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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

STATE OF ALASKA	)	
	)	
Plaintiff,	)	CASE NO. 3:12-cv-00114-SLG
	)	
UNITED STATES OF AMERICA;	)	UNITED STATES'
CHICKEN VENTURES, LLC, an	)	QUIET TITLE ACT (28 U.S.C. 2409a(e))
Alaska limited liability company;	)	DISCLAIMER
GEORGE W. SEUFFERT,	)	
SR.; GEORGE W. SEUFFERT, JR.,	)	
	)	
<u>Defendants.</u>	)	

COMES NOW the United States of America, through undersigned counsel, and, pursuant to 28 U.S.C. § 2409a(e), disclaims all interest adverse to the Plaintiff, State of Alaska, in submerged lands along the disputed reach of the Mosquito Fork of the Fortymile River identified in paragraph 19 of Plaintiff's complaint in this action filed June 1, 2012 (ECF No. 1), and described therein as:

the submerged lands and bed up to and including the ordinary high water lines of the right and left banks of the Mosquito Fork from its confluence with Dennison Fork within Sec. 8, T. 26 N., R. 18 E., Copper River Meridian, upstream to just above its confluence with Wolf Creek within Sec. 24, T. 24 N., R. 12 E., Copper River Meridian, except for those portions of the river that traverse state-owned uplands and the State's ownership of the underlying bed is undisputed. The included portions of the Mosquito Fork (hereinafter referred to as the "designated portion of the Mosquito Fork") include approximately river miles 0 through 38, 39 through 44, and 53.5 through 80.5. The excluded portions of the Mosquito Fork include the point at which the river exits the National Wild and Scenic River System at approximately river mile 38 in Sec. 19, T. 26 N., R. 15 E., Copper River Meridian upstream to the point at which the river enters Sec. 25, T. 26 N., R. 14 E., Copper River Meridian at approximately river mile 39, and the section of the river that starts in Sec. 2, T. 25 N., R. 14 E., Copper River Meridian at approximately river mile 44 through 53.5 and ending at approximately river mile 53.5 in Sec. 12, T. 25 N., R. 13. (*See* Map 1 highlighting the entire river enclosed as Exhibit 2 of Plaintiff's complaint, Attachment A hereto, and Map 5 highlighting the excluded portion of the river enclosed as Exhibit 3 of Plaintiff's complaint, Attachment B hereto.)

Respectfully submitted, this 27th day of July 2015.

JOHN C. CRUDEN  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of July 2015 a copy of the foregoing document was served electronically by means of the Court's ECF system on the following:

Jessica Moats Alloway

Michael S. Schechter

Stanley T Lewis

/s/ William E. Gerard  
WILLIAM E. GERARD