



Hancock County Board of Supervisors

Public Hearing Agenda

November 1, 2021 at 1:00 PM

Board Meeting Room

I. Call to Order

II. Motions

1. Motion to spread on the Minutes, the Road Registry Public Hearing Proof of Publication.
2. Discussion/Motion to consider accepting and/or abandoning the following roads in Hancock County: a. District 1 - Bud Ladner Road - petition asking Board to reopen east end/right at fork; b. Letter and Complaint from Negrotto & Associates, PLLC regarding Bud Ladner Road; c. District 4 Northshore Drive - petition asking the Board to abandon a portion of 123 feet; d. District 5 Lawrence Ladner Road - petition asking Board to accept another 500 feet of road for county maintenance; e. District 5 Road 510 (J.C. Favre Road) - petition asking Board to abandon entire road.

III. County Attorney

IV. Public Comments

V. Adjourn / Recess

The Sea Coast Echo

POST OFFICE BOX 2009
BAY SAINT LOUIS, MS 39521-2009

PROOF OF PUBLICATION

STATE OF MISSISSIPPI
HANCOCK COUNTY

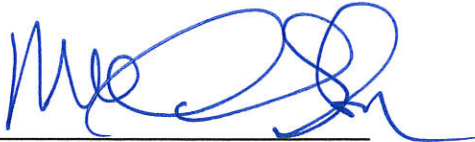
PERSONALLY appeared before me the undersigned authority in and for said County and State, MICHAEL SCHUVER, vice president of THE SEA COAST ECHO, a newspaper published in the City of Bay Saint Louis, said County, who being duly sworn, deposes and says the publication of this notice hereunto annexed has been made in the said publication 2 weeks to-wit:

On the 13th day of October 2021

On the 20th day of October 2021

On the _____ day of _____ 2021

On the _____ day of _____ 2021



Vice President

Notice of Public Hearing to Consider Changes to the Road Registry

Notice is hereby given that the Hancock County Board of Supervisors will hold a public hearing to consider having roads laid out or changed, or roads abandoned pursuant to Mississippi Code Sections 65-7-4, 65-7-57 and 65-7-121 at 1:00 p.m. on November 1, 2021 at the Board of Supervisors Boardroom located at 854 Highway 90, Bay Saint Louis, Mississippi 39520 as follows:

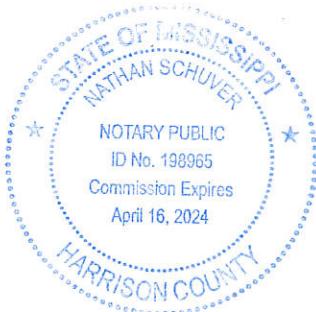
- (1) Petition requesting the addition of 500 feet of road to the County Road Registry of Lawrence Ladner Road;
- (2) Petition for abandonment a 123 feet portion of Northshore Drive;
- (3) Petition requesting the abandonment of all of Road 510;
- (4) Petition for the addition of the east section of Bud Ladner Road of 3/16 of a mile +/-; and
- (5) Petition for the addition of Amy Lee Road, Kiln, Mississippi.

All persons are hereby provided notice to appear and take such part as they deem appropriate at the hearing.
10/13/21, 10/20/21

Sworn to and subscribed before me A NOTARY PUBLIC



This 29th day of October 2021



September 2021 Road List for Hearing

1. Dist. 5 Lawrence Ladner Rd. Petition asking the Board to accept another 500 ft. of road for county maintenance.
2. Dist. 4 Northshore Drive. Petition asking the Board to abandon a portion of 123 ft.
3. Dist. 5 Road 510 Petition asking the Board to abandon whole road.

PETITION TO HAVE ROAD(S) LAID OUT OR CHANGED WITHIN HANCOCK
COUNTY, MISSISSIPPI, UNDER SECTION 65-7-57, MISSISSIPPI CODE,
1972, ANNOTATED

PETITION FOR MAINTENANCE

We request to have Lawrence Ladner Rd extended, turned
over to the County as a dedicated Road, so that it can be
maintained as a County Road.

_____, is situated in Hancock County,
(legal description)

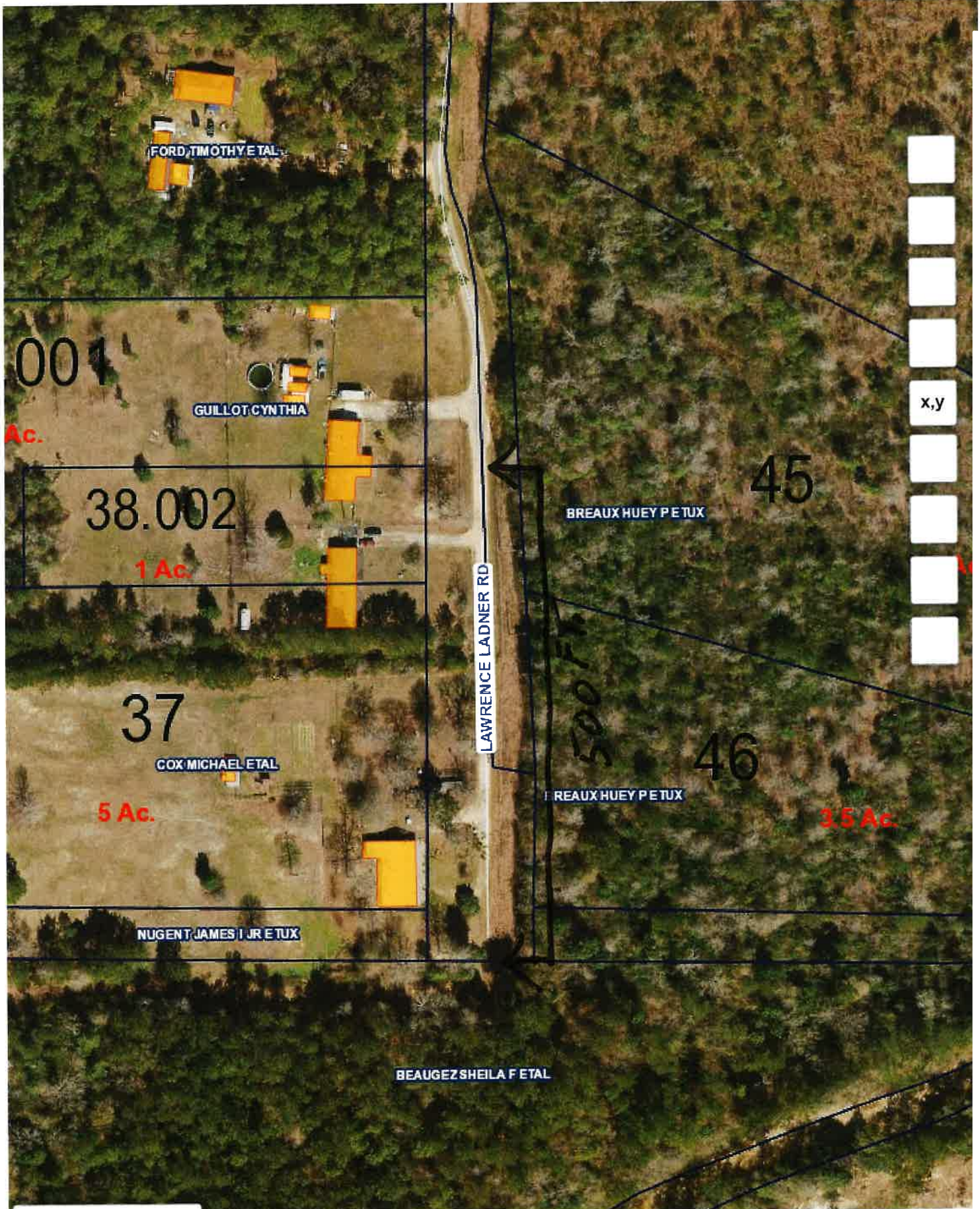
FROM END OF ASPHALT TO END OF GRAVEL/GRASS
ROAD

