

STATE OF VERMONT

SUPERIOR COURT
WASHINGTON UNIT

CIVIL DIVISION
DOCKET NO. 669-9-12 Wncv

CALVIN BLODGETT

VS

TOWN OF MORETOWN

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D E P O S I T I O N

OF

PAUL HANNAN

Taken on behalf of the Defendant
on Monday, July 8, 2013 at the
law offices of Zalinger, Cameron & Lambek, P.C.,
Montpelier, VT.

APPEARANCES:

STEPHEN L. CUSICK, ESQ., of the firm Zalinger,
Cameron & Lambek, P.C., 140 Main Street,
Montpelier, VT 05602, appeared and represented the
Plaintiff.

PAUL S. GILLIES, ESQ., of the firm Tarrant,
Gillies, Merriman & Richardson, P.O. Box 1440,
Montpelier, VT 05601-1440, appeared and represented
the Defendant.

ALSO PRESENT: Calvin and Nancy Blodgett
Robert Townsend

COURT REPORTER: Virginia L. Simmer, RPR

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(Commencing at approximately 10:04 a.m.)

PAUL HANNAN: Being first duly sworn by a Notary Public to tell the truth, deposes and says as follows:

EXAMINATION BY MR. GILLIES:

Q. Tell us your name.

A. My name is Paul Hannan.

Q. You might spell it for the record.

A. H-A-N-N-A-N.

Q. You are a surveyor?

A. I am.

Q. How long have you been a surveyor?

A. I became licensed in '81 so 32 years.

Q. And during those years you did some other things than surveying?

A. Oh, yes.

Q. So how many years active surveying would you say?

A. Oh, well, I never didn't survey even during those years a little bit but you could subtract 15 years probably.

Q. I'll just cut right to it. What were you asked to do in this case?

A. Partly review Rob Townsend's work on a road near the Blodgett property.

Q. And what did you look at as far as

STIPULATIONS

It is hereby STIPULATED and AGREED by and between the attorneys of record for the respective parties hereto, as follows:

1. That the testimony of PAUL HANNAN may be taken and treated as taken pursuant to notice and order to take deposition, and that all formalities of notice and order are waived by the parties and the signatures to this stipulation are, in like manner, waived;

2. That all objections, except as to matters of form, are reserved until the deposition or any part thereof is offered in evidence;

3. That the deposition may be signed by the said PAUL HANNAN before any Notary Public.

references?

A. Deed references, road layouts, Rob's survey. I think that's -- oh, aerial photographs.

Q. Which years?

A. Which years' aerial photos?

Q. Yes.

A. The early ones. I always call them the 43's. I can't tell you whether there's -- what particular ones were 43.

Q. And all the others that are available up to that?

A. Yes. Yes.

Q. The deeds, did you trace the deed history of the Blodgett property and the adjoining properties as well?

A. Most of them, yes.

Q. Did you see the old maps, the wallings and the Beards?

A. Ah-huh.

Q. And were there any other maps you used other than those? Well, maybe the town official -- town highway maps?

A. Town highway maps, early topo maps.

Q. Were there other surveys other than Rob's you looked at?

1 A. Bill Lowe survey. Well, there were some
2 others that were nearby. There was a Russ Capelle
3 survey.

4 Q. Did you look at anything that was not of
5 record at the Moretown land records other than the
6 old maps I guess?

7 A. I can't think of anything but --

8 Q. Did you create a survey?

9 A. No.

10 Q. Do you have a copy of Rob's survey or, Rob,
11 do you have a copy?

12 A. I do. I do.

13 MR. GILLIES: I want to make one that
14 would be usable for an exhibit.

15 MR. CUSICK: Paul's should be because
16 it's been condensed.

17 THE WITNESS: I have a tiny one here.

18 BY MR. GILLIES:

19 Q. All right. That's fine. May I see it?

20 A. Well, there's multiple. There's this, this
21 and this.

22 MR. GILLIES: Could we label these.

23 BY MR. GILLIES:

24 Q. Is this two of the same here?

25 A. No, one is trying to show the best fit

MR. GILLIES: That's okay. Shall we
take a minute to label them.

(Recess)

BY MR. GILLIES:

Q. We've now marked three exhibits. 1 and 2 are
the surveys and the third is the original road
survey I suppose. I mean, the first two are Rob
Townsend surveys, the third is the town survey.
And we also have a No. 4 in the works which is the
listing of the deed trace. Are there any other
materials that would give me a good idea as to your
opinion other than the materials we've sorted out
now?

