Wentworth Planning Board Minutes for 2/3/2020

Good Evening,

Present at tonight's meeting was Marina Reilly Collette as Chairperson, John Meade as Secretary, Mr. Palmer Koelb as Ex Officio, Mr. Tracy Currier, Mr. Craig Pasco. Quorum was met and a motion to open the meeting at 6:30 PM was made by John Meade, Seconded by Palmer Koelb and carried unanimously.

6:33 a motion to accept the meeting minutes from 6 January as provided previously to the board via e mail was made by John Meade Seconded by Palmer Koelb and carried unanimously. The 6 January 2020 meeting minutes can now be recorded to the website.

6:35 Discussion on the changes to the Wentworth Planning Board regulations were discussed. Hearing was positive from last month and no other comments were proposed by the audience after being asked by the Chair. Prior to a motion to vote John Meade made a point to discuss the driveway requirement for the ancillary dwelling. Could it share a common driveway if a second home already shared the same driveway. According to the new regulations the answer was no but hardship issues could be reviewed by the board in the future. Tracy Currier made a motion to accept the changes Seconded by Craig Pasco and voted unanimously by show of hands.

6:40 The petition before the board WPB#2020-3 By Mr. Adam Patten was presented by Mr. Kevin French of French Land Surveyors. Prior to discussion John Meade made comment that he had been contacted by two abutters Mr. and Mrs. Satmaria of West Haven, Connecticut and Mr. and Mrs. Allen of Manchester, New Hampshire. Both being direct abutters to the proposed subdivision. John Meade provided both e mails reflecting a picture of the Plat as provided by Mr. French of both the subdivision and lot line adjustment. Mrs. Satmaria was asked for any comment at which time she directed questions through the Chair to Mr. French concerning driveway placement and potential building of a home on the subdivided 2.5 acre lot on East Side Road. Mr. Patten and Mr. French responded that the driveway would be shared with the building lot up the hill Mr. Patten was creating for himself as shown on the provided Plat. Mr. Patten was selling the subdivided lot and would not be building a home so he could not comment on where the Purchaser would site the home. The chair cautioned that Wentworth did not have zoning so the home could be placed anywhere on the lot. The Satmarias had no further questions at this time.

The Chair asked for comment from the Allen's who were present.

The Chair was asked by the Allen's to read an e mail from today to John Meade and all Planning Board members and read the e mail into the record as well as a Lawyer's letter attached. The E mail is below as well as all e mails that were sent between John Meade and the Allen's. This included an e mail that was revised. The Chair read both the last e mail of 2:38 PM today and the Thomas F Quinn Attorney E mail of 27 August 2018 that is attached.

As counter the land surveyor Mr. Kevin French also produced a 26 July 2018 letter to be read into the record with picture of letter attached.

The dispute between the Allen's and Mr. Patten is a right of Way 16.5 feet wide known as the Dole Rd. that crosses the Allen's property at 25 Buffalo Rd. The gist is whether the Dole Rd. was ever transferred back in 1866. It was noted by the chair upon inspection of the WPB regulations if we had any jurisdiction to force a change to the Surveyors Plan with a note reflecting the right of way. The E mail sent by the Allen's threatened legal action against the Town of Wentworth if the note remained on the plan. The Chair noted that legal counsel would be sought for the board but future legal action would not be a deterrent to approve a subdivision plan in Good Faith. John Meade attempted to allow the subdivision and lot line adjustment to continue with amendments to the note such as "In Dispute" If this note would satisfy the Allen's needs.

The Allens then posed a question of since the Clouette lot was a separate lot and the Dole Rd. was not shown on the subdivision plan across the Patten lot how would this separate lot be accessed as no driveway or right of way was reflected. Mr. French did not have any driveway laid out to the former Clouette lot that Patten now owned. The Allens were not satisfied with allowing just a note in dispute if this was not resolved. John Meade made comment that since any two house lots are the limit on a driveway and the newly subdivided lot had frontage on East Side Road that Mr. Patten might consider a new driveway for the new subdivided lot from East Side Road alongside the present driveway to his remote house lot. In the future if the Clouette lot had a home built on it, it could in fact share the existing driveway that would access Mr. Pattens home lot. This appeared to be satisfactory to Mr. Patten and Mr. French. It did arise with a new question by the Satmarias of the new driveway placement. It was pointed out by Palmer Koelb that Mr. French needed to ensure the Satmarias were fully aware of the driveway placement prior to the next meeting on 2 March. John Meade noted that the planning board regulations did not allow for refusal of a certified plat by a licensed Land Surveyor. The issue at hand was a land dispute to be determined by the courts and not the Planning Board. The Chair made the point that the board must seek legal counsel concerning this point and if accepting a disputed plan would be acceptable. Mr French asked the board to please review the lot line adjustments and if we had any issues before making changes to the plat. The board at this time nor anyone had any comment against the lot line adjustment with Owens Property. The chair asked for a motion to continue the hearing until next month so that legal counsel could advise the board and driveway changes could be made. Motion to continue was made by John Meade and seconded by Craig Pasco. Unanimously carried.

