jail House Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2313. Public motor vehicle use of the Jail House Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2314. The Jail House Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2315. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Jail House Road.

2316. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jail House Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Temple of the Moon Road, 84

2317. The Temple of the Moon Road is designated as county road number 84 and SGID road identification number RD280359 and is more or less 1.80 miles long.

2318. Exhibit 180 (attached hereto and incorporated herein) contains certain information pertaining to the Temple of the Moon Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2319. In this action, the State and County seek to quiet title to the public highway right-of-way for the Temple of the Moon Road solely as it crosses United States public land as included and specifically described in Exhibit 180. The Temple of the Moon Road includes the segment of road specifically set forth in Exhibit 180 and as exists on the ground.

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

2320. The Temple of the Moon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2321. The Temple of the Moon Road appears on the Fruita NW (1952) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2322. The County confirmed its acceptance of the Temple of the Moon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Temple of the Moon Road using public funds pursuant to the County's governmental right and authority.

2323. Witnesses with personal knowledge of the history of the Temple of the Moon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2324. Currently known reputation in the community is that the Temple of the Moon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2325. Public motor vehicle use of the Temple of the Moon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2326. The Temple of the Moon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2327. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Temple of the Moon Road.

2328. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Temple of the Moon Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Caineville Road, 88

2329. The Caineville Road is designated as county road number 88 and SGID road identification number RD280363 and is more or less 3.51 miles long.

2330. Exhibit 181 (attached hereto and incorporated herein) contains certain information pertaining to the Caineville Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2331. In this action, the State and County seek to quiet title to the public highway right-of-way for the Caineville Road solely as it crosses United States public land as included and specifically described in Exhibit 181. The Caineville Road includes the segment of road specifically set forth in Exhibit 181 and as exists on the ground.

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

2332. The Caineville Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2333. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Caineville Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2334. The Caineville Road appears on the Caineville (1952) USGS 7.5 minute quadrangle map and Fruita (1954) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2335. The County confirmed its acceptance of the Caineville Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Caineville Road using public funds pursuant to the County's governmental right and authority.

2336. Witnesses with personal knowledge of the history of the Caineville Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2337. Currently known reputation in the community is that the Caineville Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2338. Public motor vehicle use of the Caineville Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2339. The Caineville Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2340. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Caineville Road.

2341. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Caineville Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cemetery Road, 88A

2342. The Cemetery Road is designated as county road number 88A and SGID road identification number RD280072 and is more or less 0.39 miles long.

2343. Exhibit 182 (attached hereto and incorporated herein) contains certain information pertaining to the Cemetery Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2344. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cemetery Road solely as it crosses United States public land as included and specifically described in Exhibit 182. The Cemetery Road includes the segment of road specifically set forth in Exhibit 182 and as exists on the ground.

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

2345. The Cemetery Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2346. The Cemetery Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cemetery Road using public funds pursuant to the County's governmental right and authority.

2347. Witnesses with personal knowledge of the history of the Cemetery Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2348. Currently known reputation in the community is that the Cemetery Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2349. Public motor vehicle use of the Cemetery Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2350. The Cemetery Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2351. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cemetery Road.

2352. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cemetery Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Desert Road, 89

2353. The Red Desert Road is designated as county road number 89 and SGID road identification number RD280364 and is more or less 4.51 miles long.

2354. Exhibit 183 (attached hereto and incorporated herein) contains certain information pertaining to the Red Desert Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2355. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Desert Road solely as it crosses United States public land as included and specifically described in Exhibit 183. The Red Desert Road includes the segment of road specifically set forth in Exhibit 183 and as exists on the ground.

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

2356. The Red Desert Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2357. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Red Desert Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2358. The Red Desert Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Desert Road using public funds pursuant to the County's governmental right and authority.

2359. Witnesses with personal knowledge of the history of the Red Desert Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2360. Currently known reputation in the community is that the Red Desert Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2361. Public motor vehicle use of the Red Desert Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2362. The Red Desert Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2363. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Desert Road.

2364. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Desert Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Caineville Water Road, 89_1

2365. The Caineville Water Road is designated as county road number 89_1 and SGID road identification number RD280365 and is more or less 1.58 miles long.

2366. Exhibit 184 (attached hereto and incorporated herein) contains certain information pertaining to the Caineville Water Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2367. In this action, the State and County seek to quiet title to the public highway right-of-way for the Caineville Water Road solely as it crosses United States public land as included and specifically described in Exhibit 184. The Caineville Water Road includes the segment of road specifically set forth in Exhibit 184 and as exists on the ground.

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

2368. The Caineville Water Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2369. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Caineville Water Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2370. The Caineville Water Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Caineville Water Road using public funds pursuant to the County's governmental right and authority.

2371. Witnesses with personal knowledge of the history of the Caineville Water Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2372. Currently known reputation in the community is that the Caineville Water Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2373. Public motor vehicle use of the Caineville Water Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2374. The Caineville Water Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2375. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Caineville Water Road.

2376. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Caineville Water Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Caineville Reef Road, 90

2377. The Caineville Reef Road is designated as county road number 90 and SGID road identification number RD280367 and is more or less 11.42 miles long.

2378. Exhibit 185 (attached hereto and incorporated herein) contains certain information pertaining to the Caineville Reef Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2379. In this action, the State and County seek to quiet title to the public highway right-of-way for the Caineville Reef Road solely as it crosses United States public land as included and specifically described in Exhibit 185. The Caineville Reef Road includes the segment of road specifically set forth in Exhibit 185 and as exists on the ground.

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

2380. The Caineville Reef Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2381. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Caineville Reef Road as a public highway located on the

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

2382. The Caineville Reef Road appears on the Caineville (1952) and Caine Springs (1952) USGS 7.5 minute quadrangle maps, and Factory Butte (1954) and Fruita (1954) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2383. The Caineville Reef Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Caineville Reef Road using public funds pursuant to the County's governmental right and authority.

2384. Witnesses with personal knowledge of the history of the Caineville Reef Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2385. Currently known reputation in the community is that the Caineville Reef Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2386. Public motor vehicle use of the Caineville Reef Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2387. The Caineville Reef Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2388. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Caineville Reef Road.

2389. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Caineville Reef Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Factory Butte Road, 91

2390. The Factory Butte Road is designated as county road number 91 and SGID road identification number RD280368 and is more or less 18.93 miles long.

2391. Exhibit 186 (attached hereto and incorporated herein) contains certain information pertaining to the Factory Butte Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2392. In this action, the State and County seek to quiet title to the public highway right-of-way for the Factory Butte Road solely as it crosses United States public land as included and specifically described in Exhibit 186. The Factory Butte Road includes the segment of road specifically set forth in Exhibit 186 and as exists on the ground.

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

2393. The Factory Butte Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2394. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Factory Butte Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2395. The Factory Butte Road appears on the Factory Butte (1954) and Town Point (1954) USGS 7.5 minute quadrangle maps, and Factory Butte (1954) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2396. The County confirmed its acceptance of the Factory Butte Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Factory Butte Road using public funds pursuant to the County's governmental right and authority.

2397. Witnesses with personal knowledge of the history of the Factory Butte Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2398. Currently known reputation in the community is that the Factory Butte Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2399. Public motor vehicle use of the Factory Butte Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

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

2401. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Factory Butte Road.

2402. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Factory Butte Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Coal Mine Pit Road, 91_1

2403. The Coal Mine Pit Road is designated as county road number 91_1 and SGID road identification number RD280369 and is more or less 1.74 miles long.

2404. Exhibit 187 (attached hereto and incorporated herein) contains certain information pertaining to the Coal Mine Pit Road including, a map depicting the road; township, range, and

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

2405. In this action, the State and County seek to quiet title to the public highway right-of-way for the Coal Mine Pit Road solely as it crosses United States public land as included and specifically described in Exhibit 187. The Coal Mine Pit Road includes the segment of road specifically set forth in Exhibit 187 and as exists on the ground.

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

2406. The Coal Mine Pit Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2407. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Coal Mine Pit Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2408. The Coal Mine Pit Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Coal Mine Pit Road using public funds pursuant to the County's governmental right and authority.

2409. Witnesses with personal knowledge of the history of the Coal Mine Pit Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2410. Currently known reputation in the community is that the Coal Mine Pit Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2411. Public motor vehicle use of the Coal Mine Pit Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2412. The Coal Mine Pit Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2413. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Coal Mine Pit Road.

2414. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Coal Mine Pit Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Factory Bench Road, 91_3

2415. The Factory Bench Road is designated as county road number 91_3 and SGID road identification number RD280370 and is more or less 2.00 miles long.

2416. Exhibit 188 (attached hereto and incorporated herein) contains certain information pertaining to the Factory Bench Road including, a map depicting the road; township, range, and

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

2417. In this action, the State and County seek to quiet title to the public highway right-of-way for the Factory Bench Road solely as it crosses United States public land as included and specifically described in Exhibit 188. The Factory Bench Road includes the segment of road specifically set forth in Exhibit 188 and as exists on the ground.

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

2418. The Factory Bench Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2419. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Factory Bench Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2420. The Factory Bench Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Factory Bench Road using public funds pursuant to the County's governmental right and authority.

2421. Witnesses with personal knowledge of the history of the Factory Bench Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2422. Currently known reputation in the community is that the Factory Bench Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2423. Public motor vehicle use of the Factory Bench Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2424. The Factory Bench 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 Factory Bench Road.

2426. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Factory Bench Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Caineville Gravel Pit Road, 91_4

2427. The Caineville Gravel Pit Road is designated as county road number 91_4 and SGID road identification number RD280371 and is more or less 0.39 miles long.

2428. Exhibit 189 (attached hereto and incorporated herein) contains certain information pertaining to the Caineville Gravel Pit Road including, a map depicting the road; 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 Caineville Gravel Pit Road solely as it crosses United States public land as included and specifically described in Exhibit 189. The Caineville Gravel Pit Road includes the segment of road specifically set forth in Exhibit 189 and as exists on the ground.

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

2430. The Caineville Gravel Pit 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Caineville Gravel Pit Road as a public highway located on the land at issue in this 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 Caineville Gravel Pit Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Caineville Gravel Pit Road using public funds pursuant to the County's governmental right and authority.

2433. Witnesses with personal knowledge of the history of the Caineville Gravel Pit Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2434. Currently known reputation in the community is that the Caineville Gravel Pit Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2435. Public motor vehicle use of the Caineville Gravel Pit Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2436. The Caineville Gravel Pit Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2437. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Caineville Gravel Pit Road.

2438. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Caineville Gravel Pit Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Caineville TV Tower Road, 91A

2439. The Caineville TV Tower Road is designated as county road number 91A and SGID road identification number RD280373 and is more or less 0.74 miles long.

2440. Exhibit 190 (attached hereto and incorporated herein) contains certain information pertaining to the Caineville TV Tower Road including, a map depicting the road; township,

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

2441. In this action, the State and County seek to quiet title to the public highway right-of-way for the Caineville TV Tower Road solely as it crosses United States public land as included and specifically described in Exhibit 190. The Caineville TV Tower Road includes the segment of road specifically set forth in Exhibit 190 and as exists on the ground.

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

2442. The Caineville TV Tower Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2443. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Caineville TV Tower Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2444. The Caineville TV Tower Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Caineville TV Tower Road using public funds pursuant to the County's governmental right and authority.

2445. Witnesses with personal knowledge of the history of the Caineville TV Tower Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2446. Currently known reputation in the community is that the Caineville TV Tower Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2447. Public motor vehicle use of the Caineville TV Tower Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2448. The Caineville TV Tower Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2449. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Caineville TV Tower Road.

2450. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Caineville TV Tower Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

82_10 Road

2451. The 82_10 Road is designated as county road number 82_10 and SGID road identification number RD280837 and is more or less 2.97 miles long.

2452. Exhibit 191 (attached hereto and incorporated herein) contains certain information pertaining to the 82_10 Road including, a map depicting the road; township, range, and section

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

2453. In this action, the State and County seek to quiet title to the public highway right-of-way for the 82_10 Road solely as it crosses United States public land as included and specifically described in Exhibit 191. The 82_10 Road includes the segment of road specifically set forth in Exhibit 191 and as exists on the ground.

Acceptance of the 82_10 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2454. The 82_10 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2455. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 82_10 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2456. The County confirmed its acceptance of the 82_10 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 82_10 Road pursuant to the County's governmental right and authority.

2457. Witnesses with personal knowledge of the history of the 82_10 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2458. Currently known reputation in the community is that the 82_10 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2459. Public motor vehicle use of the 82_10 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2460. The 82_10 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2461. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 82_10 Road.

2462. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 82_10 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hartnet Draw Road, 82_4

2463. The Hartnet Draw Road is designated as county road number 82_4 and SGID road identification number RD280840 and is more or less 1.94 miles long.

2464. Exhibit 192 (attached hereto and incorporated herein) contains certain information pertaining to the Hartnet Draw Road including, a map depicting the road; township, range, and

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

2465. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hartnet Draw Road solely as it crosses United States public land as included and specifically described in Exhibit 192. The Hartnet Draw Road includes the segment of road specifically set forth in Exhibit 192 and as exists on the ground.

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

2466. The Hartnet Draw Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2467. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hartnet Draw Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2468. The Hartnet Draw Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hartnet Draw Road pursuant to the County's governmental right and authority.

2469. Witnesses with personal knowledge of the history of the Hartnet Draw Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2470. Currently known reputation in the community is that the Hartnet Draw Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2471. Public motor vehicle use of the Hartnet Draw Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2472. The Hartnet Draw Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2473. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hartnet Draw Road.

2474. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hartnet Draw Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

82A_1 Road

2475. The 82A_1 Road is designated as county road number 82A_1 and SGID road identification number RD280842 and is more or less 2.31 miles long.

2476. Exhibit 193 (attached hereto and incorporated herein) contains certain information pertaining to the 82A_1 Road including, a map depicting the road; township, range, and section

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

2477. In this action, the State and County seek to quiet title to the public highway right-of-way for the 82A_1 Road solely as it crosses United States public land as included and specifically described in Exhibit 193. The 82A_1 Road includes the segment of road specifically set forth in Exhibit 193 and as exists on the ground.

Acceptance of the 82A_1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2478. The 82A_1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2479. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 82A_1 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2480. The 82A_1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 82A_1 Road pursuant to the County's governmental right and authority.

2481. Witnesses with personal knowledge of the history of the 82A_1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2482. Currently known reputation in the community is that the 82A_1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2483. Public motor vehicle use of the 82A_1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2484. The 82A_1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2485. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 82A_1 Road.

2486. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 82A_1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hartnet Valley Road, 146D

2487. The Hartnet Valley Road is designated as county road number 146D and SGID road identification number RD280738 and is more or less 0.87 miles long.

2488. Exhibit 194 (attached hereto and incorporated herein) contains certain information pertaining to the Hartnet Valley Road, 146D including, a map depicting the road; township,

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

2489. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hartnet Valley Road, 146D solely as it crosses United States public land as included and specifically described in Exhibit 194. The Hartnet Valley Road, 146D includes the segment of road specifically set forth in Exhibit 194 and as exists on the ground.

Acceptance of the Hartnet Valley Road, 146D R.S. 2477 Right-of-way Prior to October 21, 1976

2490. The Hartnet Valley Road, 146D has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2491. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hartnet Valley Road, 146D as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2492. The Hartnet Valley Road, 146D was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hartnet Valley Road, 146D pursuant to the County's governmental right and authority.

2493. Witnesses with personal knowledge of the history of the Hartnet Valley Road, 146D confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2494. Currently known reputation in the community is that the Hartnet Valley Road, 146D has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2495. Public motor vehicle use of the Hartnet Valley Road, 146D as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2496. The Hartnet Valley Road, 146D traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2497. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hartnet Valley Road, 146D.

2498. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hartnet Valley Road, 146D on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hartnet-Cathedral Road, 146D_4

2499. The Hartnet-Cathedral Road is designated as county road number 146D_4 and SGID road identification number RD280740 and is more or less 1.21 miles long.

2500. Exhibit 195 (attached hereto and incorporated herein) contains certain information pertaining to the Hartnet-Cathedral Road, 146D_4 including, a map depicting the road; township,

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

2501. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hartnet-Cathedral Road, 146D_4 solely as it crosses United States public land as included and specifically described in Exhibit 195. The Hartnet-Cathedral Road, 146D_4 includes the segment of road specifically set forth in Exhibit 195 and as exists on the ground.

Acceptance of the Hartnet-Cathedral Road, 146D_4 R.S. 2477 Right-of-way Prior to October 21, 1976

2502. The Hartnet-Cathedral Road, 146D_4 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2503. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hartnet-Cathedral Road, 146D_4 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2504. The Hartnet-Cathedral Road, 146D_4 appears on the Caine Springs (1952) USGS 7.5 minute quadrangle map and Fruita (1954) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2505. The County confirmed its acceptance of the Hartnet-Cathedral Road, 146D_4 by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Hartnet-Cathedral Road, 146D_4 pursuant to the County's governmental right and authority.

2506. Witnesses with personal knowledge of the history of the Hartnet-Cathedral Road, 146D_4 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2507. Currently known reputation in the community is that the Hartnet-Cathedral Road, 146D_4 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2508. Public motor vehicle use of the Hartnet-Cathedral Road, 146D_4 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2509. The Hartnet-Cathedral Road, 146D_4 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2510. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hartnet-Cathedral Road, 146D_4.

2511. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hartnet-Cathedral Road, 146D_4 on lands owned 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
NOTOM AREA

2512. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2513. The Notom Area is located in south central Wayne County. *See* Exhibit 9.

2514. The Notom Area includes the following roads — listed by Common Road Name (if applicable) and County Unique Number: (1) Notom Road, 85; (2) Old Notom Road, 86; (3) Burro Wash Road, 87; (4) Burro Wash Road, 86; (5) East Notom Road, 149D; (6) Notom Bench East Road, 150D; (7) 150D_1 Road, 150D_1; (8) Notom Bench Pond Road, 150D_4; (9) Pleasant Creek Diversion Road, 151D; (10) Pleasant Creek Diversion Road, 151D_1; (11) Pleasant Creek Diversion Road, 151D_2; (12) Notom Cemetery Road, 85_13; (13) Notom Bench North Road, 85_17; (14) 85_23 Road, 85_23; (15) Back Road to Notom, 85_3; and (16) Pleasant Creek Road, 85_9.

2515. Each right-of-way claimed in the Notom 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.

2516. All rights-of-way claimed in the Notom 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.

2517. All rights-of-way claimed in the Notom 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).

2518. Prior to October 21, 1976, the State of Utah, Wayne 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.

Notom Road, 85

2519. The Notom Road is designated as county road number 85 and SGID road identification number RD280360 and is more or less 9.98 miles long.

2520. Exhibit 196 (attached hereto and incorporated herein) contains certain information pertaining to the Notom Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2521. In this action, the State and County seek to quiet title to the public highway right-of-way for the Notom Road solely as it crosses United States public land as included and

specifically described in Exhibit 196. The Notom Road includes the segment of road specifically set forth in Exhibit 196 and as exists on the ground.

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

2522. The Notom Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2523. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Notom Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2524. The Notom Road appears on the Notom (1952) USGS 7.5 minute quadrangle map and Notom (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2525. The County confirmed its acceptance of the Notom Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Notom Road using public funds pursuant to the County's governmental right and authority.

2526. Witnesses with personal knowledge of the history of the Notom Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2527. Currently known reputation in the community is that the Notom Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2528. Public motor vehicle use of the Notom Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2529. The Notom Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2530. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Notom Road.