_____, and is 500 FT. ~~of a mile long.~~

Besides the daily traffic of the residents, it is also traveled
by (example; school buses, and other public and private
vehicles). Yes or No

We the property owners listed below, appreciate your attention
in this matter:

Abigail Smalley, Michael Smalley 22101 Lawrence Ladner Rd. 228-3
Sherry Drouot 22071 Lawrence Ladner Rd 39556
Alan R. Drouot 22071 Lawrence Ladner Rd 39556
Mindy Austin 22075 Lawrence Ladner Rd. 39556
Derrick Guillot 22075 Lawrence Ladner Rd. Kiln MS 39556
Cynthia Guillot Pearson 22071 Lawrence Ladner Rd 39556
Dexter Guillot 22071 Lawrence Ladner Rd Kiln MS 39556
Mark A. Guillot 22077 LAWRENCE LADNER RD, KILN, MS 39556
Kathy Ford 22049 Lawrence Ladner Rd, Kiln 39556
in 1993 22049 Lawrence Ladner Rd, Kiln MS 39556
Charles Pierce 22000 Lawrence Ladner Rd Kiln MS 39556
Burtie Gallagher " " " Kiln MS 39556
Steve Daniels " " " Kiln MS 39556
Melissa Guillot 21993 Lawrence Ladner Rd Kiln, MS 39556



Attachment: 2021 Road List for Public Hearing (10002 : Discussion regarding accepting/abandoning roads in Hancock County)

PETITION TO ABANDONMENT OF PORTION/SECTION AND OR WHOLE ROAD
WITHIN HANCOCK COUNTY, MISSISSIPPI, UNDER SECTION 65-7-121,
MISSISSIPPI CODE, 1972, ANNOTATED

DATE: 6/29/2020

RE: ABANDONMENT OF STREET/ROAD, WHOLE OR (PART) PLATTED BUT
NEVER OPENED:

Northshore Drive between
Hayes and Seneca.

Honorable Board of Supervisors
854 Hwy 90 Suite A
Bay St. Louis, MS 39520

Dear Supervisors,

I/We, RICHARD FORD & MICHELLE SCHULTER hereby request
the Hancock County Board of Supervisors to
Abandon: 11001 NORTHSHORE DR.

BAY ST. LOUIS, MS 39520

in _____, MS., platted but never
opened and used by public YES _____ NO _____. I/We are the
sole owners of said property, which consists of
_____ feet or _____ acre/s.

I/We, the petitioner's would also show unto the Board of
Supervisors the following, to-wit:

1. The section does not provide primary access to
unoccupied properties YES _____ or NO ✓, and
2. Traffic on the section has for a period of at least ten
(10) consecutive years been intermittent and of such low
volume that no substantial public purpose is being
served thereby YES _____ or NO ✓, and
3. The Board of Supervisors has, for a period of at least
the previous five (5) consecutive years, not maintained
such section as part of the County Road System.
YES ✓ or NO _____
4. The public interest or convenience does not require the
section to remain open to the public or that it is in
the public interest or convenience to close, vacate and
abandon the section. YES _____ or NO ✓

The Petitioner's is/are the property owner of the _____
side and/or both ✓ sides of the requested abandonment.

Your approval of abandonment of said property is greatly
appreciated.

Sincerely,

Michelle Schuler
Richard Ford
Tom B. Dale
Paul B. Bask
Donna Kennedy
Cal R. Bask

K. H. H. H.
B. B. B.
W. W. W.
W. W. W.
W. W. W.





**PETITION TO NAME OR RE-NAME DESIGNATED ROAD
HANCOCK COUNTY E-911 ADDRESSING OFFICE**

We, the undersigned land owners, petition to name a road not presently named to:

or change the road presently named: Road 510

To: J.C. Favre Rd

The road is in Section: 28 Township: 7 Range: 14 District: _____ and located on
Hancock County Tax Parcel Number 068-0-28-013.001

This will be/is a Public or Private Road. (Circle One)

The foregoing request has been examined by the Hancock County E-911 Addressing Office and it finds that the petition does not conflict with the E-911 Addressing System presently in use.

E-911 Coordinator: _____

SIGNATURES OF ALL REQUIRED PROPERTY OWNERS (If a parcel of property is accessible by the designated road in any way it is then required that the property owner sign the petition)

PRINTED NAME	SIGNATURE	ADDRESS	TAX PARCEL NUMBER	DATE
Kathleen Favre	<i>Kathleen Favre</i>		068-0-28-013.001	
Aaron Ruzicka	<i>Aaron Ruzicka</i>		068-0-28-013.000	
Deanna Ruzicka	<i>Deanna Ruzicka</i>		068-0-28-013.000	
Abby McGuire	<i>Abby McGuire</i>		068-0-28-013.000	
"			068-0-28-013.001	

* Please note that ALL addresses that are current will change. Upon approval of this petition by the Hancock County Board of Supervisors, a new address number and road name will be issued by the E-911 Addressing Office. It is the responsibility of the occupant to make all necessary changes with their address to ensure the accuracy of the address for E-911 purposes.

Road Manager: _____

Approved by the Hancock County Board of Supervisors at _____ meeting.

