



# The Attorney General of Texas

December 6, 1982

MARK WHITE  
Attorney General

Supreme Court Building  
P. O. Box 12548  
Austin, TX. 78711-2548  
512/475-2501  
Telex 910/874-1367  
Telecopier 512/475-0266

1607 Main St., Suite 1400  
Dallas, TX. 75201-4709  
214/742-8944

4824 Alberta Ave., Suite 160  
El Paso, TX. 79905-2793  
915/533-3484

1220 Dallas Ave., Suite 202  
Houston, TX. 77002-6986  
713/650-0666

806 Broadway, Suite 312  
Lubbock, TX. 79401-3479  
806/747-5238

4309 N. Tenth, Suite B  
McAllen, TX. 78501-1685  
512/682-4547

200 Main Plaza, Suite 400  
San Antonio, TX. 78205-2797  
512/225-4191

An Equal Opportunity/  
Affirmative Action Employer

Mr. Jack Giberson  
Chief Clerk  
General Land Office  
Austin, Texas 78711

Re: No. 82,3751-C  
State of Texas v. Bay Colony  
Property Company, Inc.,  
197th Judicial District

Dear Jack:

Enclosed is a certified copy of the judgment entered Friday, December 3, 1982, in the above-styled cause. I also enclose a copy of Plaintiff's Original Petition, Defendant's Original Answer and Cross Action and Plaintiff's First Supplemental Petition and Answer to Defendant's Cross Action.

I am also enclosing a large plat by M. L. Claunch covering the area in question in this suit which was introduced in evidence in this cause. A reduced copy of this plat is made a part of the final judgment.

Yours very truly,

*J. Milton Richardson*  
J. Milton Richardson  
Assistant Attorney General

JMR:me  
Enclosures

*Landes Court  
maps & Records  
Records  
JL*

*Counter 17124*

STATE OF TEXAS, PLAINTIFF	§	IN THE DISTRICT COURT OF
VS.	§	CAMERON COUNTY, TEXAS
BAY COLONY PROPERTY COMPANY, INC., DEFENDANT	§	197TH JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the State of Texas, on behalf of the Public Free School Fund and the General Land Office of Texas, acting herein by and through the Attorney General, and files this Original Petition against Bay Colony Property Company, Inc., this action being in the nature of a trespass to try title action. For this petition, Plaintiff would show:

1. Bay Colony Property Company, Inc. is a Delaware Corporation with its principal office and place of business in Boston, Massachusetts. Among other things, it claims to own, based upon a prior land grant from the Mexican State of Tamaulipas, certain lands on South Padre Island in Cameron County, Texas. This controversy grows out of the claim by the State of Texas that it is the fee simple owner of the tract of land which is described in Exhibit A by metes and bounds, which tract is hereinafter referred to as "the disputed tract."

2. This suit is a trespass to try title action and as required by Rule 783, TEX.R.CIV.P., Plaintiff alleges:

A. On the 1st day of January, 1981, Plaintiff was, and still is, the owner in fee simple of the disputed tract.

B. On such day, also, Plaintiff was entitled to possession of such premises; and afterward, on the 2nd of January, 1981, the Defendant unlawfully entered upon and dispossessed Plaintiff of such premises and withholds from Plaintiff the possession thereof.

C. Defendant has occupied and used such premises under such unlawful possession for a period of one year and the

rental value thereof during such occupancy is \$700.00 (Seven Hundred Dollars), in which amount by virtue of such wrongs the Defendant is justly indebted to Plaintiff; but, though repeated demand for the payment thereof has been made of Defendant by Plaintiff, Defendant has failed and refused, and still fails and refuses to pay the same, to Plaintiff's damage in the sum of \$700.00 (Seven Hundred Dollars).

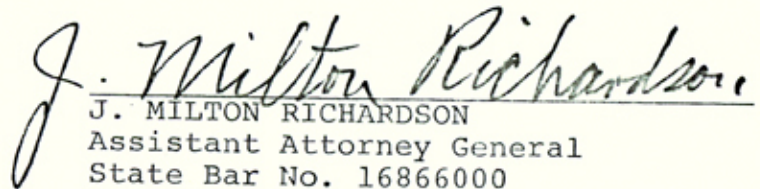
WHEREFORE, Plaintiff prays that the Defendant be cited to answer this petition, and that Plaintiff have judgment for the title and possession of the above-described premises, for Plaintiff's damages, for costs of suit and for such other and further relief to which Plaintiff may be entitled at law or in equity.

