

DIVISION OF HIGHWAYS

P.O. BOX 7791, MINCON ANNEX, SAN FRANCISCO 94119

*Rd. St. Hwy.
Rte 101
Condemnation*
RONALD REAGAN, Governor

April 16, 1973

Board of Supervisors
Santa Clara County
County Court House
70 West Hedding St.
San Jose, Calif. 95110

Please refer
to File No. 2539-A

REQUEST FOR SEGREGATION
OF PROPERTY ASSESSMENT

04-SC1-101

State Parcels: 38761, 38763, 38767,
38762

Dear Sir: Re: PEOPLE VS. OCEANIC CALIFORNIA, INC. A CORP. ET AL.
SUPERIOR COURT CASE NO. 288617
LIS PENDENS RECORDED 4-10-73
RECORDER'S SERIAL NO. 4491145

The State of California, acting through the Department of Public Works, Division of Highways, has commenced a proceeding in eminent domain and has filed a Lis Pendens as indicated above.

It is requested that you take appropriate action under Section 1252.2 of the Code of Civil Procedure to establish separate valuations on the assessment roll for the following parcels ONLY:

Suit Parcels

3A, 3B, 3C, 3X
4 and 5

Assessment Nos.

727-23-7
87-55
727-23-8
40-801

A copy of the State's condemnation action, including maps, is attached for your convenience in identifying the parcels referred to above.

Very truly yours,

T. R. LAMMERS
District Engineer

By *R. G. Schwarzmenn*
R. G. SCHWARZMANN
Senior Right-of-Way Agent

Act.

ATTACH.

TO ALL DEFENDANTS AND THEIR ATTORNEYS:
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

John P. Horgan
Robert N. DeJohn
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

JOHN P. HORGAN
ROBERT N. DeJohn
Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

OCEANIC CALIFORNIA INC., a corporation,
formerly LAKE ANDERSON CORPORATION,
a corporation, et al.,

Defendants.

No. 288617

SUMMONS

PARCELS 3A, 3B, 3C (Am),
3D, 3E, 3F, 3G, 3H, 3J, 3K,
3KK, 3L, 3M, 3N, 3P, 3Q,
3R, 3S, 3T, 3U, 3V, 3W, 3X,
3Y, 3Z, 3ZZ, 4 and 5

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

OCEANIC CALIFORNIA INC., a corporation, formerly LAKE ANDERSON
CORPORATION, a corporation, UNITED RESEARCH CORPORATION OF MENLO
PARK, a corporation, UNITED AIRCRAFT CORPORATION, a corporation,
GELCO DEVELOPMENTS, a corporation, TITLE INSURANCE AND TRUST
COMPANY, a corporation, as Trustee, JOELCO INVESTMENT, a
corporation, COUNTY OF SANTA CLARA, a political subdivision,
DOE ONE TO DOE FIFTY, inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County
of Santa Clara, within 30 days after the service on you of this
Summons.

*Orig. Co Counsel
cc: B/5
State Route 101*

1 John P. Horgan
2 Robert N. DeJohn
3 Lee Tyler
4 Attorneys for Plaintiff
5 369 Pine Street
6 San Francisco, California 94104
7 Telephone: 982-3130

(ENDORSED)
FILED
APR 10 1973

Clerk
E. E. KNOX

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
13 of Public Works,)

13 Plaintiff,)

14 vs.)

15 OCEANIC CALIFORNIA INC., a corporation,)
16 formerly LAKE ANDERSON CORPORATION, a)
17 corporation, UNITED RESEARCH CORPORATION)
18 OF MENLO PARK, a corporation, UNITED)
19 AIRCRAFT CORPORATION, a corporation,)
20 GELCO DEVELOPMENTS, a corporation, TITLE)
21 INSURANCE AND TRUST COMPANY, a corpora-)
22 tion, as Trustee, JOELCO INVESTMENT, a)
23 corporation, COUNTY OF SANTA CLARA, a)
24 political subdivision, DOE ONE TO DOE)
25 FIFTY, inclusive,)

21 Defendants.)

No. 288617

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 3A, 3B, 3C (Am),
3D, 3E, 3F, 3G, 3H, 3J, 3K,
3KK, 3L, 3M, 3N, 3P, 3Q,
3R, 3S, 3T, 3U, 3V, 3W, 3X,
3Y, 3Z, 3ZZ, 4 and 5

23 Plaintiff complains of defendants, and for cause of
24 action alleges that:

25 I

26 The Department of Public Works is, and at all times
27 herein mentioned has been, the duly authorized body in charge
28 of State highways and is by law vested with authority to exercise,
29 in the name of the People of the State of California, the right
30 of eminent domain for the purpose of acquiring property for
31 State highway purposes.

PUBLIC WORKS

OF HIGHWAYS

P.O. BOX 7791, SINGON ANNEX, SAN FRANCISCO 94119

November 10, 1972

Please refer
to File No. 2568



Board of Supervisors
Santa Clara County
County Court House
70 West Hedding St.
San Jose, Calif. 95110

REQUEST FOR SEGREGATION
OF PROPERTY ASSESSMENT

04- SC1-101

State Parcels: 41877

Dear Sir: Re: PEOPLE VS. HOWARD QUIN SEETO, ET AL.
SUPERIOR COURT CASE NO. 280949
LIS PENDENS RECORDED 11-2-72
RECORDER'S SERIAL NO. 4384949

The State of California, acting through the Department of Public Works, Division of Highways, has commenced a proceeding in eminent domain and has filed a Lis Pendens as indicated above.

It is requested that you take appropriate action under Section 1252.2 of the Code of Civil Procedure to establish separate valuations on the assessment roll for the following parcels ONLY:

Suit Parcel

1

Assessment Nos.

477-28-39, 477-28-40,
477-28-41, 477-28-42;
477-28-43, 477-28-44.

For the year 1971-72

A copy of the State's condemnation action, including maps, is attached for your convenience in identifying the parcels referred to above.

Very truly yours,

T. R. LAMMERS
District Engineer

By *Robert J. McFarland*
ROBERT J. McFARLAND
Senior Right of Way Agent

ATTACH.

TO ALL DEFENDANTS AND THEIR ATTORNEYS:
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

JOHN P. HORGAN
Attorney for Plaintiff

John P. Horgan
Robert N. DeJohn
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

HOWARD QUIN SEETO, et al.,

Defendants.

No. 280949

SUMMONS

PARCEL 1

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

HOWARD QUIN SEETO, KAY WOO SEETO, MISSION RESERVE COMPANY, INC.,
a corporation, as Trustee, CITY SAVINGS AND LOAN ASSOCIATION,
a corporation, COUNTY OF SANTA CLARA, a political subdivision,
DOE ONE TO DOE FIFTY, inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County
of Santa Clara, within 30 days after the service on you of this
Summons.

Said proceeding is brought to acquire real property
or interests in real property for public use, namely for State
highway purposes.

Orig: Co Counsel
✓ CC: BLS
State Route 101

1 John P. Horgan
2 Robert N. DeJohn
3 Lee Tyler
4 Attorneys for Plaintiff
5 369 Pine Street
6 San Francisco, California 94104
7 Telephone: 982-3130

(ENDORSED)
FILED
NOV 2 1972
GEORGE E. FOWLES, Clerk
BY A. V. DI VIRGILIO
DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
13 of Public Works,)

No. 280949

13 Plaintiff,)

COMPLAINT
IN
EMINENT
DOMAIN

14 vs.)

15 HOWARD QUIN SEETO, KAY WOO SEETO,)
16 MISSION RESERVE COMPANY, INC., a corpo-)
17 ration, as Trustee, CITY SAVINGS AND)
18 LOAN ASSOCIATION, a corporation, COUNTY)
19 OF SANTA CLARA, a political subdivision,)
20 DOE ONE TO DOE FIFTY, inclusive,)

PARCEL 1

21 Defendants.)
22
23

24 Plaintiff complains of defendants, and for cause of
25 action alleges that:

26 I

27 The Department of Public Works is, and at all times
28 herein mentioned has been, the duly authorized body in charge
29 of State highways and is by law vested with authority to exercise,
30 in the name of the People of the State of California, the right
31 of eminent domain for the purpose of acquiring property for
State highway purposes.

II

Prior to the commencement of this action, at a meeting

A-TRANSPORTATION AGENCY

RONALD REAGAN, Governor

PUBLIC WORKS

HIGHWAYS

1601 KINCON AVENUE, SAN FRANCISCO 94119

Please refer
to File No. 2539



Board of Supervisors
Santa Clara County
County Court House
70 West Hedding St.
San Jose, Calif. 95110

REQUEST FOR SEGREGATION
OF PROPERTY ASSESSMENT

04- SC1-101

State Parcels: 38801

Dear Sir: Re: PEOPLE VS. SAN MARTIN VINEYARD COMPANY, a co-ptnshp.
SUPERIOR COURT CASE NO. 278808
LIS PENDENS RECORDED September 19, 1972
RECORDER'S SERIAL NO. 4350136

The State of California, acting through the Department of Public Works, Division of Highways, has commenced a proceeding in eminent domain and has filed a Lis Pendens as indicated above.