A. I've got other roads that I looked at, GIS
maps.

Q. Well, let me be more specific. If I was to
look -- the purpose of this deposition is for me to
get to know what you know and would you say that
between these three documents that are in front of
me and the fourth one that that would be sufficient
for me to learn that?

A. No.

Q. Okay.

A. Because I did look at other roads in the
area. I looked at -- I played with if you will

1 efforts that Rob made.

2 MR. GILLIES: Shall we call them 1, 2,
3 3?

4 MR. CUSICK: Yes.

5 THE WITNESS: And I have this which is
6 chain of title which I have added to it,
7 edited.

8 MR. GILLIES: Okay if we make a copy
9 of that or --

10 THE WITNESS: Sure.

11 MR. GILLIES: I don't know if you have
12 the facility here to do anything but
13 piecemeal. We don't have to do it right
14 now.

15 MR. CUSICK: Do you have an original
16 copy of that somewhere? Is this the only
17 copy you have?

18 THE WITNESS: This is the only copy
19 with my notes on it. But this is -- the
20 underlying is Rob's and we have that copy
21 scanned.

22 MR. CUSICK: Do you have that with
23 you?

24 THE WITNESS: I don't think I do.

25 MR. CUSICK: I'm sorry, Paul.

different plottings of this description recognizing
that in order for Rob's work to work it required an
adjustment of the original description of the road
and so playing with other adjustments and things
like that.

Q. Well, just thinking in terms of documents
though, is there -- of the four that we have
mentioned is there a fifth or sixth that should be
included in this list for me to understand what
you're saying?

A. I don't think so but let's -- maybe as
questioning goes on I produce something I'll say,
oh, I should have said this will help.

Q. Exhibit 3, the road description from book 3
page 57, is the survey of the -- we all agree
that's the survey of the road that either does or
doesn't go across the Blodgetts' land?

A. Yes.

Q. Are there any alterations, discontinuances,
reclassifications, anything at all that relates to
this road subsequently to 1873?

A. Not that I found.

Q. When you were looking for the materials did
you find the Moretown road records in reliable
shape so that you could depend on their

comprehensiveness? Let me ask that in a different way: I'm sorry, I was working in progress here.

were there any obvious ellipses or holes in the record series that made you suggest the book was missing or that materials hadn't been added to the official record?

A. I'm not sure that I looked for that. I mean, I found a lot of road layouts and road events I'll call them in book 3. I didn't continue to look. I mean, I looked at some of the town records and looking for discontinuances but I wouldn't say I did an exhaustive job looking for every book to see if there were.

Q. Is book 3 essentially the road survey book?

A. I think it has a lot of the road surveys in it. Again, I'm not in a position to say that there are no other places.

Q. Did you look in indexes of the land records to see if there were road surveys?

A. I think I did. I don't recall seeing any.

Q. Were there any loose papers? Were they all bound?

A. Everything I looked at I think was bound.

Q. Did you go to AOT to the maps division to see any records they might have?

survey being the center of the road Moretown -- oh, it goes to the north -- I read the wrong line.

Thence north, maybe something's been cut off here, rods and 21 lengths to the north line of said lot.

A. So it actually starts here and goes to the north. This lot line up. It would be the lots --

Q. So the north line of the lot would be up here in the woods?

A. Yes, the terminus is somewhere along this lot line.

Q. So I should be looking at the beginning point which is at Cox Brook commencing on said road at the Smith Freeman sawmill bridge?

A. That's where another point we disagree on. I don't think that word in the original is bridge.

Q. You don't?

A. No.

Q. This exhibit is something that Rob put together?

A. It is.

MR. GILLIES: How would you -- maybe you could -- maybe it would be easiest to have a copy of this that Paul could write on and correct.

MR. CUSICK: I've actually got a copy

A. I didn't, no, other than what's available online with the historic town highway maps.

Q. I take that the orientation Rob Townsend put together is something you disagree with?

A. I do.

Q. We've started talking before about a particular description which Rob I think at the hearing said it needed a correction and it was at the -- I think it was at the -- maybe it was -- I'm looking at Exhibit 1 now, it was at -- was it at this point here?

A. That's where he's put the correction, yes.

Q. Other than this area do you have disagreements with his work? I'm pointing to the area where it suggests going one way and Rob believes it goes another way.