Respectfully submitted

MARK WHITE  
Attorney General of Texas

JOHN W. FAINTER, JR.  
First Assistant Attorney General

RICHARD E. GRAY, III  
Executive Assistant Attorney General

  
J. MILTON RICHARDSON  
Assistant Attorney General  
State Bar No. 16866000

P. O. Box 12548  
Austin, Texas 78711  
512/479-8191

ATTORNEYS FOR PLAINTIFF  
STATE OF TEXAS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing Plaintiff's Original Petition has been hand delivered to Mr. Marc O. Knisely, Texas State Bank Guilding, Austin, Texas 78701, Attorney for Bay Colony Property Co., Inc., this \_\_\_\_\_ day of \_\_\_\_\_, 1982.

  
J. Milton Richardson

NO. 82 3751 C

STATE OF TEXAS § IN THE DISTRICT COURT OF  
V. § CAMERON COUNTY, TEXAS  
BAY COLONY PROPERTY § 197TH JUDICIAL DISTRICT  
COMPANY, INC.

PLAINTIFF'S FIRST SUPPLEMENTAL PETITION  
IN ANSWER TO DEFENDANT'S CROSS ACTION

NOW COMES the Plaintiff and Cross Defendant, State of Texas, on behalf of the Public Free School Fund and General Land Office of Texas, for answer to the Cross Action of the Defendant and Cross Plaintiff, Bay Colony Property Company, Inc., and would show:

Cross Defendant denies each and every allegation of such Cross Action and pleads not guilty thereto.

WHEREFORE, the State of Texas prays for judgment as in its Original Petition.

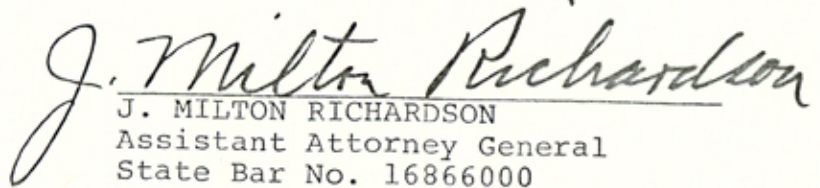
Respectfully submitted,

MARK WHITE  
Attorney General of Texas

JOHN W. FAINTER, JR.  
First Assistant Attorney General

RICHARD E. GRAY, III  
Executive Assistant Attorney General

ANDREW KEVER  
Assistant Attorney General  
Chief, Energy Division

  
J. MILTON RICHARDSON  
Assistant Attorney General  
State Bar No. 16866000

P. O. Box 12548  
Austin, Texas 78711  
512/479-8191

ATTORNEYS FOR STATE OF TEXAS

NO. 82 3751c

STATE OF TEXAS,  
Plaintiff,

V.

BAY COLONY PROPERTY  
COMPANY, INC.,  
Defendant.

§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT OF  
  
CAMERON COUNTY, TEXAS  
  
197TH JUDICIAL DISTRICT

DEFENDANT'S ANSWER AND COUNTERCLAIM

NOW COMES Defendant, Bay Colony Property Company, Inc., and for answer to the Plaintiff's Original Petition would show the Court as follows:

Defendant denies each and every allegation of such petition and pleads not guilty thereto.

WHEREFORE, the Defendant prays that Plaintiff take nothing by its suit and that Plaintiff go hence without day with its costs.

Respectfully submitted,

McGINNIS, LOCHRIDGE & KILGORE  
900 Congress Avenue  
Austin, Texas 78701

Shannon H. Ratliff  
Marc O. Knisely

By \_\_\_\_\_  
Marc O. Knisely  
State Bar No. 11614500

ATTORNEYS FOR DEFENDANT

COUNTERCLAIM

NOW COMES Bay Colony Property Company, Inc., as Counter-Plaintiff herein and files this its Counterclaim against Defendant, State of Texas, this Counterclaim being in the nature of a Trespass to Try Title action, and for same would show as follows:

1. Exhibit 1, attached hereto and made a part hereof, is a description of the property owned by Counter-Plaintiff in fee simple on South Padre Island in Cameron County, Texas.

2. This suit is a Trespass to Try Title action and as required by Rule 783, TEX. R. CIV. P., Counter-Plaintiff alleges:

a. On the 2nd day of January, 1981, Counter-Plaintiff was, and still is, the owner in fee simple of the tract described in Exhibit 1.

b. On such day, also, Counter-Plaintiff was entitled to possession of such premises; and afterward, on or about the 3rd of January, 1981, the Counter-Defendant unlawfully entered upon and dispossessed Counter-Plaintiff of such premises and withholds from Counter-Plaintiff the possession thereof.

c. Counter-Defendant has occupied and used such premises under such unlawful possession.