It is requested that you take appropriate action under Section 1252.2 of the Code of Civil Procedure to establish separate valuations on the assessment roll for the following parcels ONLY:

<u>Suit Par.</u>	<u>Assessment No.</u>
1A, 1B	727-20-1 87-1

A copy of the State's condemnation action, including maps, is attached for your convenience in identifying the parcels referred to above.

Very truly yours,

T. R. LAMMERS
District Engineer

By 
T. P. MOORE
Senior Right of Way Agent

ATTACH.

RECEIVED
BOARD OF SUPERVISORS

SEP 21 4 39 PM '72

COUNTY OF
SANTA CLARA

John P. Horgan
Robert N. DeJohn
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

SAN MARTIN VINEYARDS COMPANY,
a co-partnership, also known as
San Martin Vineyards, Co., a co-
partnership, et al.,

Defendants.

No. 278208

SUMMONS

PARCELS 1A, 1B, 1C,
1D, and 1E

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

SAN MARTIN VINEYARDS COMPANY, a co-partnership, also known as
San Martin Vineyards, Co., a co-partnership, DAVID C. DUNLAP,
TITLE INSURANCE AND TRUST COMPANY, a corporation, as Trustee,
WELLS FARGO BANK, NATIONAL ASSOCIATION, a national banking associ-
ation, Trustee under the Will of Frank J. Polak, deceased, COUNTY
OF SANTA CLARA, a political subdivision, DOE ONE TO DOE FIFTY,
inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plain-
tiff in the Superior Court of the State of California for the

*Orig: Co Counsel
CC: B/S*

State Route 101

1 John P. Horgan
2 Robert N. DeJohn
3 Lee Tyler
4 Attorneys for Plaintiff
5 369 Pine Street
6 San Francisco, California 94104
7 Telephone: 982-3130

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
13 of Public Works,)

13 Plaintiff,)

14 vs.)

15 SAN MARTIN VINEYARDS COMPANY,)
16 a co-partnership, also known as)
17 San Martin Vineyards, Co., a co-)
18 partnership, DAVID C. DUNLAP, TITLE)
19 INSURANCE AND TRUST COMPANY, a corpora-)
20 tion, as Trustee, WELLS FARGO BANK,)
21 NATIONAL ASSOCIATION, a national banking)
22 association, Trustee under the Will of)
23 Frank J. Polak, deceased, COUNTY OF)
24 SANTA CLARA, a political subdivision,)
25 DOE ONE TO DOE FIFTY, inclusive,)

21 Defendants.)

No. 278802

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 1A, 1B, 1C,
1D, and 1E

23 Plaintiff complains of defendants, and for cause of
24 action alleges that:

25 I

26 The Department of Public Works is, and at all times
27 herein mentioned has been, the duly authorized body in charge
28 of State highways and is by law vested with authority to exercise,
29 in the name of the People of the State of California, the right
30 of eminent domain for the purpose of acquiring property for
31 State highway purposes.

PUBLIC WORKS
DIVISION OF HIGHWAYS

791, RINCON ANNEZ, SAN FRANCISCO 94119



June 6, 1972

Board of Supervisors
Santa Clara County
County Court House
70 West Hedding St.
San Jose, Calif. 95110

Please refer
to File No. 2541-A

REQUEST FOR SEGREGATION
OF PROPERTY ASSESSMENT

04- SC1-280

State Parcels: 41876

Dear Sir: Re: PEOPLE VS. GINDEN - R & B COMPANY, a limited partnership
SUPERIOR COURT CASE NO. 275056
LIS PENDENS RECORDED June 28, 1972
RECORDER'S SERIAL NO. 4290288

The State of California, acting through the Department of Public Works, Division of Highways, has commenced a proceeding in eminent domain and has filed a Lis Pendens as indicated above.

It is requested that you take appropriate action under Section 1252.2 of the Code of Civil Procedure to establish separate valuations on the assessment roll for the following parcels ONLY:

Suit Par.

Assessment No.

1

477-28-72
40-352

A copy of the State's condemnation action, including maps, is attached for your convenience in identifying the parcels referred to above.

Very truly yours,

T. R. LAMMERS
District Engineer

By *T. P. Moore*
T. P. MOORE
Senior Right of Way Agent

ATTACH.

275056 OF 275056

COPIES

275056 OF 275056

275056 OF 275056

*Orig: Co Counsel
CC: B/S
State Route 101*

TO ALL DEFENDANTS AND THEIR ATTORNEYS:
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

*Per 1
Taylatter* JOHN P. HORGAN
Attorney for Plaintiff

1 John P. Horgan
2 Robert N. DeJohn
3 Lee Tyler
4 Attorneys for Plaintiff
5 369 Pine Street
6 San Francisco, California 94104
7 Telephone: 982-3130

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

11 THE PEOPLE OF THE STATE OF CALIFORNIA,
12 acting by and through the Department
13 of Public Works,

13 Plaintiff,

14 vs.

15 GINDEN-R & B COMPANY, a limited
16 partnership, et al.,

16 Defendants.

No. 275056

SUMMONS

PARCEL 1

18 THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

19 GINDEN-R & B COMPANY, a limited partnership, BANKERS LAND
20 INVESTMENT COMPANY, as Trustee, FEDERAL NATIONAL MORTGAGE
21 ASSOCIATION, BEN GINDEN, also known as Benjamin Ginden; DBA
22 Ginden-R & B Company, a limited partnership, WEB SERVICE CO.,
23 INC., COUNTY OF SANTA CLARA, a political subdivision, DOE ONE
24 TO DOE FIFTY, inclusive, defendants.

25 YOU ARE DIRECTED TO FILE with the Clerk of this Court
26 a written pleading in response to the Complaint in a proceeding
27 in Eminent Domain brought against you by the above-named plain-
28 tiff in the Superior Court of the State of California for the
29 County of Santa Clara, within 30 days after the service on you
30 of this Summons.

31 Said proceeding is brought to acquire real

1 John P. Horgan
2 Robert H. DeJohn
3 Lee Tyler
4 Attorneys for Plaintiff
5 369 Pine Street
6 San Francisco, California 94104
7 Telephone: 982-3130

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
13 of Public Works,)

No. 275056

14 Plaintiff,)

COMPLAINT

15 vs.)

IN
EMINENT
DOMAIN

16 GINDEN-R & B COMPANY, a limited partner-)
17 ship, BANKERS LAND INVESTMENT COMPANY,)
18 as Trustee, FEDERAL NATIONAL MORTGAGE)
19 ASSOCIATION, BEN GINDEN, also known as)
20 Benjamin Ginden: DBA Ginden-R & B)
21 Company, a limited partnership, WEB)
22 SERVICE CO., INC., COUNTY OF SANTA)
23 CLARA, a political subdivision, DOE ONE)
24 TO DOE FIFTY, inclusive,)

PARCEL 1

25 Defendants.)

26 Plaintiff complains of defendants, and for cause of
27 action alleges that:

28 I

29 The Department of Public Works is, and at all times
30 herein mentioned has been, the duly authorized body in charge
31 of State highways and is by law vested with authority to exercise,
in the name of the People of the State of California, the right
of eminent domain for the purpose of acquiring property for
State highway purposes.

///

RECEIVED
BOARD OF SUPERVISORS

JUL 11 9 41 AM '72

COUNTY OF
SANTA CLARA

John P. Horgan
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

SAN JOSE SCAVENGER COMPANY, INC.,
a corporation, et al.,

Defendants.

No. 274725

SUMMONS

PARCELS 2A and 2B

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

SAN JOSE SCAVENGER COMPANY, INC., a corporation, COUNTY OF
SANTA CLARA, a political subdivision, DOE ONE TO DOE FIFTY,
inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County
of Santa Clara, within 30 days after the service on you of this
Summons.

Said proceeding is brought to acquire real property
or interests in real property for public use, namely for State
highway purposes.

The real property or interests in real property sought

State Route 101
Orig: Co Counsel
cc: B/S

1 John P. Horgan
2 Lee Tyler
3 Attorneys for Plaintiff
4 369 Pine Street
5 San Francisco, California 94104
6 Telephone: 982-3130
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA
10

11 THE PEOPLE OF THE STATE OF CALIFORNIA,
12 acting by and through the Department
13 of Public Works,

14 Plaintiff,

15 vs.

16 SAN JOSE SCAVENGER COMPANY, INC., a
17 corporation, COUNTY OF SANTA CLARA, a
18 political subdivision, DOE ONE TO
19 DOE FIFTY, inclusive,

20 Defendants.
21

No. 274725

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 2A and 2B

22 Plaintiff complains of defendants, and for cause of
23 action alleges that:

24 I

25 The Department of Public Works is, and at all times
26 herein mentioned has been, the duly authorized body in charge
27 of State highways and is by law vested with authority to exercise,
28 in the name of the People of the State of California, the right
29 of eminent domain for the purpose of acquiring property for
30 State highway purposes.

31 II

Prior to the commencement of this action, at a meeting
of the California Highway Commission duly and regularly convened

TO ALL DEFENDANTS AND THEIR ATTORNEYS;
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

John P. Horgan
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

JOHN P. HORGAN
Attorney for Plaintiff

COUNTY OF
SANTA CLARA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

CHARLES GIGUERE, et al.,

Defendants.