2531. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Notom Road on lands owned 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 Notom Road, 86

2532. The Old Notom Road is designated as county road number 86 and SGID road identification number RD280361 and is more or less 3.28 miles long.

2533. Exhibit 197 (attached hereto and incorporated herein) contains certain information pertaining to the Old Notom Road including, a map depicting the road; township, range, and

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

2534. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old Notom Road solely as it crosses United States public land as included and specifically described in Exhibit 197. The Old Notom Road includes the segment of road specifically set forth in Exhibit 197 and as exists on the ground.

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

2535. The Old Notom Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2536. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Old Notom Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2537. The Old Notom Road appears on the Caineville (1952) and Notom (1952) USGS 7.5 minute quadrangle maps, and Notom (1952) and Fruita (1954) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2538. The County confirmed its acceptance of the Old Notom Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Old Notom Road using public funds pursuant to the County's governmental right and authority.

2539. Witnesses with personal knowledge of the history of the Old Notom Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2540. Currently known reputation in the community is that the Old Notom Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2541. Public motor vehicle use of the Old Notom Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2542. The Old Notom Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2543. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 Notom Road.

2544. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old Notom Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Burro Wash Road, 87

2545. The Burro Wash Road is designated as county road number 87 and SGID road identification number RD280362 and is more or less 2.61 miles long.

2546. Exhibit 198 (attached hereto and incorporated herein) contains certain information pertaining to the Burro Wash Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2547. In this action, the State and County seek to quiet title to the public highway right-of-way for the Burro Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 198. The Burro Wash Road includes the segment of road specifically set forth in Exhibit 198 and as exists on the ground.

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

2548. The Burro Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2549. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Burro Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2550. The County confirmed its acceptance of the Burro Wash Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Burro Wash Road using public funds pursuant to the County's governmental right and authority.

2551. Witnesses with personal knowledge of the history of the Burro Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2552. Currently known reputation in the community is that the Burro Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2553. Public motor vehicle use of the Burro Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2554. The Burro Wash 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 Burro Wash Road.

2556. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Burro Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Burro Wash Road, 86

2557. The Burro Wash Road is designated as county road number 86 and SGID road identification number RD280857 and is more or less 4.10 miles long.

2558. Exhibit 199 (attached hereto and incorporated herein) contains certain information pertaining to the Burro Wash Road, 86 including, a map depicting the road; 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 Burro Wash Road, 86 solely as it crosses United States public land as included and specifically described in Exhibit 199. The Burro Wash Road, 86 includes the segment of road specifically set forth in Exhibit 199 and as exists on the ground.

Acceptance of the Burro Wash Road, 86 R.S. 2477 Right-of-way Prior to October 21, 1976

2560. The Burro Wash Road, 86 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Burro Wash Road, 86 as a public highway located on the

land at issue in this 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 Burro Wash Road, 86 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Burro Wash Road, 86 pursuant to the County's governmental right and authority.

2563. Witnesses with personal knowledge of the history of the Burro Wash Road, 86 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2564. Currently known reputation in the community is that the Burro Wash Road, 86 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2565. Public motor vehicle use of the Burro Wash Road, 86 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2566. The Burro Wash Road, 86 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2567. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Burro Wash Road, 86.

2568. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Burro Wash Road, 86 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Notom Road, 149D

2569. The East Notom Road is designated as county road number 149D and SGID road identification number RD280741 and is more or less 1.25 miles long.

2570. Exhibit 200 (attached hereto and incorporated herein) contains certain information pertaining to the East Notom Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2571. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Notom Road solely as it crosses United States public land as included and specifically described in Exhibit 200. The East Notom Road includes the segment of road specifically set forth in Exhibit 200 and as exists on the ground.

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

2572. The East Notom Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2573. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the East Notom Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2574. The East Notom Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Notom Road pursuant to the County's governmental right and authority.

2575. Witnesses with personal knowledge of the history of the East Notom Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2576. Currently known reputation in the community is that the East Notom Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2577. Public motor vehicle use of the East Notom Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2578. The East Notom Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2579. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Notom Road.

2580. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Notom Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Notom Bench East Road, 150D

2581. The Notom Bench East Road is designated as county road number 150D and SGID road identification number RD280742 and is more or less 3.90 miles long.

2582. Exhibit 201 (attached hereto and incorporated herein) contains certain information pertaining to the Notom Bench East Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2583. In this action, the State and County seek to quiet title to the public highway right-of-way for the Notom Bench East Road solely as it crosses United States public land as included and specifically described in Exhibit 201. The Notom Bench East Road includes the segment of road specifically set forth in Exhibit 201 and as exists on the ground.

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

2584. The Notom Bench East Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2585. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Notom Bench East Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2586. The Notom Bench East Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Notom Bench East Road pursuant to the County's governmental right and authority.

2587. Witnesses with personal knowledge of the history of the Notom Bench East Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2588. Currently known reputation in the community is that the Notom Bench East Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2589. Public motor vehicle use of the Notom Bench East Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2590. The Notom Bench East Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2591. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Notom Bench East Road.

2592. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Notom Bench East Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

150D_1 Road

2593. The 150D_1 Road is designated as county road number 150D_1 and SGID road identification number RD280743 and is more or less 1.43 miles long.

2594. Exhibit 202 (attached hereto and incorporated herein) contains certain information pertaining to the 150D_1 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2595. In this action, the State and County seek to quiet title to the public highway right-of-way for the 150D_1 Road solely as it crosses United States public land as included and specifically described in Exhibit 202. The 150D_1 Road includes the segment of road specifically set forth in Exhibit 202 and as exists on the ground.

Acceptance of the 150D_1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2596. The 150D_1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2597. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 150D_1 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2598. The150D_1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 150D_1 Road pursuant to the County's governmental right and authority.

2599. Witnesses with personal knowledge of the history of the 150D_1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2600. Currently known reputation in the community is that the 150D_1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2601. Public motor vehicle use of the 150D_1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2602. The 150D_1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2603. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 150D_1 Road.

2604. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 150D_1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Notom Bench Pond Road, 150D_4

2605. The Notom Bench Pond Road is designated as county road number 150D_4 and SGID road identification number RD280745 and is more or less 0.45 miles long.

2606. Exhibit 203 (attached hereto and incorporated herein) contains certain information pertaining to the Notom Bench Pond Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2607. In this action, the State and County seek to quiet title to the public highway right-of-way for the Notom Bench Pond Road solely as it crosses United States public land as included and specifically described in Exhibit 203. The Notom Bench Pond Road includes the segment of road specifically set forth in Exhibit 203 and as exists on the ground.

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

2608. The Notom Bench Pond Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2609. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Notom Bench Pond Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2610. The Notom Bench Pond Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Notom Bench Pond Road pursuant to the County's governmental right and authority.

2611. Witnesses with personal knowledge of the history of the Notom Bench Pond Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2612. Currently known reputation in the community is that the Notom Bench Pond Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2613. Public motor vehicle use of the Notom Bench Pond Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2614. The Notom Bench Pond Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2615. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Notom Bench Pond Road.

2616. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Notom Bench Pond Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pleasant Creek Diversion Road, 151D

2617. The Pleasant Creek Diversion Road is designated as county road number 151D and SGID road identification number RD280747 and is more or less 0.78 miles long.

2618. Exhibit 204 (attached hereto and incorporated herein) contains certain information pertaining to the Pleasant Creek Diversion Road, 151D including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2619. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pleasant Creek Diversion Road, 151D solely as it crosses United States public land as included and specifically described in Exhibit 204. The Pleasant Creek Diversion Road, 151D includes the segment of road specifically set forth in Exhibit 204 and as exists on the ground.

Acceptance of the Pleasant Creek Diversion Road, 151D R.S. 2477 Right-of-way Prior to October 21, 1976

2620. The Pleasant Creek Diversion Road, 151D has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2621. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Pleasant Creek Diversion Road, 151D as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2622. The Pleasant Creek Diversion Road, 151D was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pleasant Creek Diversion Road, 151D pursuant to the County's governmental right and authority.

2623. Witnesses with personal knowledge of the history of the Pleasant Creek Diversion Road, 151D confirm public use of this road as a public 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 Pleasant Creek Diversion Road, 151D has been open for all to come 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 Pleasant Creek Diversion Road, 151D as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or

necessary, for a period of 10 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 Pleasant Creek Diversion Road, 151D 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 Pleasant Creek Diversion Road, 151D.

2628. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pleasant Creek Diversion Road, 151D on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pleasant Creek Diversion Road, 151D_1

2629. The Pleasant Creek Diversion Road is designated as county road number 151D_1 and SGID road identification number RD280748 and is more or less 0.72 miles long.

2630. Exhibit 205 (attached hereto and incorporated herein) contains certain information pertaining to the Pleasant Creek Diversion Road, 151D_1 including, a map depicting the road; 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 Pleasant Creek Diversion Road, 151D_1 solely as it crosses United States public

land as included and specifically described in Exhibit 205. The Pleasant Creek Diversion Road, 151D_1 includes the segment of road specifically set forth in Exhibit 205 and as exists on the ground.

Acceptance of the Pleasant Creek Diversion Road, 151D_1 R.S. 2477 Right-of-way Prior to October 21, 1976

2632. The Pleasant Creek Diversion Road, 151D_1 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 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Pleasant Creek Diversion Road, 151D_1 as a public highway located on the land at issue in this 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 Pleasant Creek Diversion Road, 151D_1 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pleasant Creek Diversion Road, 151D_1 pursuant to the County's governmental right and authority.

2635. Witnesses with personal knowledge of the history of the Pleasant Creek Diversion Road, 151D_1 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2636. Currently known reputation in the community is that the Pleasant Creek Diversion Road, 151D_1 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2637. Public motor vehicle use of the Pleasant Creek Diversion Road, 151D_1 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2638. The Pleasant Creek Diversion Road, 151D_1 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2639. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pleasant Creek Diversion Road, 151D_1.

2640. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pleasant Creek Diversion Road, 151D_1 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pleasant Creek Diversion Road, 151D_2

2641. The Pleasant Creek Diversion Road is designated as county road number 151D_2 and SGID road identification number RD280749 and is more or less 0.91 miles long.

2642. Exhibit 206 (attached hereto and incorporated herein) contains certain information pertaining to the Pleasant Creek Diversion Road, 151D_2 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2643. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pleasant Creek Diversion Road, 151D_2 solely as it crosses United States public land as included and specifically described in Exhibit 206. The Pleasant Creek Diversion Road, 151D_2 includes the segment of road specifically set forth in Exhibit 206 and as exists on the ground.

Acceptance of the Pleasant Creek Diversion Road, 151D_2 R.S. 2477 Right-of-way Prior to October 21, 1976

2644. The Pleasant Creek Diversion Road, 151D_2 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2645. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Pleasant Creek Diversion Road, 151D_2 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2646. The Pleasant Creek Diversion Road, 151D_2 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pleasant Creek Diversion Road, 151D_2 pursuant to the County's governmental right and authority.

2647. Witnesses with personal knowledge of the history of the Pleasant Creek Diversion Road, 151D_2 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2648. Currently known reputation in the community is that the Pleasant Creek Diversion Road, 151D_2 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2649. Public motor vehicle use of the Pleasant Creek Diversion Road, 151D_2 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2650. The Pleasant Creek Diversion Road, 151D_2 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2651. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pleasant Creek Diversion Road, 151D_2.

2652. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pleasant Creek Diversion Road, 151D_2 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Notom Cemetery Road, 85_13

2653. The Notom Cemetery Road is designated as county road number 85_13 and SGID road identification number RD280845 and is more or less 0.38 miles long.

2654. Exhibit 207 (attached hereto and incorporated herein) contains certain information pertaining to the Notom Cemetery Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2655. In this action, the State and County seek to quiet title to the public highway right-of-way for the Notom Cemetery Road solely as it crosses United States public land as included and specifically described in Exhibit 207. The Notom Cemetery Road includes the segment of road specifically set forth in Exhibit 207 and as exists on the ground.

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

2656. The Notom Cemetery Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2657. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Notom Cemetery Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2658. The Notom Cemetery Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-

way by managing, maintaining, and improving the Notom Cemetery Road pursuant to the County's governmental right and authority.

2659. Witnesses with personal knowledge of the history of the Notom Cemetery Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2660. Currently known reputation in the community is that the Notom Cemetery Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2661. Public motor vehicle use of the Notom Cemetery Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2662. The Notom Cemetery Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2663. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Notom Cemetery Road.

2664. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Notom Cemetery Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Notom Bench North Road, 85_17

2665. The Notom Bench North Road is designated as county road number 85_17 and SGID road identification number RD280848 and is more or less 1.72 miles long.

2666. Exhibit 208 (attached hereto and incorporated herein) contains certain information pertaining to the Notom Bench North Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2667. In this action, the State and County seek to quiet title to the public highway right-of-way for the Notom Bench North Road solely as it crosses United States public land as included and specifically described in Exhibit 208. The Notom Bench North Road includes the segment of road specifically set forth in Exhibit 208 and as exists on the ground.

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

2668. The Notom Bench North Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2669. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Notom Bench North Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2670. The Notom Bench Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Notom Bench Road pursuant to the County's governmental right and authority.

2671. Witnesses with personal knowledge of the history of the Notom Bench North Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2672. Currently known reputation in the community is that the Notom Bench North Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2673. Public motor vehicle use of the Notom Bench North Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2674. The Notom Bench North Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2675. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Notom Bench North Road.

2676. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Notom Bench North Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

85_23 Road

2677. The 85_23 Road is designated as county road number 85_23 and SGID road identification number RD280852 and is more or less 1.70 miles long.

2678. Exhibit 209 (attached hereto and incorporated herein) contains certain information pertaining to the 85_23 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2679. In this action, the State and County seek to quiet title to the public highway right-of-way for the 85_23 Road solely as it crosses United States public land as included and specifically described in Exhibit 209. The 85_23 Road includes the segment of road specifically set forth in Exhibit 209 and as exists on the ground.

Acceptance of the 85_23 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2680. The 85_23 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2681. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 85_23 Road as a public highway located on the land at

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

2682. The 85_23 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 85_23 Road pursuant to the County's governmental right and authority.

2683. Witnesses with personal knowledge of the history of the 85_23 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2684. Currently known reputation in the community is that the 85_23 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2685. Public motor vehicle use of the 85_23 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2686. The 85_23 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2687. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 85_23 Road.

2688. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 85_23 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Back Road to Notom, 85_3

2689. The Back Road to Notom is designated as county road number 85_3 and SGID road identification number RD280855 and is more or less 1.37 miles long.

2690. Exhibit 210 (attached hereto and incorporated herein) contains certain information pertaining to the Back Road to Notom including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2691. In this action, the State and County seek to quiet title to the public highway right-of-way for the Back Road to Notom solely as it crosses United States public land as included and specifically described in Exhibit 210. The Back Road to Notom includes the segment of road specifically set forth in Exhibit 210 and as exists on the ground.

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

2692. The Back Road to Notom has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2693. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Back Road to Notom as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2694. The Back Road to Notom was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Back Road to Notom pursuant to the County's governmental right and authority.

2695. Witnesses with personal knowledge of the history of the Back Road to Notom confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2696. Currently known reputation in the community is that the Back Road to Notom has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2697. Public motor vehicle use of the Back Road to Notom as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2698. The Back Road to Notom traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2699. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Back Road to Notom.

2700. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Back Road to Notom on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pleasant Creek Road, 85_9

2701. The Pleasant Creek Road is designated as county road number 85_9 and SGID road identification number RD280856 and is more or less 0.21 miles long.

2702. Exhibit 211 (attached hereto and incorporated herein) contains certain information pertaining to the Pleasant Creek Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2703. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pleasant Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 211. The Pleasant Creek Road includes the segment of road specifically set forth in Exhibit 211 and as exists on the ground.

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

2704. The Pleasant Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2705. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Pleasant Creek Road as a public highway located on the

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

2706. The Pleasant Creek Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pleasant Creek Road pursuant to the County's governmental right and authority.

2707. Witnesses with personal knowledge of the history of the Pleasant Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2708. Currently known reputation in the community is that the Pleasant Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2709. Public motor vehicle use of the Pleasant Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2710. The Pleasant Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2711. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pleasant Creek Road.

2712. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pleasant Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

EIGHTH CAUSE OF ACTION - QUIET TITLE
DUGOUT AREA

2713. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2714. The Dugout Area is located in central and south central Wayne County. *See* Exhibit 10.

2715. The Dugout Area includes the following roads — listed by Common Road Name and County Unique Number: (1) South River Road, 108; (2) Blue Valley Road, 92; (3) Blue Valley Cemetery Road, 92A; (4) Giles Road, 92B; (5) Bert Avery Road, 93; (6) Dugout Road, 94; (7) Fairview Ranch Road, 95; (8) South Fairview Road, 96; (9) Back Road to Granite, 97; (10) Granite Ranch Road, 98; (11) East Gate Reservoir Road, 99; (12) Bull Wash Road, 180D; (13) Bull Wash 1 Road, 181D; (14) Pinto Hills Road, 182D; (15) Pinto Hills Road, 182D_3; (16) Pinto Hills South Road, 182D_5; (17) 182D_7 Road, 182D_7; (18) Jackson Pond Road, 92_18; (19) Jackson Water Line Road, 93_12; (20) 93_13 Road, 93_13; (21) 93_4 Road, 93_4; (22) 95_15 Road, 95_15; (23) Fairview Spur Road, 95_2; (24) 96_4 Road, 96_4; (25) Granite Ranch Road, 96_6; (26) 97_2 Road, 97_2; (27) 97_4 Road, 97_4; and (28) 97_7 Road, 97_7.

2716. Each right-of-way claimed in Dugout 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.

2717. All rights-of-way claimed in Dugout 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.

2718. All rights-of-way claimed in Dugout 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).

2719. Prior to October 21, 1976, the State of Utah, Wayne County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

South River Road, 108

2720. The South River Road is designated as county road number 108 and SGID road identification number RD280270 and is more or less 1.33 miles long.

2721. Exhibit 212 (attached hereto and incorporated herein) contains certain information pertaining to the South River Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2722. In this action, the State and County seek to quiet title to the public highway right-of-way for the South River Road solely as it crosses United States public land as included and specifically described in Exhibit 212. The South River Road includes the segment of road specifically set forth in Exhibit 212 and as exists on the ground.

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

2723. The South River Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2724. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the South River Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2725. The South River Road appears on the Hanksville (1954) USGS 7.5 minute quadrangle map and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2726. The County confirmed its acceptance of the South River Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

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

2727. Witnesses with personal knowledge of the history of the South River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2728. Currently known reputation in the community is that the South River Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2729. Public motor vehicle use of the South River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2730. The South River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2731. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South River Road.

2732. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South River Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Blue Valley Road, 92

2733. The Blue Valley Road is designated as county road number 92 and SGID road identification number RD280374 and is more or less 8.48 miles long.

2734. Exhibit 213 (attached hereto and incorporated herein) contains certain information pertaining to the Blue 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.

2735. In this action, the State and County seek to quiet title to the public highway right-of-way for the Blue Valley Road solely as it crosses United States public land as included and specifically described in Exhibit 213. The Blue Valley Road includes the segment of road specifically set forth in Exhibit 213 and as exists on the ground.

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

2736. The Blue Valley Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2737. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Blue 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.

2738. The Blue 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, and improving the Blue Valley Road using public funds pursuant to the County's governmental right and authority.

2739. Witnesses with personal knowledge of the history of the Blue 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.

2740. Currently known reputation in the community is that the Blue 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.

2741. Public motor vehicle use of the Blue 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.

2742. The Blue Valley 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 Blue Valley Road.

2744. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Blue 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.