WHEREFORE Counter-Plaintiff, Bay Colony Property Company, Inc., prays that it have judgment against Counter-Defendant, the State of Texas, for the title and possession of the above-described premises, costs of suit and for such other and further relief to which Counter-Plaintiff may be entitled either at law or in equity.

Respectfully submitted,

McGINNIS, LOCHRIDGE & KILGORE  
900 Congress Avenue  
Austin, Texas 78701  
512/476-6982

Shannon H. Ratliff  
Marc O. Knisely

By \_\_\_\_\_  
Marc O. Knisely  
State Bar No. 11614500

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Defendant's Answer and Counterclaim has been hand delivered to Mr. J. Milton Richardson, Assistant Attorney General, 100 W. 15th St., Austin, Texas 78701, this \_\_\_\_\_ day of \_\_\_\_\_, 1982.

\_\_\_\_\_  
Marc O. Knisely

sketch  
File No. 8A  
Cameron County  
Dependent Public Survey  
Filed 12-20-1985  
BOB ALMSTRONG, Com.  
M. L. Claunch

DESCRIPTION

Twelve (12) acres on South Padre Island in Cameron County, Texas being a part of the said South Padre Island formerly known as the "Dickinson Tract" and more particularly being out of and a part of a certain "22.28 acres" tract as conveyed by Edith Branch Herbert, Independent Executrix of the Estate of Agnes A. Dickinson, to Richard B. Dorn by Warranty Deed dated April 12, 1961 and recorded in Volume 710, Pages 9-12, of the Deed Records of Cameron County; and the said twelve (12) acres being more particularly located and described as follows:

Commencing at a  $4\frac{1}{2}$ "x $4\frac{1}{2}$ " concrete monument for the southwest corner of the above mentioned "22.28 acres" tract (at coordinate position X = 2,437,419.252 and Y = 152,362.466 on the plane of the Texas Coordinate System - South Zone); from which U.S. Coast and Geodetic Survey Triangulation Station "Brazos" (X = 2,438,525.630 and Y = 150,643.800) bears South  $32^{\circ}-46'-16"$  East 2,043.98 feet (735.83 varas) and the northwest corner of a "10.51 acres" Coast Guard Station Tract (X = 2,438,130.099 and Y = 150,424.305) bears South  $20^{\circ}-08'-28"$  East 2,064.41 feet (743.19 varas); thence with a line for the southern boundary of the said "22.28 acres" tract, and for the northern boundary of Cameron County Isla Blanca Park, North  $83^{\circ}-09'-25"$  East a distance of 7.01 feet (2.52 varas) to the southwestern corner and place of beginning of the twelve (12) acres herein described (at coordinate position X = 2,437,426.212 and Y = 152,363.302):

THENCE with a line for the western boundary of the twelve (12) acres herein described, North  $6^{\circ}-50'-35"$  West, a distance of 1,023.65 feet (368.51 varas) to an intersection with a line for the north boundary of the said "22.28 acres"; the said place of intersection being the northwest corner of the tract herein described:

THENCE with the said line for the northern boundary of the said "22.28 acres", North  $83^{\circ}-09'-25"$  East, a distance of 517.70 feet (186.37 varas) to a  $4\frac{1}{2}$ "x $4\frac{1}{2}$ " concrete monument for the northeastern corner of this tract on the western right-of-way line of Texas State Park Road No. 100:

THENCE with the said western right-of-way of Texas State Park Road No. 100;

South  $9^{\circ}-33'-13"$  East, 513.75 feet (184.95 varas) a  $4\frac{1}{2}$ "x $4\frac{1}{2}$ " concrete monument, and

South  $4^{\circ}-22'-10"$  West, 520.41 feet (187.35 varas) to the southeast corner of this tract on a line for the southern boundary of the above mentioned "22.28 acres" tract:

THENCE with the said line for the southern boundary of the said "22.28 acres" tract, South  $83^{\circ}-09'-25"$  West, a distance of 440.80 feet (158.69 varas) to the place of beginning:

Containing according to the dimensions herein stated an area of twelve (12) acres, more or less.

The bearings and distances herein are based on the meridian and grid plane of the Texas Coordinate System (South Zone).