No. 274724

SUMMONS

PARCELS 1A, 1B,
and 1C

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

CHARLES GIGUERE, WESTERN TITLE INSURANCE COMPANY, a corporation,
as Trustee, COMMUNITY BANK OF SAN JOSE, a corporation, COUNTY
OF SANTA CLARA, a political subdivision, DOE ONE TO DOE FIFTY,
inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County
of Santa Clara, within 30 days after the service on you of this
Summons.

Said proceeding is brought to acquire real property
or interests in real property for public use, namely for State
highway purposes.

State Route 101
Orig: CS counsel
EC: B/S

1 The real property or interests in real property sought
2 to be acquired are in the County of Santa Clara, State of
3 California, and generally described as being near the City of
4 San Jose between Herald Avenue and Story Road. Reference is
5 made to the complaint herein for specific descriptions of the
6 parcels sought to be acquired.

7 YOU ARE HEREBY NOTIFIED that unless you file with the
8 Clerk a written responsive pleading to said complaint as above
9 required, said plaintiff will apply to said court for the relief
10 demanded therein.

11 YOU MAY SEEK THE ADVICE OF AN ATTORNEY IN ANY MATTER
12 CONNECTED WITH THE COMPLAINT OR THIS SUMMONS. SUCH ATTORNEY
13 SHOULD BE CONSULTED PROMPTLY SO THAT YOUR PLEADING MAY BE FILED
14 OR ENTERED WITHIN THE TIME REQUIRED BY THIS SUMMONS.

15 DATED: _____ GEORGE E. FOWLES, Clerk
16 By *[Signature]*, Deputy

17 NOTICE TO THE PERSON SERVED

18 _____ You are served as an individual defendant.

19 _____ You are served as (or on behalf of) the person sued under
20 fictitious name of: _____
in the capacity of: _____

21 ☒ You are served on behalf of: County of Santa Clara A
Deputy / Subscribed

22 Under: _____ C.C.P. Sec. 416.10 (Corporation)
23 _____ C.C.P. Sec. 416.20 (Defunct corporation)
24 ☒ C.C.P. Sec. 416.40 (Association or partnership)
25 _____ C.C.P. Sec. 416.50 (Public entity)
26 _____ C.C.P. Sec. 416.60 (Minor)
_____ C.C.P. Sec. 416.70 (Incompetent)
_____ C.C.P. Sec. 416.90 (Individual)
_____ Other:

27 A written pleading, including an answer, demurrer, etc., must be
28 in the form required by the California Rules of Court. Your
29 original pleading must be filed in this court with proper filing
fees and proof that a copy thereof was served on plaintiff's
attorney.

30 The time when a summons is deemed served on a party may vary de-
31 pending on the method of service. For example, see Code of Civil
Procedure Sections 413.10 through 415.40.

1 John P. Morgan
Lee Tyler
2 Attorneys for Plaintiff
369 Pine Street
3 San Francisco, California 94104
Telephone: 982-3130
4
5
6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
of Public Works,)

13 Plaintiff,)

14 vs.)

15 CHARLES GIGUERE, WESTERN TITLE)
16 INSURANCE COMPANY, a corporation,)
17 as Trustee, COMMUNITY BANK OF SAN JOSE,)
a corporation, COUNTY OF SANTA CLARA,)
18 a political subdivision, DOE ONE TO)
DOE FIFTY, inclusive,)

19 Defendants.)

No.

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 1A, 1B,
and 1C

20
21 Plaintiff complains of defendants, and for cause of
22 action alleges that:

23 I

24 The Department of Public Works is, and at all times
25 herein mentioned has been, the duly authorized body in charge
26 of State highways and is by law vested with authority to exercise,
27 in the name of the People of the State of California, the right
28 of eminent domain for the purpose of acquiring property for
29 State highway purposes.

30 II

31 Prior to the commencement of this action, at a meeting

DEPARTMENT OF PUBLIC WORKS

DIVISION OF HIGHWAYS

P.O. BOX 7791, RINCON ANNE, SAN FRANCISCO 94119

Please refer
to File No. 2540

June 29, 1972

Board of Supervisors
Santa Clara County
County Court House
70 West Hedding St.
San Jose, Calif. 95110REQUEST FOR SEGREGATION
OF PROPERTY ASSESSMENT

04- SC1-280,680,101

State Parcels: 41866

Dear Sir: Re: PEOPLE VS. SAN JOSE SCAVENGER COMPANY, Inc. et al.
SUPERIOR COURT CASE NO. 274725
LIS PENDENS RECORDED June 22, 1972
RECORDER'S SERIAL NO. 4285644

The State of California, acting through the Department of Public Works, Division of Highways, has commenced a proceeding in eminent domain and has filed a Lis Pendens as indicated above.

It is requested that you take appropriate action under Section 1252.2 of the Code of Civil Procedure to establish separate valuations on the assessment roll for the following parcels ONLY:

Suit Par.Assessment No.2A
2B472-9-138
66013

A copy of the State's condemnation action, including maps, is attached for your convenience in identifying the parcels referred to above.

Very truly yours,

T. R. LAMMERS
District EngineerBy *T. P. Moore*T. P. MOORE
Senior Right of Way Agent

ATTACH.

Orig: Co Counsel
cc: B/S
State Route 280, 680, 101

TO ALL DEFENDANTS AND THEIR ATTORNEYS;
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

John P. Horgan
Lee Tyler
Attorneys for Plaintiff:
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

John P. Horgan
Attorney for Plaintiff

(ENDORSED)
FILED
JUN 22 1972
GEORGE E. FOWLES, Clerk
BY DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

SAN JOSE SCAVENGER COMPANY, INC.,
a corporation, et al.,

Defendants.

No. 271725

SUMMONS

PARCELS 2A and 2B

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

SAN JOSE SCAVENGER COMPANY, INC., a corporation, COUNTY OF
SANTA CLARA, a political subdivision, DOE ONE TO DOE FIFTY,
inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County
of Santa Clara, within 30 days after the service on you of this
Summons.

Said proceeding is brought to acquire real property
or interests in real property for public use, namely for State
highway purposes.

The real property or interests in real property sought

1 John P. Horgan
2 Lee Tyler
3 Attorneys for Plaintiff
4 369 Pine Street
5 San Francisco, California 94104
6 Telephone: 982-3130

(ENDORSED)
FILED
JUN 22 1972

GEORGE E. FOWLES, Clerk
BY _____
DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
13 of Public Works,)

13 Plaintiff,)

14 vs.)

15 SAN JOSE SCAVENGER COMPANY, INC., a)
16 corporation, COUNTY OF SANTA CLARA, a)
17 political subdivision, DOE ONE TO)
18 DOE FIFTY, inclusive,)

18 Defendants.)

No.

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 2A and 2B

20 Plaintiff complains of defendants, and for cause of
21 action alleges that:

22 I

23 The Department of Public Works is, and at all times
24 herein mentioned has been, the duly authorized body in charge
25 of State highways and is by law vested with authority to exercise,
26 in the name of the People of the State of California, the right
27 of eminent domain for the purpose of acquiring property for
28 State highway purposes.

29 II

30 Prior to the commencement of this action, at a meeting
31 of the California Highway Commission duly and regularly convened

DEPARTMENT OF PUBLIC WORKS

DIVISION OF HIGHWAYS

P.O. BOX 7791, BANCROFT ANNEX, SAN FRANCISCO 94119

Please refer
to File No. 2540

June 29, 1972

REQUEST FOR SEGREGATION
OF PROPERTY ASSESSMENT

04- SC1-280,680,101

State Parcels: 41865

Board of Supervisors
Santa Clara County
County Court House
70 West Hedding St.
San Jose, Calif. 95110Dear Sir: Re: PEOPLE VS. CHARLES GIGUERE, et al.
SUPERIOR COURT CASE NO. 274724
LIS PENDENS RECORDED June 22, 1972
RECORDER'S SERIAL NO. 4285643

The State of California, acting through the Department of Public Works, Division of Highways, has commenced a proceeding in eminent domain and has filed a Lis Pendens as indicated above.

It is requested that you take appropriate action under Section 1252.2 of the Code of Civil Procedure to establish separate valuations on the assessment roll for the following parcels ONLY:

Suit Par.1A
1BAssessment No.472-9-147
66-13

A copy of the State's condemnation action, including maps, is attached for your convenience in identifying the parcels referred to above.

Very truly yours,

T. R. LAMMERS
District EngineerBy *T. P. Moore*T. P. MOORE
Senior Right of Way Agent

ATTACH.

Orig: Co Counsel

cc: B/S

20017 010007

0000000000

700 30 1 00 14 15

12082

State Route 280, 680, 101

TO ALL DEFENDANTS AND THEIR ATTORNEYS;
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

John P. Horgan
Lee Tyler

JOHN P. HORGAN
Attorney for Plaintiff

1A-1B
Tans. Keller
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

CHARLES GIGUERE, et al.,

Defendants.