CONTACT FOR PETITION _____

Form Rev. January 5, 2017



DISCLAIMER: Any user of this map product accepts its faults and assumes all responsibility for the use thereof, and further agrees to hold Hancock County harmless from and against any damage, loss or liability arising from any use of the map product. Users are cautioned to consider carefully the provisional nature of the maps and data before using it for decisions that concern personal or public safety or the conduct of business that involves monetary or operational consequences. Conclusions drawn from, or actions undertaken, on the basis of such maps and data, are the sole responsibility of the user.

April 6, 2021



PETITION TO HAVE ROAD(S) LAID OUT OR CHANGED WITHIN HANCOCK
COUNTY, MISSISSIPPI, UNDER SECTION 65-7-57, MISSISSIPPI CODE,
1972, ANNOTATED

PETITION FOR East section of Bud Ladner Rd to be
added to registry.

We request to have east end / right @ Fork Budd Ladner Rd ^{Reopened} turned
over to the County as a dedicated Road, so that it can be
maintained as a County Road .

Bud Ladner Road , is situated in Hancock County,
(legal description)

The undersigned have no desire or intentions
to have this section of road paved or any major
repairs performed.

, and is 3/10 of a mile long.

Besides the daily traffic of the residents, it is also traveled
by (example; school buses, and other public and private
vehicles). Yes or No

We the property owners listed below, appreciate your attention
in this matter:

Thomas Maffray Jr.
Shirley Maffray
Mary Daneline Ladner
Allison B. Cole
Blenda L. Cole
Ron F. D.
Stephen C. Ladner Sr.
Barbara E. Ladner
Dana C. Ladner Jr.
Beto L. Breshears
Thomas Maffray Jr.
Penny Lickler Sahague
Kayla Maffray Overell
Anna Lundy
Angie B. Dawsey
Annet Rung Jr.
Jesse Woods Jr.
Boyz Cagle

Mark S. Lickert
Tammy Wake
Dana Wake
Angie S.
Earl J. Ladner Jr.
Seymour F. Ladner
Charles M. Ladner
Charles Ladner
Anne Maffray
Kip
Frank J. Maffray
Patricia Maffray
Jesse Egan
Kelly Fort

NEGROTTO
&
ASSOCIATES, PLLC

LEWIE G. "SKIP" NEGROTTO IV
skip@negrottolaw.com

220 E. SCENIC DRIVE, SUITE 200
PASS CHRISTIAN, MISSISSIPPI 39571
TELEPHONE: 228-222-4777
FACSIMILE: 866-526-0715

October 26, 2021

Gary Yarborough, Esq.
Hancock County Board of Supervisors
845B Highway 90
Bay St. Louis, MS 39520

Re: Public Hearing on "Petition for the addition of the east section of Bud Ladner Road"

Penny Ladner Sahuque v. Ernest Charles Ladner, Jr., Hancock County
Chancery Court Cause No. 21-396, Judge Persons

Dear Gary,

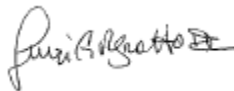
Hope this finds you well.

It is my understanding that the above-referenced public hearing is set for November 1, 2021, at 1 pm. It appears that the request is to have the Board open an already existing public road. I question the existence of a public road as I have been unable to find an "east" extension of Bud Ladner Road on the County road map.

The above-referenced lawsuit currently pending in Hancock County Chancery Court addresses the exact issue that will be presented to the Board on November 1, 2021. I represent the Defendant, Earnest Ladner, who owns the property through which Ms. Sahuque seeks access. Ms. Sahuque is simply trying to do an end run around the legal process hoping the Board will approve her request to take my client's land. I respectfully request the Board table this matter and await the outcome of the pending litigation. I will be present at the Board meeting on behalf of my client and will have documents in support of our position to be reviewed by the Board if necessary.

On another matter, I have not heard anything on my client's request to void the tax sale related to the movie theater in Waveland. Can you please give me an update?

Sincerely,



Lewie G. Negrotto IV

Attachment: Letter to Gary Yarborough 10.26.21 (10002 : Discussion regarding accepting/abandoning roads in Hancock County)

IN THE CHANCERY COURT OF HANCOCK COUNTY, MISSISSIPPI

PENNY LADNER SAHUQUE

FILED

PLAINTIFF

VS

JUL 20 2021 CAUSE NO.: 23CH1:21-cv-396 JP

ERNEST CHARLES LADNER, JR.

TIMOTHY A. KELLAR
CHANCERY CLERK

DEFENDANT

BY _____ D.C.

**COMPLAINT TO CONFIRM TITLE, CANCEL CLOUDS, FOR
DECLARATORY JUDGMENT, AND FOR OTHER RELEIF**

COMES NOW Penny Ladner Sahuque, by and through Michael D. Haas, Jr. her attorney, and files this Complaint against the Defendant and to confirm Plaintiff's title, cancel cloud, for declaratory and other relief related to the real property hereinafter described for and in support thereof the Plaintiff would show as follows, to-wit:

1.

That Penny Ladner Sahuque is an adult resident citizen of Hancock County, Mississippi who may be served with process in this matter on her attorney Michael D. Haas, Jr., 201 N. 2nd Street, Bay St. Louis, MS 39520.

2.

That Ernest Charles Ladner, Jr. is an adult resident citizen of Hancock County, Mississippi who may be served with process in this matter at 5260 Bud Ladner Road, Bay St. Louis, Mississippi 39520.

3.

That the Court has jurisdiction over the parties and the subject matter. Hancock County, Mississippi is the proper venue due to the fact that the cause of action accrued in Hancock County, Mississippi, and the real property involved in this case is located in Hancock County, Mississippi. The matter is

Attachment: DOC 3 Complaint (10002 : Discussion regarding accepting/abandoning roads in Hancock County)

filed in the Chancery Court due to Chancery Court's constitutional jurisdiction and also due to the fact that no adequate remedy is available at law.

