



**Exhibit A**

**DOC # 00354990**

Affidavits B: 0603 P: 0209  
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**AFFIDAVIT OF JOAN ANDERSON**  
**POVERTY FLAT ROAD**  
**SEVIER COUNTY, UTAH**  
**COUNTY ROAD NUMBER 6495**

State of Utah                                 )  
  : ss.  
County of Sevier                            )

JOAN ANDERSON, being first duly sworn, deposes and states as follows:

1. I am an adult competent to testify about the matters set forth below based upon my personal knowledge. I currently reside in Marysvale, Piute County, Utah. I have lived in Piute County 65 years.
2. I have traveled and am familiar with a road in Sevier County known as the Poverty Flat Road (County Road Number 6495). I am also familiar with the land the road traverses. When I first used and observed the road in the 1940's, it followed the same route as in 2006 when I last observed it. Attached is a Sevier County map showing Poverty Flat Road (County Road Number 6495). To the best of my knowledge and based upon my use of and familiarity with this road and the land it traverses, the location and route of the road are correctly illustrated on the attached map.
3. I am informed that the County also identifies this road according to the road number listed above.
4. I have observed that the road has been open to the public for all to use, to come and go as they pleased, since at least as early as the 1940's and continuing through 1976 to 2006. Throughout this time period I have observed travel on the road by various means, including jeeps and trucks and ATV's. Throughout this time period, the road has been used daily.
5. Throughout the time period from the 1940's to 2006, I have used the road myself for the following uses: Mining and hunting for wild flowers. I used to ride my horse to the uranium mines.

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6. Throughout the time period described in the previous paragraphs, I observed vehicles using the road at various times for the uses described in the previous paragraphs, plus the following uses: Access to the Deer Trail Mine and wood gathering.

7. It is also the reputation in the community that this road has been open to the public for all to use, to come and go as they pleased, since at least as early as before the 1920's and continuing through 1976 to 2006, for the uses described in the previous paragraphs, plus the following uses: Access to the gold and uranium mines and sheep herding.

8. Prior to 1976, I observed backhoes performing maintenance/construction activities on the road.

DATED this 16 day of November, 2006.

  
\_\_\_\_\_  
JOAN ANDERSON

SUBSCRIBED AND SWORN to before me this 16<sup>th</sup> day of November, 2006.

  
\_\_\_\_\_  
NOTARY PUBLIC

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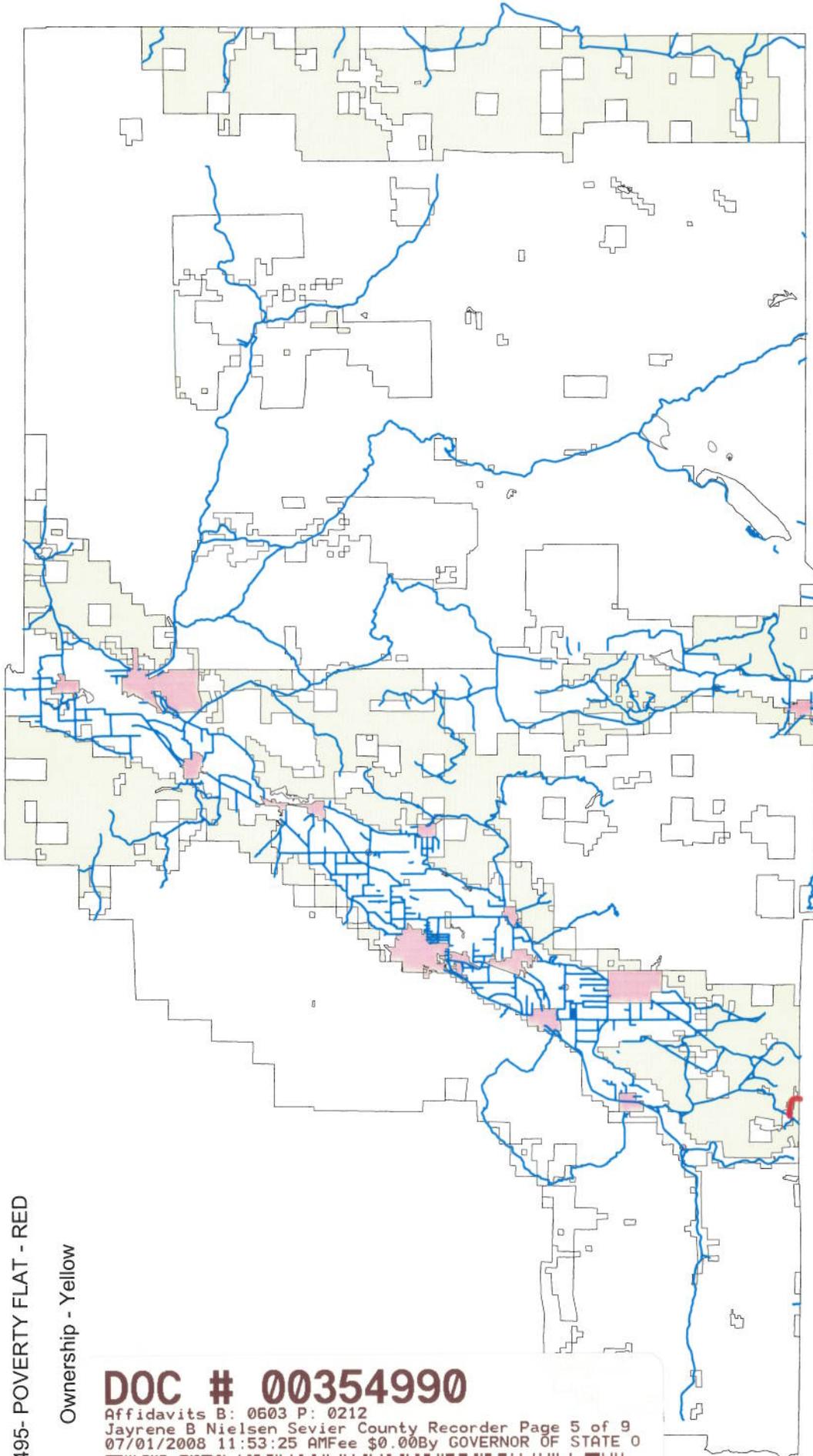