No. 274724

SUMMONS

PARCELS 1A, 1B,
and 1C

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

CHARLES GIGUERE, WESTERN TITLE INSURANCE COMPANY, a corporation,
as Trustee, COMMUNITY BANK OF SAN JOSE, a corporation, COUNTY
OF SANTA CLARA, a political subdivision, DOE ONE TO DOE FIFTY,
inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County
of Santa Clara, within 30 days after the service on you of this
Summons.

Said proceeding is brought to acquire real property
or interests in real property for public use, namely for State
highway purposes.

1 John P. Horgan
2 Lee Tyler
3 Attorneys for Plaintiff
4 369 Pine Street
5 San Francisco, California 94104
6 Telephone: 982-3130

(ENDORSED)
FILED
JUN 22 1972
GEORGE E. FOWLES, Clerk
BY _____
DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA

11 THE PEOPLE OF THE STATE OF CALIFORNIA,
12 acting by and through the Department
13 of Public Works,

13 Plaintiff,

14 vs.

15 CHARLES GIGUERE, WESTERN TITLE
16 INSURANCE COMPANY, a corporation,
17 as Trustee, COMMUNITY BANK OF SAN JOSE,
18 a corporation, COUNTY OF SANTA CLARA,
19 a political subdivision, DOE ONE TO
20 DOE FIFTY, inclusive,

20 Defendants.

No. 274724

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 1A, 1B,
and 1C

21 Plaintiff complains of defendants, and for cause of
22 action alleges that:

23 I

24 The Department of Public Works is, and at all times
25 herein mentioned has been, the duly authorized body in charge
26 of State highways and is by law vested with authority to exercise,
27 in the name of the People of the State of California, the right
28 of eminent domain for the purpose of acquiring property for
29 State highway purposes.

30 II

31 Prior to the commencement of this action, at a meeting

Name, Address and Telephone No. of SENDER

Space Below for Use of Court Clerk Only

DIVISION OF HIGHWAYS
P.O. BOX 7791, RINCON ANNEX
SAN FRANCISCO, CALIF. 94119 94120

RECEIVED
BOARD OF SUPERVISORS

MAY 12 3 04 PM '72

COUNTY OF
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
(SUPERIOR, MUNICIPAL, or JUSTICE)

(When applicable, insert name of Municipal or Justice Court District or of branch court)

Plaintiff(s): THE PEOPLE OF THE STATE OF
CALIFORNIA, acting by and through
the Department of Public Works, et al.
vs. Defendant(s):

CASE NUMBER

NOTICE AND ACKNOWLEDGMENT
OF SERVICE

04-SC1-101

EA 117322

Deed 38753

Parcels 1A and 1B

VICTOR F. CORSIGLIA, SR., ET AL.

(Abbreviated Title)

TO COUNTY OF SANTA CLARA, a political subdivision
(Insert name of individual on whom this form is being served)

This summons is served pursuant to Section 415.30 of the California Code of Civil Procedure. Your failure to complete this form and return it to me within 20 days may subject you (or the party on whose behalf you are being served) to liability for the payment of any expenses incurred in serving a summons on you in any other manner permitted by law.

If you are being served on behalf of a corporation, unincorporated association (including a partnership), or other entity, this form must be signed by you in the name of such entity or by a person authorized to receive service of process on behalf of such entity. In all other cases, this form must be signed by you personally or by a person authorized by you to acknowledge receipt of summons. Section 415.30 provides that this summons is deemed served on the date you sign the Acknowledgment of Receipt of Summons, if you return this form to me.

Dated May 8, 1972

Linda Madigan

(Signature of sender)

ACKNOWLEDGMENT OF RECEIPT OF SUMMONS

May 12, 1972

This acknowledges receipt on: (Insert date)

of a copy of the summons and of the complaint at: (Insert address)

Board of Supervisors
County of Santa Clara
70 West Hedding Street
Room #524
San Jose, Ca. 95110

Dated

(Date this form is signed)

(Signature of person acknowledging receipt, with title if
acknowledgment is made on behalf of another person)

JOHANN GARDIN, DEPUTY CLERK

(Type or print your name and name of entity, if any, on
whose behalf this form is signed)

Orig: Division of Highways

Form Approved by the
Judicial Council of California
Effective July 1, 1970

NOTICE AND ACKNOWLEDGMENT OF SERVICE

C.C.P. § 415.30, 417.10

file

Endorsed - Filed
4-17-72

John P. Horgan
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works, the Department of
Parks and Recreation, and the State
Public Works Board,

No. 266811

Plaintiff,

FIRST AMENDED
COMPLAINT IN
EMINENT DOMAIN

vs.

VICTOR F. CORSIGLIA, SR., PAUL W.
MADSEN, O'CONNEL BROS., a corporation,
GIAN TRAVERSO, MOLLIE TRAVERSO, GERMANO
PRUZZO, GIUSEPPINA PRUZZO, CHARLES
PRUZZO, LEO PRUZZO, CEDRIC A. FEGTLY,
REVA I. FEGTLY; JOHN LUCHETTI AND C. R.
ACKER, partners doing business under
the firm name and style of Gilroy and
Morgan Hill Garbage Company; TRANS-
AMERICA TITLE INSURANCE COMPANY, a
corporation, as Trustee, M. S. MIGUEL,
MARTHA MIGUEL, COUNTY OF SANTA CLARA,
a political subdivision, DOE ONE TO
DOE FIFTY, inclusive,

Parcels 1A and 1B

Defendants.

Plaintiff complains of defendants, and for cause of
action alleges that:

I

The Department of Public Works is, and at all times
herein mentioned has been, the duly authorized body in charge
of State highways and is by law vested with authority to
exercise, in the name of the People of the State of California,

Orig: Co Counsel
CC: B/S
State Route 101

1 the right of eminent domain for the purpose of acquiring
2 property for State highway purposes, including parks adjoining
3 or near a State highway.

4 II

5 The Department of Parks and Recreation is, and at all
6 times herein mentioned has been, the duly authorized body in
7 charge of State parks and the State Public Works Board is by law
8 vested with authority to exercise in the name of The People of
9 the State of California, the right of eminent domain for purpose
10 of acquiring property for State park purposes.

11 III

12 Prior to the commencement of this action, at a meeting
13 of the California Highway Commission duly and regularly convened
14 at Sacramento, California, on November 18, 1971, said California
15 Highway Commission duly and regularly passed and adopted Condem-
16 nation Resolution No. C-10247 stating and determining that public
17 interest and necessity require the acquisition of certain real
18 property in fee simple absolute unless a lesser estate is de-
19 scribed herein for State highway purposes; for drainage control
20 purposes for and in connection with a public improvement, namely
21 the Santa Clara County Flood Control and Water District's
22 Drainage Control System, in accordance with that certain
23 Cooperative Agreement No. 43-237382, dated July 13, 1971
24 between the Santa Clara County Flood Control and Water District
25 and the State of California, Department of Public Works, entered
26 into pursuant to the provisions of the Joint Exercise of Powers
27 Act, Government Code Section 6500 et. seq.; and for State park
28 purposes for and in connection with a public improvement,
29 namely the Coyote River Parkway Project, in accordance with
30 that certain Cooperative Agreement dated May 27, 1969, between
31 the State of California, Department of Public Works, Division

1 of Highways, and the State of California, Department of Parks
2 and Recreation, General Services and Public Works Board, and in
3 accordance with a Resolution adopted October 30, 1970 by the
4 State of California Public Works Board, entered into pursuant
5 to the provisions of the Joint Exercise of Powers Act, Government
6 Code Section 6500 et. seq., both being part of a joint and
7 integrated plan of public works construction which includes
8 State highway, Road 04-SC1-101-19.4, declared a freeway. The
9 use of the real property described in said resolutions is a
10 public use authorized by law.

11 IV

12 Prior to the commencement of this action, at a meeting
13 of the State of California Public Works Board duly and regularly
14 convened on October 30, 1970, said State Public Works Board duly
15 and regularly passed and adopted a condemnation resolution
16 stating and determining that public interest and necessity
17 require the acquisition of certain real property in fee simple
18 absolute, to wit, Parcel 1B, described herein, for State park
19 purposes for and in connection with a public improvement,
20 namely the Coyote River Parkway Project. The use of the real
21 property described in said resolution is a public use authorized
22 by law.

23 V

24 The real property or interests in real property which
25 the Department of Public Works and the State Public Works Board
26 are authorized to acquire by said resolutions and said Cooperative
27 Agreements is situated in the County of Santa Clara, State of
28 California, and described as follows:
29
30
31

1 PARCEL 1A:

2 For freeway purposes, that real property described as
3 follows:

4 COMMENCING on the northerly line of that parcel of
5 land conveyed to the State of California by PARCEL 1 of deed
6 from H. R. Watchie and Associates Incorporated
7 recorded October 28, 1969, in Book 8717, at Page 681,
8 Official Records of Santa Clara County at the westerly terminus
9 of the course described as "S. 89°23'03" W., 247.06 feet";
10 thence along said northerly line N. 89°23'03" E., 247.06 feet
11 and S. 76°36'56" E., 296.83 feet; thence N. 31°47'15" W.,
12 78.76 feet; thence S. 57°49'10" W., 60.00 feet; thence
13 N. 29°40'58" W., 13.24 feet; thence along a tangent curve to
14 the left with a radius of 4000.00 feet, through an angle
15 of 14°10'23", an arc length of 989.47 feet; thence
16 N. 43°51'21" W., 515.11 feet to the most easterly corner of
17 that parcel of land conveyed to the State of California by
18 PARCEL 2 of said deed; thence along the southeasterly line of
19 said PARCEL 2, S. 51°11'39" W., 326.72 feet; thence
20 S. 41°08'24" E., 613.05 feet; thence S. 37°14'57" E.,
21 598.03 feet to the point of commencement.