FACTS

The Plaintiff is the owner of real property located in Hancock County, Mississippi more particularly described as follows, to-wit:

Commencing at an axle found at the Sections corner common to Section 22, 23, 26 and 27, Township 9 South, Range 15 West, Hancock County, Mississippi; thence on and along the Section line between Sections 22 and 23, North 00 degrees 22 minutes 48 seconds East 1329.56 feet to a 10" fence corner; thence North 89 degrees 29 minutes 43 seconds West 79.97 feet to a 5/8" rebar set with cap and the Point of Beginning; thence North 54 degrees 13 minutes 52 seconds West 219.62 to a 5/8" rebar set with cap; thence North 48 degrees 49 minutes 37 seconds West 61.75 feet to a 5/8" rebar set with cap; thence North 70 degrees 36 minutes 33 seconds West 61.75 feet to a 5/8" rebar set with cap; thence South 85 degrees 33 minutes 09 seconds West 37.20 feet to a 5/8" rebar set with cap; thence North 44 degrees 22 minutes 48 seconds East 260.28 feet to the center of Bayou Cadet; thence along the center of said bayou for the following calls: South 55 degrees 52 minutes 19 seconds East 48.90 feet; thence South 71 degrees 26 minutes 13 seconds East 200.74 feet; thence South 00 degrees 04 minutes 02 seconds East 57.67 feet; thence South 77 degrees 35 minutes 27 seconds East 65.49 feet; thence North 72 degrees 40 minutes 34 seconds East 64.96 feet; thence South 62 degrees 45 minutes 24 seconds East 60.55 feet; thence South 22 degrees 48 minutes 10 seconds West 93.39 feet; thence South 32 degrees 22 minutes 54 seconds East 26.45 feet; thence South 65 degrees 26 minutes 57 seconds East 236.80 feet; thence leaving said bayou, North 89 degrees 29 minutes 43 seconds West 464.32 feet to the Point of Beginning, containing 3.10 acres, more or less, and being located in the Northeast Quarter of the Southeast Quarter of Section 22, and the Northwest Quarter of the Southwest Quarter of Section 23, Township 9 South, Range 15 West, Hancock County, Mississippi. The basis of bearings is the Mississippi State Plane Coordinate System, NAD83, MS East Zone.

and is shown on survey by Chad H. Cutrer, **Exhibit "A"** attached hereto. The real property was acquired by Warranty Deed, a copy of attached hereto as Exhibit "A-1".

4.

That the Defendant is the owner of real property located in Hancock County, Mississippi more particularly described as follows, to-wit:

Beginning at a stake set at the SW corner of the SE $\frac{1}{4}$ of the SE $\frac{1}{4}$, Section 22, Township 9 South, Range 15 West, Hancock County, Mississippi; thence running North 1413.5 feet to a stake; thence East 405 feet to a stake; thence South 1413.5 feet to a stake; thence West 405 feet to the place of beginning. Containing 13 $\frac{1}{6}$ acres, more or less, in the East half (E $\frac{1}{2}$) of the SE $\frac{1}{4}$ of Section 22, Township 9 South, Range 15 West, Hancock County, Mississippi. LESS AND EXCEPT THEREFROM ANY PRIOR CONVEYANCES.

That the Deraignment of Title to the Defendants real property is attached hereto and made a part hereof as **Exhibit "B"**.

5.

That the Plaintiff deraigns her title which was duly patented from the United States of America to the State of Mississippi in compliance with Mississippi Code Annotated § 11-17-35. That the larger tract of real property was thereafter subdivided and conveyed to different persons including the Plaintiff herein. That the conveyances regarding the real property are shown on the deraignment of title attached hereto and made a part hereof as **Exhibit "C"**.

6.

That the real property in dispute is accessed by a public roadway which was established and maintained as a County road for many years and has not been legally abandoned by the Hancock County Board of Supervisors.

7.

Additionally, the deed in favor of the Defendant's predecessor in title, Jaki S. Sanford, specifically contained a reservation of all easements of record which would include access thereto. In particular a deed from Jaki Smith Sanford filed in Deed Book BB 174, Pages 1-2, Deed Records of Hancock County, Mississippi, a copy of which is attached hereto as **Exhibit "D"** described the real property conveyed to Ernest C. Ladner, Sr. and Velma Ladner as being to the "centerline of a roadway" and follows the roadway centerline to the Plaintiff's real property. The deed provides that the conveyance is "less and except that part which constitutes a **public road right-of-way**". (emphasis added).

8.

That the Plaintiff and her predecessors in title have accessed the real property hereinabove described by virtue of a gravel road off Bud Ladner Road, the approximate location of the existing road bed is shown on the surveyor's sketch prepared by Chad H. Cutrer, Licensed Professional Surveyor, which is attached hereto as **Exhibit "E"**. The road begins at Bud Ladner Road (a public

roadway) shown on the sketch to the real property owned by the Plaintiff. The Plaintiff and her predecessors in title have utilized this road as their sole means of access to their real property for a period in excess of 50 years. The road has not been relocated and remains in the same location. The public road and the continued use by the Plaintiff should be adjudicated by the Court to be the road easement referred to in the previous deeds and the Court should adjudicate that the Plaintiff has the unfettered right to continue to use the road from Bud Ladner Road to Plaintiff's real property. That the Defendant should be temporarily and permanently enjoined from further harassment, blocking of the road, installation of gates which block access (installed in approximately January 27, 2020) and all other actions of harassment which have been utilized by Ernest Charles Ladner, Jr to intimidate and harass the Plaintiff and deny her access to her real property. Additionally, the Plaintiff requests the Court permanently enjoin the Defendant from any further actions to block the Plaintiff's use and access to the road which has been in existence for more than 50 years.

9.

Alternatively, the Plaintiff requests that the Court find that the acts and actions by the Plaintiff and her predecessors in title and acts, action and omissions of the Defendant and his predecessors in title regarding the actual use and location of the road hereinabove mentioned entitle the Plaintiff to a Judgment of the Court establishing a prescriptive easement and right to use

the road, in the event the Court determines that the real property or any portion thereof in which the road is situate is owned by the Defendant.

10.

Alternatively, that the Court should adjudicate the road to be a public road and confirm the right of the Plaintiff to continue to use said road and enjoin the Defendant from interfering with such use by Plaintiff. Upon information and belief, Hancock County, Mississippi maintained the road for many years as a county public road and has not abandoned the road by action of the Board of Supervisors. That attached hereto as **Exhibit "F"** is an Affidavit of Bert Courrege, Jr. attesting to the public maintenance of the road by the Hancock County, Mississippi Board of Supervisors.

11.

Further, that upon hearing hereof the Court should cancel the cloud on Plaintiff's title caused by the Defendant by virtue trespass based on the claim of ownership of Plaintiff's property rights and access as hereinabove stated, and award damages to the Plaintiff including court costs and attorneys' fees, as well.

12.

That alternatively, should the Court determine that the road is not legally established for use by the Plaintiff that the Court, under the provision of Miss. Code Ann. § 65-2-201 should establish a private road thru the land as described and shown on a survey by Cutrer Land Survey attached hereto as

Exhibit "G" along the centerline of the old roadbed and that the Court shall determine reasonable compensation to the Defendant, as well.