  
M. L. Claunch  
Registered Public Surveyor

Exhibit 1

Counter 17130

State of Texas  
Cameron County  
15-20-1985  
15-20-1985  
M. L. Claunch

DESCRIPTION

Twelve (12) acres on South Padre Island in Cameron County, Texas being a part of the said South Padre Island formerly known as the "Dickinson Tract" and more particularly being out of and a part of a certain "22.28 acres" tract as conveyed by Edith Branch Herbert, Independent Executrix of the Estate of Agnes A. Dickinson, to Richard B. Dorn by Warranty Deed dated April 12, 1961 and recorded in Volume 710, Pages 9-12, of the Deed Records of Cameron County; and the said twelve (12) acres being more particularly located and described as follows:

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THENCE with a line for the western boundary of the twelve (12) acres herein described, North  $6^{\circ}-50'-35"$  West, a distance of 1,023.65 feet (368.51 varas) to an intersection with a line for the north boundary of the said "22.28 acres"; the said place of intersection being the northwest corner of the tract herein described:

THENCE with the said line for the northern boundary of the said "22.28 acres", North  $83^{\circ}-09'-25"$  East, a distance of 517.70 feet (186.37 varas) to a  $4\frac{1}{2}$ "x $4\frac{1}{2}$ " concrete monument for the northeastern corner of this tract on the western right-of-way line of Texas State Park Road No. 100:

THENCE with the said western right-of-way of Texas State Park Road No. 100;

South  $9^{\circ}-33'-13"$  East, 513.75 feet (184.95 varas) a  $4\frac{1}{2}$ "x $4\frac{1}{2}$ " concrete monument, and

South  $4^{\circ}-22'-10"$  West, 520.41 feet (187.35 varas) to the southeast corner of this tract on a line for the southern boundary of the above mentioned "22.28 acres" tract:

THENCE with the said line for the southern boundary of the said "22.28 acres" tract, South  $83^{\circ}-09'-25"$  West, a distance of 440.80 feet (158.69 varas) to the place of beginning:

Containing according to the dimensions herein stated an area of twelve (12) acres, more or less.

The bearings and distances herein are based on the meridian and grid plane of the Texas Coordinate System (South Zone).

  
M. L. Claunch  
Registered Public Surveyor



Sketch

File No. 8

Cameron County

State of Texas vs. Bay Colony Property Co.

Filed 12-20- 1982

BOB ARMSTRONG, Com'r

By J. E. McCarty

COPY

NO. 82-3751-C

STATE OF TEXAS	§	IN THE DISTRICT COURT OF
V.	§	CAMERON COUNTY, TEXAS
BAY COLONY PROPERTY COMPANY, INC.	§	197TH JUDICIAL DISTRICT

FINAL JUDGMENT

On this day came on for trial the above-entitled and numbered cause, wherein the State of Texas, acting by and through the Attorney General of Texas and the Commissioner of the General Land Office, is Plaintiff and Cross Defendant and Bay Colony Property Company, Inc. is Defendant and Cross Plaintiff. Plaintiff and Defendant appeared by and through their attorneys and announced ready for trial, and, no jury having been demanded, this cause was tried before the Court.

The Court, having considered the evidence adduced, the pleadings, and arguments of counsel, does hereby render the following judgment:

1. It is ORDERED, ADJUDGED and DECREED that Bay Colony Property Company, Inc. is the owner of all the lands described in Exhibit 1 and depicted on the plat marked Exhibit 2, such Exhibits 1 and 2 being attached to and made a part of this Final Judgment; that said lands, comprising approximately 12.0 acres and being located in Cameron County, Texas, are a part of the original grant of an island, now known as Padre Island, from the State of Tamaulipas to Padre Nicolas Balli and his nephew Juan Jose Balli; that Bay Colony Property Company, Inc. succeeded through mesne conveyances to the title to such lands.

2. It is further ORDERED, ADJUDGED and DECREED that the western boundary of the lands which are the subject of this suit, which western boundary is described in Exhibit 1, accurately demarks the boundary between Padre Island and the state owned Laguna Madre. The said western boundary shall become a fixed boundary and shall no longer be subject to change because of a change in the elevation of

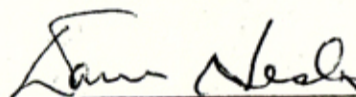
the tide, encroachment for any reason by water, temporary or permanent, or because of avulsion, reliction, accretion, erosion or any other causes whether natural or man made, and such described line shall, by this Judgment, become a fixed non-tidal boundary; provided, however, that for all other purposes and specifically for the purposes of the rights created or preserved by Sections 33.001, et seq. of the Texas Natural Resources Code, Bay Colony Property Company, Inc. shall be regarded as a littoral or riparian owner.