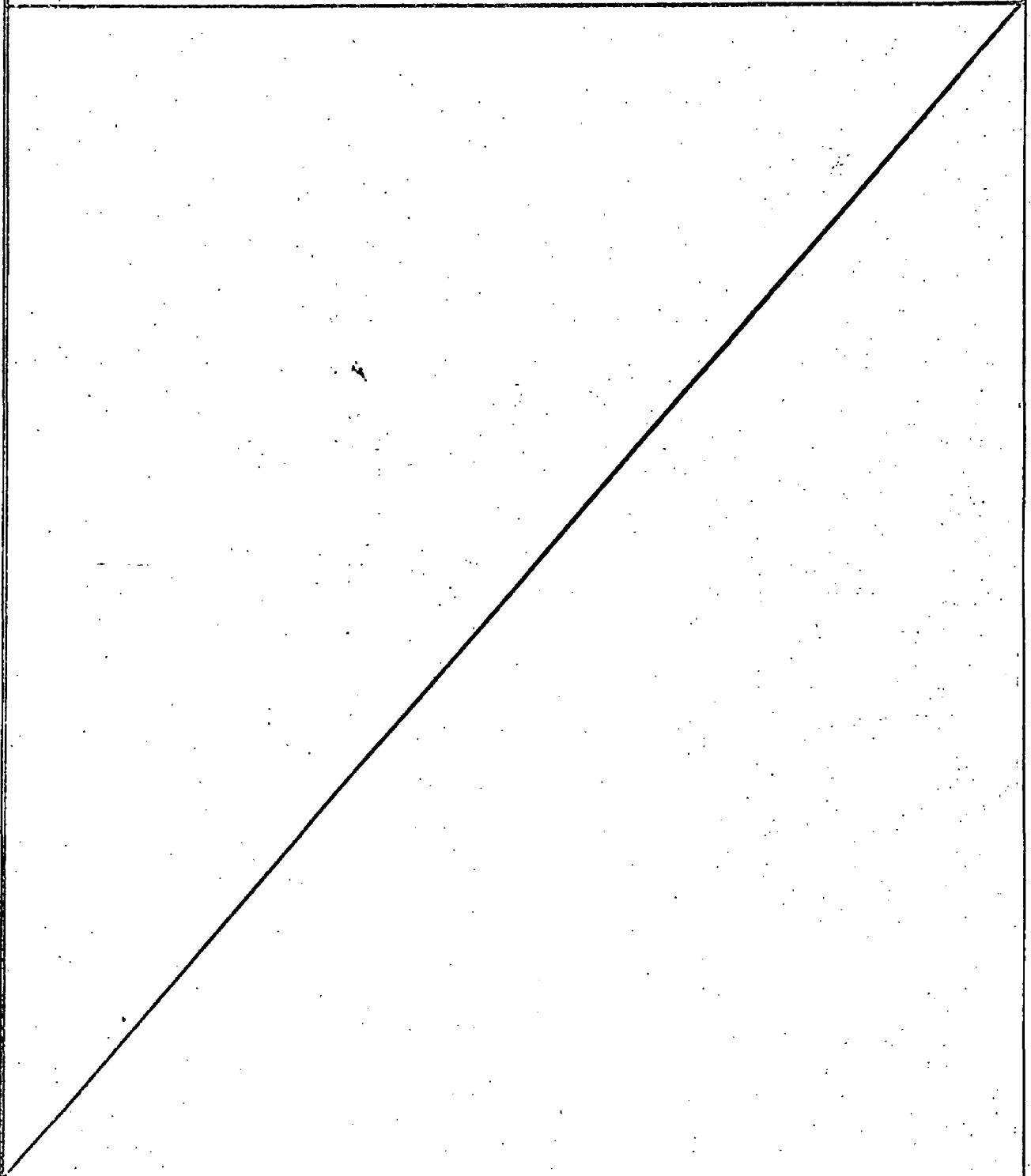
22 TOGETHER WITH an easement for drainage purposes and
23 incidents thereto, over and across the following described
24 parcel:

25 COMMENCING at the northwesterly terminus of the course
26 described above as "S. 41°08'24" E., 613.05 feet"; thence
27 along said course S. 41°08'24" E., 30.01 feet; thence
28 S. 47°13'00" W., 428.44 feet to the southwesterly line of
29 that parcel of land conveyed to Victor F. Corsiglia, Sr., et al
30 by deed recorded December 21, 1965 in Book 7218, at page 531,
31 Official Records of Santa Clara County; thence along said

1 southwesterly line N. $54^{\circ}21'57''$ W., 30.62 feet; thence
2 N. $47^{\circ}13'00''$ E., 435.45 feet to the point of commencement.

3 Lands abutting said freeway shall have no right or
4 easement of access thereto.

5 The bearings and distances used in the above description
6 are on the California Coordinate System, Zone 3. Multiply the
7 above distances by 1.0000350 to obtain ground level distances.
8



1 PARCEL 1B:

2 A fee simple estate for park purposes, that real property
3 described as follows:

4 BEGINNING at an iron pipe standing in the center line
5 of Coyote River at the most Northerly corner of that tract
6 of land deeded to John Kirby by Deed dated March 2, 1883 and
7 recorded in Book 66 of Deeds, at page 467, in the office of
8 the County Recorder of the County of Santa Clara, California,
9 running thence along the Northeasterly line of said tract
10 deeded to Kirby, South 54°55' East 17.22 chains to an iron
11 pipe; thence North 88°50' East 6.57 chains to an iron pipe;
12 thence South 77°10' East 12.50 chains to an iron pipe, and
13 South 56°45' East 0.56 chains to an iron pipe standing at the
14 most Easterly corner of said tract deeded to John Kirby;
15 thence North 36°52' East 13.75 chains to a stake marked
16 0-2-F-2 standing in the fence line that separates the hill
17 land from the level land; thence along the general course of
18 said fence line, North 65°18' West 4.45 chains to a stake
19 marked 0-1-F-1; North 64°00' West 20.00 chains to a stake marked
20 0-F, North 52°08' West 5.72 chains to an iron pipe driven in
21 the Southerly line of that 1000 acre tract deeded to
22 James and John Fitzgerald, by Deed dated January 12, 1860,
23 recorded in Book "N" of Deeds, page 23, in the office of the
24 County Recorder of the County of Santa Clara, California; thence
25 South 50°35' West 19.49 chains to the point of beginning.

26 EXCEPTING THEREFROM that parcel of land described in
27 PARCEL 1A above.

28 TOGETHER WITH a perpetual right of way for road purposes
29 over a strip of land 20 feet in width following the Northeasterly
30 high bank of the Coyote River from the Southeasterly line of
31 the above described 55.57 acre tract Southeasterly to the

Northwesterly line of that certain 88.92 acre tract of land conveyed to Agostino Guglieri by Deed recorded September 20, 1899 in Book 22 of Deeds, at page 234, and thence crossing the Coyote River and following the Southwesterly bank of the Coyote River to a sycamore tree R. G. 3 set on the Southerly line of the above mentioned 88.92 acre tract as granted by O'Connell Bros., a corporation, to Barney Ferranti by Deed recorded February 16, 1925 in Book 141 Official Records, Page 85.

ALSO TOGETHER WITH a perpetual right of way for road purposes over a strip of land 20 feet wide, the center line of which begins at the above mentioned sycamore tree marked R. G. 3, in the center of the Coyote River, and running thence South $58\frac{1}{2}^{\circ}$ West 1.40 chains to a station on the West bank of Coyote River; thence South $10\frac{1}{2}^{\circ}$ East 3 chains and thence South $46^{\circ}25'$ West parallel and 10 feet Southerly from the fence now standing on the South side of Raggio's main irrigation ditch, 17 chains, more or less, to a point 10 feet Southeasterly from the Westernmost corner of the above mentioned Malaguera tract; and thence Southwesterly parallel to and along the southeasterly fence, now forming the Northwestern boundary line of the original Toney Tract and along and over the present travelled road and right of way belonging and appertaining to the original Malaguera Tract to the Monterey Road, as granted by O'Connell Bros., a corporation, to Barney Ferranti, by Deed dated January 7, 1925 and recorded February 16, 1925 in Book 141 Official Records, page 85.

ALSO TOGETHER WITH:

a. Those certain rights provided for in that certain grant of easement dated November 4, 1937, executed by Barney Ferranti, et ux, to Santa Clara Valley Water

1 Conservation District, recorded June 16, 1938 in Book 880
2 Official Records, page 336, as follows:

3 Said first parties shall have the right to conduct water
4 from the Coyote River or other source across, over or
5 under said right of way to their remaining lands for
6 irrigation or domestic purposes is not to exceed 2 pipes.