A. Yeah, there are a couple of disagreements. And I have to infer a few things but for one thing Rob's survey appears to go all the way to the Cox Brook Road and that's not what this layout says. He also seems to want to make it go to what he's seeing as a bridge abutment and that's also not what the layout says.

Q. Let's take that separately. The last line of the survey, and this is Exhibit 3, says the line of

here. It's a little bit larger but --

MR. GILLIES: I guess I can keep it straight if we use 3.

MR. CUSICK: It bothers me that the part of the edge might be cut off there.

MR. GILLIES: Oh, I see. Well, is this a copy we can use?

MR. CUSICK: Yes.

MR. GILLIES: How about calling that 5.

BY MR. GILLIES:

Q. So maybe you could take this pen if it's possible or that pen and go through the survey and this is the Rob Townsend's version of it and you mentioned bridge was something you don't believe is bridge?

A. Right.

Q. So you could like circle the words you disagree with and draw a line up and write the right word or the word you think it is. Start with bridge.

A. It's the only, I mean, other than --

Q. And what word did you think it is?

A. Privilege.

Q. Privilege.

1 A. I could also circle it in the original if you
2 like.
3 Q. That's okay. So where does this, the road
4 that's laid out in 1873 begin?
5 A. At the Smith Freeman sawmill privilege.
6 Q. And do you know where that is?
7 A. It's I believe a linear right that extends at
8 least down to the next road, the Tartaglia Road,
9 probably farther.
10 Q. Now, having been on the site visit down means
11 toward the east?
12 A. Towards "Gouldsville," yes, downstream.
13 Q. So you believe that this Exhibit 5 survey is
14 a description of the Tartaglia Road?
15 A. No, no, no, no, I'm saying that the privilege
16 extended at least that far because that road also
17 says it starts at the sawmill privilege.
18 Q. Privilege meaning a grant from the early
19 proprietors for the building of a mill or a
20 sawmill?
21 A. I'm speculating when I answer this question
22 but my speculation is there's a right sort of like
23 flowage rights, the ability to use the stream for
24 the sawmill.
25 Q. Is that engendered in any deed that you saw,

BY MR. GILLIES:

Q. If you're confused by any question I ask you
can say what do you mean. I was asking -- you said
it either is or isn't and so it suggested to me
that you had not a certain idea where it did begin.
A. I'm certain it begins on the privilege. I'm
not sure where that is. I don't know the extent of
the mill privilege. It clearly goes at least
downstream as far as the next road. I think it's
Tartaglia. It could even be the next road. I have
to look through my notes. It likely includes where
Blodgett is because there are some deeds referring
to a sawmill in that area.
Q. So the 1873 survey could actually relate to a
road across the Blodgett land?
A. It could.
Q. What other land might it cross, do you know
the present owners?
A. I'm not sure I know all the present owners.
It could --
Q. Well, you had a chance to look at the town
tax map?
A. Yes.
Q. That looks like it.
A. Well, it's the digital layer. It doesn't

1 the privilege?
2 A. Not that I found. I didn't search all of
3 Smith Freeman's. I looked at some of them. It
4 got -- he was a wheeler-dealer, did a lot of work
5 so I did not find the sawmill privilege.
6 Q. In your profession what does privilege mean?
7 A. A right.
8 Q. A right. And is it usually a right granted
9 by deed?
10 A. I don't know.
11 Q. Did you have a chance to look at the
12 proprietor's records for the Town of Moretown?
13 A. No.
14 Q. Do they exit?
15 A. Don't know.
16 Q. So I'll go back to that question a few
17 minutes ago which is where does the road laid out
18 in 1873 begin?
19 A. I don't know. I don't think anybody does.
20 It begins somewhere on the privilege and it ends on
21 the lot line and it either does or doesn't follow
22 those particular bearings and distances.
23 Q. So you are of more than one mind on this?
24 MR. CUSICK: Object to form. Go ahead
25 and answer the question.

have the names all on it. I did this --
Q. I don't need that as an exhibit but point out
the Blodgett property.
A. It's these parcels here.
Q. And --
A. Actually not that one. I think it's these
three.
Q. Is it your understanding that the privilege
is only along what is this?
A. Cox.
Q. Cox Brook. The privilege runs only on a
brook?
A. Again, I'm inferring a lot from having seen
two references to the sawmill privilege and having
seen references elsewhere the privilege which is
basically repairing rights to use the water.
Q. Would that privilege include the right to
flow land?
A. Possibly.
Q. Well, what were the references that you saw
the privilege mentioned in? What were those?
A. Another road layout.
Q. Can you tell me which one it is?
A. I think it's the Tartaglia Road but I
didn't -- yes, it's the Tartaglia Road.