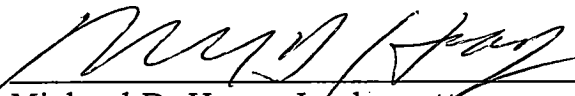
WHEREFORE PREMISES CONSIDERED the Plaintiff prays that under the provisions of Mississippi Code Annotated §§ 11-17-29, 11-17-31 and other applicable sections of the Mississippi Code of 1972, the Court will receive and file this Complaint, and upon hearing hereof, the Court will enter a Judgment in favor of the Plaintiff against the Defendant which will declare and confirm that the Plaintiff is entitled to use the road shown on **Exhibit "E"** for all purposes under Mississippi law confirm the Plaintiff's title free and clear of all claims of the Defendant and remove any claims or clouds on the title, as well. Further, that the court award trespass damages to the Plaintiff against the Defendant including court costs and attorney's fees. Finally, the Court allow any and all relief which the Plaintiff is entitled to receive, premises duly considered.

This the 15th day of July, 2021.

Respectfully submitted,

PENNY LADNER SAHUQUE, Plaintiff

By:


Michael D. Haas, Jr., her attorney

Haas & Haas Attorney's
MS BAR NO. 5091
201 N. 2nd Street
Bay St. Louis, MS 39520
T: (228) 467-6574
F: (228) 467-6575

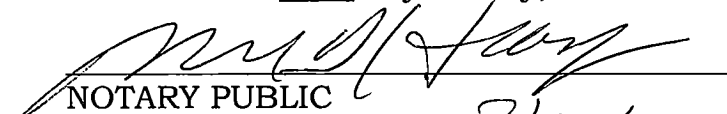
**STATE OF MISSISSIPPI
COUNTY OF HANCOCK**

Personally appeared before me, the undersigned authority in and for the aforesaid jurisdiction, **PENNY LADNER SAHUQUE**, who being by me first duly sworn states on oath that the matters and things positively stated in the foregoing Complaint are true and correct as therein stated, and that those otherwise stated are upon trustworthy information which Affiant believes to be true, and that this verification is upon the personal knowledge, or information, as the case may be, of the Affiant.


PENNY LADNER SAHUQUE

Sworn to and subscribed before me this the 15th day of July, 2021.

(SEAL REQUIRED)


NOTARY PUBLIC
My Commission Expires: 8/17/2024

Attachment: DOC 3 Complaint (10002 : Discussion regarding accepting/abandoning roads in Hancock County)



2020-1935
Recorded in the Above
Deed Book & Page
02-14-2020 11:44:57 AM
Tiaothy A Kellar

STATE OF MISSISSIPPI
COUNTY OF HANCOCK

Prepared by and Return to:
Penny Ladner Sahuque
10200 Road 106
Bay Saint Louis, MS 39520
228-216-1015

WARRANTY DEED

FOR AND IN CONSIDERATION of the sum and amount of TEN (10.00) DOLLARS, cash paid in hand, and other good and valuable consideration not herein necessary to mention, receipt of all of which is hereby acknowledged, I,

JAKI S. SANFORD

204 North Pine Street

Harrison, AR 72601

870-365-0673

do hereby sell, convey and warrant unto,

PENNY LADNER SAHUQUE

10200 Road 106

Bay Saint Louis, MS 39520

228-216-1015

The following described real property situated and located on Bayou Caddy in Hancock County, Mississippi, and more particularly and certainly described as follows:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

EXHIBIT "A-1"

2020 1934
Deed Book & Page

Together with all and singular, the rights, privileges, and improvements and appurtenances to the same belonging or in any wise appertaining.

This conveyance is subject to all easements, roadways, servitudes, restrictive covenants and oil, gas and other mineral reservations, exceptions, conveyances and leases of record or obvious on reasonable inspection of the subject property.

NO TITLE SEARCH REQUESTED NOR PREFORMED

WITNESS MY SIGNATURE, on this the 10 day of Feb, 2020.

Jaki S. Sanford

JAKI S. SANFORD

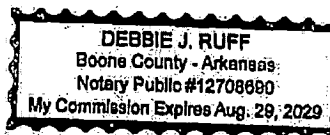
STATE of ARKANSAS

COUNTY of BOONE

Personally appeared before me, the undersigned authority in and for the said county and state, on this the 10th day of February, 2020, within my jurisdiction, the within name Jaki S. Sanford, who acknowledged that she executed, signed and delivered the above foregoing instrument.

Debbie J. Ruff
NOTARY PUBLIC

My commission expires: Aug 29, 2029



Attachment: DOC 3 Complaint (10002 : Discussion regarding accepting/abandoning roads in Hancock County)

EXHIBIT A**Legal Description**

Commencing at an Axle Found at the Section Corner common to Section 22, 23, 26 & 27, Township 9 South, Range 15 West, Hancock County, Mississippi; thence on and along the Section line between Sections 22 & 23, North 00 degrees 22 minutes 48 seconds East 1329.56 feet to a 10" Fence Corner; thence North 89 degrees 29 minutes 43 seconds West 79.97 feet to a 5/8" Rebar Set with Cap and the Point of Beginning; thence North 54 degrees 13 minutes 52 seconds West 219.62 feet to a 5/8" Rebar Set with Cap; thence North 48 degrees 49 minutes 37 seconds West 64.06 feet to a 5/8" Rebar Set with Cap; thence North 70 degrees 36 minutes 33 seconds West 61.75 feet to a 5/8" Rebar Set with Cap; thence South 85 degrees 33 minutes 09 seconds West 37.20 feet to a 5/8" Rebar Set with Cap; thence North 44 degrees 22 minutes 48 seconds East 260.28 feet to the center of Bayou Cadet; thence along the center of said bayou for the following calls: South 55 degrees 52 minutes 19 seconds East 48.90 feet; thence South 71 degrees 26 minutes 13 seconds East 200.74 feet; thence South 00 degrees 04 minutes 02 seconds East 57.67 feet; thence South 77 degrees 35 minutes 27 seconds East 65.49 feet; thence North 72 degrees 40 minutes 34 seconds East 64.96 feet; thence South 62 degrees 45 minutes 24 seconds East 60.55 feet; thence South 22 degrees 48 minutes 10 seconds West 93.39 feet; thence South 32 degrees 22 minutes 54 seconds East 26.45 feet; thence South 65 degrees 26 minutes 57 seconds East 236.80 feet; thence leaving said bayou, North 89 degrees 29 minutes 43 seconds West 464.32 feet to the Point of Beginning, containing 3.10 acres, more or less, and being located in the Northeast Quarter of the Southeast Quarter of Section 22, and the Northwest Quarter of the Southwest Quarter of Section 23, Township 9 South, Range 15 West, Hancock County, Mississippi. The Basis of Bearings is the Mississippi State Plane Coordinate System, NAD83, MS East Zone.