7 b. That certain right of way granted in the Agreement by
8 and between Gian Traverso, et ux, first parties,
9 Germano Pruzzo, et ux, second parties, Charles Pruzzo, et al,
10 third parties and Cedric A. Fegtly et ux, fourth parties,
11 dated April 30, 1945 and recorded February 2, 1946, in
12 Book 1323 Official Records, page 422.

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VI

Plaintiff seeks to acquire by this proceeding the parcels of real property, or interests in real property, described in Paragraph V herein. Said parcels include only parts of an entire parcel.

VII

The location, general route, and termini of the right of way sought to be acquired herein for State highway purposes, for drainage control purposes, and the property sought to be acquired for State park purposes, insofar as involved in this proceeding, are as shown on the maps attached hereto and by this reference made a part hereof.

VIII

All of the herein described property lying within the boundaries of streets, highways, or other public easements is subject to an easement or prescriptive right of the public for use for such purpose.

IX

The names of all owners of and claimants to the property sought to be acquired herein, insofar as known to plaintiff, are hereinafter set forth in this paragraph. Each defendant named has, or claims to have, some right, title, or interest in or to the parcels of real property heretofore described. For the convenience of the court and parties, and not as allegations to which plaintiff intends to be bound, plaintiff has set out the name of each defendant and opposite each name a statement of the respective interest in said parcel.

<u>NAME OF DEFENDANT</u>	<u>INTEREST</u>
<u>Parcels 1A and 1B</u>	
Victor F. Corsiglia, Sr., and Paul W. Madsen	Owners

<u>1</u> <u>NAME OF DEFENDANT</u>	<u>INTEREST</u>
<u>2</u> <u>Parcels 1A and 1B (Cont'd)</u>	
<u>3</u> O'Connel Bros.,	
<u>4</u> a corporation	Right of way
<u>5</u> Gian Traverso,	
<u>6</u> Mollie Traverso,	
<u>7</u> Germano Pruzzo,	
<u>8</u> Giuseppina Pruzzo,	
<u>9</u> Charles Pruzzo,	
<u>10</u> Leo Pruzzo,	
<u>11</u> Cedric A. Fegtly, and	
<u>12</u> Reva I. Fegtly	Unknown interest
<u>13</u> John Luchetti and	
<u>14</u> C. R. Acker, partners,	
<u>15</u> doing business under the	
<u>16</u> firm name and style of	
<u>17</u> Gilroy and Morgan Hill	
<u>18</u> Garbage Company	Lessees
<u>19</u> Transamerica Title Insurance	
<u>20</u> Company, a corporation,	
<u>21</u> as Trustee	Trustee under
<u>22</u> M. S. Miguel and	
<u>23</u> Martha Miguel	Beneficiaries under
<u>24</u> County of Santa Clara,	
<u>25</u> a political subdivision	Taxes and assessments

26 WHEREFORE, plaintiff prays judgment as prayed for in

27 the complaint and also in conformity with the matters and facts

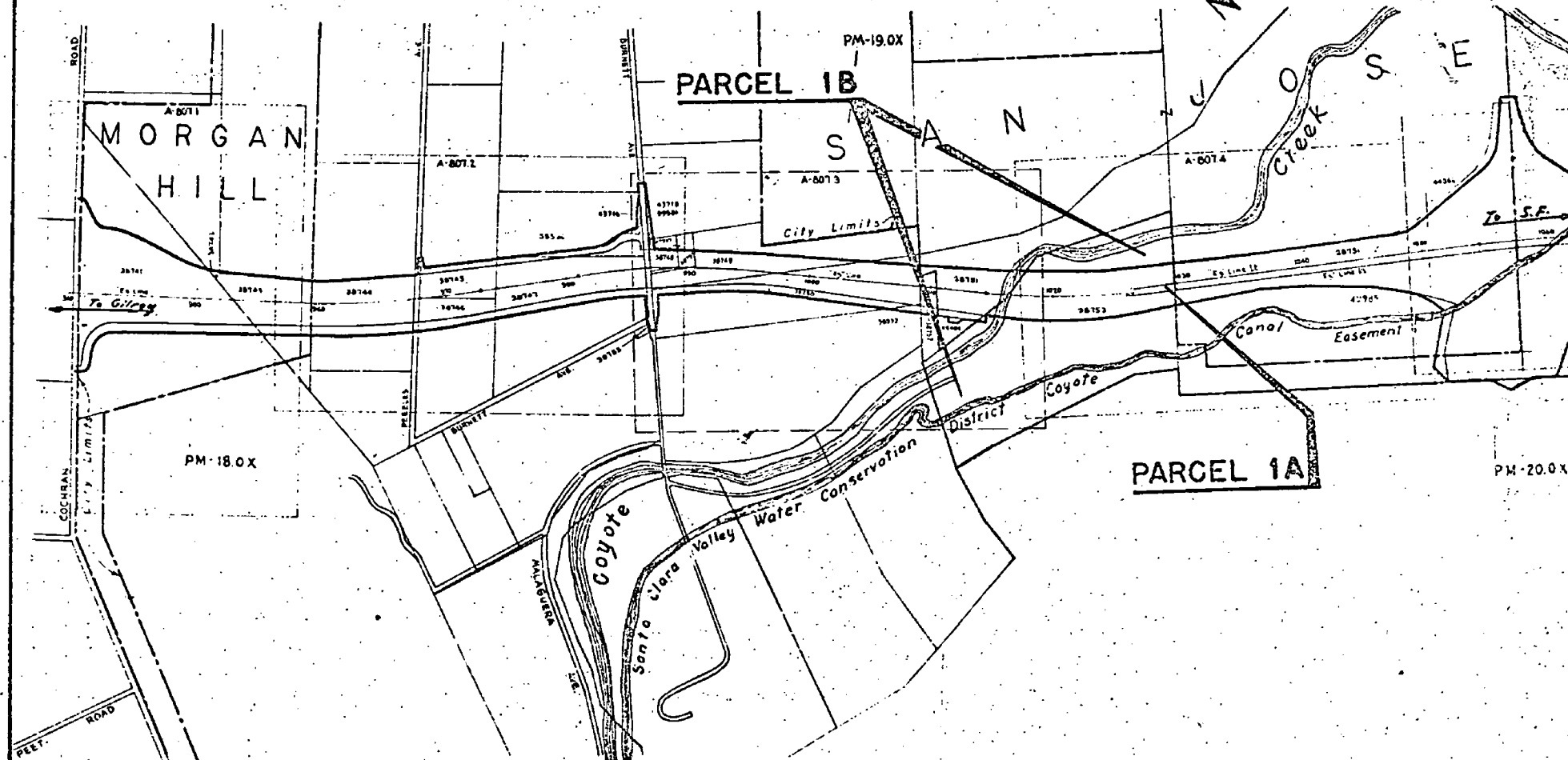
28 set forth in this First Amended Complaint in Eminent Domain.