Q. Can you give me the book and page?

A. Book 3 page 62. In the back of the book it says survey of the James Cannon Road to the place where Timothy, hard to read, Glennon maybe, Gleason, not sure, now lives commencing on the Northfield Road at Smith Freeman mill privilege.

Q. Okay.

A. Morrisette Place.

Q. That was one and was there another? Was it in a deed or --

A. I don't think so. Well, here, I've transcribed it. That was 1878.

Q. Did you do a title search of the Smith whatever it is, Freeman title back to the sovereign?

A. No. I went back farther than Rob's chain which we have.

Q. It's being printed. Did you go to the end of the Smith Freeman ownership though of the lots?

A. I went to where Smith Freeman -- before Smith Freeman got them.

Q. And of the deeds that you saw you saw no grant of a privilege or --

A. No, but I had compiled a list of Smith Freeman as grantee that I did not finish going

any other road that crosses the Blodgett land other than the Moretown Road? Are there competing roads --

A. Yes, there are other --

Q. -- on the Blodgett land?

A. I'm not sure they're on the Blodgett land but there are other road-like impressions in the landscape.

Q. I suppose it's easier for a surveyor to distinguish between logging roads and town roads, farm lanes?

A. Yeah, I think so.

Q. So what you saw suggested a town road, not farmland?

A. You mean where Rob has it? The difficulty in saying yes to that is that a great deal of that road has been widened and made to look different than I think it was say 75 or a hundred years ago so it's hard to tell whether it's in the same place, you know, again except for up near the lot line.

Q. When we did the site visit we visited four different sites as I recall, at least four. One was further up up the Moretown Cox Brook Road or whatever?

through.

Q. Is your work not completed if we were going to trial today?

A. It depends on what we're trying to show. Not to be argumentative but I think you have to show that it is there and I'm saying I don't think it is or at least there's not enough certainty that I would lay out the road and say this is where it is.

Q. Okay. Have you walked the land by the way?

A. I have.

Q. Is there any evidence of any road along the route that Rob has drawn?

A. Yes.

Q. Let me qualify that. Is there any evidence of an ancient road along that line?

A. Some.

Q. What would that be, stone walls?

A. Wire fences.

Q. Wire fences?

A. Yeah. Up at the upper end up near the lot line.

Q. Do you believe that area up near the lot line is the road that was laid out in 1873?

A. Not sure.

Q. Did you see indications in your studies of

A. Cox Brook.

Q. Then there was at least two below the site of the Blodgett home, did you see all of the -- did you walk the length of the river and the roads that are connecting to it?

A. I walked the river with waders on from somewhere up in here, probably a thousand feet above the Blodgett property and followed it down to maybe 500 feet below the Blodgett property.

Q. Any evidence of abutments of any sort or remains of abutments along that tour?

A. Several.

Q. Can you point to them on, let's see, how about the one we were just looking at?

A. You know, I don't --

Q. Maybe you can't. Maybe I'm asking too much of your recollection. What did you see -- what was the bridge abutment closest to the Blodgetts'?

A. Well, let me quibble a little. You're saying bridge abutment and I'm not sure that everything that I saw, nor am I sure that what Rob is calling a bridge abutment is, in fact, a bridge abutment as much as a bolstering of the road above it.

Q. Okay. The thing that we're talking about that was closest to Blodgetts', what did it look

1 like and where was it?

2 A. Well, there are two things, things, that you

3 might say are on the Blodgett property: One is the

4 thing Rob is calling an abutment, the other is some

5 timbers and chunks of concrete. So then going

6 upstream there are some -- and this does -- I would

7 almost bet that it's on the Cox Brook Road and it

8 is, in fact, a shoring up of the road. Go a little

9 farther upstream, I don't know, a few hundred feet

10 and on the non-Cox Brook Road side of the brook is

11 some stones clearly set there for some purpose.

12 Q. Did any of your research turn up an

13 alteration of the Cox Brook Road in the area of the

14 Blodgetts' house?

15 A. No.

16 Q. As a surveyor are you comfortable giving an

17 opinion about where it would make sense to put a

18 bridge along Cox Brook, say, 500 feet up or 500

19 feet below the Blodgett home?