7:40 Krumaker Monroe lot line adjustment was presented by Mr. Sanborn of Cardigan Mountain Land Surveyors. Discussion was had concerning the same plat reviewed last month. The adjustment corrected a misunderstood lot line and solved an issue between neighbors. A motion to accept the change was made by Tracy Currier and seconded by Palmer Koelb. Unanimously carried. \$51 check for filing fees collected and signatures affixed to the Plat to be filed.

7:55 Stuart minor subdivision was presented by Mr. French. Changes reflecting the septic and well on the present lot had been made as requested by the board previously. The subdivided 8 acre lot with 50' driveway ROW was well within our regulations. With no objections Palmer Koelb made a motion to accept and this was seconded by Craig Pasco, Carried unanimously. Signatures affixed to the Plat and filing fees had been previously collected.

8:05 Open business discussions concerning the new cost for postage of certified mail. The electronic response from the Postal Service reduced costs by \$1 and would allow our \$8 abutters notice fee to remain the same. Marina will check with counsel of the electronic signed receipt if legal for our use. The reduction of WPB board size from 5 members to four allowing for a 3 person quorum with Ex Officio being a tie breaker on a deadlock vote. It was determined to review if this could be accomplished by the board itself but it should be discussed at Town Meeting along with a plea for folks to join the board even as an alternate. 8:15 A motion to adjourn was made by Tracy Currier and seconded by Palmer Koelb. Carried unanimously.

It was noted that Madame Chair came out with the Flu donning a surgical mask. Her tenacity and dedication is appreciated.

After 3 years of service Mr. Tracy Currier is stepping down from the Board after next month's meeting. I personally will miss his level headed approach and his Live Free attitude. He was and is an asset to Wentworth.

Thank You

1 of 6 3/8/2020, 10:52 AM

John Meade

THE FOLLOWING E MAIL WAS READ INTO THE RECORD CONCERNING THE ADAM J PATTEN REQUEST FOR SUBDIVISION

From: Debra <knowdak@yahoo.com> Sent: Monday, February 3, 2020 2:39 PM

To: John Meade <john.meade@preferredmechanicalservices.com>

Cc: Marina Reilly-Collette <marina.irc.wentworth@gmail.com>; Palmer Koelb <palmer@shin-bokunursery.com>; craig pasco <craigatcoolrivers@gmail.com>; Ray Welch <rwelch.jkloggingllc@gmail.com>; Tracy Currier <tracyjcurrier@gmail.com>; Tom Quinn <tquinn@tfqtitle.com>

Subject: Re: Patten Entire Submissions

John,

We apologize, but after further discussion with our attorney, Tom Quinn, he has revised the letter to be read and incorporated into the public meeting and minutes as follows:

To the Planning Board of the Town of Wentworth,

RE: Adam Patten- minor subdivision and lot line adjustment

We are abutters to the Patten property on lot 8-13-5. After reviewing the subdivision plan proposed by Mr. Patten we wish to make a formal protest of the notes pertaining to our property and the so called "Dole Rd" as they are inaccurate, misleading and infer rights across our property that do not exist. Since this application is for a minor subdivision and lot line adjustment, which does not directly affect our property, the notes on this plan pertaining to our property are unnecessary and if left on on the plan to be recorded would only serve to perpetuate erroneous and misleading information and we ask they be removed from the plan prior to approval.

Because of the significance of this matter to us we are putting the board on notice that any decision of the board approving this plan with the notes in place will be appealed by us to Superior Court.