29 JOHN P. HORGAN

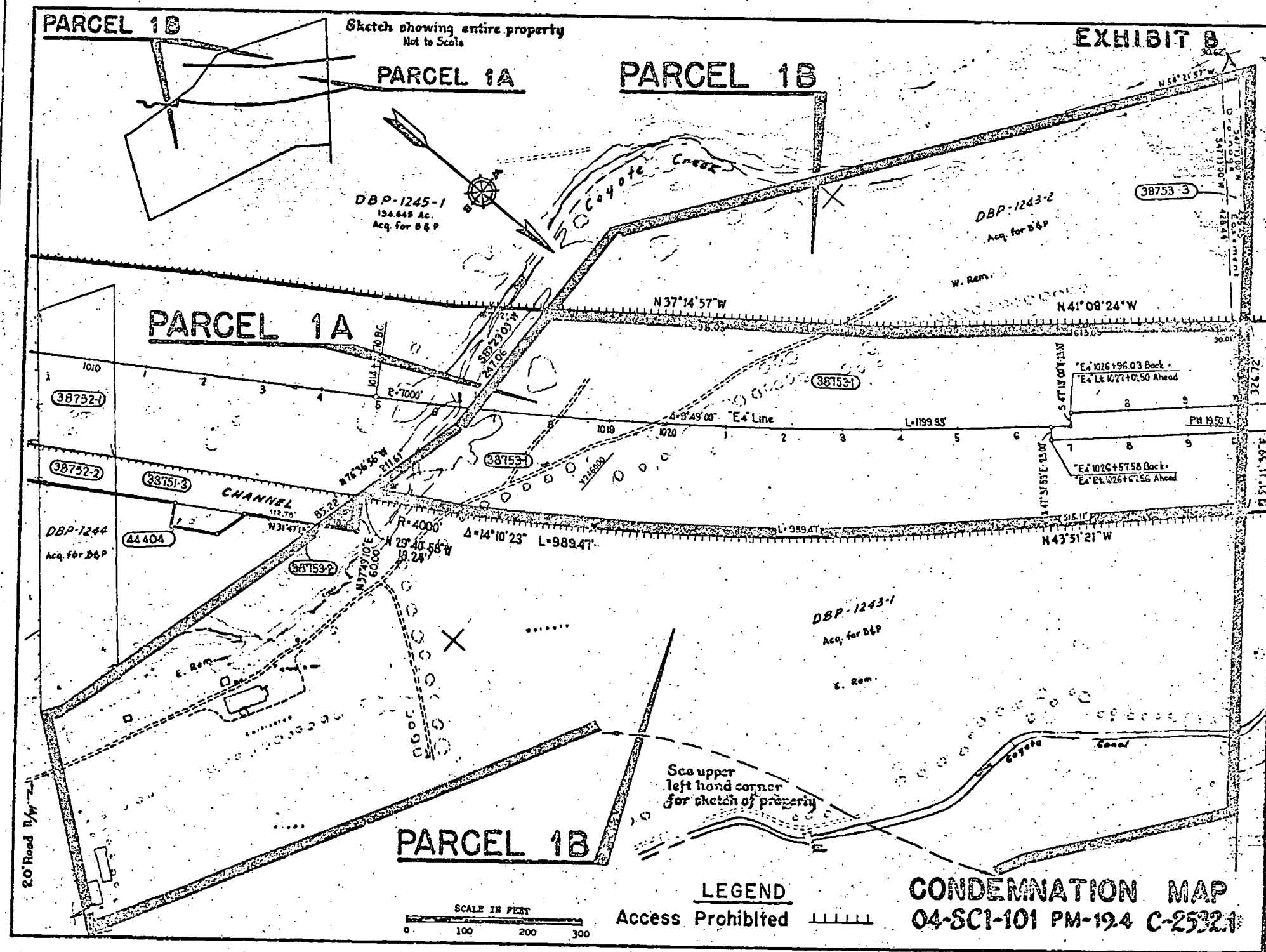
30 LEE TYLER

31 By LEE TYLER

 Attorneys for Plaintiff



CONDEMNATION MAP
04-SC1-101 PM180X-20.0XC-25320



TO ALL DEFENDANTS AND THEIR ATTORNEYS;
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

JOHN P. HORGAN
Attorney for Plaintiff

John P. Horgan
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

COUNTY OF
SANTA CLARA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

HOWARD C. PLATT, et al.,

Defendants.

No. 267258

SUMMONS

PARCELS 1A and 1B

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

HOWARD C. PLATT, AMERICAN SECURITIES COMPANY, a corporation,
as Trustee, WELLS FARGO BANK, NATIONAL ASSOCIATION, a national
banking association, COUNTY OF SANTA CLARA, a political subdivi-
sion, DOE ONE TO DOE FIFTY, inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
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tiff in the Superior Court of the State of California for the
County of Santa Clara, within 30 days after the service on
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Said proceeding is brought to acquire real property
or interests in real property for public use, namely for State
highway purposes.

Orig: Co Counsel
CC: B/S
State Hwy 101

1 John P. Horgan
2 Lee Tyler
3 Attorneys for Plaintiff
4 369 Pine Street
5 San Francisco, California 94104
6 Telephone: 982-3130
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA
10

11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
13 of Public Works,)

13 Plaintiff,)

14 vs.)

15 HOWARD C. PLATT, AMERICAN SECURITIES)
16 COMPANY, a corporation, as Trustee,)
17 WELLS FARGO BANK, NATIONAL ASSOCIATION,)
18 a national banking association, COUNTY)
19 OF SANTA CLARA, a political subdivision,)
20 DOE ONE TO DOE FIFTY, inclusive,)

20 Defendants.)
21

No. 267258

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 1A and 1B

21 Plaintiff complains of defendants, and for cause of
22 action alleges that:

23 I

24 The Department of Public Works is, and at all times
25 herein mentioned has been, the duly authorized body in charge
26 of State highways and is by law vested with authority to exercise
27 in the name of the People of the State of California, the right
28 of eminent domain for the purpose of acquiring property for
29 State highway purposes.

30 II

31 Prior to the commencement of this action, at a meeting

TO ALL DEFENDANTS AND THEIR ATTORNEYS;
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

JOHN P. HORGAN
Attorney for Plaintiff

John P. Horgan
Lee Tyler

Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

COUNTY OF SANTA CLARA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

HOWARD C. PLATT, et al.,

Defendants.

No. 267258

SUMMONS

PARCELS 1A and 1B

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

HOWARD C. PLATT, AMERICAN SECURITIES COMPANY, a corporation,
as Trustee, WELLS FARGO BANK, NATIONAL ASSOCIATION, a national
banking association, COUNTY OF SANTA CLARA, a political subdivi-
sion, DOE ONE TO DOE FIFTY, inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plain-
tiff in the Superior Court of the State of California for the
County of Santa Clara, within 30 days after the service on
you of this Summons.

Said proceeding is brought to acquire real property
or interests in real property for public use, namely for State
highway purposes.

Orig. Co Counsel
CC: B/S
State Hwy 101

1 John P. Horgan
2 Lee Tyler
3 Attorneys for Plaintiff
4 369 Pine Street
5 San Francisco, California 94104
6 Telephone: 982-3130
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA
10

11 THE PEOPLE OF THE STATE OF CALIFORNIA,)
12 acting by and through the Department)
13 of Public Works,)

13 Plaintiff,)

14 vs.)

15 HOWARD C. PLATT, AMERICAN SECURITIES)
16 COMPANY, a corporation, as Trustee,)
17 WELLS FARGO BANK, NATIONAL ASSOCIATION,)
18 a national banking association, COUNTY)
19 OF SANTA CLARA, a political subdivision,)
20 DOE ONE TO DOE FIFTY, inclusive,)

20 Defendants.)
21)
22)
23)
24)
25)
26)
27)
28)
29)
30)
31)

267256
No.

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 1A and 1B

21 Plaintiff complains of defendants, and for cause of
22 action alleges that:

23 I

24 The Department of Public Works is, and at all times
25 herein mentioned has been, the duly authorized body in charge
26 of State highways and is by law vested with authority to exercise,
27 in the name of the People of the State of California, the right
28 of eminent domain for the purpose of acquiring property for
29 State highway purposes.

30 II

31 Prior to the commencement of this action, at a meeting

Name, Address and Telephone No. of SENDER

Space for Use of Court Clerk Only

DIVISION OF HIGHWAYS
P. O. Box 7791, Rincon Annex
San Francisco, CA 94120

RECEIVED
BOARD OF SUPERVISORS

APR 6 12 53 PM '72

COUNTY OF
SANTA CLARA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
(SUPERIOR, MUNICIPAL, or JUSTICE)

(When applicable, insert name of Municipal or Justice Court District or of branch court)

Plaintiff(s) THE PEOPLE OF THE STATE OF
CALIFORNIA, acting by and through
the Department of Public Works,
vs. Defendant(s):

H. A. ALFORD, etc., et al.

(Abbreviated Title)

CASE NUMBER
269212

NOTICE AND ACKNOWLEDGMENT
OF SERVICE

04-SCI-280/680/101
EA 208402
Deed 41895
Parcel 4

TO BOARD OF SUPERVISORS OF THE COUNTY OF SANTA CLARA
(Insert name of individual on whom this form is being served)

This summons is served pursuant to Section 415.30 of the California Code of Civil Procedure. Your failure to complete this form and return it to me within 20 days may subject you (or the party on whose behalf you are being served) to liability for the payment of any expenses incurred in serving a summons on you in any other manner permitted by law.

If you are being served on behalf of a corporation, unincorporated association (including a partnership), or other entity, this form must be signed by you in the name of such entity or by a person authorized to receive service of process on behalf of such entity. In all other cases, this form must be signed by you personally or by a person authorized by you to acknowledge receipt of summons. Section 415.30 provides that this summons is deemed served on the date you sign the Acknowledgment of Receipt of Summons, if you return this form to me.

Dated April 4, 1972

Linda Madigan

(Signature of sender)

ACKNOWLEDGMENT OF RECEIPT OF SUMMONS

✓ This acknowledges receipt on: (Insert date) April 10, 1972

✓ of a copy of the summons and of the complaint at: (Insert address)

Board of Supervisors
County of Santa Clara
70 West Hedding Street
Room #524
San Jose, Ca. 95110

✓ Dated April 10, 1972
(Date this form is signed)

✓ (Signature of person acknowledging receipt, with title if
acknowledgment is made on behalf of another person)

• Orig: Division of Highways

✓ Johann Mardin, Deputy Clerk

(Type or print your name and name of entity, if any, on
whose behalf this form is signed)

TO ALL DEFENDANTS AND THEIR ATTORNEYS;
Will you please furnish us TWO copies
of your answer when served and filed.
This courtesy will be greatly
appreciated.

JOHN P. HORGAN
Attorney for Plaintiff

John P. Horgan
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

H. A. ALFORD, etc, et al.,

Defendants.

No. 269212

SUMMONS

PARCEL 4

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:

H. A. ALFORD, also known as Horace Alford, also known as H.
Alford, GEORGE SCHNELLER, SYLVIA SCHNELLER, NICK SORGE, VIVIAN
SORGE, BOARD OF SUPERVISORS OF THE COUNTY OF SANTA CLARA, HOME
AUXILIARY CORPORATION, a corporation, as Trustee, HOME FEDERAL
SAVINGS AND LOAN ASSOCIATION OF SAN FRANCISCO, a corporation,
COUNTY OF SANTA CLARA, a political subdivision, DOE ONE TO DOE
FIFTY, inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County
of Santa Clara, within 30 days after the service on you of this
Summons.