Blue Valley Cemetery Road, 92A

2745. The Blue Valley Cemetery Road is designated as county road number 92A and SGID road identification number RD280061 and is more or less 2.12 miles long.

2746. Exhibit 214 (attached hereto and incorporated herein) contains certain information pertaining to the Blue Valley Cemetery Road including, a map depicting the road; 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 Blue Valley Cemetery Road solely as it crosses United States public land as included and specifically described in Exhibit 214. The Blue Valley Cemetery Road includes the segment of road specifically set forth in Exhibit 214 and as exists on the ground.

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

2748. The Blue Valley Cemetery Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2749. The Blue Valley Cemetery Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477

right-of-way by managing, maintaining, and improving the Blue Valley Cemetery Road using public funds pursuant to the County's governmental right and authority.

2750. Witnesses with personal knowledge of the history of the Blue Valley Cemetery Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2751. Currently known reputation in the community is that the Blue Valley Cemetery Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2752. Public motor vehicle use of the Blue Valley Cemetery Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2753. The Blue Valley Cemetery Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2754. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Blue Valley Cemetery Road.

2755. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Blue Valley Cemetery Road on lands owned by the United States as

described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Giles Road, 92B

2756. The Giles Road is designated as county road number 92B and SGID road identification number RD280045 and is more or less 1.61 miles long.

2757. Exhibit 215 (attached hereto and incorporated herein) contains certain information pertaining to the Giles Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2758. In this action, the State and County seek to quiet title to the public highway right-of-way for the Giles Road solely as it crosses United States public land as included and specifically described in Exhibit 215. The Giles Road includes the segment of road specifically set forth in Exhibit 215 and as exists on the ground.

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

2759. The Giles Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2760. The Giles Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Giles Road using public funds pursuant to the County's governmental right and authority.

2761. Witnesses with personal knowledge of the history of the Giles Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2762. Currently known reputation in the community is that the Giles Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2763. Public motor vehicle use of the Giles Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2764. The Giles Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2765. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Giles Road.

2766. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Giles Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bert Avery Road, 93

2767. The Bert Avery Road is designated as county road number 93 and SGID road identification number RD280377 and is more or less 16.08 miles long.

2768. Exhibit 216 (attached hereto and incorporated herein) contains certain information pertaining to the Bert Avery Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2769. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bert Avery Road solely as it crosses United States public land as included and specifically described in Exhibit 216. The Bert Avery Road includes the segment of road specifically set forth in Exhibit 216 and as exists on the ground.

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

2770. The Bert Avery Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2771. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Bert Avery Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2772. The Bert Avery Road appears on the Mt Ellen (1962) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2773. The County confirmed its acceptance of the Bert Avery Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Bert Avery Road using public funds pursuant to the County's governmental right and authority.

2774. Witnesses with personal knowledge of the history of the Bert Avery Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2775. Currently known reputation in the community is that the Bert Avery Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2776. Public motor vehicle use of the Bert Avery Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2777. The Bert Avery Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2778. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bert Avery Road.

2779. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bert Avery Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dugout Road, 94

2780. The Dugout Road is designated as county road number 94 and SGID road identification number RD280378 and is more or less 6.87 miles long.

2781. Exhibit 217 (attached hereto and incorporated herein) contains certain information pertaining to the Dugout Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2782. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dugout Road solely as it crosses United States public land as included and specifically described in Exhibit 217. The Dugout Road includes the segment of road specifically set forth in Exhibit 217 and as exists on the ground.

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

2783. The Dugout Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2784. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dugout Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2785. The Dugout Road appears on the Mt Ellen (1962) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2786. The Dugout Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dugout Road using public funds pursuant to the County's governmental right and authority.

2787. Witnesses with personal knowledge of the history of the Dugout Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2788. Currently known reputation in the community is that the Dugout Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2789. Public motor vehicle use of the Dugout Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2790. The Dugout Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2791. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dugout Road.

2792. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dugout Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Fairview Ranch Road, 95

2793. The Fairview Ranch Road is designated as county road number 95 and SGID road identification number RD280379 and is more or less 17.91 miles long.

2794. Exhibit 218 (attached hereto and incorporated herein) contains certain information pertaining to the Fairview Ranch Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2795. In this action, the State and County seek to quiet title to the public highway right-of-way for the Fairview Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 218. The Fairview Ranch Road includes the segment of road specifically set forth in Exhibit 218 and as exists on the ground.

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

2796. The Fairview Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2797. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Fairview Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2798. The Fairview Ranch Road appears on the Hanksville (1954) and Bull Mountain (1952) USGS 7.5 minute quadrangle maps, and Bull Mtn (1952) and Hanksville (1963) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2799. The County confirmed its acceptance of the Fairview Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Fairview Ranch Road using public funds pursuant to the County's governmental right and authority.

2800. Witnesses with personal knowledge of the history of the Fairview Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2801. Currently known reputation in the community is that the Fairview Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2802. Public motor vehicle use of the Fairview Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2803. The Fairview Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2804. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Fairview Ranch Road.

2805. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Fairview Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Fairview Road, 96

2806. The South Fairview Road is designated as county road number 96 and SGID road identification number RD280380 and is more or less 4.80 miles long.

2807. Exhibit 219 (attached hereto and incorporated herein) contains certain information pertaining to the South Fairview Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2808. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Fairview Road solely as it crosses United States public land as included and specifically described in Exhibit 219. The South Fairview Road includes the segment of road specifically set forth in Exhibit 219 and as exists on the ground.

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

2809. The South Fairview Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2810. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the South Fairview Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2811. The South Fairview Road appears on the Bull Mountain (1952) USGS 7.5 minute quadrangle map and Bull Mtn (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2812. The County confirmed its acceptance of the South Fairview Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Fairview Road using public funds pursuant to the County's governmental right and authority.

2813. Witnesses with personal knowledge of the history of the South Fairview Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2814. Currently known reputation in the community is that the South Fairview Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2815. Public motor vehicle use of the South Fairview Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2816. The South Fairview Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2817. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Fairview Road.

2818. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Fairview Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Back Road to Granite, 97

2819. The Back Road to Granite is designated as county road number 97 and SGID road identification number RD280381 and is more or less 5.61 miles long.

2820. Exhibit 220 (attached hereto and incorporated herein) contains certain information pertaining to the Back Road to Granite including, a map depicting the road; township, range, and

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

2821. In this action, the State and County seek to quiet title to the public highway right-of-way for the Back Road to Granite solely as it crosses United States public land as included and specifically described in Exhibit 220. The Back Road to Granite includes the segment of road specifically set forth in Exhibit 220 and as exists on the ground.

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

2822. The Back Road to Granite has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2823. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Back Road to Granite as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2824. The County confirmed its acceptance of the Back Road to Granite by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Back Road to Granite using public funds pursuant to the County's governmental right and authority.

2825. Witnesses with personal knowledge of the history of the Back Road to Granite confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

2826. Currently known reputation in the community is that the Back Road to Granite has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2827. Public motor vehicle use of the Back Road to Granite as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2828. The Back Road to Granite traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2829. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Back Road to Granite.

2830. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Back Road to Granite on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Granite Ranch Road, 98

2831. The Granite Ranch Road is designated as county road number 98 and SGID road identification number RD280382 and is more or less 3.47 miles long.

2832. Exhibit 221 (attached hereto and incorporated herein) contains certain information pertaining to the Granite Ranch Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2833. In this action, the State and County seek to quiet title to the public highway right-of-way for the Granite Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 221. The Granite Ranch Road includes the segment of road specifically set forth in Exhibit 221 and as exists on the ground.

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

2834. The Granite Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2835. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Granite Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2836. The Granite Ranch Road appears on the Bull Mountain (1952) USGS 7.5 minute quadrangle map and Bull Mtn (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2837. The County confirmed its acceptance of the Granite Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

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

2838. Witnesses with personal knowledge of the history of the Granite Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2839. Currently known reputation in the community is that the Granite Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2840. Public motor vehicle use of the Granite Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2841. The Granite Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2842. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Granite Ranch Road.

2843. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Granite Ranch Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Gate Reservoir Road, 99

2844. The East Gate Reservoir Road is designated as county road number 99 and SGID road identification number RD280383 and is more or less 2.11 miles long.

2845. Exhibit 222 (attached hereto and incorporated herein) contains certain information pertaining to the East Gate Reservoir Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2846. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Gate Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 222. The East Gate Reservoir Road includes the segment of road specifically set forth in Exhibit 222 and as exists on the ground.

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

2847. The East Gate Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2848. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the East Gate Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2849. The County confirmed its acceptance of the East Gate Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Gate Reservoir Road using public funds pursuant to the County's governmental right and authority.

2850. Witnesses with personal knowledge of the history of the East Gate Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2851. Currently known reputation in the community is that the East Gate Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2852. Public motor vehicle use of the East Gate Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2853. The East Gate Reservoir 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 East Gate Reservoir Road.

2855. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Gate Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bull Wash Road, 180D

2856. The Bull Wash Road is designated as county road number 180D and SGID road identification number RD280765 and is more or less 1.78 miles long.

2857. Exhibit 223 (attached hereto and incorporated herein) contains certain information pertaining to the Bull Wash Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2858. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bull Wash Road solely as it crosses United States public land as included and specifically described in Exhibit 223. The Bull Wash Road includes the segment of road specifically set forth in Exhibit 223 and as exists on the ground.

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

2859. The Bull Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2860. The Bull Wash Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2861. The Bull Wash Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Bull Wash Road pursuant to the County's governmental right and authority.

2862. Witnesses with personal knowledge of the history of the Bull Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2863. Currently known reputation in the community is that the Bull Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2864. Public motor vehicle use of the Bull Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2865. The Bull Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2866. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bull Wash Road.

2867. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bull Wash Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bull Wash 1 Road, 181D

2868. The Bull Wash 1 Road is designated as county road number 181D and SGID road identification number RD280766 and is more or less 1.45 miles long.

2869. Exhibit 224 (attached hereto and incorporated herein) contains certain information pertaining to the Bull Wash 1 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2870. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bull Wash 1 Road solely as it crosses United States public land as included and specifically described in Exhibit 224. The Bull Wash 1 Road includes the segment of road specifically set forth in Exhibit 224 and as exists on the ground.

Acceptance of the Bull Wash 1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2871. The Bull Wash 1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2872. The Bull Wash 1 Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2873. The Bull Wash 1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way

by managing, maintaining, and improving the Bull Wash 1 Road pursuant to the County's governmental right and authority.

2874. Witnesses with personal knowledge of the history of the Bull Wash 1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2875. Currently known reputation in the community is that the Bull Wash 1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2876. Public motor vehicle use of the Bull Wash 1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2877. The Bull Wash 1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2878. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bull Wash 1 Road.

2879. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bull Wash 1 Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pinto Hills Road, 182D

2880. The Pinto Hills Road is designated as county road number 182D and SGID road identification number RD280767 and is more or less 2.32 miles long.

2881. Exhibit 225 (attached hereto and incorporated herein) contains certain information pertaining to the Pinto Hills Road, 182D including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2882. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pinto Hills Road, 182D solely as it crosses United States public land as included and specifically described in Exhibit 225. The Pinto Hills Road, 182D includes the segment of road specifically set forth in Exhibit 225 and as exists on the ground.

Acceptance of the Pinto Hills Road, 182D R.S. 2477 Right-of-way Prior to October 21, 1976

2883. The Pinto Hills Road, 182D has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2884. The Pinto Hills Road, 182D appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2885. The County confirmed its acceptance of the Pinto Hills Road, 182D by 1975, when it designated and accepted the road as a County highway on the County's general highway

map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pinto Hills Road, 182D pursuant to the County's governmental right and authority.

2886. Witnesses with personal knowledge of the history of the Pinto Hills Road, 182D confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2887. Currently known reputation in the community is that the Pinto Hills Road, 182D has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2888. Public motor vehicle use of the Pinto Hills Road, 182D as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2889. The Pinto Hills Road, 182D traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2890. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pinto Hills Road, 182D.

2891. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pinto Hills Road, 182D on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pinto Hills Road, 182D_3

2892. The Pinto Hills Road is designated as county road number 182D_3 and SGID road identification number RD280769 and is more or less 1.13 miles long.

2893. Exhibit 226 (attached hereto and incorporated herein) contains certain information pertaining to the Pinto Hills Road, 182D_3 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2894. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pinto Hills Road, 182D_3 solely as it crosses United States public land as included and specifically described in Exhibit 226. The Pinto Hills Road, 182D_3 includes the segment of road specifically set forth in Exhibit 226 and as exists on the ground.

Acceptance of the Pinto Hills Road, 182D_3 R.S. 2477 Right-of-way Prior to October 21, 1976

2895. The Pinto Hills Road, 182D_3 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2896. The Pinto Hills Road, 182D_3 appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2897. The Pinto Hills Road, 182D_3 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477

right-of-way by managing, maintaining, and improving the Pinto Hills Road, 182D_3 pursuant to the County's governmental right and authority.

2898. Witnesses with personal knowledge of the history of the Pinto Hills Road, 182D_3 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2899. Currently known reputation in the community is that the Pinto Hills Road, 182D_3 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2900. Public motor vehicle use of the Pinto Hills Road, 182D_3 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2901. The Pinto Hills Road, 182D_3 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2902. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pinto Hills Road, 182D_3.

2903. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pinto Hills Road, 182D_3 on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pinto Hills South Road, 182D_5

2904. The Pinto Hills South Road is designated as county road number 182D_5 and SGID road identification number RD280770 and is more or less 4.06 miles long.

2905. Exhibit 227 (attached hereto and incorporated herein) contains certain information pertaining to the Pinto Hills South Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2906. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pinto Hills South Road solely as it crosses United States public land as included and specifically described in Exhibit 227. The Pinto Hills South Road includes the segment of road specifically set forth in Exhibit 227 and as exists on the ground.

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

2907. The Pinto Hills South Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2908. The Pinto Hills South Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2909. The Pinto Hills Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Pinto Hills Road pursuant to the County's governmental right and authority.

2910. Witnesses with personal knowledge of the history of the Pinto Hills South Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2911. Currently known reputation in the community is that the Pinto Hills South Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2912. Public motor vehicle use of the Pinto Hills South Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2913. The Pinto Hills South Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2914. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pinto Hills South Road.

2915. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pinto Hills South Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

182D_7 Road

2916. The 182D_7 Road is designated as county road number 182D_7 and SGID road identification number RD280771 and is more or less 0.85 miles long.

2917. Exhibit 228 (attached hereto and incorporated herein) contains certain information pertaining to the 182D_7 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2918. In this action, the State and County seek to quiet title to the public highway right-of-way for the 182D_7 Road solely as it crosses United States public land as included and specifically described in Exhibit 228. The 182D_7 Road includes the segment of road specifically set forth in Exhibit 228 and as exists on the ground.

Acceptance of the 182D_7 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2919. The 182D_7 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2920. The 182D_7 Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2921. The 182D_7 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the 182D_7 Road pursuant to the County's governmental right and authority.

2922. Witnesses with personal knowledge of the history of the 182D_7 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2923. Currently known reputation in the community is that the 182D_7 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2924. Public motor vehicle use of the 182D_7 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2925. The 182D_7 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2926. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 182D_7 Road.

2927. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 182D_7 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jackson Pond Road, 92_18

2928. The Jackson Pond Road is designated as county road number 92_18 and SGID road identification number RD280868 and is more or less 6.68 miles long.

2929. Exhibit 229 (attached hereto and incorporated herein) contains certain information pertaining to the Jackson Pond Road, 92_18 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2930. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jackson Pond Road, 92_18 solely as it crosses United States public land as included and specifically described in Exhibit 229. The Jackson Pond Road, 92_18 includes the segment of road specifically set forth in Exhibit 229 and as exists on the ground.

Acceptance of the Jackson Pond Road, 92_18 R.S. 2477 Right-of-way Prior to October 21, 1976

2931. The Jackson Pond Road, 92_18 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2932. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Jackson Pond Road, 92_18 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2933. The Jackson Pond Road, 92_18 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477

right-of-way by managing, maintaining, and improving the Jackson Pond Road, 92_18 pursuant to the County's governmental right and authority.

2934. Witnesses with personal knowledge of the history of the Jackson Pond Road, 92_18 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2935. Currently known reputation in the community is that the Jackson Pond Road, 92_18 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2936. Public motor vehicle use of the Jackson Pond Road, 92_18 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2937. The Jackson Pond Road, 92_18 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2938. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Jackson Pond Road, 92_18.

2939. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jackson Pond Road, 92_18 on lands owned by the United States as

described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jackson Water Line Road, 93_12

2940. The Jackson Water Line Road is designated as county road number 93_12 and SGID road identification number RD280873 and is more or less 1.34 miles long.

2941. Exhibit 230 (attached hereto and incorporated herein) contains certain information pertaining to the Jackson Water Line Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2942. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jackson Water Line Road solely as it crosses United States public land as included and specifically described in Exhibit 230. The Jackson Water Line Road includes the segment of road specifically set forth in Exhibit 230 and as exists on the ground.

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

2943. The Jackson Water Line Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2944. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Jackson Water Line Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2945. The Jackson Water Line Road appears on the Mt Ellen (1962) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2946. The Jackson Water Line Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Jackson Water Line Road pursuant to the County's governmental right and authority.

2947. Witnesses with personal knowledge of the history of the Jackson Water Line Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2948. Currently known reputation in the community is that the Jackson Water Line Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2949. Public motor vehicle use of the Jackson Water Line Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2950. The Jackson Water Line Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2951. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Jackson Water Line Road.

2952. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jackson Water Line Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

93_13 Road

2953. The 93_13 Road is designated as county road number 93_13 and SGID road identification number RD280874 and is more or less 1.08 miles long.

2954. Exhibit 231 (attached hereto and incorporated herein) contains certain information pertaining to the 93_13 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2955. In this action, the State and County seek to quiet title to the public highway right-of-way for the 93_13 Road solely as it crosses United States public land as included and specifically described in Exhibit 231. The 93_13 Road includes the segment of road specifically set forth in Exhibit 231 and as exists on the ground.

Acceptance of the 93_13 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2956. The 93_13 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2957. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 93_13 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2958. The 93_13 Road appears on the Mt Ellen (1962) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2959. The 93_13 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 93_13 Road pursuant to the County's governmental right and authority.

2960. Witnesses with personal knowledge of the history of the 93_13 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2961. Currently known reputation in the community is that the 93_13 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2962. Public motor vehicle use of the 93_13 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2963. The 93_13 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2964. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 93_13 Road.

2965. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 93_13 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

93_4 Road

2966. The 93_4 Road is designated as county road number 93_4 and SGID road identification number RD280881 and is more or less 3.67 miles long.

2967. Exhibit 232 (attached hereto and incorporated herein) contains certain information pertaining to the 93_4 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2968. In this action, the State and County seek to quiet title to the public highway right-of-way for the 93_4 Road solely as it crosses United States public land as included and specifically described in Exhibit 232. The 93_4 Road includes the segment of road specifically set forth in Exhibit 232 and as exists on the ground.

Acceptance of the 93_4 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2969. The 93_4 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2970. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 93_4 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2971. The 93_4 Road appears on the Mt Ellen (1962) USGS15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2972. The 93_4 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 93_4 Road pursuant to the County's governmental right and authority.

2973. Witnesses with personal knowledge of the history of the 93_4 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2974. Currently known reputation in the community is that the 93_4 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2975. Public motor vehicle use of the 93_4 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2976. The 93_4 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2977. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 93_4 Road.

2978. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 93_4 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

95_15 Road

2979. The 95_15 Road is designated as county road number 95_15 and SGID road identification number RD280884 and is more or less 2.02 miles long.