3. It is further ORDERED, ADJUDGED and DECREED that the Plaintiff, the State of Texas, take nothing by its suit.

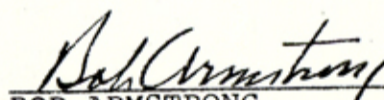
4. It is further ORDERED, ADJUDGED and DECREED that each party shall bear all costs and expenses incurred by such party, and therefore that no costs shall be taxed.

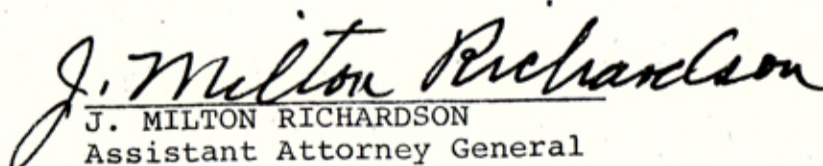
5. It is further ORDERED, ADJUDGED and DECREED that all relief not specifically granted herein is denied.

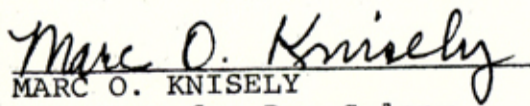
Signed this 3rd day of December, 1982.

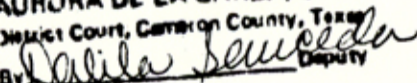
  
Darrell Hester, District Judge  
197th Judicial District Court

APPROVED:

  
BOB ARMSTRONG  
Commissioner of the General  
Land Office

  
J. MILTON RICHARDSON  
Assistant Attorney General

  
MARC O. KNISELY  
Attorney for Bay Colony  
Property Company, Inc.

TIME **FILED**  
9:43 AM  
DEC 8 1982  
AURORA DE LA GARZA, Clerk  
District Court, Cameron County, Texas  
By  Deputy

DESCRIPTION

Twelve (12) acres on South Padre Island in Cameron County, Texas being a part of the said South Padre Island formerly known as the "Dickinson Tract" and more particularly being out of and a part of a certain "22.28 acres" tract as conveyed by Edith Branch Herbert, Independent Executrix of the Estate of Agnes A. Dickinson, to Richard B. Dorn by Warranty Deed dated April 12, 1961 and recorded in Volume 710, Pages 9-12, of the Deed Records of Cameron County; and the said twelve (12) acres being more particularly located and described as follows:

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THENCE with a line for the western boundary of the twelve (12) acres herein described, North  $6^{\circ}-50'-35"$  West, a distance of 1,023.65 feet (368.51 varas) to an intersection with a line for the north boundary of the said "22.28 acres"; the said place of intersection being the northwest corner of the tract herein described:

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THENCE with the said western right-of-way of Texas State Park Road No. 100;

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Containing according to the dimensions herein stated an area of twelve (12) acres, more or less.

The bearings and distances herein are based on the meridian and grid plane of the Texas Coordinate System (South Zone).

  
M. L. Claunch  
Registered Public Surveyor

Notes Applied, August 1975

1. MONITORING - 215.2 x 3.5 "10-1-42" in address, referring well of east and Green Jaccala Causway, Elevation 415 "Sea Level Datum of 1929"
2. 1975 Elevation in C-123 (Plot of Causway & Green Properties, dated January, 1975) for location survey

  
 MERIDIAN  
 QU 1929  
 TEXAS DEED-LINE SYSTEM  
 59.74 DEGREES  
 SCALE 1"=60'

NOTES APPLIED August 5, 1982

1. Contour of Elevation +0.48 surveyed on the ground, August 18-20, 1975.
2. North and south boundary lines surveyed on the ground, January, 1972.
3. Survey markers, as shown, found and certified, February 1982.
4. Original plat drafting by Wm. E. Lottrop, Aug. 1975.
5. Revisions to show 12 acres by M.L. Claunch, August, 1982.
6. References hereon made to "Preliminary Plat" prepared for South Texas CO., Inc.