20 A. Are you asking if I have the expertise to

21 pick a good engineered site for --

22 Q. I'm not asking to be an engineer but I'm

23 asking as a surveyor to say this would never be a

24 good place for a bridge or this would be an okay

25 place or this would be a marginal. If there was a

1 bridge at the location that Rob believes that the

2 road crosses, would it make sense?

3 A. It could make sense. I think there are

4 better places requiring less, in the near vicinity

5 that would require less effort.

6 Q. Assuming that the -- is it fair to assume

7 that the bridge was related to the sawmill?

8 A. I don't know as it's fair to assume that

9 because I don't know what the toe in the door to be

10 talking about a bridge is. Again, it's not -- as

11 far as I'm concerned not in the road layout.

12 Q. Do you see any remains of the sawmill?

13 A. No, I didn't.

14 Q. Did the location of the -- was the location

15 shown on the Wallings map of the sawmill?

16 A. I don't think so. I'm not sure I have

17 Wallings with me. I may have Beards.

18 Q. Let's just clear that up. Were there any

19 maps that you saw that showed location of the

20 sawmill?

21 A. I didn't.

22 Q. Were there any deeds that suggested to you

23 the location of a sawmill?

24 A. Of a sawmill, yes, because one of the Smith

25 Freeman deeds apparently had a sawmill on it

already, reference to another individual.

Q. Is the Smith -- well, the Smith Freeman privilege the same as the Smith Freeman landholdings?

A. I don't believe so but I'm not, you know -- and I say that because of the extent of the Cox Brook upon wherein it is referenced.

Q. Did Smith Freeman own more than what the Blodgetts own now?

A. Yes, I believe so.

Q. And when you saw that evidence or suggestion of a sawmill in a deed do you know where it was located?

A. I think on the Blodgett property.

Q. On the Blodgett property?

A. Yes, when you trace back there would be reference to it.

Q. This would be a hydro powered sawmill?

A. You know, I thought there was some reference to horsepower but I think it was probably a hydro powered sawmill.

Q. Would there have been a mill dam necessarily?

A. Not necessarily. I mean, it could be a series of, you know, run of the river sort of thing, pipe, intake pipe up. There's a pretty good

drop on Cox Brook there.

Q. So maybe there was a pipe that turned the wheel or --

A. Yeah.

Q. Let's talk about the footprint of the road as laid out in 1873. Do you agree with Rob's work regardless of where it is, if we were just to lift it out of the geography and just put it on a bare map would you agree that, say, starting at a place and with its various movements left and right and distances with for the moment the exception of this judgment area where we could call it area A maybe, area 51 maybe, would you say that he has -- has he made any mistakes in terms of location of the lines on the survey, again, not concentrating on where it is on earth but just in terms of the footprint?

A. I have to say I don't know because there's no bearings and distances on the map. And I can't tell how -- from the map what he wrote, you know, how he dealt with change in magnetic declination between 1873 and today.

Q. Did you plot a version of the road?

A. Several, yeah.

Q. Did it look sort of like it?

A. It's generally, yes, in general it's fine.

Q. Putting yourself in his position for a minute in area 51 or area A we're talking about here, how would you make the judgment in that situation? How do you go about it as a surveyor generally between a -- with what appears to be a mistake of either direction or length?

A. Well, at some point I would -- in other words, if you have enough ambiguity in a deed, just sort of making it work I think it's beyond our purview. It sort of forgets the quasi part of the quasi judicial function and at some point when the result of correcting mistake is maybe -- causes as much havoc as it does my response is let's get people together and figure out what works and where we can put a road that doesn't wreak havoc because I think there's enough other flaws -- again, this iteration of the road goes all the way to the Cox Brook Road and that's not what the layout says so there's clearly other errors that need to be corrected.

Q. Have you seen road layouts in the Town of Moretown that don't connect roads to roads?

A. I guess I didn't ask that question when I looked at, you know -- oh, you mean starting at a road and ending at a road?

Q. Actually the opposite starting not at a road and ending not at a road, have you ever seen anything like that?

A. I can't say as I did.

Q. And would it make sense that a road that begins at a privilege would not begin on a road?

A. I guess it depends on who was trying to get someplace.

Q. Well, assuming --

A. In other words --

Q. -- for the sake of this question that the road begins not on a road but on a privilege which we're saying, which is to say not connected to the road, how could it be a public road?