2980. Exhibit 233 (attached hereto and incorporated herein) contains certain information pertaining to the 95_15 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2981. In this action, the State and County seek to quiet title to the public highway right-of-way for the 95_15 Road solely as it crosses United States public land as included and

specifically described in Exhibit 233. The 95_15 Road includes the segment of road specifically set forth in Exhibit 233 and as exists on the ground.

Acceptance of the 95_15 Road R.S. 2477 Right-of-way Prior to October 21, 1976

2982. The 95_15 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2983. The 95_15 Road appears on the Hanksville (1954) USGS 7.5 minute quadrangle map and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2984. The 95_15 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 95_15 Road pursuant to the County's governmental right and authority.

2985. Witnesses with personal knowledge of the history of the 95_15 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2986. Currently known reputation in the community is that the 95_15 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2987. Public motor vehicle use of the 95_15 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

2988. The 95_15 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2989. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 95_15 Road.

2990. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 95_15 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Fairview Spur Road, 95_2

2991. The Fairview Spur Road is designated as county road number 95_2 and SGID road identification number RD280885 and is more or less 0.82 miles long.

2992. Exhibit 234 (attached hereto and incorporated herein) contains certain information pertaining to the Fairview Spur Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2993. In this action, the State and County seek to quiet title to the public highway right-of-way for the Fairview Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 234. The Fairview Spur Road includes the segment of road specifically set forth in Exhibit 234 and as exists on the ground.

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

2994. The Fairview Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2995. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Fairview Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

2996. The Fairview Spur Road appears on the Bull Mountain (1952) USGS 7.5 minute quadrangle map and Bull Mtn (1952) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

2997. Witnesses with personal knowledge of the history of the Fairview Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2998. Currently known reputation in the community is that the Fairview Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2999. Public motor vehicle use of the Fairview Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

3000. The Fairview Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3001. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Fairview Spur Road.

3002. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Fairview Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

96_4 Road

3003. The 96_4 Road is designated as county road number 96_4 and SGID road identification number RD280891 and is more or less 0.94 miles long.

3004. Exhibit 235 (attached hereto and incorporated herein) contains certain information pertaining to the 96_4 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3005. In this action, the State and County seek to quiet title to the public highway right-of-way for the 96_4 Road solely as it crosses United States public land as included and

specifically described in Exhibit 235. The 96_4 Road includes the segment of road specifically set forth in Exhibit 235 and as exists on the ground.

Acceptance of the 96_4 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3006. The 96_4 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3007. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 96_4 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3008. The 96_4 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 96_4 Road pursuant to the County's governmental right and authority.

3009. Witnesses with personal knowledge of the history of the 96_4 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3010. Currently known reputation in the community is that the 96_4 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3011. Public motor vehicle use of the 96_4 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3012. The 96_4 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3013. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 96_4 Road.

3014. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 96_4 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Granite Ranch Road, 96_6

3015. The Granite Ranch Road is designated as county road number 96_6 and SGID road identification number RD280893 and is more or less 1.55 miles long.

3016. Exhibit 236 (attached hereto and incorporated herein) contains certain information pertaining to the Granite Ranch Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3017. In this action, the State and County seek to quiet title to the public highway right-of-way for the Granite Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 236. The Granite Ranch Road includes the segment of road specifically set forth in Exhibit 236 and as exists on the ground.

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

3018. The Granite Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3019. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Granite Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3020. The Granite ranch Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Granite Ranch Road pursuant to the County's governmental right and authority.

3021. Witnesses with personal knowledge of the history of the Granite Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3022. Currently known reputation in the community is that the Granite Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3023. Public motor vehicle use of the Granite Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

3024. The Granite Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3025. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Granite Ranch Road.

3026. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Granite Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

97_2 Road

3027. The 97_2 Road is designated as county road number 97_2 and SGID road identification number RD280895 and is more or less 1.70 miles long.

3028. Exhibit 237 (attached hereto and incorporated herein) contains certain information pertaining to the 97_2 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3029. In this action, the State and County seek to quiet title to the public highway right-of-way for the 97_2 Road solely as it crosses United States public land as included and

specifically described in Exhibit 237. The 97_2 Road includes the segment of road specifically set forth in Exhibit 237 and as exists on the ground.

Acceptance of the 97_2 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3030. The 97_2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3031. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 97_2 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3032. The 97_2 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 97_2 Road pursuant to the County's governmental right and authority.

3033. Witnesses with personal knowledge of the history of the 97_2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3034. Currently known reputation in the community is that the 97_2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3035. Public motor vehicle use of the 97_2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3036. The 97_2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3037. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 97_2 Road.

3038. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 97_2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

97_4 Road

3039. The 97_4 Road is designated as county road number 97_4 and SGID road identification number RD280896 and is more or less 1.25 miles long.

3040. Exhibit 238 (attached hereto and incorporated herein) contains certain information pertaining to the 97_4 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3041. In this action, the State and County seek to quiet title to the public highway right-of-way for the 97_4 Road solely as it crosses United States public land as included and specifically described in Exhibit 238. The 97_4 Road includes the segment of road specifically set forth in Exhibit 238 and as exists on the ground.

Acceptance of the 97_4 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3042. The 97_4 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3043. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 97_4 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3044. The 97_4 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 97_4 Road pursuant to the County's governmental right and authority.

3045. Witnesses with personal knowledge of the history of the 97_4 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3046. Currently known reputation in the community is that the 97_4 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3047. Public motor vehicle use of the 97_4 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3048. The 97_4 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3049. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 97_4 Road.

3050. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 97_4 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

97_7 Road

3051. The 97_7 Road is designated as county road number 97_7 and SGID road identification number RD280898 and is more or less 0.91 miles long.

3052. Exhibit 239 (attached hereto and incorporated herein) contains certain information pertaining to the 97_7 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3053. In this action, the State and County seek to quiet title to the public highway right-of-way for the 97_7 Road solely as it crosses United States public land as included and specifically described in Exhibit 239. The 97_7 Road includes the segment of road specifically set forth in Exhibit 239 and as exists on the ground.

Acceptance of the 97_7 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3054. The 97_7 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3055. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 97_7 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3056. The 97_7 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 97_7 Road pursuant to the County's governmental right and authority.

3057. Witnesses with personal knowledge of the history of the 97_7 Road confirm public use of this road as a public 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 97_7 Road has been open for all to come 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 97_7 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 97_7 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 97_7 Road.

3062. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 97_7 Road on lands owned 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
SAND SLIDE AREA

3063. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

3064. The Sand Slide Area is located in south central Wayne County. *See* Exhibit 11.

3065. The Sand Slide Area includes the following roads — listed by Common Road Name (if applicable) and County Unique Number: (1) Sand Slide Road, 100; (2) Sand Slide Overlook Road, 100_2; (3) Dell Seep Road, 101; (4) Burr Point Pond Road, 101_1; (5) Burr Point Overlook Road, 101A; (6) Dell Seep Cutoff Road, 102; (7) North Point Road, 103; (8) Oil Well Point, 104; (9) Road to Gravel Pit, 105; (10) East Hanksville Road, 105_1; (11) Mixing Pad Road, 105_2; (12) Hanksville Landfill Road, 106; (13) Hanksville TV Tower Road, 106_1; (14) Hanksville Cemetery Road, 106A; (15) Hanksville East Loop Road, 107; (16) Sand Slide Well Road, 184D; (17) 101_1 Road, 101_1; (18) 101_12 Road, 101_12; (19) 103_3 Road, 103_3; and (20) Poison Spring Road, 186D.

3066. Each right-of-way claimed in the Sand Slide 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.

3067. All rights-of-way claimed in the Sand Slide 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.

3068. All rights-of-way claimed in the Sand Slide 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).

3069. Prior to October 21, 1976, the State of Utah, Wayne 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.

Sand Slide Road, 100

3070. The Sand Slide Road is designated as county road number 100 and SGID road identification number RD280255 and is more or less 18.21 miles long.

3071. Exhibit 240 (attached hereto and incorporated herein) contains certain information pertaining to the Sand Slide Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3072. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sand Slide Road solely as it crosses United States public land as included and specifically described in Exhibit 240. The Sand Slide Road includes the segment of road specifically set forth in Exhibit 240 and as exists on the ground.

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

3073. The Sand Slide Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3074. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Sand Slide Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3075. The Sand Slide Road appears on the Hanksville (1954) and Bull Mountain (1952) USGS 7.5 minute quadrangle maps, and Hanksville (1963) and Bull Mtn (1952) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3076. The Sand Slide Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Sand Slide Road using public funds pursuant to the County's governmental right and authority.

3077. Witnesses with personal knowledge of the history of the Sand Slide Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3078. Currently known reputation in the community is that the Sand Slide Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3079. Public motor vehicle use of the Sand Slide Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3080. The Sand Slide Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3081. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sand Slide Road.

3082. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sand Slide Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sand Slide Overlook Road, 100_2

3083. The Sand Slide Overlook Road is designated as county road number 100_2 and SGID road identification number RD280256 and is more or less 0.35 miles long.

3084. Exhibit 241 (attached hereto and incorporated herein) contains certain information pertaining to the Sand Slide Overlook Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3085. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sand Slide Overlook Road solely as it crosses United States public land as included and specifically described in Exhibit 241. The Sand Slide Overlook Road includes the segment of road specifically set forth in Exhibit 241 and as exists on the ground.

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

3086. The Sand Slide Overlook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3087. The Sand Slide Overlook Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sand Slide Overlook Road using public funds pursuant to the County's governmental right and authority.

3088. Witnesses with personal knowledge of the history of the Sand Slide Overlook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

3089. Currently known reputation in the community is that the Sand Slide Overlook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3090. Public motor vehicle use of the Sand Slide Overlook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3091. The Sand Slide Overlook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3092. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sand Slide Overlook Road.

3093. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sand Slide Overlook Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dell Seep Road, 101

3094. The Dell Seep Road is designated as county road number 101 and SGID road identification number RD280257 and is more or less 19.66 miles long.

3095. Exhibit 242 (attached hereto and incorporated herein) contains certain information pertaining to the Dell Seep Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3096. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dell Seep Road solely as it crosses United States public land as included and specifically described in Exhibit 242. The Dell Seep Road includes the segment of road specifically set forth in Exhibit 242 and as exists on the ground.

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

3097. The Dell Seep Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3098. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Dell Seep Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3099. The Dell Seep Road appears on the Bull Mtn (1952) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3100. The County confirmed its acceptance of the Dell Seep Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Dell Seep Road using public funds pursuant to the County's governmental right and authority.

3101. Witnesses with personal knowledge of the history of the Dell Seep Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3102. Currently known reputation in the community is that the Dell Seep Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3103. Public motor vehicle use of the Dell Seep Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3104. The Dell Seep Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3105. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dell Seep Road.

3106. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dell Seep Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Burr Point Pond Road, 101_1

3107. The Burr Point Pond Road is designated as county road number 101_1 and SGID road identification number RD280258 and is more or less 1.88 miles long.

3108. Exhibit 243 (attached hereto and incorporated herein) contains certain information pertaining to the Burr Point Pond Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3109. In this action, the State and County seek to quiet title to the public highway right-of-way for the Burr Point Pond Road solely as it crosses United States public land as included and specifically described in Exhibit 243. The Burr Point Pond Road includes the segment of road specifically set forth in Exhibit 243 and as exists on the ground.

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

3110. The Burr Point Pond Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3111. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Burr Point Pond Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3112. The Burr Point Pond Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-

way by managing, maintaining, and improving the Burr Point Pond Road using public funds pursuant to the County's governmental right and authority.

3113. Witnesses with personal knowledge of the history of the Burr Point Pond Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3114. Currently known reputation in the community is that the Burr Point Pond Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3115. Public motor vehicle use of the Burr Point Pond Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3116. The Burr Point Pond Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3117. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Burr Point Pond Road.

3118. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Burr Point Pond Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Burr Point Overlook Road, 101A

3119. The Burr Point Overlook Road is designated as county road number 101A and SGID road identification number RD280259 and is more or less 2.18 miles long.

3120. Exhibit 244 (attached hereto and incorporated herein) contains certain information pertaining to the Burr Point Overlook Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3121. In this action, the State and County seek to quiet title to the public highway right-of-way for the Burr Point Overlook Road solely as it crosses United States public land as included and specifically described in Exhibit 244. The Burr Point Overlook Road includes the segment of road specifically set forth in Exhibit 244 and as exists on the ground.

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

3122. The Burr Point Overlook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3123. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Burr Point Overlook Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3124. The Burr Point Overlook Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Burr Point Overlook Road using public funds pursuant to the County's governmental right and authority.

3125. Witnesses with personal knowledge of the history of the Burr Point Overlook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3126. Currently known reputation in the community is that the Burr Point Overlook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3127. Public motor vehicle use of the Burr Point Overlook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3128. The Burr Point Overlook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3129. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Burr Point Overlook Road.

3130. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Burr Point Overlook Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dell Seep Cutoff Road, 102

3131. The Dell Seep Cutoff Road is designated as county road number 102 and SGID road identification number RD280260 and is more or less 4.07 miles long.

3132. Exhibit 245 (attached hereto and incorporated herein) contains certain information pertaining to the Dell Seep Cutoff Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3133. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dell Seep Cutoff Road solely as it crosses United States public land as included and specifically described in Exhibit 245. The Dell Seep Cutoff Road includes the segment of road specifically set forth in Exhibit 245 and as exists on the ground.

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

3134. The Dell Seep Cutoff Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3135. The Dell Seep Cutoff Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-

way by managing, maintaining, and improving the Dell Seep Cutoff Road using public funds pursuant to the County's governmental right and authority.

3136. Witnesses with personal knowledge of the history of the Dell Seep Cutoff Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3137. Currently known reputation in the community is that the Dell Seep Cutoff Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3138. Public motor vehicle use of the Dell Seep Cutoff Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3139. The Dell Seep Cutoff Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3140. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dell Seep Cutoff Road.

3141. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dell Seep Cutoff Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Point Road, 103

3142. The North Point Road is designated as county road number 103 and SGID road identification number RD280261 and is more or less 4.50 miles long.

3143. Exhibit 246 (attached hereto and incorporated herein) contains certain information pertaining to the North Point Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3144. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Point Road solely as it crosses United States public land as included and specifically described in Exhibit 246. The North Point Road includes the segment of road specifically set forth in Exhibit 246 and as exists on the ground.

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

3145. The North Point Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3146. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North Point Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3147. The North Point Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Point Road using public funds pursuant to the County's governmental right and authority.

3148. Witnesses with personal knowledge of the history of the North Point Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3149. Currently known reputation in the community is that the North Point Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3150. Public motor vehicle use of the North Point Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3151. The North Point Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3152. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Point Road.

3153. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Point Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Oil Well Point Road, 104

3154. The Oil Well Point Road is designated as county road number 104 and SGID road identification number RD280262 and is more or less 2.10 miles long.

3155. Exhibit 247 (attached hereto and incorporated herein) contains certain information pertaining to the Oil Well Point Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3156. In this action, the State and County seek to quiet title to the public highway right-of-way for the Oil Well Point Road solely as it crosses United States public land as included and specifically described in Exhibit 247. The Oil Well Point Road includes the segment of road specifically set forth in Exhibit 247 and as exists on the ground.

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

3157. The Oil Well Point Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3158. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Oil Well Point Road as a public highway located on the

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

3159. The Oil Well Point Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Oil Well Point Road using public funds pursuant to the County's governmental right and authority.

3160. Witnesses with personal knowledge of the history of the Oil Well Point Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3161. Currently known reputation in the community is that the Oil Well Point Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3162. Public motor vehicle use of the Oil Well Point Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3163. The Oil Well Point Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3164. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Oil Well Point Road.

3165. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Oil Well Point Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Road to Gravel Pit, 105

3166. The Road to Gravel Pit is designated as county road number 105 and SGID road identification number RD280263 and is more or less 3.21 miles long.

3167. Exhibit 248 (attached hereto and incorporated herein) contains certain information pertaining to the Road to Gravel Pit including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3168. In this action, the State and County seek to quiet title to the public highway right-of-way for the Road to Gravel Pit solely as it crosses United States public land as included and specifically described in Exhibit 248. The Road to Gravel Pit includes the segment of road specifically set forth in Exhibit 248 and as exists on the ground.

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

3169. The Road to Gravel Pit has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3170. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Road to Gravel Pit as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3171. The Road to Gravel Pit appears on the Hanksville (1954) USGS 7.5 minute quadrangle map and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3172. The County confirmed its acceptance of the Road to Gravel Pit by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Road to Gravel Pit using public funds pursuant to the County's governmental right and authority.

3173. Witnesses with personal knowledge of the history of the Road to Gravel Pit confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3174. Currently known reputation in the community is that the Road to Gravel Pit has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3175. Public motor vehicle use of the Road to Gravel Pit as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3176. The Road to Gravel Pit traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3177. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Road to Gravel Pit.

3178. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Road to Gravel Pit on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Hanksville Road, 105_1

3179. The East Hanksville Road is designated as county road number 105_1 and SGID road identification number RD280264 and is more or less 2.09 miles long.

3180. Exhibit 249 (attached hereto and incorporated herein) contains certain information pertaining to the East Hanksville Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3181. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Hanksville Road solely as it crosses United States public land as included and specifically described in Exhibit 249. The East Hanksville Road includes the segment of road specifically set forth in Exhibit 249 and as exists on the ground.

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

3182. The East Hanksville Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3183. The East Hanksville Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Hanksville Road using public funds pursuant to the County's governmental right and authority.

3184. Witnesses with personal knowledge of the history of the East Hanksville Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3185. Currently known reputation in the community is that the East Hanksville Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3186. Public motor vehicle use of the East Hanksville Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

3187. The East Hanksville Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3188. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Hanksville Road.

3189. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Hanksville Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Mixing Pad Road, 105_2

3190. The Mixing Pad Road is designated as county road number 105_2 and SGID road identification number RD280265 and is more or less 0.89 miles long.

3191. Exhibit 250 (attached hereto and incorporated herein) contains certain information pertaining to the Mixing Pad Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3192. In this action, the State and County seek to quiet title to the public highway right-of-way for the Mixing Pad Road solely as it crosses United States public land as included and

specifically described in Exhibit 250. The Mixing Pad Road includes the segment of road specifically set forth in Exhibit 250 and as exists on the ground.

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

3193. The Mixing Pad Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3194. The Mixing Pad Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Mixing Pad Road using public funds pursuant to the County's governmental right and authority.

3195. Witnesses with personal knowledge of the history of the Mixing Pad Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3196. Currently known reputation in the community is that the Mixing Pad Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3197. Public motor vehicle use of the Mixing Pad Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3198. The Mixing Pad Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3199. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Mixing Pad Road.

3200. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Mixing Pad Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hanksville Landfill Road, 106

3201. The Hanksville Landfill Road is designated as county road number 106 and SGID road identification number RD280266 and is more or less 4.61 miles long.

3202. Exhibit 251 (attached hereto and incorporated herein) contains certain information pertaining to the Hanksville 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.

3203. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hanksville Landfill Road solely as it crosses United States public land as included and specifically described in Exhibit 251. The Hanksville Landfill Road includes the segment of road specifically set forth in Exhibit 251 and as exists on the ground.

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

3204. The Hanksville Landfill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3205. The Hanksville Landfill Road appears on the Hanksville (1954) and The Notch (1954) USGS 7.5 minute quadrangle maps, and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3206. The County confirmed its acceptance of the Hanksville Landfill Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hanksville Landfill Road using public funds pursuant to the County's governmental right and authority.