LAGUNA MADRE

15.52 ACRES  
 WEST OF HWY 291 TO "CONRAD SURVEY"  
 14.27 ACRES  
 WEST OF HWY 291 TO  
 MEAN MEANDER OF ELEVATION 0.45'

STATE PARK ROAD NO 100

PLAT SHOWING  
 TWELVE (12) ACRES  
 OUT OF THE  
 "CICKINSON TRACT"  
 SOUTH PADRE ISLAND  
 CAMERON COUNTY, TEXAS

PREPARED FOR  
 BAY COLONY PROPERTY COMPANY, INC.  
 AUGUST 1, 1982

SUBVENDOR CERTIFICATE:  
 I, M. L. Claunch, Registered Public Surveyor, do hereby certify that this is a true and correct plat of survey made on the ground by and under my supervision on the dates noted hereon. The western boundary of the eastern twelve (12) acres, hereon, is per office computation and has not been marked on the ground.

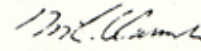
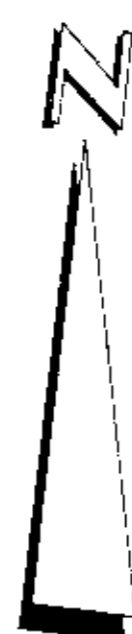
  
 M. L. Claunch  
 Registered Public Surveyor

Exhibit 2

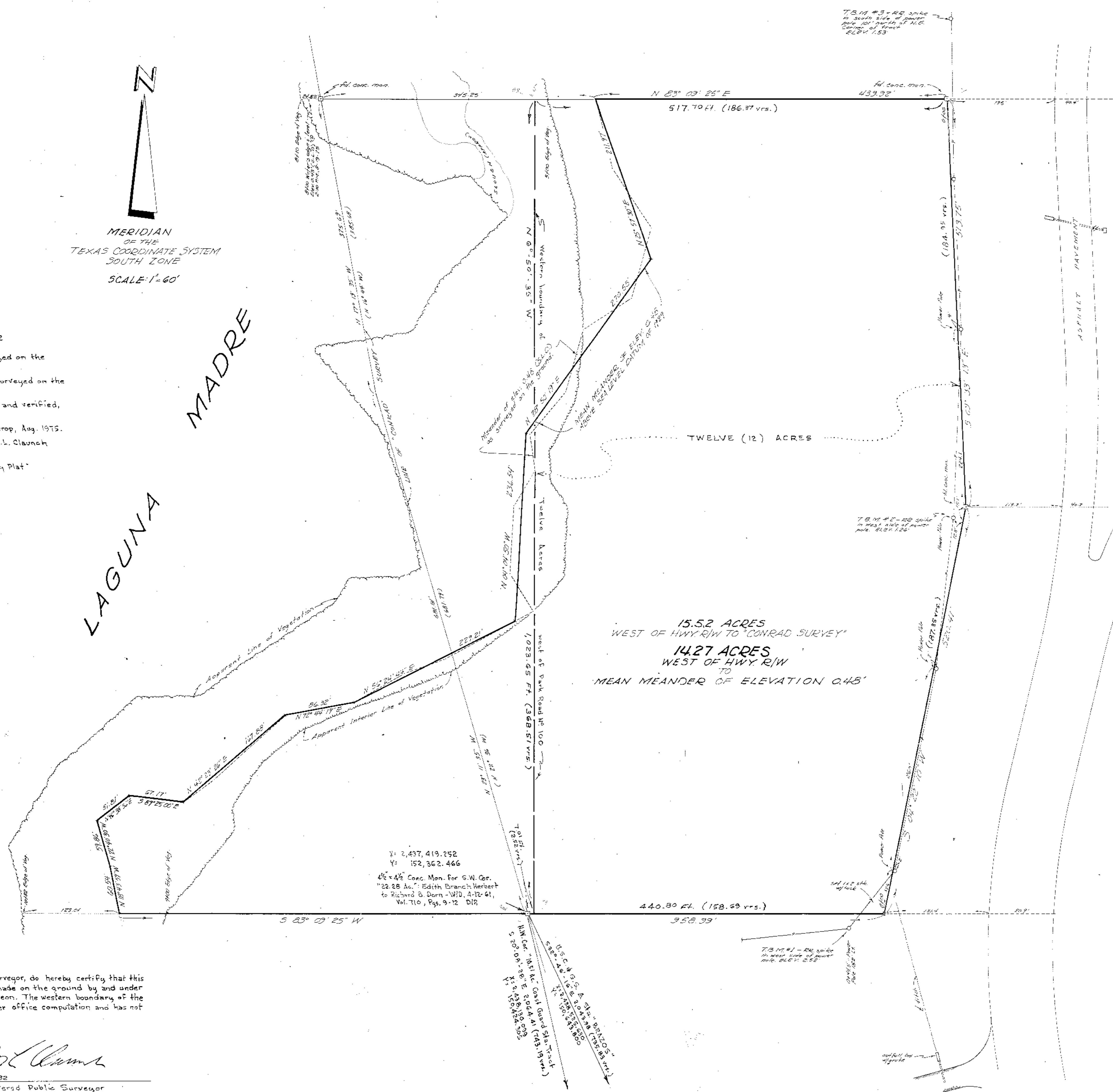
Counter 17134

  
**MERIDIAN**  
 OF THE  
 TEXAS COORDINATE SYSTEM  
 SOUTH ZONE  
 SCALE: 1"=60'

**NOTES APPLIED August 5, 1982**

1. Contour of Elevation +0.48 surveyed on the ground, August 18-20, 1975.
2. North and south boundary lines surveyed on the ground, January, 1972.
3. Survey markers, as shown, found and verified, February 1982.
4. Original plat drafting by Wm. N. Lothrop, Aug. 1975.
5. Revisions to show 12 Acres by M.L. Claunch August, 1982.
6. Reference hereby made to "Preliminary Plat" prepared for South Padre GO, Inc.

LAGUNA  
 MADRE



Notes Applied, August 1975


1. BENCHMARK - U.S.C. & G.S. "M-1142" on approach retaining wall of east end Queen Isabella Causeway, Elevation 418' ("Sea Level" Datum of 1929).
2. NOTE: Refer to C-193 (Plat of Richard B. Dorn Properties, dated January, 1972) for location survey.

STATE PARK ROAD NO 100

PLAT SHOWING  
 TWELVE (12) ACRES  
 OUT OF THE  
 "DICKINSON TRACT"  
 SOUTH PADRE ISLAND  
 CAMERON COUNTY, TEXAS

PREPARED FOR  
 BAY COLONY PROPERTY COMPANY, INC.  
 AUGUST 5, 1982

**SURVEYORS CERTIFICATE:**  
 I, M.L. Claunch, Registered Public Surveyor, do hereby certify that this is a true and correct plat of survey made on the ground by and under my supervision on the dates noted hereon. The western boundary of the eastern twelve (12) acres, herein, is per office computation and has not been marked on the ground.

  