We believe it's in everybody's best interest for all of these notes pertaining to our property and the so called "Dole Rd" be removed so that consideration of this plan can proceed. But if the applicant is not willing to remove these notes the application should either be denied or tabled until resolution of the title issue is made.

We hired a Title/Land Use Attorney and have done an exhaustive and extensive title search of every deed in the area going back to the time the Patten property was first created and found that he has absolutely no legal rights to cross our property. This, and other issues were presented at our expense to Mr. Patten, his Surveyor Mr. French, and Mr. Patten's Attorney way back in August 2018. We asked at the time that the notes on his plan regarding our property be removed as they are incorrect (See letter of clarification from Attorney Quinn which is attached).

In addition to this there is the Clouette property, lot 8-13-4 that Mr. Patten also owns. This piece is landlocked by his surrounding property and one other owner. We feel it may be pertinent for the board to discuss at this point his future plans for this property and how he plans to access this property since there are no recorded legal rights connecting it to road frontage and he is using up road frontage and his only shared driveway privileges for this subdivision.

Thank you for your consideration, we ask that this letter and the attached letter from our attorney Tom Quinn dated 8/27/2018 be incorporated into the minutes in their entirety.

Sincerely,

William and Debra Allen

On Monday, February 3, 2020, 2:02:44 PM EST, Debra < knowdak@yahoo.com > wrote:

John,

Thank you for your reply. We are revising our original letter to be read and incorporated into the public meeting and minutes as follows:

To the Planning Board of the Town of Wentworth,

RE: Adam Patten- minor subdivision and lot line adjustment

We are abutters to the Patten property on lot 8-13-5. After reviewing the subdivision plan proposed by Mr. Patten we wish to make a formal protest of the notes pertaining to our property and the so called "Dole Rd" as they are inaccurate, misleading and infer rights across our property that do not exist. Since this application is for a minor subdivision and lot line adjustment, which does not directly affect our property, the notes on this plan pertaining to our property are unnecessary and if left on on the plan to be recorded would only serve to perpetuate erroneous and misleading information and we ask they be removed from the plan prior to approval.

2 of 6 3/8/2020, 10:52 AM

We hired a Title/Land Use Attorney and have done an exhaustive and extensive title search of every deed in the area going back to the time the Patten property was first created and found that he has absolutely no legal rights to cross our property. This, and other issues were presented at our expense to Mr. Patten, his Surveyor Mr. French, and Mr. Patten's Attorney way back in August 2018. We asked at the time that the notes on his plan regarding our property be removed as they are incorrect (See letter of clarification from our Attorney which is attached).

In addition to this there is the Clouette property, lot 8-13-4 that Mr. Patten also owns. This piece is landlocked by his surrounding property and one other owner. We feel it may be pertinent for the board to discuss at this point his future plans for this property and how he plans to access this property since there are no recorded legal rights connecting it to road frontage and he is using up road frontage and shared driveway privileges for this subdivision.

Thank you for your consideration, we ask that this letter and the attached letter from our attorney Tom Quinn dated 8/27/2018 be incorporated into the minutes in their entirety.

Sincerely,

William and Debra Allen

On Sunday, February 2, 2020, 2:05:30 PM EST, John Meade < john.meade@preferredmechanicalservices.com > wrote:

Hi Debra

There are two meetings for this application. One is the lot line adjustment removing acreage from lot 8-13-7 and lot 8-13-4 ading a total of 1.5 acres to lot 8-13-13 The Owens

The previous Clouette Lot was land locked then and remains so. Our regulations allow only 2 homes share a driveway. Mr Patten is opting to provide access to his newly created lot from the driveway he uses on East Side Rd. This then maximizes this diveway so it cannot be used in the future for the Clouette lot. I have copied the Planning board for transparency however we are unable to discuss your points unless in an open meeting. I will provide this e mail and your letter to the board for discussion. As requested i will bring up the points you have made, however to do so I must read it into the record. I am at a loss to explain our role in the verification of existing notes on a plan provided by a licensed land surveyor such as Mr. French. These notes also do not affect the application but if approved would be filed as a Plat Plan as you have pointed out.