3207. Witnesses with personal knowledge of the history of the Hanksville 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.

3208. Currently known reputation in the community is that the Hanksville 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.

3209. Public motor vehicle use of the Hanksville 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.

3210. The Hanksville Landfill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3211. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hanksville Landfill Road.

3212. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hanksville 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.

Hanksville TV Tower Road, 106_1

3213. The Hanksville TV Tower Road is designated as county road number 106_1 and SGID road identification number RD280267 and is more or less 0.54 miles long.

3214. Exhibit 252 (attached hereto and incorporated herein) contains certain information pertaining to the Hanksville TV Tower Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3215. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hanksville TV Tower Road solely as it crosses United States public land as

included and specifically described in Exhibit 252. The Hanksville TV Tower Road includes the segment of road specifically set forth in Exhibit 252 and as exists on the ground.

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

3216. The Hanksville TV Tower Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3217. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hanksville TV Tower Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3218. The Hanksville TV Tower Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3219. The County confirmed its acceptance of the Hanksville TV Tower Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hanksville TV Tower Road using public funds pursuant to the County's governmental right and authority.

3220. Witnesses with personal knowledge of the history of the Hanksville TV Tower Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3221. Currently known reputation in the community is that the Hanksville TV Tower Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3222. Public motor vehicle use of the Hanksville TV Tower Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3223. The Hanksville TV Tower Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3224. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hanksville TV Tower Road.

3225. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hanksville TV Tower Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hanksville Cemetery Road, 106A

3226. The Hanksville Cemetery Road is designated as county road number 106A and SGID road identification number RD280268 and is more or less 2.71 miles long.

3227. Exhibit 253 (attached hereto and incorporated herein) contains certain information pertaining to the Hanksville Cemetery Road including, a map depicting the road; township,

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

3228. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hanksville Cemetery Road solely as it crosses United States public land as included and specifically described in Exhibit 253. The Hanksville Cemetery Road includes the segment of road specifically set forth in Exhibit 253 and as exists on the ground.

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

3229. The Hanksville Cemetery Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3230. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Hanksville Cemetery Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3231. The Hanksville Cemetery Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3232. The County confirmed its acceptance of the Hanksville Cemetery Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hanksville Cemetery Road using public funds pursuant to the County's governmental right and authority.

3233. Witnesses with personal knowledge of the history of the Hanksville Cemetery Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3234. Currently known reputation in the community is that the Hanksville Cemetery Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3235. Public motor vehicle use of the Hanksville Cemetery Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3236. The Hanksville Cemetery Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3237. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hanksville Cemetery Road.

3238. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hanksville Cemetery Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hanksville East Loop Road, 107

3239. The Hanksville East Loop Road is designated as county road number 107 and SGID road identification number RD280269 and is more or less 1.11 miles long.

3240. Exhibit 254 (attached hereto and incorporated herein) contains certain information pertaining to the Hanksville East Loop Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3241. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hanksville East Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 254. The Hanksville East Loop Road includes the segment of road specifically set forth in Exhibit 254 and as exists on the ground.

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

3242. The Hanksville East Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3243. The Hanksville East Loop Road appears on the Hanksville (1954) and The Notch (1954) USGS 7.5 minute quadrangle maps, and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3244. The County confirmed its acceptance of the Hanksville East Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Hanksville East Loop Road using public funds pursuant to the County's governmental right and authority.

3245. Witnesses with personal knowledge of the history of the Hanksville East Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3246. Currently known reputation in the community is that the Hanksville East Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3247. Public motor vehicle use of the Hanksville East Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3248. The Hanksville East Loop 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 Hanksville East Loop Road.

3250. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hanksville East Loop Road on lands owned by the United States as

described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sand Slide Well Road, 184D

3251. The Sand Slide Well Road is designated as county road number 184D and SGID road identification number RD280297 and is more or less 4.80 miles long.

3252. Exhibit 255 (attached hereto and incorporated herein) contains certain information pertaining to the Sand Slide Well Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3253. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sand Slide Well Road solely as it crosses United States public land as included and specifically described in Exhibit 255. The Sand Slide Well Road includes the segment of road specifically set forth in Exhibit 255 and as exists on the ground.

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

3254. The Sand Slide Well Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3255. The Sand Slide Well Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sand Slide Well Road using public funds pursuant to the County's governmental right and authority.

3256. Witnesses with personal knowledge of the history of the Sand Slide Well Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3257. Currently known reputation in the community is that the Sand Slide Well Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3258. Public motor vehicle use of the Sand Slide Well Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3259. The Sand Slide Well Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3260. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sand Slide Well Road.

3261. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sand Slide Well Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

101_1 Road

3262. The 101_1 Road is designated as county road number 101_1 and SGID road identification number RD280699 and is more or less 2.72 miles long.

3263. Exhibit 256 (attached hereto and incorporated herein) contains certain information pertaining to the 101_1 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3264. In this action, the State and County seek to quiet title to the public highway right-of-way for the 101_1 Road solely as it crosses United States public land as included and specifically described in Exhibit 256. The 101_1 Road includes the segment of road specifically set forth in Exhibit 256 and as exists on the ground.

Acceptance of the 101_1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3265. The 101_1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3266. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 101_1 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3267. The 101_1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the 101_1 Road pursuant to the County's governmental right and authority.

3268. Witnesses with personal knowledge of the history of the 101_1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3269. Currently known reputation in the community is that the 101_1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3270. Public motor vehicle use of the 101_1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3271. The 101_1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3272. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 101_1 Road.

3273. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 101_1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

101_12 Road

3274. The 101_12 Road is designated as county road number 101_12 and SGID road identification number RD280700 and is more or less 1.18 miles long.

3275. Exhibit 257 (attached hereto and incorporated herein) contains certain information pertaining to the 101_12 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3276. In this action, the State and County seek to quiet title to the public highway right-of-way for the 101_12 Road solely as it crosses United States public land as included and specifically described in Exhibit 257. The 101_12 Road includes the segment of road specifically set forth in Exhibit 257 and as exists on the ground.

Acceptance of the 101_12 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3277. The 101_12 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3278. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 101_12 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3279. The 101_12 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the 101_12 Road pursuant to the County's governmental right and authority.

3280. Witnesses with personal knowledge of the history of the 101_12 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3281. Currently known reputation in the community is that the 101_12 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3282. Public motor vehicle use of the 101_12 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3283. The 101_12 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3284. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 101_12 Road.

3285. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 101_12 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

103_3 Road

3286. The 103_3 Road is designated as county road number 103_3 and SGID road identification number RD280702 and is more or less 3.54 miles long.

3287. Exhibit 258 (attached hereto and incorporated herein) contains certain information pertaining to the 103_3 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3288. In this action, the State and County seek to quiet title to the public highway right-of-way for the 103_3 Road solely as it crosses United States public land as included and specifically described in Exhibit 258. The 103_3 Road includes the segment of road specifically set forth in Exhibit 258 and as exists on the ground.

Acceptance of the 103_3 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3289. The 103_3 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3290. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 103_3 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3291. The 103_3 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the103_3 Road pursuant to the County's governmental right and authority.

3292. Witnesses with personal knowledge of the history of the 103_3 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3293. Currently known reputation in the community is that the 103_3 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3294. Public motor vehicle use of the 103_3 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3295. The 103_3 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3296. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 103_3 Road.

3297. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 103_3 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Poison Spring Road, 186D

3298. The Poison Spring Road is designated as county road number 186D and SGID road identification number RD280775 and is more or less 3.32 miles long.

3299. Exhibit 259 (attached hereto and incorporated herein) contains certain information pertaining to the Poison Spring Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3300. In this action, the State and County seek to quiet title to the public highway right-of-way for the Poison Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 259. The Poison Spring Road includes the segment of road specifically set forth in Exhibit 259 and as exists on the ground.

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

3301. The Poison Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3302. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Poison Spring Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3303. The County confirmed its acceptance of the Poison Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. *See* UTAH CODE ANN. § 72-3-103(4) (2009). Following its confirmed acceptance of this road

and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Poison Spring Road pursuant to the County's governmental right and authority.

3304. Witnesses with personal knowledge of the history of the Poison Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3305. Currently known reputation in the community is that the Poison Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3306. Public motor vehicle use of the Poison Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3307. The Poison Spring 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 Poison Spring Road.

3309. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Poison Spring Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

TENTH CAUSE OF ACTION - QUIET TITLE
BLACKBURN WASH AREA

3310. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

3311. The Blackburn Wash Area is located in northeastern Wayne County. *See* Exhibit 12.

3312. The Blackburn Wash Area includes the following roads — listed by Common Road Name (if applicable) and County Unique Number: (1) Blackburn Wash Road, 111; (2) Blackburn Wash Spur Road, 111A; (3) The Square Road, 112; (4) San Rafael Road, 112_1; (5) Jeffrey Wells Road, 112_2; (6) South of the Square Road, 113; (7) River Overlook Road, 113_1; (8) North River Road, 109; (9) Cow Dung Road, 110; (10) 111_1 Road, 111_1; (11) Well Draw Road, 165D; (12) Well Draw Road, 165D_4; (13) Well Draw Road, 165D_6; (14) Old State Road, 167D; (15) Old State Road, 167D_1; (16) 156D_2 Road, 156D_2; and (17) Muddy River Road, 166D.

3313. Each right-of-way claimed in the Blackburn Wash 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.

3314. All rights-of-way claimed in the Blackburn Wash 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.

3315. All rights-of-way claimed in the Blackburn Wash 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).

3316. Prior to October 21, 1976, the State of Utah, Wayne 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.

Blackburn Wash Road, 111

3317. The Blackburn Wash Road is designated as county road number 111 and SGID road identification number RD280273 and is more or less 29.89 miles long.

3318. Exhibit 260 (attached hereto and incorporated herein) contains certain information pertaining to the Blackburn Wash Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3319. In this action, the State and County seek to quiet title to the public highway right-of-way for the Blackburn Wash Road solely as it crosses United States public land as included

and specifically described in Exhibit 260. The Blackburn Wash Road includes the segment of road specifically set forth in Exhibit 260 and as exists on the ground.

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

3320. The Blackburn Wash Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3321. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Blackburn Wash Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3322. The Blackburn Wash Road appears on the Hanksville (1963) and Robbers Roost Canyon (1963) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3323. The Blackburn Wash Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Blackburn Wash Road using public funds pursuant to the County's governmental right and authority.

3324. Witnesses with personal knowledge of the history of the Blackburn Wash Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3325. Currently known reputation in the community is that the Blackburn Wash Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3326. Public motor vehicle use of the Blackburn Wash Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3327. The Blackburn Wash Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3328. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Blackburn Wash Road.

3329. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Blackburn Wash Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Blackburn Wash Spur Road, 111A

3330. The Blackburn Wash Spur Road is designated as county road number 111A and SGID road identification number RD280274 and is more or less 0.39 miles long.

3331. Exhibit 261 (attached hereto and incorporated herein) contains certain information pertaining to the Blackburn Wash Spur Road including, a map depicting the road; township,

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

3332. In this action, the State and County seek to quiet title to the public highway right-of-way for the Blackburn Wash Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 261. The Blackburn Wash Spur Road includes the segment of road specifically set forth in Exhibit 261 and as exists on the ground.

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

3333. The Blackburn Wash Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3334. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Blackburn Wash Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3335. The Blackburn Wash Spur Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3336. The Blackburn Wash Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Blackburn Wash Spur Road using public funds pursuant to the County's governmental right and authority.

3337. Witnesses with personal knowledge of the history of the Blackburn Wash Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3338. Currently known reputation in the community is that the Blackburn Wash Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3339. Public motor vehicle use of the Blackburn Wash Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3340. The Blackburn Wash Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3341. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Blackburn Wash Spur Road.

3342. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Blackburn Wash Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

The Square Road, 112

3343. The Square Road is designated as county road number 112 and SGID road identification number RD280275 and is more or less 8.25 miles long.

3344. Exhibit 262 (attached hereto and incorporated herein) contains certain information pertaining to The Square Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3345. In this action, the State and County seek to quiet title to the public highway right-of-way for The Square Road solely as it crosses United States public land as included and specifically described in Exhibit 262. The Square Road includes the segment of road specifically set forth in Exhibit 262 and as exists on the ground.

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

3346. The Square Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3347. The Square Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3348. The Square Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving The Square Road using public funds pursuant to the County's governmental right and authority.

3349. Witnesses with personal knowledge of the history of The Square Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3350. Currently known reputation in the community is that The Square Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3351. Public motor vehicle use of The Square Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3352. The Square Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3353. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying The Square Road.

3354. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for The Square Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

San Rafael Road, 112_1

3355. The San Rafael Road is designated as county road number 112_1 and SGID road identification number RD280276 and is more or less 2.63 miles long.

3356. Exhibit 263 (attached hereto and incorporated herein) contains certain information pertaining to the San Rafael Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3357. In this action, the State and County seek to quiet title to the public highway right-of-way for the San Rafael Road solely as it crosses United States public land as included and specifically described in Exhibit 263. The San Rafael Road includes the segment of road specifically set forth in Exhibit 263 and as exists on the ground.

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

3358. The San Rafael Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3359. The San Rafael Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3360. The San Rafael Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the San Rafael Road using public funds pursuant to the County's governmental right and authority.

3361. Witnesses with personal knowledge of the history of the San Rafael Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3362. Currently known reputation in the community is that the San Rafael Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3363. Public motor vehicle use of the San Rafael Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3364. The San Rafael Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3365. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the San Rafael Road.

3366. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the San Rafael Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Jeffrey Wells Road, 112_2

3367. The Jeffrey Wells Road is designated as county road number 112_2 and SGID road identification number RD280277 and is more or less 2.29 miles long.

3368. Exhibit 264 (attached hereto and incorporated herein) contains certain information pertaining to the Jeffrey Wells Road including, a map depicting the road; township, range, and

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

3369. In this action, the State and County seek to quiet title to the public highway right-of-way for the Jeffrey Wells Road solely as it crosses United States public land as included and specifically described in Exhibit 264. The Jeffrey Wells Road includes the segment of road specifically set forth in Exhibit 264 and as exists on the ground.

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

3370. The Jeffrey Wells Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3371. The Jeffrey Wells Road appears on the Hanksville (1963) and Robbers Roost Canyon (1963) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3372. The Jeffrey Wells Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Jeffrey Wells Road using public funds pursuant to the County's governmental right and authority.

3373. Witnesses with personal knowledge of the history of the Jeffrey Wells Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3374. Currently known reputation in the community is that the Jeffrey Wells Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3375. Public motor vehicle use of the Jeffrey Wells Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3376. The Jeffrey Wells Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3377. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Jeffrey Wells Road.

3378. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Jeffrey Wells Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South of the Square Road, 113

3379. The South of the Square Road is designated as county road number 113 and SGID road identification number RD280278 and is more or less 3.52 miles long.

3380. Exhibit 265 (attached hereto and incorporated herein) contains certain information pertaining to the South of the Square Road including, a map depicting the road; township, range,

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

3381. In this action, the State and County seek to quiet title to the public highway right-of-way for the South of the Square Road solely as it crosses United States public land as included and specifically described in Exhibit 265. The South of the Square Road includes the segment of road specifically set forth in Exhibit 265 and as exists on the ground.

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

3382. The South of the Square Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3383. The South of the Square Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3384. The South of the Square Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South of the Square Road using public funds pursuant to the County's governmental right and authority.

3385. Witnesses with personal knowledge of the history of the South of the Square Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3386. Currently known reputation in the community is that the South of the Square Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3387. Public motor vehicle use of the South of the Square Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3388. The South of the Square Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3389. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South of the Square Road.

3390. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South of the Square Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

River Overlook Road, 113_1

3391. The River Overlook Road is designated as county road number 113_1 and SGID road identification number RD280279 and is more or less 1.32 miles long.

3392. Exhibit 266 (attached hereto and incorporated herein) contains certain information pertaining to the River Overlook Road including, a map depicting the road; township, range, and

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

3393. In this action, the State and County seek to quiet title to the public highway right-of-way for the River Overlook Road solely as it crosses United States public land as included and specifically described in Exhibit 266. The River Overlook Road includes the segment of road specifically set forth in Exhibit 266 and as exists on the ground.

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

3394. The River Overlook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3395. The River Overlook Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3396. The River Overlook Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the River Overlook Road using public funds pursuant to the County's governmental right and authority.

3397. Witnesses with personal knowledge of the history of the River Overlook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3398. Currently known reputation in the community is that the River Overlook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3399. Public motor vehicle use of the River Overlook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3400. The River Overlook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3401. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the River Overlook Road.

3402. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the River Overlook Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North River Road, 109

3403. The North River Road is designated as county road number 109 and SGID road identification number RD280271 and is more or less 2.84 miles long.

3404. Exhibit 267 (attached hereto and incorporated herein) contains certain information pertaining to the North River Road including, a map depicting the road; township, range, and

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

3405. In this action, the State and County seek to quiet title to the public highway right-of-way for the North River Road solely as it crosses United States public land as included and specifically described in Exhibit 267. The North River Road includes the segment of road specifically set forth in Exhibit 267 and as exists on the ground.

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

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

3407. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the North River Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3408. The North River Road appears on The Notch (1954) USGS 7.5 minute quadrangle map and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3409. The County confirmed its acceptance of the North River Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the North River Road using public funds pursuant to the County's governmental right and authority.

3410. Witnesses with personal knowledge of the history of the North River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3411. Currently known reputation in the community is that the North River Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3412. Public motor vehicle use of the North River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3413. The North River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3414. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North River Road.

3415. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North River Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cow Dung Road, 110

3416. The Cow Dung Road is designated as county road number 110 and SGID road identification number RD280272 and is more or less 8.82 miles long.

3417. Exhibit 268 (attached hereto and incorporated herein) contains certain information pertaining to the Cow Dung Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3418. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cow Dung Road solely as it crosses United States public land as included and specifically described in Exhibit 268. The Cow Dung Road includes the segment of road specifically set forth in Exhibit 268 and as exists on the ground.

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

3419. The Cow Dung Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3420. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Cow Dung Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3421. The Cow Dung Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cow Dung Road using public funds pursuant to the County's governmental right and authority.

3422. Witnesses with personal knowledge of the history of the Cow Dung Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3423. Currently known reputation in the community is that the Cow Dung Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3424. Public motor vehicle use of the Cow Dung Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3425. The Cow Dung Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3426. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cow Dung Road.

3427. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cow Dung Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

111_1 Road

3428. The 111_1 Road is designated as county road number 111_1 and SGID road identification number RD280705 and is more or less 2.30 miles long.

3429. Exhibit 269 (attached hereto and incorporated herein) contains certain information pertaining to the 111_1 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3430. In this action, the State and County seek to quiet title to the public highway right-of-way for the 111_1 Road solely as it crosses United States public land as included and specifically described in Exhibit 269. The 111_1 Road includes the segment of road specifically set forth in Exhibit 269 and as exists on the ground.

Acceptance of the 111_1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3431. The 111_1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3432. The 111_1 Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3433. The 111_1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the 111_1 Road pursuant to the County's governmental right and authority.

3434. Witnesses with personal knowledge of the history of the 111_1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3435. Currently known reputation in the community is that the 111_1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3436. Public motor vehicle use of the 111_1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3437. The 111_1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3438. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 111_1 Road.

3439. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 111_1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Well Draw Road, 165D

3440. The Well Draw Road is designated as county road number 165D and SGID road identification number RD280757 and is more or less 1.76 miles long.