State Route 280, 680, 101 ✓
Orig: Co Counsel
CC: 13/5

1 John P. Morgan
2 Lee Tyler
3 Attorneys for Plaintiff
4 369 Pine Street
5 San Francisco, California 94104
6 Telephone: 982-3130
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA
10

11 THE PEOPLE OF THE STATE OF CALIFORNIA,
12 acting by and through the Department
13 of Public Works,

14 Plaintiff,

15 vs.

16 H. A. ALFORD, also known as Horace
17 Alford, also known as H. Alford, GEORGE
18 SCHNELLER, SYLVIA SCHNELLER, NICK SORGE,
19 VIVIAN SORGE, BOARD OF SUPERVISORS OF
20 THE COUNTY OF SANTA CLARA, HOME
21 AUXILIARY CORPORATION, a corporation,
22 as Trustee, HOME FEDERAL SAVINGS AND
23 LOAN ASSOCIATION OF SAN FRANCISCO, a
24 corporation, COUNTY OF SANTA CLARA, a
25 political subdivision, DOE ONE TO DOE
26 FIFTY, inclusive,

27 Defendants.
28

No.

269212

COMPLAINT
IN
EMINENT
DOMAIN

PARCEL 4

29 Plaintiff complains of defendants, and for cause of
30 action alleges that:

31 I

32 The Department of Public Works is, and at all times
33 herein mentioned has been, the duly authorized body in charge
34 of State highways and is by law vested with authority to exercise,
35 in the name of the People of the State of California, the right
36 of eminent domain for the purpose of acquiring property for
37 State highway purposes.

file

RECEIVED
JAN 31 11 03 AM '72
COUNTY OF
SANTA CLARA

John P. Horgan
Lee Tyler
Attorneys for Plaintiff
369 Pine Street
San Francisco, California 94104
Telephone: 982-3130

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,
acting by and through the Department
of Public Works,

Plaintiff,

vs.

VICTOR F. CORSIGLIA, SR., et al.,

Defendants.

No. 266911

SUMMONS

PARCELS 1A and 1B

THE PEOPLE OF THE STATE OF CALIFORNIA SEND GREETINGS TO:
VICTOR F. CORSIGLIA, SR., PAUL W. MADSEN, O'CONNEL BROS., a
corporation, GIAN TRAVERSO, MOLLIE TRAVERSO, GERMANO PRUZZO,
GIUSEPPINA PRUZZO, CHARLES PRUZZO, LEO PRUZZO, CEDRIC A. FEGTLY,
REVA I. FEGTLY; JOHN LUCHETTI AND C. R. ACKER, partners, doing
business under the firm name and style of Gilroy and Morgan
Hill Garbage Company; TRANSAMERICA TITLE INSURANCE COMPANY,
a corporation, as Trustee, M. S. MIGUEL, MARTHA MIGUEL, COUNTY
OF SANTA CLARA, a political subdivision, DOE ONE TO DOE FIFTY,
inclusive, defendants.

YOU ARE DIRECTED TO FILE with the Clerk of this Court
a written pleading in response to the Complaint in a proceeding
in Eminent Domain brought against you by the above-named plaintiff
in the Superior Court of the State of California for the County

Orig: Co Counsel
B/S
State Route 101

1 of Santa Clara, within 30 days after the service on you of this
2 Summons.

3
4 Said proceeding is brought to acquire real property
5 or interests in real property for public use, namely for State
6 highway purposes, for drainage control purposes, and for State
7 park purposes.

8 The real property or interests in real property sought
9 to be acquired are in the County of Santa Clara, State of
10 California, and generally described as being northwesterly of
11 the City of Morgan Hill at Coyote Creek. Reference is made
12 to the complaint herein for specific descriptions of the parcels
13 sought to be acquired.

14 YOU ARE HEREBY NOTIFIED that unless you file with the
15 Clerk a written responsive pleading to said complaint as above
16 required, said plaintiff will apply to said court for the relief
17 demanded therein.

18 YOU MAY SEEK THE ADVICE OF AN ATTORNEY IN ANY MATTER
19 CONNECTED WITH THE COMPLAINT OR THIS SUMMONS. SUCH ATTORNEY
20 SHOULD BE CONSULTED PROMPTLY SO THAT YOUR PLEADING MAY BE FILED
21 OR ENTERED WITHIN THE TIME REQUIRED BY THIS SUMMONS.

22
23 DATED: _____, Clerk
24 By George E. Fowles, Deputy
25
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NOTICE TO THE PERSON SERVED

____ You are served as an individual defendant.

____ You are served as (or on behalf of) the person sued under
fictitious name of: _____
in the capacity of: _____

✓ ____ You are served on behalf of: COUNTY OF SANTA CLARA
A POLITICAL SUBDIVISION

Under: _____ C.C.P. Sec. 416.10 (Corporation)
_____ C.C.P. Sec. 416.20 (Defunct corporation)
_____ C.C.P. Sec. 416.40 (Association or partnership)
✓ _____ C.C.P. Sec. 416.50 (Public entity)
_____ C.C.P. Sec. 416.60 (Minor)
_____ C.C.P. Sec. 416.70 (Incompetent)
_____ C.C.P. Sec. 416.90 (Individual)
_____ Other:

A written pleading, including an answer, demurrer, etc., must be in the form required by the California Rules of Court. Your original pleading must be filed in this court with proper filing fees and proof that a copy thereof was served on plaintiff's attorney.

The time when a summons is deemed served on a party may vary depending on the method of service. For example, see Code of Civil Procedure Sections 413.10 through 415.40.

1 John P. Horgan
2 Lee Tyler
3 Attorneys for Plaintiff
4 369 Pine Street
5 San Francisco, California 94104
6 Telephone: 982-3130
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA CLARA
10

11 THE PEOPLE OF THE STATE OF CALIFORNIA,
12 acting by and through the Department
13 of Public Works,

14 Plaintiff,

15 vs.

16 VICTOR F. CORSIGLIA, SR., PAUL W.
17 MADSEN, O'CONNEL BROS., a corporation,
18 GIAN TRAVERSO, MOLLIE TRAVERSO, GERMANO
19 PRUZZO, GIUSEPPINA PRUZZO, CHARLES
20 PRUZZO, LEO PRUZZO, CEDRIC A. FEGTLY,
21 REVA I. FEGTLY; JOHN LUCHETTI AND C. R.
22 ACKER, partners, doing business under
23 the firm name and style of Gilroy and
24 Morgan Hill Garbage Company; TRANS-
25 AMERICA TITLE INSURANCE COMPANY, a
26 corporation, as Trustee, M. S. MIGUEL,
27 MARTHA MIGUEL, COUNTY OF SANTA CLARA,
28 a political subdivision, DOE ONE TO
29 DOE FIFTY, inclusive,

30 Defendants.
31

No. 266811

COMPLAINT
IN
EMINENT
DOMAIN

PARCELS 1A and 1B

Plaintiff complains of defendants, and for cause of
action alleges that:

I

The Department of Public Works is, and at all times
herein mentioned has been, the duly authorized body in charge
of State highways and is by law vested with authority to exercise,
in the name of the People of the State of California, the right
of eminent domain for the purpose of acquiring property for

1 State highway purposes.

2 II

3 Prior to the commencement of this action, at a meeting
4 of the California Highway Commission duly and regularly convened
5 at Sacramento, California, on November 18, 1971, said California
6 Highway Commission duly and regularly passed and adopted Condem-
7 nation Resolution No. C-10247 stating and determining that public
8 interest and necessity require the acquisition of certain real
9 property in fee simple absolute unless a lesser estate is de-
10 scribed herein for State highway purposes; for drainage control
11 purposes for and in connection with a public improvement, namely
12 the Santa Clara County Flood Control and Water District's Drainage
13 Control System, in accordance with that certain Cooperative
14 Agreement No. 43-237382, dated July 13, 1971 between the Santa
15 Clara County Flood Control and Water District and the State
16 of California, Department of Public Works, entered into pursuant
17 to the provisions of the Joint Exercise of Powers Act, Government
18 Code Section 6500 et. seq.; and for State park purposes for
19 and in connection with a public improvement, namely the Coyote
20 River Parkway Project, in accordance with that certain Coopera-
21 tive Agreement dated May 27, 1969, between the State of California,
22 Department of Public Works, Division of Highways, and the State
23 of California, Departments of Parks and Recreation, General
24 Services and Public Works Board, and in accordance with a Resolution
25 adopted October 30, 1970 by the State of California Public Works
26 Board, entered into pursuant to the provisions of the Joint
27 Exercise of Powers Act, Government Code Section 6500 et. seq.,
28 both being part of a joint and integrated plan of public works
29 construction which includes State highway, Road 04-SC1-101-
30 19.4, declared a freeway. The use of the real property described
31 in said resolution is a public use authorized by law.