Regards

John Meade

Sent from my Verizon, Samsung Galaxy smartphone

------ Original message -------From: Debra <<u>knowdak@yahoo.com</u>> Date: 2/2/20 11:16 AM (GMT-05:00)

To: John Meade <john.meade@preferredmechanicalservices.com>

Subject: Re: Patten Entire Submissions

2-2-20

Hi John,

Thank you so much for sending the proposed plan for the Adam Patten minor subdivision. We plan to attend the PB meeting on Mon 2-3-20, however, there are some issues regarding this proposed plan we are hoping you could address with the board rather than us addressing them in the public meeting because we fear it may become inflammatory.

We are abutters to the Patten property on lot 8-13-5. Since Mr. Patten purchased this property in 2018 he has been trying to create a right away over our driveway, within inches of our garage, and across our back yard to get to the property behind us, without any legal right to do so! He has aggressively persisted (even after explaining the facts to him several times) by coming on to our property unannounced, driving his 4 wheeler across it, cutting our vegetation, putting posted signs in our back yard, and threatening us. We were left with no option but to hire a Title and Land use Attorney.

We have done an exhaustive and extensive title search of every deed in the area going back to the time the Patten property was first created and found that he has absolutely no legal rights to cross our property. This, and other issues were presented at our expense to Mr. Patten, his Surveyor Mr. French,, and Attorney way back in Sept. 2018. We asked at the time that the notes on his plan regarding our property be removed as they are incorrect (Letter from our Attorney attached).

The proposed plan you sent still has notes added to it regarding our property that are not only inaccurate and misleading but we believe are intentionally added to try and create a recorded legal document that will somehow support and bolster his argument in the future. Not only that but information detrimental to his position that burdens his property has purposely been left off of this plan.

This proposed plan is for a minor subdivision that is far enough away from us it does not directly effect our property. We feel any notes **whatsoever** attached to our property should not be required and should be taken off of this plan so as not to create incorrect legal documents and perpetuate errors.

We are not unreasonable people and are not trying to slow down Mr Patten's subdivision but if it is approved as is we will have no choice but to appeal the approval and file complaints with the Land Surveyor Board as this kind of behavior is strictly prohibited from licensed surveyors.

In addition to this there is the Clouette property, lot 8-13-4 that Mr. Patten also owns. This piece is essentially landlocked by his surrounding property and one other owner. We feel it may be pertinent for the board to discuss at this point his future plans for this property and how he plans to access this property since there are no recorded legal rights connecting it to road frontage and he is using up road frontage for this subdivision.

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We will contact our Attorney tomorrow and he may	want to address this as well but you know our concerns for now.	
Please Advise.		
Thank you, William and Debra Allen		
On Friday, January 31, 2020, 6:26:45 PM EST, John Meade < john.meade@preferredmechanicalservices.com > wrote:		
Debra Please find a picture of entire plat plan. Regards John		
Sent from my Verizon, Samsung Galaxy smartphone		
-20200203_204234.jpeg		
Please find a picture of entire plat plan. Regards John Sent from my Verizon, Samsung Galaxy smartphone		

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July 26, 2018

William G. Allen – Trustee The William Gary Allen Rev. Trust dated November 23, 2010 P.O. Box 386 New Boston, NH 03070

Dear Mr. Allen:

French Land Services, Inc. recently conducted some survey work on property now owned by Adam Patten, which abuts your property located at 25 Buffalo Road in Wentworth, NH. In the course of conducting the field and record research we found that there is an existing access way along the southerly boundary line of your property. This access way is commonly referred to in various deeds as the "Dole Road" and is referenced as being "one rod wide" (16.5 feet). This access road is excepted out of your chain of title going back to the deed of Sarah Downing, Mary Downing and Andrew Aiken to George Plummer, dated April 9, 1894 and recorded at the Grafton County Registry in Book 418, Page 310 (copy enclosed). This reference appears in your deed recorded in Book 3818. Page 267 (copy enclosed). I have also included the deed of Marion Small to Samuel and Shirley Worrick, dated July 30, 1966 and recorded in Book 1040, Page 389. This deed is in your chain of title and gives the same property description as your deed. It also expressly excepts and reserves the "one rod" right of way referenced in Deed Book 418, Page 310 also. There are numerous conveyances of your property going back to the 1894 Downing et al to Plummer deed and they consistently carry through with the Dole Road reservation. The Plummer deed also references an 1867 deed from Sargeant to Aiken, recorded in Book 300 Page 385 (copy enclosed). This deed is the same description as in your deed and references running "easterly diagonally across the Dole road, so called ". (Your deed incorrectly refers to it as the "Dale" road). In any event, it shows that the access way has been in place for over 150 years.