3441. Exhibit 270 (attached hereto and incorporated herein) contains certain information pertaining to the Well Draw Road, 165D including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3442. In this action, the State and County seek to quiet title to the public highway right-of-way for the Well Draw Road, 165D solely as it crosses United States public land as included and specifically described in Exhibit 270. The Well Draw Road, 165D includes the segment of road specifically set forth in Exhibit 270 and as exists on the ground.

Acceptance of the Well Draw Road, 165D R.S. 2477 Right-of-way Prior to October 21, 1976

3443. The Well Draw Road, 165D has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3444. The Well Draw Road, 165D appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3445. The Well Draw Road, 165D was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Well Draw Road, 165D pursuant to the County's governmental right and authority.

3446. Witnesses with personal knowledge of the history of the Well Draw Road, 165D confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3447. Currently known reputation in the community is that the Well Draw Road, 165D has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3448. Public motor vehicle use of the Well Draw Road, 165D as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3449. The Well Draw Road, 165D traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3450. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Well Draw Road, 165D.

3451. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Well Draw Road, 165D on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Well Draw Road, 165D_4

3452. The Well Draw Road is designated as county road number 165D_4 and SGID road identification number RD280758 and is more or less 1.51 miles long.

3453. Exhibit 271 (attached hereto and incorporated herein) contains certain information pertaining to the Well Draw Road, 165D_4 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3454. In this action, the State and County seek to quiet title to the public highway right-of-way for the Well Draw Road, 165D_4 solely as it crosses United States public land as included and specifically described in Exhibit 271. The Well Draw Road, 165D_4 includes the segment of road specifically set forth in Exhibit 271 and as exists on the ground.

Acceptance of the Well Draw Road, 165D_4 R.S. 2477 Right-of-way Prior to October 21, 1976

3455. The Well Draw Road, 165D_4 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3456. The Well Draw Road, 165D_4 appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3457. The Well Draw Road, 165D_4 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Well Draw Road, 165D_4 pursuant to the County's governmental right and authority.

3458. Witnesses with personal knowledge of the history of the Well Draw Road, 165D_4 confirm public use of this road as a public 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 Well Draw Road, 165D_4 has been open for all to come 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 Well Draw Road, 165D_4 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 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 Well Draw Road, 165D_4 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 Well Draw Road, 165D_4.

3463. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Well Draw Road, 165D_4 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Well Draw Road, 165D_6

3464. The Well Draw Road is designated as county road number 165D_6 and SGID road identification number RD280759 and is more or less 3.53 miles long.

3465. Exhibit 272 (attached hereto and incorporated herein) contains certain information pertaining to the Well Draw Road, 165D_6 including, a map depicting the road; 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 Well Draw Road, 165D_6 solely as it crosses United States public land as included and specifically described in Exhibit 272. The Well Draw Road, 165D_6 includes the segment of road specifically set forth in Exhibit 272 and as exists on the ground.

Acceptance of the Well Draw Road, 165D_6 R.S. 2477 Right-of-way Prior to October 21, 1976

3467. The Well Draw Road, 165D_6 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3468. The Well Draw Road, 165D_6 appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3469. The Well Draw Road, 165D_6 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Well Draw Road, 165D_6 pursuant to the County's governmental right and authority.

3470. Witnesses with personal knowledge of the history of the Well Draw Road, 165D_6 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3471. Currently known reputation in the community is that the Well Draw Road, 165D_6 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3472. Public motor vehicle use of the Well Draw Road, 165D_6 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3473. The Well Draw Road, 165D_6 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3474. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Well Draw Road, 165D_6.

3475. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Well Draw Road, 165D_6 on lands owned 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 State Road, 167D

3476. The Old State Road is designated as county road number 167D and SGID road identification number RD280761 and is more or less 3.89 miles long.

3477. Exhibit 273 (attached hereto and incorporated herein) contains certain information pertaining to the Old State Road, 167D including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3478. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old State Road, 167D solely as it crosses United States public land as included and specifically described in Exhibit 273. The Old State Road, 167D includes the segment of road specifically set forth in Exhibit 273 and as exists on the ground.

Acceptance of the Old State Road, 167D R.S. 2477 Right-of-way Prior to October 21, 1976

3479. The Old State Road, 167D has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3480. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Old State Road, 167D as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3481. The Old State Road, 167D appears on The Notch (1954) USGS 7.5 minute quadrangle map and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the

existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3482. The Old State Road, 167D was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Old State Road, 167D pursuant to the County's governmental right and authority.

3483. Witnesses with personal knowledge of the history of the Old State Road, 167D confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3484. Currently known reputation in the community is that the Old State Road, 167D has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3485. Public motor vehicle use of the Old State Road, 167D as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3486. The Old State Road, 167D traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3487. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 State Road, 167D.

3488. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old State Road, 167D on lands owned 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 State Road, 167D_1

3489. The Old State Road is designated as county road number 167D_1 and SGID road identification number RD280762 and is more or less 0.65 miles long.

3490. Exhibit 274 (attached hereto and incorporated herein) contains certain information pertaining to the Old State Road, 167D_1 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3491. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old State Road, 167D_1 solely as it crosses United States public land as included and specifically described in Exhibit 274. The Old State Road, 167D_1 includes the segment of road specifically set forth in Exhibit 274 and as exists on the ground.

Acceptance of the Old State Road, 167D_1 R.S. 2477 Right-of-way Prior to October 21, 1976

3492. The Old State Road, 167D_1 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3493. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Old State Road, 167D_1 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3494. The Old State Road, 167D_1 appears on The Notch (1954) USGS 7.5 minute quadrangle map and Hanksville (1963) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3495. The County confirmed its acceptance of the Old State Road, 167D_1 by 1975, when it designated and accepted the road as a County highway on the County's general highway map. *See* UTAH CODE ANN. § 72-3-103(4) (2009). Following its confirmed acceptance of this road and prior to October 21, 1976, the County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Old State Road, 167D_1 pursuant to the County's governmental right and authority.

3496. Witnesses with personal knowledge of the history of the Old State Road, 167D_1 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3497. Currently known reputation in the community is that the Old State Road, 167D_1 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3498. Public motor vehicle use of the Old State Road, 167D_1 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3499. The Old State Road, 167D_1 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3500. Without confirmation from the United States, a cloud remains on the State and County's title to the right-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 State Road, 167D_1.

3501. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old State Road, 167D_1 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

156D_2 Road

3502. The 156D_2 Road is designated as county road number 156D_2 and SGID road identification number RD280754 and is more or less 0.30 miles long.

3503. Exhibit 275 (attached hereto and incorporated herein) contains certain information pertaining to the 156D_2 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3504. In this action, the State and County seek to quiet title to the public highway right-of-way for the 156D_2 Road solely as it crosses United States public land as included and specifically described in Exhibit 275. The 156D_2 Road includes the segment of road specifically set forth in Exhibit 275 and as exists on the ground.

Acceptance of the 156D_2 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3505. The 156D_2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3506. The 156D_2 Road appears on the Steamboat Point (1954) USGS 7.5 minute quadrangle map and Factory Butte (1954) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3507. The 156D_2 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 156D_2 Road pursuant to the County's governmental right and authority.

3508. Witnesses with personal knowledge of the history of the 156D_2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3509. Currently known reputation in the community is that the 156D_2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3510. Public motor vehicle use of the 156D_2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3511. The 156D_2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3512. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 156D_2 Road.

3513. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 156D_2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Muddy River Road, 166D

3514. The Muddy River Road is designated as county road number 166D and SGID road identification number RD280760 and is more or less 6.72 miles long.

3515. Exhibit 276 (attached hereto and incorporated herein) contains certain information pertaining to the Muddy River Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3516. In this action, the State and County seek to quiet title to the public highway right-of-way for the Muddy River Road solely as it crosses United States public land as included and

specifically described in Exhibit 276. The Muddy River Road includes the segment of road specifically set forth in Exhibit 276 and as exists on the ground.

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

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

3518. The Muddy River Road appears on the Hanksville (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3519. The Muddy River Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Muddy River Road pursuant to the County's governmental right and authority.

3520. Witnesses with personal knowledge of the history of the Muddy River Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3521. Currently known reputation in the community is that the Muddy River Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3522. Public motor vehicle use of the Muddy River Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

3523. The Muddy River Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3524. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Muddy River Road.

3525. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Muddy River Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

ELEVENTH CAUSE OF ACTION - QUIET TITLE
EKKER RANCH AREA

3526. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

3527. The Ekker Ranch Area is located in eastern Wayne County. *See* Exhibit 13.

3528. The Ekker Ranch Area includes the following roads — listed by Common Road Name and County Unique Number: (1) Roost Road, 114; (2) Lower San Rafael Road, 114A; (3) Oil Well Road/Roost House Road, 115; (4) Ekker Ranch Road, 116; (5) South Ekker Ranch Road, 117; (6) Angel Point Road, 118; (7) Sam's Mesa Road, 119; (8) Chad Moore's Well Road, 121; (9) Bull Pasture Overlook Road, 122; (10) Spur Road, 120; (11) Windy Peak Road, 120A; (12) Horseshoe Overlook Road, 209D; (13) 114_1 Road, 114_1; (14) 114_11 Road, 114_11; (15) Twin Corral Oil Well Road, 114_14; (16) 114_20 Road, 114_20; (17) 114_3 Road, 114_3;

(18) 114_4 Road, 114_4; (19) 114_5 Road, 114_5; (20) 114_6 Road, 114_6; (21) 114_8 Road, 114_8; (22) 116_2 Road, 116_2; (23) 117_1 Road, 117_1; (24) Sam's Mesa Road, 119_3; (25) Well Road, 121_1; (26) Well Road, 121_2; (27) 122_2 Road, 122_2; (28) 122_3 Road, 122_3; (29) 122_4 Road, 122_4; (30) 122_6 Road, 122_6; (31) 114_19 Road, 114_19; (32) High Spur Road, 120_1; and (33) Spur Trail Road, 120_5; (34) HC_1 Road, HC_1; and (35) HC_3 Road, HC_3.

3529. Each right-of-way claimed in the Ekker Ranch 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.

3530. All rights-of-way claimed in the Ekker Ranch 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.

3531. All rights-of-way claimed in the Ekker Ranch 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).

3532. Prior to October 21, 1976, the State of Utah, Wayne 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.

Roost Road, 114

3533. The Roost Road is designated as county road number 114 and SGID road identification number RD280280 and is more or less 30.45 miles long.

3534. Exhibit 277 (attached hereto and incorporated herein) contains certain information pertaining to the Roost Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3535. In this action, the State and County seek to quiet title to the public highway right-of-way for the Roost Road solely as it crosses United States public land as included and specifically described in Exhibit 277. The Roost Road includes the segment of road specifically set forth in Exhibit 277 and as exists on the ground.

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

3536. The Roost Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3537. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Roost Road as a public highway located on the land at

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

3538. The Roost Road appears on the Gordon Flats (1953) and Head Spur (1953) USGS 7.5 minute quadrangle maps, and Orange Cliffs (1953) and The Spur (1953) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3539. The County confirmed its acceptance of the Roost Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Roost Road using public funds pursuant to the County's governmental right and authority.

3540. Witnesses with personal knowledge of the history of the Roost Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3541. Currently known reputation in the community is that the Roost Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3542. Public motor vehicle use of the Roost Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3543. The Roost Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3544. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Roost Road.

3545. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Roost Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower San Rafael Road, 114A

3546. The Lower San Rafael Road is designated as county road number 114A and SGID road identification number RD280281 and is more or less 10.10 miles long.

3547. Exhibit 278 (attached hereto and incorporated herein) contains certain information pertaining to the Lower San Rafael Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3548. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower San Rafael Road solely as it crosses United States public land as included and specifically described in Exhibit 278. The Lower San Rafael Road includes the segment of road specifically set forth in Exhibit 278 and as exists on the ground.

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

3549. The Lower San Rafael Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3550. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Lower San Rafael Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3551. The Lower San Rafael Road appears on The Spur (1953) and Robbers Roost Canyon (1963) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3552. The County confirmed its acceptance of the Lower San Rafael Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower San Rafael Road using public funds pursuant to the County's governmental right and authority.

3553. Witnesses with personal knowledge of the history of the Lower San Rafael Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3554. Currently known reputation in the community is that the Lower San Rafael Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3555. Public motor vehicle use of the Lower San Rafael Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3556. The Lower San Rafael Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3557. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower San Rafael Road.

3558. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lower San Rafael Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Oil Well Road/Roost House Road, 115

3559. The Oil Well Road/Roost House Road is designated as county road number 115 and SGID road identification number RD280282 and is more or less 9.76 miles long.

3560. Exhibit 279 (attached hereto and incorporated herein) contains certain information pertaining to the Oil Well Road/Roost House Road including, a map depicting the road;

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

3561. In this action, the State and County seek to quiet title to the public highway right-of-way for the Oil Well Road/Roost House Road solely as it crosses United States public land as included and specifically described in Exhibit 279. The Oil Well Road/Roost House Road includes the segment of road specifically set forth in Exhibit 279 and as exists on the ground.

Acceptance of the Oil Well Road/Roost House Road R.S. 2477 Right-of-way Prior to October 21, 1976

3562. The Oil Well Road/Roost House Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3563. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Oil Well Road/Roost House Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3564. The Oil Well Road/Roost House Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3565. The Oil Well Road/Roost House Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Oil Well Road/Roost House Road using public funds pursuant to the County's governmental right and authority.

3566. Witnesses with personal knowledge of the history of the Oil Well Road/Roost House Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3567. Currently known reputation in the community is that the Oil Well Road/Roost House Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3568. Public motor vehicle use of the Oil Well Road/Roost House Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3569. The Oil Well Road/Roost House Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3570. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Oil Well Road/Roost House Road.

3571. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Oil Well Road/Roost House Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Ekker Ranch Road, 116

3572. The Ekker Ranch Road is designated as county road number 116 and SGID road identification number RD280283 and is more or less 6.84 miles long.

3573. Exhibit 280 (attached hereto and incorporated herein) contains certain information pertaining to the Ekker Ranch Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3574. In this action, the State and County seek to quiet title to the public highway right-of-way for the Ekker Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 280. The Ekker Ranch Road includes the segment of road specifically set forth in Exhibit 280 and as exists on the ground.

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

3575. The Ekker Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3576. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Ekker Ranch Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3577. The Ekker Ranch Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3578. The County confirmed its acceptance of the Ekker Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Ekker Ranch Road using public funds pursuant to the County's governmental right and authority.

3579. Witnesses with personal knowledge of the history of the Ekker Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3580. Currently known reputation in the community is that the Ekker Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3581. Public motor vehicle use of the Ekker Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3582. The Ekker Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3583. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Ekker Ranch Road.

3584. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Ekker Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Ekker Ranch Road, 117

3585. The South Ekker Ranch Road is designated as county road number 117 and SGID road identification number RD280284 and is more or less 3.89 miles long.

3586. Exhibit 281 (attached hereto and incorporated herein) contains certain information pertaining to the South Ekker Ranch Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3587. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Ekker Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 281. The South Ekker Ranch Road includes the segment of road specifically set forth in Exhibit 281 and as exists on the ground.

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

3588. The South Ekker Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3589. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the South Ekker Ranch Road as a public highway located on

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

3590. The South Ekker Ranch Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3591. The County confirmed its acceptance of the South Ekker Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Ekker Ranch Road using public funds pursuant to the County's governmental right and authority.

3592. Witnesses with personal knowledge of the history of the South Ekker Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3593. Currently known reputation in the community is that the South Ekker Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3594. Public motor vehicle use of the South Ekker Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3595. The South Ekker Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3596. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Ekker Ranch Road.

3597. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Ekker Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Angel Point Road, 118

3598. The Angel Point Road is designated as county road number 118 and SGID road identification number RD280285 and is more or less 11.38 miles long.

3599. Exhibit 282 (attached hereto and incorporated herein) contains certain information pertaining to the Angel Point Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3600. In this action, the State and County seek to quiet title to the public highway right-of-way for the Angel Point Road solely as it crosses United States public land as included and specifically described in Exhibit 282. The Angel Point Road includes the segment of road specifically set forth in Exhibit 282 and as exists on the ground.

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

3601. The Angel Point Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3602. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Angel Point Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3603. The Angel Point Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3604. The Angel Point Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Angel Point Road using public funds pursuant to the County's governmental right and authority.

3605. Witnesses with personal knowledge of the history of the Angel Point Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3606. Currently known reputation in the community is that the Angel Point Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3607. Public motor vehicle use of the Angel Point Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3608. The Angel Point Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3609. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Angel Point Road.

3610. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Angel Point Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sam's Mesa Road, 119

3611. The Sam's Mesa Road is designated as county road number 119 and SGID road identification number RD280286 and is more or less 7.75 miles long.

3612. Exhibit 283 (attached hereto and incorporated herein) contains certain information pertaining to the Sam's Mesa Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3613. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sam's Mesa Road solely as it crosses United States public land as included and specifically described in Exhibit 283. The Sam's Mesa Road includes the segment of road specifically set forth in Exhibit 283 and as exists on the ground.

Acceptance of the Sam's Mesa Road R.S. 2477 Right-of-way Prior to October 21, 1976

3614. The Sam's Mesa Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3615. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Sam's Mesa Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3616. The Sam's Mesa Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sam's Mesa Road using public funds pursuant to the County's governmental right and authority.

3617. Witnesses with personal knowledge of the history of the Sam's Mesa Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3618. Currently known reputation in the community is that the Sam's Mesa Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

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

3620. The Sam's Mesa Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3621. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sam's Mesa Road.

3622. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sam's Mesa Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Chad Moore's Well Road, 121

3623. The Chad Moore's Well Road is designated as county road number 121 and SGID road identification number RD280289 and is more or less 4.25 miles long.

3624. Exhibit 284 (attached hereto and incorporated herein) contains certain information pertaining to the Chad Moore's Well Road including, a map depicting the road; township, range,

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

3625. In this action, the State and County seek to quiet title to the public highway right-of-way for the Chad Moore's Well Road solely as it crosses United States public land as included and specifically described in Exhibit 284. The Chad Moore's Well Road includes the segment of road specifically set forth in Exhibit 284 and as exists on the ground.

Acceptance of the Chad Moore's Well Road R.S. 2477 Right-of-way Prior to October 21, 1976

3626. The Chad Moore's Well Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3627. The Chad Moore's Well Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3628. The Chad Moore's Well Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Chad Moore's Well Road using public funds pursuant to the County's governmental right and authority.

3629. Witnesses with personal knowledge of the history of the Chad Moore's Well Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3630. Currently known reputation in the community is that the Chad Moore's Well Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

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

3632. The Chad Moore's Well Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3633. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Chad Moore's Well Road.

3634. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Chad Moore's Well Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bull Pasture Overlook Road, 122

3635. The Bull Pasture Overlook Road is designated as county road number 122 and SGID road identification number RD280290 and is more or less 5.01 miles long.

3636. Exhibit 285 (attached hereto and incorporated herein) contains certain information pertaining to the Bull Pasture Overlook Road including, a map depicting the road; township,

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

3637. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bull Pasture Overlook Road solely as it crosses United States public land as included and specifically described in Exhibit 285. The Bull Pasture Overlook Road includes the segment of road specifically set forth in Exhibit 285 and as exists on the ground.

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

3638. The Bull Pasture Overlook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3639. The Bull Pasture Overlook Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3640. The Bull Pasture Overlook Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Bull Pasture Overlook Road using public funds pursuant to the County's governmental right and authority.

3641. Witnesses with personal knowledge of the history of the Bull Pasture Overlook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3642. Currently known reputation in the community is that the Bull Pasture Overlook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3643. Public motor vehicle use of the Bull Pasture Overlook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3644. The Bull Pasture Overlook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3645. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bull Pasture Overlook Road.