A. Well, there could have been -- I didn't search for every little stub of a road. There could have been another road, a short road that went from Cox Brook to the brook.

Q. Did you see any within the range of your studies that might serve as such a linkage?

A. I didn't, no.

Q. So you described general terms how we would handle area A. Is what you're saying your opinion as to this particular layout as well, that having looked this over you would say you folks better

settle this by mediation rather than try to force something, is that what this kind of development, is there mistake sufficient to make you want to not try to find it a road?

A. Not try what?

Q. Not try to make the survey work.

A. I think there's enough, there are enough problems with it that I, again, I would not tell my client here's where your road is, bring on the bulldozers, build a bridge, go for it.

Q. Is it your understanding that bulldozers would be involved?

A. No, not at all.

Q. Or a bridge?

A. Well, I don't know what's to be involved but I would not tell my client you're good to go for whatever purposes.

Q. And you alluded to other problems in area A, could you enumerate them?

A. Well, the fact that it goes beyond -- the distances go beyond the brook and my -- the implication I see in that is that it starts at the brook and even if you -- I think if you even use the word bridge you still have the same issue. In other words, if there were a bridge there in Smith

Freeman's time and if that's where you were arguing -- if you were arguing that that doesn't say privilege, that it says bridge you still don't get over the Cox Brook Road but this survey does.

Q. In other work you've done have you seen the word privilege used?

A. I'm reading a book on the Erie Canal and they used it in there. I don't know if that counts as my work or not.

Q. Okay. Anything else?

A. Well, idea being that the riparian rights that benefit an owner.

Q. As a surveyor you would expect to find those riparian rights incorporated in a deed of some sort?

A. In a document, I would. And, again, I -- given the authorization from my client I would love to go look for it. I feel certain that Smith Freeman got them somewhere since the town was aware of them and two roads were laid out starting at his privilege.

Q. Okay. And what was the other road that was laid out at the privilege?

A. The Tartaglia.

Q. Your comments suggest that you were on a

1 limited budget and that you didn't have all the
 2 time you needed to do the research?
 3 A. I think that's a fair characterization.
 4 Q. Did you have anything to look at from
 5 Townsend's work other than the survey and
 6 apparently you had his, what do you call it, title?
 7 A. Chain of title.
 8 Q. Chain of title.
 9 A. I'm sorry.
 10 Q. Anything else that you got from the --
 11 A. No, just those -- well, let me make sure I'm
 12 telling you the truth. I don't think so.
 13 Q. I see you have a copy of the lotting plan.
 14 Did that help at all in the work you did on this?
 15 A. Yes.
 16 Q. Did you find a way of connecting the lotting
 17 plan with the orthos or the town --
 18 A. Yes.
 19 Q. -- with this map that was the basis of the
 20 tax map?
 21 A. Yes, it's a bit of a chicken and egg process
 22 but I used the tax map and some visible lines on
 23 the ortho photos and this map here, the yellow
 24 lines represent my best effort at reproducing the
 25 lot lines. And this just didn't happen to have the

1 photo underneath it but part of what got me to lay
 2 the lot lines in like that was the tax map and --
 3 well, here's a smaller -- field lines like this
 4 and, you know, actually we went to this point here
 5 and that's what these red dots represent, GPS
 6 readings. And this line up here, the Bill Lowe map
 7 I mentioned calls that the lot line so --
 8 Q. So you would place the Blodgett land in lot
 9 33 of what division and what range?
 10 A. It is lot 33. I don't know the answer to
 11 that. I could look at the deeds.
 12 Q. Well, you could help me just by pointing to
 13 it on that.
 14 A. There's 33. This corner where the road ends
 15 is near the corner of -- where the visible road
 16 ends near the corner of 37, 36, 33 and 32 which
 17 would be right there.
 18 MR. CUSICK: Where are you pointing
 19 to, Paul for the record?
 20 A. I'm pointing to a version of the lotting plan
 21 that I got off the Secretary of State archives
 22 website and I'm pointing to the common corner for
 23 lots 36, 37, 32 and 33.
 24 Q. Years ago I deposed Paul Bigelow, an old
 25 surveyor from -- who had spent a lot of time in

Moretown who told me that the lotting plans for the
 town were all wrong. Any reaction to that from the
 work you've done in Moretown on this or any other
 work?