This Right of way is also referenced in Mr. Patten's deed from Donna Clouette dated Dec. 6, 2017 and recorded in Book 4331, Page 23 (copy enclosed). This deed references the deed of Stephen Dole to Daniel Colby dated Dec. 17, 1866 and recorded in Book 311, Page 43 (copy enclosed). This right was reserved, as it was the access to the Clouette property. This right of way continued through your property and the land previously owned by Eugene and Kae Page to the Clouette parcels. Mr. Patten recently purchased the Page property as well.

I have enclosed a copy of the portion of the survey that we did for Mr. Patten, which has your property shown on it. We have shown the location of the "Dole Road" as called for in the various deeds mentioned above. In the course of our survey work we noticed that you have placed a gate and gate posts at the entrance to this access way. Recently, it was brought to our attention that a tractor has been parked there also as shown on photos taken on 7/26/2018 (photos enclosed). I am sending you this information, on the behalf of Mr. Patten, to kindly ask that you remove any obstructions that might be within the 16.5 foot access way to his back property. Additionally, as it is always my intent and practice to resolve any of these issues as quickly and amicably as possible. if you have any questions, or would like to meet on site and go over this, I would be happy to meet with you.

Sincerely,

Cc: Adam J. Patten Atty. Brian Ray Kevin L. French French Land Services Inc. 581 School Street Rumney, NH 03266 (603) 786-9790 (603) 254-9790 (cell)

frenchls@worldpath.net (email)

-Attachments:	
Tom Quinns 1st letter to Attorney Ray 8.27.18- REVISED 8.28 (2).pdf	92.1 KB
20200203_204234.jpeg	2.6 MB

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THOMAS F. QUINN PROF. CORP.

62 Elm Street PH: 603-554-1662 Milford, NH 03055 FAX: 603-554-1495

E-MAIL:tquinn@tfqtitle.com

COPY

August 27, 2018

Brian W. Ray, Esquire Brian W. Ray, P.L.L.C. 11 South Main Street P.O. Box 369 Plymouth, NH 03264

Re: Adam J. Patten and Dole Road, so-called

Dear Attorney Ray:

You may recall that I represent William G. Allen with respect to a dispute he is having with your client, Adam J. Patten, relative to Mr. Allen's property situated at 25 Buffalo Road, Wentworth, New Hampshire. Mr. Allen has forwarded to me both your letter of August 20, 2018 and Mr. French's letter of July 26, 2018. I only recently returned from vacation and am slowly catching up, so please excuse the delay in responding to these letters. That have been said, I do not agree with the assertions made by Mr. French and yourself relative to my client's property. The simple fact is that Mr. Patten does not own any portion of Mr. Allen's property or the Dole road. Nor does he enjoy any easement across my client's property. I will explain.

By deed dated August 13, 1867, recorded in Grafton County Registry of Deeds at Book 300, Page 385, J. Everett Sargent conveyed to Hiram Aikens the property now owned by my client. That deed expressly excepted and reserved the "Dole road (so-called) and the fee of the land in the road." Subsequently, by deed dated May 23, 1868, and recorded in said Registry at Book 303, Page 292, Mr. Sargent conveyed to William H. Moore several parcels of land, one of which has recently been conveyed to Mr. Patten by deed recorded in said Registry at Book 4319, Page 822. You will note that in his deed to Mr. Moore, Mr. Everett expressly excepts and reserves from the conveyance "the Dole Road so-called through said last tract of land." We have conducted an examination of title to this property, and neither Mr. Sargent, nor any of his heirs, successors and assigns, ever conveyed any interest in this fee of the so-called Dole road to anyone in this chain of title to Mr. Patten's property.

Nor did Mr. Sargent, his heirs, successors or assigns, ever convey to Mr. Moore, or anyone else in the chain of title to Mr. Patten's property, an easement to use any portion of the so-called Dole

road. And, of course, Mr. Sargent did not reserve an easement over the so-called Dole road for the benefit of his remaining property presumably for the obvious reason that, as owner of the fee, he had no need for such an easement. Since no easement existed, either expressly or by implication, then no such easement could have attached to his remaining land, later conveyed to Mr. Moore, as an appurtenance.

We have searched diligently and find no records that the so-called Dole road was ever a public highway. So, it is not possible that Mr. Patten would have a right to use of the "road" as a member of the general public.