3646. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bull Pasture Overlook Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Spur Road, 120

3647. The Spur Road is designated as county road number 120 and SGID road identification number RD280287 and is more or less 19.68 miles long.

3648. Exhibit 286 (attached hereto and incorporated herein) contains certain information pertaining to the Spur Road including, a map depicting the road; township, range, and section

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

3649. In this action, the State and County seek to quiet title to the public highway right-of-way for the Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 286. The Spur Road includes the segment of road specifically set forth in Exhibit 286 and as exists on the ground.

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

3650. The Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3651. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3652. The Spur Road appears on the Head Spur (1953) USGS 7.5 minute quadrangle map and The Spur (1953) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3653. The Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Spur Road using public funds pursuant to the County's governmental right and authority.

3654. Witnesses with personal knowledge of the history of the Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3655. Currently known reputation in the community is that the Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3656. Public motor vehicle use of the Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3657. The Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3658. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Spur Road.

3659. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Windy Peak Road, 120A

3660. The Windy Peak Road is designated as county road number 120A and SGID road identification number RD280288 and is more or less 2.30 miles long.

3661. Exhibit 287 (attached hereto and incorporated herein) contains certain information pertaining to the Windy Peak Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3662. In this action, the State and County seek to quiet title to the public highway right-of-way for the Windy Peak Road solely as it crosses United States public land as included and specifically described in Exhibit 287. The Windy Peak Road includes the segment of road specifically set forth in Exhibit 287 and as exists on the ground.

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

3663. The Windy Peak Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3664. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Windy Peak Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3665. The Windy Peak Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Windy Peak Road using public funds pursuant to the County's governmental right and authority.

3666. Witnesses with personal knowledge of the history of the Windy Peak Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

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

3667. Currently known reputation in the community is that the Windy Peak Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3668. Public motor vehicle use of the Windy Peak Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3669. The Windy Peak Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3670. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Windy Peak Road.

3671. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Windy Peak Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Horseshoe Overlook Road, 209D

3672. The Horseshoe Overlook Road is designated as county road number 209D and SGID road identification number RD280301 and is more or less 2.04 miles long.

3673. Exhibit 288 (attached hereto and incorporated herein) contains certain information pertaining to the Horseshoe Overlook Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3674. In this action, the State and County seek to quiet title to the public highway right-of-way for the Horseshoe Overlook Road solely as it crosses United States public land as included and specifically described in Exhibit 288. The Horseshoe Overlook Road includes the segment of road specifically set forth in Exhibit 288 and as exists on the ground.

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

3675. The Horseshoe Overlook Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3676. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Horseshoe Overlook Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3677. The Horseshoe Overlook Road appears on The Spur (1953) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3678. The Horseshoe Overlook Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477

right-of-way by managing, maintaining, and improving the Horseshoe Overlook Road using public funds pursuant to the County's governmental right and authority.

3679. Witnesses with personal knowledge of the history of the Horseshoe Overlook Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3680. Currently known reputation in the community is that the Horseshoe Overlook Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3681. Public motor vehicle use of the Horseshoe Overlook Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3682. The Horseshoe Overlook Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3683. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Horseshoe Overlook Road.

3684. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Horseshoe Overlook Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_1 Road

3685. The 114_1 Road is designated as county road number 114_1 and SGID road identification number RD280711 and is more or less 3.42 miles long.

3686. Exhibit 289 (attached hereto and incorporated herein) contains certain information pertaining to the 114_1 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3687. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_1 Road solely as it crosses United States public land as included and specifically described in Exhibit 289. The 114_1 Road includes the segment of road specifically set forth in Exhibit 289 and as exists on the ground.

Acceptance of the 114_1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3688. The 114_1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3689. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 114_1 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3690. The 114_1 Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3691. The 114_1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_1 Road pursuant to the County's governmental right and authority.

3692. Witnesses with personal knowledge of the history of the 114_1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3693. Currently known reputation in the community is that the 114_1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3694. Public motor vehicle use of the 114_1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3695. The 114_1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3696. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_1 Road.

3697. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_11 Road

3698. The 114_11 Road is designated as county road number 114_11 and SGID road identification number RD280712 and is more or less 0.81 miles long.

3699. Exhibit 290 (attached hereto and incorporated herein) contains certain information pertaining to the 114_11 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3700. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_11 Road solely as it crosses United States public land as included and specifically described in Exhibit 290. The 114_11 Road includes the segment of road specifically set forth in Exhibit 290 and as exists on the ground.

Acceptance of the 114_11 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3701. The 114_11 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3702. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 114_11 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3703. The 114_11 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_11 Road pursuant to the County's governmental right and authority.

3704. Witnesses with personal knowledge of the history of the 114_11 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3705. Currently known reputation in the community is that the 114_11 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3706. Public motor vehicle use of the 114_11 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3707. The 114_11 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3708. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_11 Road.

3709. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_11 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Twin Corral Oil Well Road, 114_14

3710. The Twin Corral Oil Well Road is designated as county road number 114_14 and SGID road identification number RD280713 and is more or less 1.40 miles long.

3711. Exhibit 291 (attached hereto and incorporated herein) contains certain information pertaining to the Twin Corral Oil Well Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3712. In this action, the State and County seek to quiet title to the public highway right-of-way for the Twin Corral Oil Well Road solely as it crosses United States public land as included and specifically described in Exhibit 291. The Twin Corral Oil Well Road includes the segment of road specifically set forth in Exhibit 291 and as exists on the ground.

Acceptance of the Twin Corral Oil Well Road R.S. 2477 Right-of-way Prior to October 21, 1976

3713. The Twin Corral Oil Well Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3714. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Twin Corral Oil Well Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3715. The Twin Corral Oil Well Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Twin Corral Oil Well Road pursuant to the County's governmental right and authority.

3716. Witnesses with personal knowledge of the history of the Twin Corral Oil Well Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3717. Currently known reputation in the community is that the Twin Corral Oil Well Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3718. Public motor vehicle use of the Twin Corral Oil Well Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3719. The Twin Corral Oil Well Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3720. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Twin Corral Oil Well Road.

3721. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Twin Corral Oil Well Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_20 Road

3722. The 114_20 Road is designated as county road number 114_20 and SGID road identification number RD280716 and is more or less 3.87 miles long.

3723. Exhibit 292 (attached hereto and incorporated herein) contains certain information pertaining to the 114_20 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3724. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_20 Road solely as it crosses United States public land as included and specifically described in Exhibit 292. The 114_20 Road includes the segment of road specifically set forth in Exhibit 292 and as exists on the ground.

Acceptance of the 114_20 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3725. The 114_20 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3726. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 114_20 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3727. The 114_20 Road appears on the Head Spur (1953) USGS 7.5 minute quadrangle map and The Spur (1953) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3728. The 114_20 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_20 Road pursuant to the County's governmental right and authority.

3729. Witnesses with personal knowledge of the history of the 114_20 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3730. Currently known reputation in the community is that the 114_20 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3731. Public motor vehicle use of the 114_20 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3732. The 114_20 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3733. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_20 Road.

3734. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_20 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_3 Road

3735. The 114_3 Road is designated as county road number 114_3 and SGID road identification number RD280717 and is more or less 3.66 miles long.

3736. Exhibit 293 (attached hereto and incorporated herein) contains certain information pertaining to the 114_3 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3737. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_3 Road solely as it crosses United States public land as included and specifically described in Exhibit 293. The 114_3 Road includes the segment of road specifically set forth in Exhibit 293 and as exists on the ground.

Acceptance of the 114_3 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3738. The 114_3 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3739. The 114_3 Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3740. The 114_3 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_3 Road pursuant to the County's governmental right and authority.

3741. Witnesses with personal knowledge of the history of the 114_3 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3742. Currently known reputation in the community is that the 114_3 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3743. Public motor vehicle use of the 114_3 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3744. The 114_3 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3745. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_3 Road.

3746. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_3 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_4 Road

3747. The 114_4 Road is designated as county road number 114_4 and SGID road identification number RD280718 and is more or less 1.48 miles long.

3748. Exhibit 294 (attached hereto and incorporated herein) contains certain information pertaining to the 114_4 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3749. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_4 Road solely as it crosses United States public land as included and specifically described in Exhibit 294. The 114_4 Road includes the segment of road specifically set forth in Exhibit 294 and as exists on the ground.

Acceptance of the 114_4 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3750. The 114_4 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3751. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 114_4 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3752. The 114_4 Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3753. The 114_4 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_4 Road pursuant to the County's governmental right and authority.

3754. Witnesses with personal knowledge of the history of the 114_4 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3755. Currently known reputation in the community is that the 114_4 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3756. Public motor vehicle use of the 114_4 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3757. The 114_4 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3758. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_4 Road.

3759. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_4 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_5 Road

3760. The 114_5 Road is designated as county road number 114_5 and SGID road identification number RD280719 and is more or less 2.46 miles long.

3761. Exhibit 295 (attached hereto and incorporated herein) contains certain information pertaining to the 114_5 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3762. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_5 Road solely as it crosses United States public land as included and

specifically described in Exhibit 295. The 114_5 Road includes the segment of road specifically set forth in Exhibit 295 and as exists on the ground.

Acceptance of the 114_5 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3763. The 114_5 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3764. The 114_5 Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3765. The 114_5 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_5 Road pursuant to the County's governmental right and authority.

3766. Witnesses with personal knowledge of the history of the 114_5 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3767. Currently known reputation in the community is that the 114_5 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3768. Public motor vehicle use of the 114_5 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3769. The 114_5 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3770. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_5 Road.

3771. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_5 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_6 Road

3772. The 114_6 Road is designated as county road number 114_6 and SGID road identification number RD280720 and is more or less 0.98 miles long.

3773. Exhibit 296 (attached hereto and incorporated herein) contains certain information pertaining to the 114_6 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3774. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_6 Road solely as it crosses United States public land as included and specifically described in Exhibit 296. The 114_6 Road includes the segment of road specifically set forth in Exhibit 296 and as exists on the ground.

Acceptance of the 114_6 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3775. The 114_6 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3776. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 114_6 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3777. The 114_6 Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3778. The 114_6 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_6 Road pursuant to the County's governmental right and authority.

3779. Witnesses with personal knowledge of the history of the 114_6 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3780. Currently known reputation in the community is that the 114_6 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3781. Public motor vehicle use of the 114_6 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3782. The 114_6 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3783. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_6 Road.

3784. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_6 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_8 Road

3785. The 114_8 Road is designated as county road number 114_8 and SGID road identification number RD280697 and is more or less 1.38 miles long.

3786. Exhibit 297 (attached hereto and incorporated herein) contains certain information pertaining to the 114_8 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3787. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_8 Road solely as it crosses United States public land as included and

specifically described in Exhibit 297. The 114_8 Road includes the segment of road specifically set forth in Exhibit 297 and as exists on the ground.

Acceptance of the 114_8 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3788. The 114_8 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3789. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 114_8 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3790. The 114_8 Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3791. The 114_8 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_8 Road pursuant to the County's governmental right and authority.

3792. Witnesses with personal knowledge of the history of the 114_8 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3793. Currently known reputation in the community is that the 114_8 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3794. Public motor vehicle use of the 114_8 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3795. The 114_8 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3796. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_8 Road.

3797. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_8 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

116_2 Road

3798. The 116_2 Road is designated as county road number 116_2 and SGID road identification number RD280724 and is more or less 2.14 miles long.

3799. Exhibit 298 (attached hereto and incorporated herein) contains certain information pertaining to the 116_2 Road including, a map depicting the road; township, range, and section

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

3800. In this action, the State and County seek to quiet title to the public highway right-of-way for the 116_2 Road solely as it crosses United States public land as included and specifically described in Exhibit 298. The 116_2 Road includes the segment of road specifically set forth in Exhibit 298 and as exists on the ground.

Acceptance of the 116_2 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3801. The 116_2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3802. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 116_2 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3803. The 116_2 Road appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3804. The 116_2 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 116_2 Road pursuant to the County's governmental right and authority.

3805. Witnesses with personal knowledge of the history of the 116_2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3806. Currently known reputation in the community is that the 116_2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3807. Public motor vehicle use of the 116_2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3808. The 116_2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3809. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 116_2 Road.

3810. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 116_2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

117_1 Road

3811. The 117_1 Road is designated as county road number 117_1 and SGID road identification number RD280725 and is more or less 0.85 miles long.

3812. Exhibit 299 (attached hereto and incorporated herein) contains certain information pertaining to the 117_1 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3813. In this action, the State and County seek to quiet title to the public highway right-of-way for the 117_1 Road solely as it crosses United States public land as included and specifically described in Exhibit 299. The 117_1 Road includes the segment of road specifically set forth in Exhibit 299 and as exists on the ground.

Acceptance of the 117_1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3814. The 117_1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3815. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 117_1 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3816. The 117_1 Road appears on the Robber Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3817. The 117_1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the 117_1 Road pursuant to the County's governmental right and authority.

3818. Witnesses with personal knowledge of the history of the 117_1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3819. Currently known reputation in the community is that the 117_1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3820. Public motor vehicle use of the 117_1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3821. The 117_1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3822. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 117_1 Road.

3823. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 117_1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sam's Mesa Road, 119_3

3824. The Sam's Mesa Road is designated as county road number 119_3 and SGID road identification number RD280726 and is more or less 4.53 miles long.

3825. Exhibit 300 (attached hereto and incorporated herein) contains certain information pertaining to the Sam's Mesa Road, 119_3 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3826. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sam's Mesa Road, 119_3 solely as it crosses United States public land as included and specifically described in Exhibit 300. The Sam's Mesa Road, 119_3 includes the segment of road specifically set forth in Exhibit 300 and as exists on the ground.

Acceptance of the Sam's Mesa Road, 119_3 R.S. 2477 Right-of-way Prior to October 21, 1976

3827. The Sam's Mesa Road, 119_3 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3828. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Sam's Mesa Road, 119_3 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3829. The Sam's Mesa Road, 119_3 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-

way by managing, maintaining, and improving the Sam's Mesa Road, 119_3 pursuant to the County's governmental right and authority.

3830. Witnesses with personal knowledge of the history of the Sam's Mesa Road, 119_3 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3831. Currently known reputation in the community is that the Sam's Mesa Road, 119_3 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3832. Public motor vehicle use of the Sam's Mesa Road, 119_3 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3833. The Sam's Mesa Road, 119_3 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3834. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sam's Mesa Road, 119_3.

3835. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sam's Mesa Road, 119_3 on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Well Road, 121_1

3836. The Well Road is designated as county road number 121_1 and SGID road identification number RD280730 and is more or less 4.00 miles long.

3837. Exhibit 301 (attached hereto and incorporated herein) contains certain information pertaining to the Well Road, 121_1 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3838. In this action, the State and County seek to quiet title to the public highway right-of-way for the Well Road, 121_1 solely as it crosses United States public land as included and specifically described in Exhibit 301. The Well Road, 121_1 includes the segment of road specifically set forth in Exhibit 301 and as exists on the ground.

Acceptance of the Well Road, 121_1 R.S. 2477 Right-of-way Prior to October 21, 1976

3839. The Well Road, 121_1 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3840. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Well Road, 121_1 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3841. The Well Road, 121_1 appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3842. The Well Road, 121_1 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Well Road, 121_1 pursuant to the County's governmental right and authority.

3843. Witnesses with personal knowledge of the history of the Well Road, 121_1 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3844. Currently known reputation in the community is that the Well Road, 121_1 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3845. Public motor vehicle use of the Well Road, 121_1 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3846. The Well Road, 121_1 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3847. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Well Road, 121_1.

3848. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Well Road, 121_1 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Well Road, 121_2

3849. The Well Road is designated as county road number 121_2 and SGID road identification number RD280731 and is more or less 0.89 miles long.

3850. Exhibit 302 (attached hereto and incorporated herein) contains certain information pertaining to the Well Road, 121_2 including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3851. In this action, the State and County seek to quiet title to the public highway right-of-way for the Well Road, 121_2 solely as it crosses United States public land as included and specifically described in Exhibit 302. The Well Road, 121_2 includes the segment of road specifically set forth in Exhibit 302 and as exists on the ground.

Acceptance of the Well Road, 121_2 R.S. 2477 Right-of-way Prior to October 21, 1976

3852. The Well Road, 121_2 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3853. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Well Road, 121_2 as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3854. The Well Road, 121_2 appears on the Robbers Roost Canyon (1963) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3855. The Well Road, 121_2 was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Well Road, 121_2 pursuant to the County's governmental right and authority.

3856. Witnesses with personal knowledge of the history of the Well Road, 121_2 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3857. Currently known reputation in the community is that the Well Road, 121_2 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3858. Public motor vehicle use of the Well Road, 121_2 as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

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

3859. The Well Road, 121_2 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3860. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Well Road, 121_2.

3861. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Well Road, 121_2 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

122_2 Road

3862. The 122_2 Road is designated as county road number 122_2 and SGID road identification number RD280732 and is more or less 5.71 miles long.

3863. Exhibit 303 (attached hereto and incorporated herein) contains certain information pertaining to the 122_2 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3864. In this action, the State and County seek to quiet title to the public highway right-of-way for the 122_2 Road solely as it crosses United States public land as included and

specifically described in Exhibit 303. The 122_2 Road includes the segment of road specifically set forth in Exhibit 303 and as exists on the ground.

Acceptance of the 122_2 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3865. The 122_2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3866. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 122_2 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3867. The 122_2 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 122_2 Road pursuant to the County's governmental right and authority.

3868. Witnesses with personal knowledge of the history of the 122_2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3869. Currently known reputation in the community is that the 122_2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3870. Public motor vehicle use of the 122_2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

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

3871. The 122_2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3872. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 122_2 Road.

3873. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 122_2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

122_3 Road

3874. The 122_3 Road is designated as county road number 122_3 and SGID road identification number RD280733 and is more or less 0.71 miles long.

3875. Exhibit 304 (attached hereto and incorporated herein) contains certain information pertaining to the 122_3 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3876. In this action, the State and County seek to quiet title to the public highway right-of-way for the 122_3 Road solely as it crosses United States public land as included and specifically described in Exhibit 304. The 122_3 Road includes the segment of road specifically set forth in Exhibit 304 and as exists on the ground.

Acceptance of the 122_3 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3877. The 122_3 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3878. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 122_3 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3879. The 122_3 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 122_3 Road pursuant to the County's governmental right and authority.

3880. Witnesses with personal knowledge of the history of the 122_3 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3881. Currently known reputation in the community is that the 122_3 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3882. Public motor vehicle use of the 122_3 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3883. The 122_3 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3884. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 122_3 Road.

3885. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 122_3 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

122_4 Road

3886. The 122_4 Road is designated as county road number 122_4 and SGID road identification number RD280734 and is more or less 1.15 miles long.

3887. Exhibit 305 (attached hereto and incorporated herein) contains certain information pertaining to the 122_4 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3888. In this action, the State and County seek to quiet title to the public highway right-of-way for the 122_4 Road solely as it crosses United States public land as included and specifically described in Exhibit 305. The 122_4 Road includes the segment of road specifically set forth in Exhibit 305 and as exists on the ground.

Acceptance of the 122_4 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3889. The 122_4 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3890. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 122_4 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3891. The 122_4 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 122_4 Road pursuant to the County's governmental right and authority.

3892. Witnesses with personal knowledge of the history of the 122_4 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3893. Currently known reputation in the community is that the 122_4 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3894. Public motor vehicle use of the 122_4 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3895. The 122_4 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3896. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 122_4 Road.