SEVIER COUNTY  
RS2477  
October 18, 2006

Class "B" Maintained Roads - Blue

6495- POVERTY FLAT - RED

Ownership - Yellow



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**AFFIDAVIT OF STEPHEN WANLASS**

**POVERTY FLAT ROAD**

**SEVIER COUNTY, UTAH**

**COUNTY ROAD NUMBER 6495**

State of Utah                    )  
  : ss.  
County of Sevier                )

STEPHEN WANLASS, being first duly sworn, deposes and states as follows:

1. I am an adult competent to testify about the matters set forth below based upon my personal knowledge. I currently reside in Monroe, Sevier County, Utah. I have lived in Sevier County since 1939.
2. I have traveled and am familiar with a road in Sevier County known to me as the Poverty Flat Road (County Road Number 6495). I am also familiar with the land the road traverses. When I first used and observed the road in 1956, it followed the same route as in 2006 when I last observed it. Attached is a Sevier County map showing the Poverty Flat Road (County Road Number 6495). To the best of my knowledge and based upon my use of and familiarity with this road and the land it traverses, the location and route of the road are correctly illustrated on the attached map.
3. I am informed that the County also identifies this road according to the road number listed above.
4. I have observed that the road has been open to the public for all to use, to come and go as they pleased, since at least as early as 1956 and continuing through 1976 to 2006. During this time period I have observed travel on the road by various means, including cars and trucks. During this time period, the road has been used daily.
5. During the time period from 1956 to 2006, I have used the road myself for the following uses: Hunting, wood gathering, and recreation.

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6. During the time period described in the previous paragraphs, I observed vehicles using the road at various times for the uses described in the previous paragraphs, plus the following uses: Mining, government access and livestock operations.

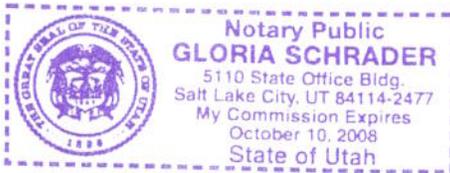
7. It is also the reputation in the community that this road has been open to the public for all to use, to come and go as they pleased, since at least as early as the 1920's and continuing through 1976 to 2006, for the uses described in the previous paragraphs.

8. Prior to 1976, I observed the graded surface of the road.

DATED this 15 day of November, 2006.

Stephen Wanlass  
STEPHEN WANLASS

SUBSCRIBED AND SWORN to before me this 15<sup>th</sup> day of November, 2006.