The assertion that Mr. French made, and whether you repeated, to the effect that deeds in the chain of title to Mr. Allen's property make it expressly subject to a right of way one rod wide is unfounded. I have examined the deeds in the chain of title to Mr. Allen's property, of which there are twenty or so, and have determined that there is only one deed which suggests that the property is subject to a right of way. Marianne C. Small's deed to Samuel and Shirley Worrick, dated July 1966, recorded in said Registry at Book 1040, Page 389, makes such a recitation. But that assertion appearing for the first time since the lot was created in 1867, ninety-nine years earlier, and never to appear again, is clearly a scrivener's error.

I am sure Mr. French and yourself have noticed, during your review of the title to Mr. Patten's and Mr. Allen's property, that with the exception of Ms. Small's deed, there is no indication anywhere in the chain of title to Mr. Allen's property that his property is subject to an easement of any width nor is the width of the so-called Dole road reserved by Mr. Sargent even indicated in the chain of title to Mr. Allen's property.

The source of this error is found in two deeds in the chain of title to the property recently conveyed to Mr. Patten by Donna Clouette, dated December 6, 2017, and recorded in said Registry at Book 4331, Page 23. The first was a deed from Stephen Dole to Mr. Aiken, dated August 23, 1866, recorded in said Registry of Deeds at Book 300, Page 387. That deed excepted and reserved to Mr. Dole a rod wide right-of-way over the southeast corner of the property conveyed by Mr. Dole. It did not grant to Mr. Aiken or anyone else any right to use the right of way. Nor did Mr. Dole ever convey that right of way to anyone else. The effect of this reference is that the property conveyed by Mr. Dole to Mr. Aiken is subject to the right of way, not benefitted by it. The second deed is a deed from Mr. Dole to Daniel Colby, dated December 17, 1866, recorded in said Registry of Deeds at Book 311, Page 43. This deed, although recorded after the Dole to Aiken deed, is actually dated before that deed. In this deed, Mr. Dole excepted and reserved "a right of way one rod in width to be located by me within one year from the date if the said Colby shall elect to have me so do this right of way being for the accommodation of land which I still own". The land which Mr. Dole then still owned would appear to be the property (30 acres +/-) that he later sold to Mr. Aiken. In other words, the property Mr. Dole conveyed to Mr. Colby appears to be subject to a reserved right of way over the property Mr. Dole conveyed to Mr. Aiken for the benefit of Mr. Doles other property that he later conveyed to Mr. Aiken. None of this suggests that Mr. Dole or anyone else ever had or conveyed a right of way over the Sargent property.

There is, in deed, a reference to a right of way in the deed from Ms. Clouette to Mr. Patten as you suggest. But that reference indicates that the property conveyed is <u>subject</u> to a right of way, not <u>benefitted</u> by a right of way.

As you can see, the record evidence reflects that Mr. Patten enjoys neither the fee ownership of any right of way over any portion of Mr. Allen's property. And in any event, Mr. Allen and his predecessors in interest have exercised exclusive domain and content over the property for decades, if not longer, and have thereby extinguished any compelling claim to ownership of, or a right of way over, any portion of their property through adverse possession, abandonment, etc.

Attorney Ray, it is apparent that Mr. Patten's position and threatened action are based on a misunderstanding of the facts and law. Fortunately, Mr. Patten can access the public highways from various other points of his property. I respectfully suggest that it would behoove him to pursue the use of the other potential points of access.

Mr. Allen is not by nature a contentious person and would much prefer to resolve this dispute through dialogue and, if necessary, negotiation, but nothing that you or Mr. French have produced thus far gives the slightest indication that Mr. Patten has any rights with respect to Mr. Allen's property. Any legal proceedings that could be initiated at this point in time would be premature at best and most likely would be deemed frivolous. And, of course, Mr. Allen would contest any such litigation vigorously and through all courts who have jurisdiction.

But, as I stated, that is not his preference. So, if you do have additional information I would appreciate it if you would share it so that it can be discussed. Toward that end, I would also appreciate it if Mr. French would provide to me a full-size copy of the complete survey plan that he has produced for Mr. Patten.

I look forward to hearing from you and to an amicable resolution to the dispute.

Sincerely,

Thomas F. Quinn

TFQ/sg Enclosures