**DERAIGNMENT OF TITLE OF
ERNEST CHARLES LADNER, JR.**

1. Warranty Deed, Coburn Ladner, Grantor, to Ernest Ladner, Grantee, Deed Book L-3, Page 378, dated 9/6/1957, filed 9/7/1957;
2. Warranty Deed, Ernest Ladner and Velma Ladner, Grantors, to Hancock County, MS, Grantees, Deed Book V-1, Page 106, dated 7/3/1969, filed 7/3/1969; (Railroad)
3. Drainage Easement, Ernest Ladner and Velma E. Ladner, Grantors to Hancock County, MS, Grantees, Deed Book V-4, Page 272, dated 1/10/1970, filed 1/12/1970;
4. Warranty Deed in Book L-3, Page 378 with death certificate of Coburn Ladner, Coburn Ladner, Grantor, to Ernest Ladner, Grantee, was refiled in Deed Book 2007, Pages 5920, dated 9/6/1957, filed 7/20/2007;
5. Covenant Agreement, MDA Katrina Covenants, Ernest Ladner and Velma E. Ladner, Grantor, to Mississippi Development Authority, Grantee, Deed Book 2007, Page 24525 dated 9/26/2007, filed 9/27/2007; (Katrina)
6. Covenant Agreement, MDA Katrina Covenants, Ernest Ladner and Velma Ladner, Grantors, to Mississippi Development Authority, Grantees, Deed Book 2008, Page 8623, dated 1/28/2008, filed 4/9/2008; (Katrina)
7. Administratrix's Deed, Estate Ernest C. Ladner, Sr. a/k/a Ernest Ladner, deceased, Grantor, to Velma E. Ladner, Ernest C. Ladner, Jr., Melissa R. Moran, Coburn H. Ladner, Shelia M. Ingersoll and Jody M. Ladner, Grantees, Deed Book 2009, Page 14105, dated 11/9/2009, filed 11/17/2009;
8. Warranty Deed, Velma E. Ladner, Ernest C. Ladner, Jr., Melissa R. Moran, Coburn H. Ladner, Shelia M. Ingersoll and Jody M. Ladner, Grantors, to Velma E. Ladner, Grantee, Deed Book 2009, Page 14112, dated 11/9/2009, filed 11/17/2009;
9. Warranty Deed, Velma E. Ladner, Grantor, to Velma E. Ladner, Life Estate Only, and Ernest Charles Ladner, Jr., Grantees, Deed Book 2014, Page 10798, dated 7/22/2014, filed 10/23/2014;
10. Sewer Vault Easement, Velma E. Ladner, Grantor, to Hancock County Board of Supervisors, Grantee, Deed Book 2016, Page 3125, dated 3/9/2015, filed 3/21/2016;

EXHIBIT "B"

11. Sewer Vault Easement, Velma E. Ladner, Grantor, to Hancock County Board of Supervisors, Grantee, Deed Book 2016, Page 3129, dated 3/9/2015, filed 3/21/2016;
12. Refiling of Warranty Deed with Velma E. Ladner's Death Certificate, Velma E. Ladner, Grantor, to Velma E. Ladner and Ernest Charles Ladner, Jr., Grantees, Deed Book 2018, Page 9836, dated 7/22/2014, filed 8/10/2018.

Attachment: DOC 3 Complaint (10002 : Discussion regarding accepting/abandoning roads in Hancock County)

**DERAIGNMENT OF TITLE OF
PENNY LADNER SAHUQUE**

1. Albert LaFontaine, Grantor to Richard A. Vaughn, Grantee, Book G-3, Page 442, dated 6/20/1994, filed 6/20/1944;
2. Richard A. Vaughn, Grantor to A. G. Courrege, Sr. and Aline Ladner Courrege WROS, Grantees, Book H-0, Pages 461-462, dated 5/26/1949, filed 6/7/1949;
3. A. G. Courrege, Sr. and Aline Ladner Courrege, Grantor to Amelia Hellmers Hose (with other property), Book J-3, Page 540, dated 5/19/1953, filed 5/20/1953;
4. Amelia Hellmars Hose, Grantor, to Jaki Smith Sanford, Grantee, Book BB-38, Page 10 (with other property), dated 5/4/1989, filed 5/18/1989;
5. Jaki S. Sanford, Grantor, to Penny Ladner Sahuque, Grantee, Book 2019, Pages 15039-15040, dated 12/10/2019, filed 12/16/2019;
6. Warranty Deed Jaki S. Sandford, Grantor to Penny Ladner Sahuque, Grantee, Book 2020, Pages 1833-1836, dated 2/10/2020, filed 2/14/2020.

Exhibit "C"

Attachment: DOC 3 Complaint (10002 : Discussion regarding accepting/abandoning roads in Hancock County)

STATE OF MISSISSIPPI
COUNTY OF HANCOCK

BOOK 38174 PAGE 1

WARRANTY DEED

FOR AND IN CONSIDERATION OF THE SUM OF TEN DOLLARS (\$10.00), cash in hand paid, and other good and valuable consideration, the receipt of which is hereby acknowledged, I, JAKI SMITH SANFORD, do hereby sell, convey and warrant unto, ERNEST C. LADNER, SR. and wife, VELMA LADNER, as an estate in the entirety with right of survivorship, and not as tenants in common the following described property, together with the improvements situated thereon, located and situated in Hancock County, Mississippi, to-wit:

Beginning at the SE corner of Section 22-9S-15W, Hancock County, Mississippi; thence S 89° 20' 04" W along south line of the SE 1/4 of the SE 1/4 of Section 22 a distance of 609.79' to a point; thence North 1489.68' to a point on the centerline of a roadway; thence N 89° 29' 57" E along centerline of said roadway a distance of 402.27'; thence S 71° 50' 22" E along centerline of said roadway 61.75'; thence S 50° 03' 27" E along centerline of said roadway a distance of 64.06'; thence S 55° 27' 42" E along centerline of said roadway a distance of 219.62' to a point of intersection on the North line of the SW 1/4 of the SW 1/4 of Section 22-9S-15W; thence West a distance of 79.97' to a point, said point being the NE corner of the SE 1/4 of the SE 1/4 of Section 22-9S-15W; thence South along the east line of the SE 1/4 of the SE 1/4 of Section 22-9S-15W a distance of 1329.27' to the P.O.B., said Parcel "A" containing 20.87 acres of land, more or less, less and except that part which constitutes a public road right-of-way.