Gloria Schrader  
NOTARY PUBLIC

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SEVIER COUNTY  
RS2477  
October 18, 2006

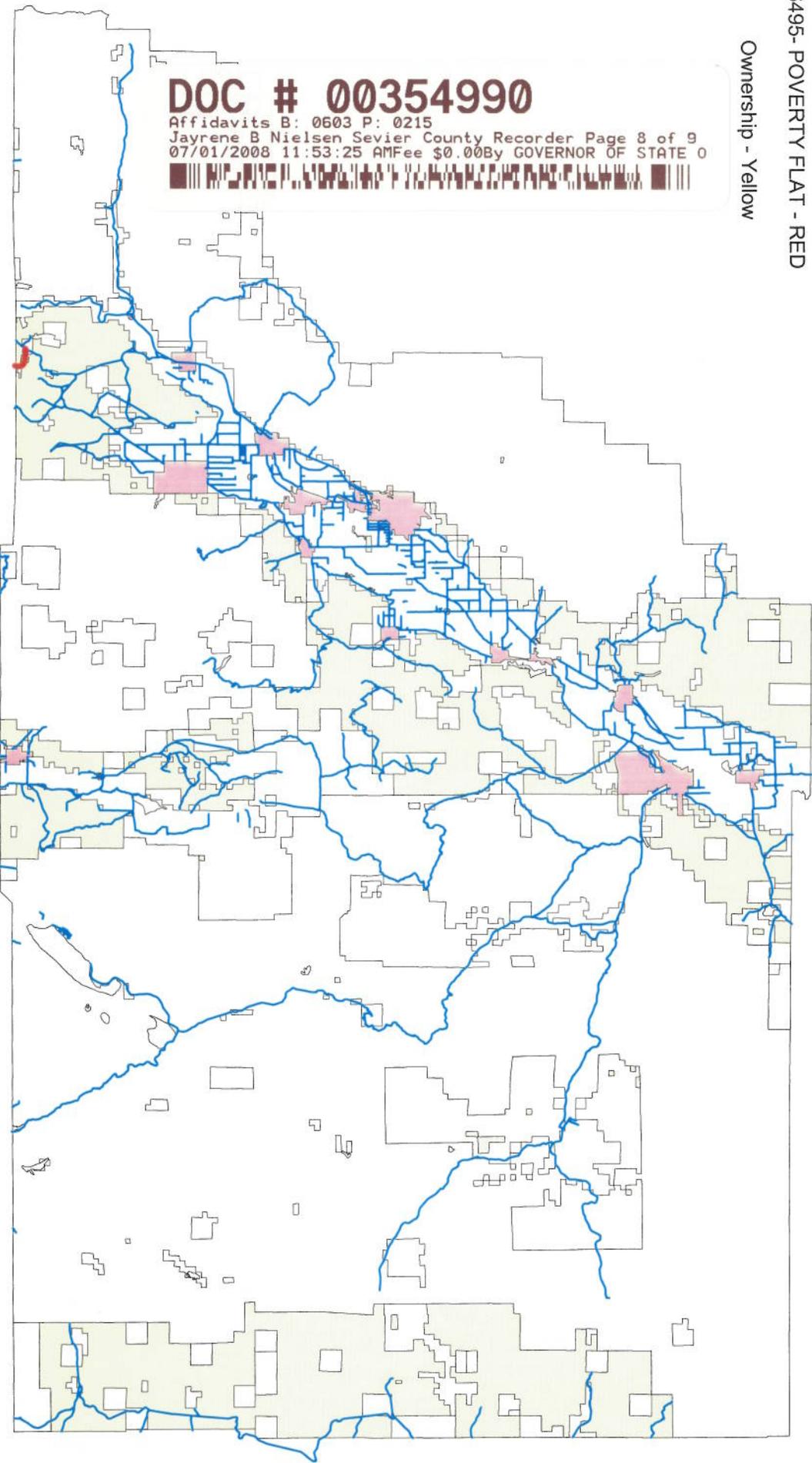
Class "B" Maintained Roads - Blue

6495- POVERTY FLAT - RED

Ownership - Yellow

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## Exhibit B

### Beginning & Ending Points and Township, Range, and Section References For:

**Popular Name: 1038d\_Poverty Flat Road**

**County: Sevier**

**County Road Number: 6495**

**State Geographic Information Database (SGID) Road Identification Number: RD210096.**

**Total Road Length: 1.21 miles more or less.**

**Beginning at a point** on the road centerline located at 38 degrees 31 minutes 05.71 seconds North Latitude and -112 degrees 13 minutes 47.66 seconds West Longitude, which can be converted to mapping accuracy State Plane Utah Central Zone NAD 83 feet coordinates of X = 1,431,542.2 feet and Y = 6,629,877.3 feet based on the US Survey Foot conversion.

**Ending at a point** on the road centerline located at 38 degrees 30 minutes 040.5 seconds North Latitude and -112 degrees 12 minutes 055.6 seconds West Longitude, which can be converted to mapping accuracy State Plane Utah Central Zone NAD 83 feet coordinates of X = 1,435,659.8 feet and Y = 6,627,293.6 feet based on the US Survey Foot conversion.

This road may traverse:

Township 26 South Range 4 West, Section(s) 22,26,27, Salt Lake Base & Meridian

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