 M.L. Claunch  
 Registered Public Surveyor

Sketch

File No. 8

Cameron County

Supplemental Petition

Filed 12-20- 1982

BOB ARMSTRONG, Com'r

By J. E. McCarty

no. 82 3721 c

STATE OF TEXAS  
v.  
BAY COLONY PROPERTY  
COMPANY, INC.

IN THE DISTRICT COURT OF  
CAMERON COUNTY, TEXAS  
19TH JUDICIAL DISTRICT

PLAINTIFF'S FIRST SUPPLEMENTAL PETITION  
IN ANSWER TO DEFENDANT'S CROSS ACTION

NOW COMES the Plaintiff and Cross Defendant, State of Texas,  
on behalf of the Public Free School Fund and General Land Office  
of Texas, for answer to the Cross Action of the Defendant and  
Cross Plaintiff, Bay Colony Property Company, Inc., and would  
show:  
Cross Defendant denies each and every allegation of such  
Cross Action and pleads not guilty thereto.

WHEREFORE, the State of Texas prays for judgment as in its  
Original Petition.

Respectfully submitted,

MARK WHITE  
Attorney General of Texas

JOHN W. FAINTER, JR.  
First Assistant Attorney General

RICHARD E. GRAY, III  
Executive Assistant Attorney General

ANDREW KEVOR  
Assistant Attorney General  
Chief, Energy Division

J. Milton Richardson  
J. MILTON RICHARDSON  
Assistant Attorney General  
Seal No. 1686600

P. O. Box 12548  
Austin, Texas 78711  
512/479-8191

ATTORNEYS FOR STATE OF TEXAS

Sketch

File No. 8

Cameron County

Final Judgement Cause No. 82-3751-C

Filed 12-20-1982

BOB ARMSTRONG, Com'r

By J. E. McCarty



Exhibit 5

Counter 80096



Sketch

File No. 8A

Cameron County

Defendants Answer & Counter claim

Filed 12-20-1902

BOB ARMSTRONG, Com'r

By J. S. M. Carter

DESCRIPTION

Twelve (12) acres on East Park Road in Cameron County, Texas... part of the said East Park Road... "Dickinson tract" and more particularly being out of and a part of a certain "22.28 acres" tract as conveyed by Edith Branch Herbert, Independent Executor of the Estate of Agnes A. Dickinson, to Robert H. Doby by Warranty Deed dated April 12, 1901 and recorded in Volume 115, Pages 9-12, of the Deed Records of Cameron County, and the said twelve (12) acres being more particularly located and described as follows:

Commencing at a 4 1/2" x 4 1/2" concrete monument for the southwest corner of the above mentioned "22.28 acres" tract (at coordinate position X = 2,437,419.223 and Y = 152,382,382) on the place of the Texas Coordinate System - South Zone; from which U.S. Coast and Geodetic Survey triangulation station "Brazos" (X = 2,438,252.830 and Y = 152,382,800) bears South 50° 46' 10" East 2,042,887 feet (607,822.474) and the northeast corner of a "10.51 acres" Coast Guard Station tract (X = 2,418,130.022 and Y = 150,421,305) bears South 30° 08' 22" East 2,004.41 feet (611.447) there with a line for the southern boundary of the said "22.28 acres" tract, and for the northern boundary of Cameron County (East Park Road, North 83° 00' 22" East a distance of 7.01 feet (2.127 meters) to the southwest corner and place of beginning of the twelve (12) acres herein described (at coordinate position X = 2,437,419.212 and Y = 152,382,382.305):

THENCE with a line for the western boundary of the twelve (12) acres herein described, North 50° 50' 38" West, a distance of 1,023.88 feet (312.417 meters) to an intersection with a line for the north boundary of the said "22.28 acres"; the said place of intersection being the northwest corner of the tract herein described:

THENCE with the said line for the northern boundary of the said "22.28 acres", North 83° 00' 22" East, a distance of 517.76 feet (157.817 meters) to a 4 1/2" x 4 1/2" concrete monument for the northeast corner of this tract on the western right-of-way line of Texas State Park Road No. 100:

THENCE with the said western right-of-way of Texas State Park Road No. 100; South 50° 51' 12" East, 513.75 feet (157.127 meters) a 4 1/2" x 4 1/2" concrete monument, and South 40° 22' 10" West, 320.41 feet (97.357 meters) to the southeast corner of the said tract on a line for the southern boundary of the above mentioned "22.28 acres" tract:

THENCE with the said line for the southern boundary of the said "22.28 acres" tract, South 83° 00' 22" West, a distance of 440.20 feet (134.152 meters) to the place of beginning:

According to the dimensions herein stated an area of twelve (12) acres, more or less,

The bearings and distances herein are based on the meridian and plane of the Texas Coordinate System (South Zone).

*[Signature]*  
M. J. Claunch  
Registered Public Surveyor

Exhibit 1

File No. 84  
County  
Date of Judgment  
Filed 12-20-1982  
BOB ARMSTRONG, Com'r  
By J.E.M. Carter

УВЕЛЕТЪ ИМЪ  
СЪМЪОНЪ БЪРЪВЕЛЪ КОМЪНИЪ ЛТД  
СЪМЪОНЪ СОУЛЪ ДЪЛЪДЪ  
БОУЛЪ БЪРЪВЕ ЛЪГЪИД  
ДЪКЪИЪОНЪ ЛЪБЪСТЪ  
ОНЪ ОЪ ЛЪБЪ  
ЛМЕЛЪ (ИЪ) УЪБЪБЪ  
БЪГЪЛЪ ЗНОУИЪ

STATE PARK ROAD No 100

WESTA MEMBERS OF ELEVATION ONE  
MEET OF THE L.M.S.  
1225 ACRES

ЛМЕЛЪ (ИЪ) УЪБЪБЪ

1. The State Park Road No 100  
2. The State Park Road No 100  
3. The State Park Road No 100  
4. The State Park Road No 100  
5. The State Park Road No 100  
6. The State Park Road No 100  
7. The State Park Road No 100  
8. The State Park Road No 100  
9. The State Park Road No 100  
10. The State Park Road No 100

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Handwritten notes in the bottom left corner.

АМУСАЛЪ

БЪРЪВЕ

MEMBERS OF ELEVATION ONE  
MEET OF THE L.M.S.  
1225 ACRES



- 1. The State Park Road No 100
- 2. The State Park Road No 100
- 3. The State Park Road No 100
- 4. The State Park Road No 100
- 5. The State Park Road No 100
- 6. The State Park Road No 100
- 7. The State Park Road No 100
- 8. The State Park Road No 100
- 9. The State Park Road No 100
- 10. The State Park Road No 100