Together with all and singular the rights, privileges, improvements and appurtenances to same belonging or anywise appertaining.

THIS CONVEYANCE is subject to any and all recorded restrictive covenants, rights-of-way, easements and prior reservations of oil, gas and other minerals in, on and under the hereinabove described property.

Payment of the 1998 Ad Valorem taxes are hereby assumed by the Grantor herein.

WITNESS MY SIGNATURE this the 14th day of JULY, 1998.

Jaki Smith Sanford
JAKI SMITH SANFORD

STATE OF MISSISSIPPI
COUNTY OF HANCOCK

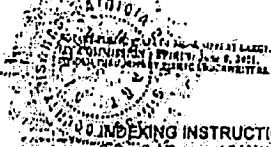
Personally appeared before me, the undersigned authority in and for the said county and state, on this 14th day of JULY, 1998, within my jurisdiction, the within

Exhibit "D"

Attachment: DOC 3 Complaint (10002 : Discussion regarding accepting/abandoning roads in Hancock County)

2014 3575
Deed Book & Page

named, Jeki Smith Sanford, who acknowledged that she executed the above and foregoing instrument.



NOTARY PUBLIC
My Commission Expires:

INDEXING INSTRUCTIONS: SE 1/4 of the SE 1/4 of Section 22, Township 6 South, Range 16 West, Hancock County, MS

Grantor's address:
1528 Olive Avenue
Gulfport, MS 39507
(228) 883-6075

Grantee's address:
5260 Bud Ledor Road
Bay St. Louis, MS 39520
(228) 467-7878

DOCUMENT PREPARED BY:
J.P. Comptre
P.O. Box 87
Bay St. Louis, MS 39520
(601) 487-1010

RETURN RECORDED DOCUMENT TO:
Preparer

STATE OF MISSISSIPPI
COUNTY OF HANCOCK



TIMOTHY A. KELLAR, Clerk of the Chancery Court of said County, hereby certify that the within instrument was filed for record on this the 16 day of July, 1998, at 2:00 o'clock P. M., and duly recorded in Deed Record Book No. 83104, Page No. 1-2.
WITNES my hand and Seal at Gulfport, this the 17 day of July, 1998.

TIMOTHY A. KELLAR, Chancery Clerk
By: Erica Landreth

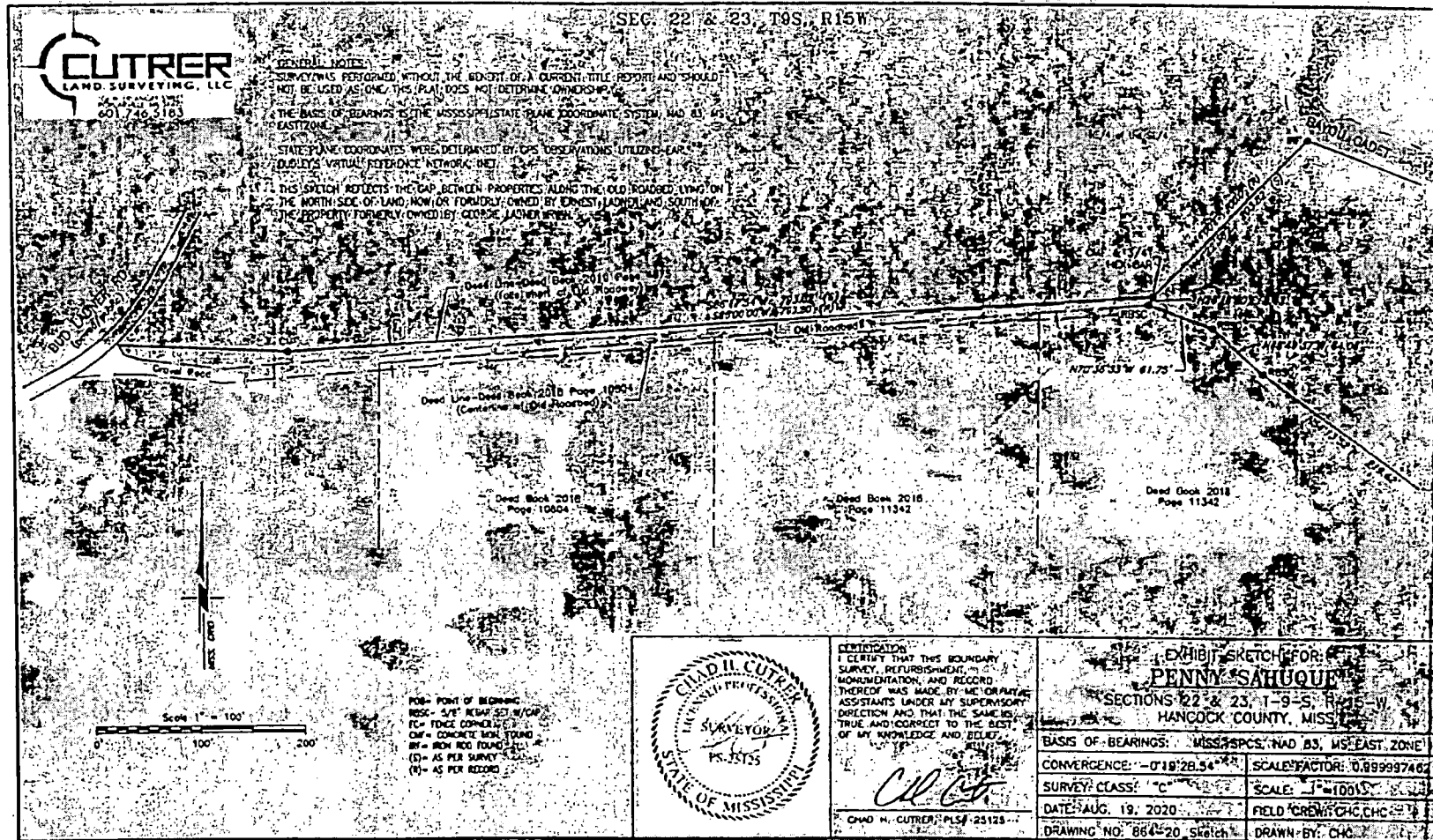


Exhibit "E"

IN THE CHANCERY COURT OF HANCOCK COUNTY, MISSISSIPPI**PENNY LADNER SAHUQUE****PLAINTIFF****VS****CAUSE NO.: 23CH1:21-cv-_____****ERNEST CHARLES LADNER, JR.****DEFENDANT****STATE OF MISSISSIPPI****COUNTY OF HANCOCK****AFFIDAVIT OF BERTRAM COURREGE**

First having been duly sworn, personally came and appeared before me the undersigned Notary Public, Bertram Courrege, 19140 Magnolia Ridge Drive, Kiln, Mississippi an adult resident of Hancock County, Mississippi, and upon oath states as follows, to-wit:

1. That I served as a Member of the Board of Supervisors of Hancock County, Mississippi for 12 years of time beginning 1977 and ending in 1988.