3897. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 122_4 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

122_6 Road

3898. The 122_6 Road is designated as county road number 122_6 and SGID road identification number RD280735 and is more or less 0.68 miles long.

3899. Exhibit 306 (attached hereto and incorporated herein) contains certain information pertaining to the 122_6 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3900. In this action, the State and County seek to quiet title to the public highway right-of-way for the 122_6 Road solely as it crosses United States public land as included and specifically described in Exhibit 306. The 122_6 Road includes the segment of road specifically set forth in Exhibit 306 and as exists on the ground.

Acceptance of the 122_6 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3901. The 122_6 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3902. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 122_6 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3903. The 122_6 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 122_6 Road pursuant to the County's governmental right and authority.

3904. Witnesses with personal knowledge of the history of the 122_6 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3905. Currently known reputation in the community is that the 122_6 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3906. Public motor vehicle use of the 122_6 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3907. The 122_6 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3908. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 122_6 Road.

3909. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 122_6 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

114_19 Road

3910. The 114_19 Road is designated as county road number 114_19 and SGID road identification number RD280714 and is more or less 3.36 miles long.

3911. Exhibit 307 (attached hereto and incorporated herein) contains certain information pertaining to the 114_19 Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3912. In this action, the State and County seek to quiet title to the public highway right-of-way for the 114_19 Road solely as it crosses United States public land as included and specifically described in Exhibit 307. The 114_19 Road includes the segment of road specifically set forth in Exhibit 307 and as exists on the ground.

Acceptance of the 114_19 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3913. The 114_19 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3914. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the 114_19 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3915. The 114_19 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 114_19 Road pursuant to the County's governmental right and authority.

3916. Witnesses with personal knowledge of the history of the 114_19 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3917. Currently known reputation in the community is that the 114_19 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3918. Public motor vehicle use of the 114_19 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3919. The 114_19 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3920. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 114_19 Road.

3921. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 114_19 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

High Spur Road, 120_1

3922. The High Spur Road is designated as county road number 120_1 and SGID road identification number RD280728 and is more or less 4.08 miles long.

3923. Exhibit 308 (attached hereto and incorporated herein) contains certain information pertaining to the High Spur Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3924. In this action, the State and County seek to quiet title to the public highway right-of-way for the High Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 308. The High Spur Road includes the segment of road specifically set forth in Exhibit 308 and as exists on the ground.

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

3925. The High Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3926. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the High Spur Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3927. The High Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the High Spur Road pursuant to the County's governmental right and authority.

3928. Witnesses with personal knowledge of the history of the High Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3929. Currently known reputation in the community is that the High Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3930. Public motor vehicle use of the High Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3931. The High Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3932. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the High Spur Road.

3933. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the High Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Spur Trail Road, 120_5

3934. The Spur Trail Road is designated as county road number 120_5 and SGID road identification number RD280729 and is more or less 12.02 miles long.

3935. Exhibit 309 (attached hereto and incorporated herein) contains certain information pertaining to the Spur Trail Road including, a map depicting the road; township, range, and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3936. In this action, the State and County seek to quiet title to the public highway right-of-way for the Spur Trail Road solely as it crosses United States public land as included and specifically described in Exhibit 309. The Spur Trail Road includes the segment of road specifically set forth in Exhibit 309 and as exists on the ground.

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

3937. The Spur Trail Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3938. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the Spur Trail Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3939. The Spur Trail Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Spur Trail Road pursuant to the County's governmental right and authority.

3940. Witnesses with personal knowledge of the history of the Spur Trail Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3941. Currently known reputation in the community is that the Spur Trail Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3942. Public motor vehicle use of the Spur Trail Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3943. The Spur Trail Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3944. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Spur Trail Road.

3945. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Spur Trail Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

HC_1 Road

3946. The HC_1 Road is designated as county road number HC_1 and SGID road identification number RD280902 and is more or less 2.29 miles long.

3947. Exhibit 310 (attached hereto and incorporated herein) contains certain information pertaining to the HC_1 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3948. In this action, the State and County seek to quiet title to the public highway right-of-way for the HC_1 Road solely as it crosses United States public land as included and specifically described in Exhibit 310. The HC_1 Road includes the segment of road specifically set forth in Exhibit 310 and as exists on the ground.

Acceptance of the HC_1 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3949. The HC_1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3950. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the HC_1 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3951. The HC_1 Road appears on the Pinnacle (1953) USGS 7.5 minute quadrangle map and Fiddler Butte (1953) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3952. The HC_1 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the HC_1 Road pursuant to the County's governmental right and authority.

3953. Witnesses with personal knowledge of the history of the HC_1 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3954. Currently known reputation in the community is that the HC_1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3955. Public motor vehicle use of the HC_1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3956. The HC_1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3957. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the HC_1 Road.

3958. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the HC_1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

HC_3 Road

3959. The HC_3 Road is designated as county road number HC_3 and SGID road identification number RD280904 and is more or less 12.04 miles long.

3960. Exhibit 311 (attached hereto and incorporated herein) contains certain information pertaining to the HC_3 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

3961. In this action, the State and County seek to quiet title to the public highway right-of-way for the HC_3 Road solely as it crosses United States public land as included and

specifically described in Exhibit 311. The HC_3 Road includes the segment of road specifically set forth in Exhibit 311 and as exists on the ground.

Acceptance of the HC_3 Road R.S. 2477 Right-of-way Prior to October 21, 1976

3962. The HC_3 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

3963. Aerial photography from 1976 confirms the historical use, existence, and acceptance of the right-of-way for the HC_3 Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

3964. The HC_3 Road appears on the Pinnacle (1953) and Gordon Flats (1953) USGS 7.5 minute quadrangle maps, and Fiddler Butte (1953) and Orange Cliffs (1953) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit 14 for more detailed map information.

3965. The HC_3 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the HC_3 Road pursuant to the County's governmental right and authority.

3966. Witnesses with personal knowledge of the history of the HC_3 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

3967. Currently known reputation in the community is that the HC_3 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

3968. Public motor vehicle use of the HC_3 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

3969. The HC_3 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

3970. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the HC_3 Road.

3971. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the HC_3 Road on lands owned 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 – the Big Rocks Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Big Hollow Road, 24; (2) Big Rocks Road, 25; (3) Road to Don Edwards, 25A; (4) Black Point Road, 3; (5) Loa TV

Tower Road, 4; (6) Jacksonville Road, 54; (7) Long Hollow/Hunts Road, 8; (8) Sage Draw Road, 9; (9) WYPM0325 Road, 24_3; (10) WYPM0012 Road, 24F; (11) Behind Big Rocks Road, 25_5; (12) Black Point Reservoir Road, 3_4; (13) WYPM0193 Road, 3_7; (14) WYPM0190 Road, 3_9; (15) WYPM0228 Road, 4_1; (16) WYPM0235 Road, 4_2; (17) WYPM0235a Road, 4_3; (18) West of TV Tower Road, 4_6; (19) CO_28_0007 Road, 6_5; and (20) WYPM0282 Road, 8_4; and

2. On its Second Cause of Action – the North Mountain Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Fish Lake Road, 2; (2) Cabin Spring Road, 2A; (3) Fremont Road, 35; (4) Tidwell Road, 39; (5) Jakes Place Road, 40; (6) Mill Meadow Dirt Road, 43; (7) Vance Road, 44; (8) Mill Meadow Oil Road, 45; (9) Horse Valley Road, 46; (10) Peterson Road, 46A; (11) Forest Boundary Road, 47; (12) High Line Ditch Road, 48; (13) North Mountain Road, 5; (14) Saddle Pass Road, 56; (15) Foothill Drive Road, 56a; (16) Lyman Water Tank Road, 57; (17) Trail Hollow Road, 5A; (18) Cedar Draw Road, 5B; (19) WYPM0002 Road, 2_10a; (20) WYPM0001 Road, 2_11; (21) WYPM0011 Road, 2_2; (22) PTPM0005 Road, 2_21; (23) WYPM0013 Road, 2_3; (24) PTPM0008 Road, 2_5; (25) WYPM0010 Road, 2_6; (26) WYPM0004 Road, 2_7; (27) WYPM0023 Road, 2A_1; (28) WYPM0039 Road, 2A_10; (29) WYPM0041 Road, 2A_11; (30) WYPM0025 Road, 2A_2; (31) WYPM0032 Road, 2A_4; (32) CO_28_0013 Road, 2A_5; (33) WYPM0035 Road, 2A_6; (34) WYPM0034 Road, 2A_7; (35) WYPM0036 Road, 2A_8; (36) WYPM0038 Road, 2A_9; (37) WYPM0100 Road, 40_1; (38) WYPM0097 Road, 40_2; (39) WYPM0097a Road, 40_2a; (40) WYPM0103 Road, 40_3; (41) WYPM0127 Road, 40_8; (42)

WYPM0117 Road, 44_1; (43) WYPM0119 Road, 44_2; (44) WYPM0119A Road, 44_3; (45) WYPM0109 Road, 44_4; (46) WYPM0119B Road, 44_5; (47) WYPM0158 Road, 46_2; (48) WYPM0159 Road, 46A_1; (49) Red Canyon Road, 47_1 (50) Old Red Canyon Road, 47_1A; (51) WYPM0054 Road, 5_3; (52) WYPM0058 Road, 5_4; (53) WYPM0057 Road, 5_5; (54) WYPM0015 Road, 5A_1; (55) Dog Flats Road, 5A_2; (56) WYPM0022 Road, 5A_3; and (57) WYPM0018 Road, 5A_4; and

3. On its Third Cause of Action – the Wild Cat Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Bull Roost Reservoir Road, 13; (2) Sky Reservoir Road, 15; (3) Flat Top Road, 17; (4) Tommy Hollow Road, 17a; (5) Dry Lake Road, 19; (6) Smooth Knoll Road, 20; (7) Wild Cat Road, 21; (8) Pine Creek Road, 23; (9) Dennis Road, 26; (10) Big Hollow Pit Road, 26a; (11) Bicknell Fish Hatchery Road, 27; (12) Jack King Road, 27A; (13) Chad's Road, 58; (14) Bicknell Pond Road, 59; (15) Carl Taft Road, 61; (16) Sunglow Road, 63A; (17) North Slope Road, 77; (18) WYPM0355 Road, 17_1; (19) WYPM0353 Road, 17_2; (20) WYPM0354 Road, 17_3; (21) WYPM0345 Road, 17A_1; (22) WYPM0381 Road, 2_12; (23) WYPM0390 Road, 20_10; (24) CO_28_0001 Road, 20_12; (25) WYPM0401 Road, 20_13; (26) WYPM0389 Road, 20_2; (27) WYPM0388 Road, 20_3; (28) WYPM0388a Road, 20_3a; (29) WYPM0381a Road, 20_8; (30) WYPM0381b Road, 21_1; (31) WYPM0378 Road, 21_4; (32) WYPM0398 Road, 21_7; (33) WYPM0393 Road, 21_8; (34) WYPM0420 Road, 59_3; (35) Middle Balsam Road, 8_1; and (36) WYPM0362 Road, 8_2A; and

4. On its Fourth Cause of Action – the Teasdale Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Brey Road, 29; (2) Teasdale TV Tower Road, 64; (3) Teasdale Road, 65; (4) Fish Creek Cove Road, 65E; (5) Teasdale Bench Road, 66; (6) Teasdale Powerline Road, 67; (7) Cigarette Hollow Road, 68; (8) Dick Pace Road, 71; (9) River View Drive Road, 73; (10) Chadburn Road, 73A; (11) Beas Lewis Flat Road, 76; (12) North Beas Lewis Flat Road, 76B; (13) Meadowbrook Road, 77A; (14) Sulphur Creek Road, 81; (15) WYPM0438 Road, 68_2; (16) Stone Road, 72_1; (17) WYPMO451 Road, 74_1; (18) Beas Lewis Flat South Road, 76_19; and (19) WYPM0459a Road, 80_1c; and

5. On its Fifth Cause of Action – the Miners Mountain Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) East Miners Road, 139D; (2) Miners Mountain Road, 80; (3) North Miners Road, 80A; (4) WYPM0519 Road, 1390_1; (5) West Hollow Road, 77_1; (6) Lion Mountain Road, 78_2; (7) Hale Summer Theatre Road, 79_2; (8) East Grover Road, 80_1; (9) WYPM0476 Road, 80_10; (10) WYPM0509 Road, 80_15; (11) WYPM0508 Road, 80_16; (12) Miners Mountain Road, 80_18; (13) Miners Mountain Road, 80_19; (14) WYPM0471 Road, 80_1a; (15) Miners Mountain Road, 80_20; (16) Miners Mountain Trail Road, 80_21; (17) WYPM0525 Road, 80_22; (18) WYPM0479 Road, 80_3; (19) WYPM0478 Road, 80_4; (20) WYPM0479a Road, 80_6; (21) WYPM0477 Road, 80_7; (22) WYPM0475 Road, 80_9; (23) WYPM0529 Road, 80A; (24) WYPM0530 Road, 80A_1; (25) WYPM0511 Road, 80A_1b; (26) WYPM0481 Road, 80A_3;

(27) WYPM0530a Road, 80A_3a; (28) WYPM0515 Road, 80A_5; (29) WYPM0483 Road, 80A_6; and (30) WYPM0517 Road, 80A_7; and

6. On its Sixth Cause of Action – the Caineville Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Skyline View Road, 155D; (2) Hartnet-Cathedral Road, 82; (3) Jail House Road, 82A; (4) Temple of the Moon Road, 84; (5) Caineville Road, 88; (6) Cemetery Road, 88A; (7) Red Desert Road, 89; (8) Caineville Water Road, 89_1; (9) Caineville Reef Road, 90; (10) Factory Butte Road, 91; (11) Coal Mine Pit Road, 91_1; (12) Factory Bench Road, 91_3; (13) Caineville Gravel Pit Road, 91_4; (14) Caineville TV Tower Road, 91A; (15) 82_10 Road, 82_10; (16) Hartnet Draw Road, 82_4; (17) 82A_1 Road, 82A_1; (18) Hartnet Valley Road, 146D; and (19) Hartnet-Cathedral Road, 146D_4; and

7. On its Seventh Cause of Action – the Notom Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Notom Road, 85; (2) Old Notom Road, 86; (3) Burro Wash Road, 87; (4) Burro Wash Road, 86; (5) East Notom Road, 149D; (6) Notom Bench East Road, 150D; (7) 150D_1 Road, 150D_1; (8) Notom Bench Pond Road, 150D_4; (9) Pleasant Creek Diversion Road, 151D; (10) Pleasant Creek Diversion Road, 151D_1; (11) Pleasant Creek Diversion Road, 151D_2; (12) Notom Cemetery Road, 85_13; (13) Notom Bench North Road, 85_17; (14) 85_23 Road, 85_23; (15) Back Road to Notom, 85_3; and (16) Pleasant Creek Road, 85_9; and

8. On its Eighth Cause of Action – the Dugout Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) South River Road, 108;

(2) Blue Valley Road, 92; (3) Blue Valley Cemetery Road, 92A; (4) Giles Road, 92B; (5) Bert Avery Road, 93; (6) Dugout Road, 94; (7) Fairview Ranch Road, 95; (8) South Fairview Road, 96; (9) Back Road to Granite, 97; (10) Granite Ranch Road, 98; (11) East Gate Reservoir Road, 99; (12) Bull Wash Road, 180D; (13) Bull Wash 1 Road, 181D; (14) Pinto Hills Road, 182D; (15) Pinto Hills Road, 182D_3; (16) Pinto Hills South Road, 182D_5; (17) 182D_7 Road, 182D_7; (18) Jackson Pond Road, 92_18; (19) Jackson Water Line Road, 93_12; (20) 93_13 Road, 93_13; (21) 93_4 Road, 93_4; (22) 95_15 Road, 95_15; (23) Fairview Spur Road, 95_2; (24) 96_4 Road, 96_4; (25) Granite Ranch Road, 96_6; (26) 97_2 Road, 97_2; (27) 97_4 Road, 97_4; and (28) 97_7 Road, 97_7; and

9. On its Ninth Cause of Action – the Sand Slide Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Sand Slide Road, 100; (2) Sand Slide Overlook Road, 100_2; (3) Dell Seep Road, 101; (4) Burr Point Pond Road, 101_1; (5) Burr Point Overlook Road, 101A; (6) Dell Seep Cutoff Road, 102; (7) North Point Road, 103; (8) Oil Well Point, 104; (9) Road to Gravel Pit, 105; (10) East Hanksville Road, 105_1; (11) Mixing Pad Road, 105_2; (12) Hanksville Landfill Road, 106; (13) Hanksville TV Tower Road, 106_1; (14) Hanksville Cemetery Road, 106A; (15) Hanksville East Loop Road, 107; (16) Sand Slide Well Road, 184D; (17) 101_1 Road, 101_1; (18) 101_12 Road, 101_12; (19) 103_3 Road, 103_3; and (20) Poison Spring Road, 186D; and

10. On its Tenth Cause of Action – the Blackburn Wash Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Blackburn Wash Road, 111; (2) Blackburn Wash Spur Road, 111A; (3) The Square Road, 112; (4) San

Rafael Road, 112_1; (5) Jeffrey Wells Road, 112_2; (6) South of the Square Road, 113; (7) River Overlook Road, 113_1; (8) North River Road, 109; (9) Cow Dung Road, 110; (10) 111_1 Road, 111_1; (11) Well Draw Road, 165D; (12) Well Draw Road, 165D_4; (13) Well Draw Road, 165D_6; (14) Old State Road, 167D; (15) Old State Road, 167D_1; (16) 156D_2 Road, 156D_2; and (17) Muddy River Road, 166D.

11. On its Eleventh Cause of Action – the Ekker Ranch Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Roost Road, 114; (2) Lower San Rafael Road, 114A; (3) Oil Well Road/Roost House Road, 115; (4) Ekker Ranch Road, 116; (5) South Ekker Ranch Road, 117; (6) Angel Point Road, 118; (7) Sam's Mesa Road, 119; (8) Chad Moore's Well Road, 121; (9) Bull Pasture Overlook Road, 122; (10) Spur Road, 120; (11) Windy Peak Road, 120A; (12) Horseshoe Overlook Road, 209D; (13) 114_1 Road, 114_1; (14) 114_11 Road, 114_11; (15) Twin Corral Oil Well Road, 114_14; (16) 114_20 Road, 114_20; (17) 114_3 Road, 114_3; (18) 114_4 Road, 114_4; (19) 114_5 Road, 114_5; (20) 114_6 Road, 114_6; (21) 114_8 Road, 114_8; (22) 116_2 Road, 116_2; (23) 117_1 Road, 117_1; (24) Sam's Mesa Road, 119_3; (25) Well Road, 121_1; (26) Well Road, 121_2; (27) 122_2 Road, 122_2; (28) 122_3 Road, 122_3; (29) 122_4 Road, 122_4; (30) 122_6 Road, 122_6; (31) 114_19 Road, 114_19; (32) High Spur Road, 120_1; and (33) Spur Trail Road, 120_5; (34) HC_1 Road, HC_1; and (35) HC_3 Road, HC_3; and

12. An order awarding costs and fees, specifically including, but not limited to, reasonable attorney fees to the extent permitted by law; and

13. An order granting such further and other relief as may be appropriate.

Respectfully submitted this 28th day of August 2012.

/s/ Roger R. Fairbanks
Assistant Attorney General