2. That I am the son of A. J. Courrege, Sr. and Aline Ladner Courrege who formerly owned property located generally off Bud Ladner Road and bounded on the North by Bayou Cadet and on the South by the current railroad operated by the Hancock County Port and Harbor Commission and located in Sections 22 and 23, Township 9 South, Range 15 West, Hancock County, Mississippi.

3. That the access to the real property owned by my parents was provided by public road which led from Bud Ladner Road easterly towards Bayou Cadet to real property which was owned by the predecessors in interest to Penny Ladner Sahuque and which is at the terminus of the public road.

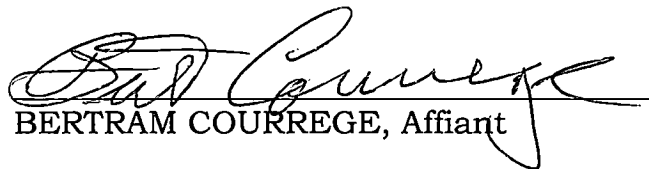
EXHIBIT "F"

4. That I have personal knowledge that the road was built, established, maintained and utilized by the public for many years including during the term of my occupancy as son of the prior owners, and my term as a Member of the Board of Supervisors. The maintenance was continuous through the Hancock County Board of Supervisors during my occupancy in the office and upon information and belief, this is a public road maintained by Hancock County, Mississippi.

5. That the predecessors in title to Penny Ladner Sahuque utilized this road to access a house which the former residents maintained on the property which is located at the end of the public road.

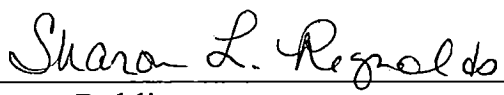
6. That I am not aware of any action by the Board of Supervisors of Hancock County, Mississippi to officially abandon public use of the road and the roadway is the only practical access to the property since the other potential access is either wetlands, waterways or is blocked by a railroad right-of-way operated by the Hancock County Port and Harbor Commission.

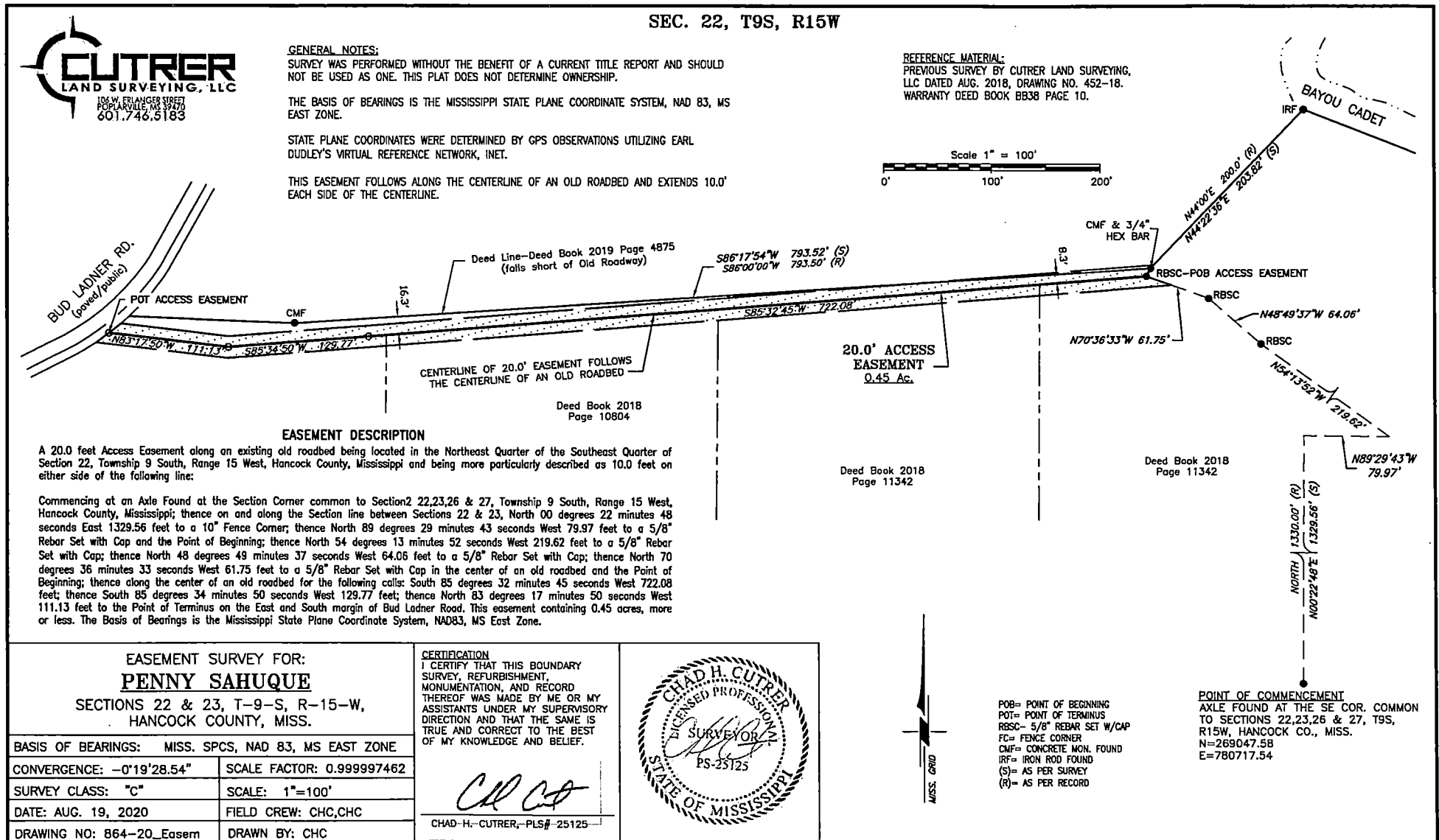
So sworn on this the 25th day of March, 2021.


BERTRAM COURREGE, Affiant

SWORN TO and subscribed before me this the undersigned Notary Public on this the 25th day of March, 2021.




Notary Public
My Commission expires: 10-20-2023

**EXHIBIT "G"**