A. I think you could probably say that about
 many towns, maybe most towns so you kind of have
 to, you know, work with what you've got. I've done
 some work over on the -- what you think of more as
 the Mad River Valley side of things and those lots
 lined up, in fact, probably the same share of lots
 coming across -- I'm sorry. Well, never mind.

Q. And the history of Moretown in this area,
 this would be the Berlin side over here?

A. Yes.

Q. On the east side. Was the line that
 distinguished Berlin and Moretown, did that remain
 the same or was there adjustments, were there gores
 that required it to be altered over the years?

A. Can I interrupt? I think I just pointed to
 the wrong intersection of those. And it says
 second division. It's here, 35, 36, 33, 34.

Q. All right. So it would be the northwest
 corner?

A. Yes, because here's Northfield. This is a
 little screwy because north is down the page. So

here's --

Q. Oh, wait. So north -- of course, it's south
 of it so it would be the southwest corner?

A. Right. So it's this. I'm going to go ahead
 and circle it.

MR. GILLIES: Now I've forgotten that
 question I was asking. Would you read it
 back.

A. Something about --

(Question read)

BY MR. GILLIES:

Q. Sometimes when a town abuts another town the
 line is in dispute. Williamstown and Berlin would
 be example. Any evidence in terms of the research
 you did as to whether the line that separates the
 two towns was ever disputed or altered by the
 legislature?

A. Not that I found but I wasn't looking for
 that.

Q. Not having seen the proprietor's records do
 you know the name of the proprietor to whom lot 33
 was granted?

A. If I do, it isn't in my head. Maybe in these
 documents.

Q. Were you comprehensive in answering my

question as to the problems that existed with the original survey? You mentioned the area A and the nexus or the starting point as a bridge or privilege. Were there any other inherent problems with the survey as it applies to work on the ground?

A. Again, only my frustration in not having the data, in other words, the bearings and distances and the rotation angle, just seeing if that's what --

Q. Rob will be able to tell us perhaps in his deposition why he chose this locus or location but to the extent that Rob's orientation of the 1873 survey appears to track an existing road does that -- is that irrelevant to your conclusions about the --

MR. CUSICK: Object to the form of it.

Go ahead and answer the question.

A. It's not irrelevant. It's just --

Q. Not determinative?

A. Thank you.

Q. But isn't it a coincidence of some value?

A. Well, again, I could -- in fact, I did take a totally different correction of that area 51 and made it come out at a bridge abutment, one of the

can rotate one bearing and all the others can be made to fit whatever you want to make them fit.

Q. And that must be a constant problem in dealing with old roads?

A. Yes.

Q. The dropped number or the mistaken east to west, south, north, whatever. At what point if it's possible to say do you give up and say let's go to the bargaining table, is there a flash point?

A. There's not a bright line that I can draw for you. I would have on this one.

Q. You would have?

A. Yeah.

Q. And although it's somewhat academic to ask, if the issue of the privilege were not here would the mistaken or the error in the alignment at area A be sufficient to justify a conclusion that you need to go to the bargaining table?

A. I missed the first part of the question.

Q. I was saying -- I'm trying to do -- what I usually do is to say let's forget the privilege argument for a minute and just look at this area A where there's a --

A. In other words, if we don't care where the road ends -- well, actually in this case begins

other ones that I found.

Q. Did you draw that?

A. I think I only have it on the computer. I don't think I have it.

MR. GILLIES: Steve, could you help us -- could you supply us with a copy of that?

MR. CUSICK: Yes. You mean afterwards?

MR. GILLIES: Yes.

MR. CUSICK: Yes, we can produce it.

BY MR. GILLIES:

Q. If you wouldn't mind?

A. No, no, no, I don't mind at all. I just -- I don't think I printed it out. There was a lot of trial and error and that's what some of these things are and just seeing what works and --

Q. In that particular one you said it led to a bridge abutment?

A. It led to one of the things that I found along the --

Q. Could you show me where that would be?

A. It would be upstream quite a bit in here somewhere. And, again, I was -- you know, my goal was to try to make the point you can take -- you

because that's your working --

Q. What I'm trying to do is get at the idea how critical the problem is with this course?

A. I guess I'm still at a loss as to how to answer it. It does -- you know, when you interject that correction it gets close to the road. Is that a coincidence? Probably not but --

Q. How legitimate is it for you to adjust a road layout's metes and bounds to fit what appears on the ground?

A. I guess when -- part of the answer to that is what appears on the ground and how like an ancient road does it look. And again my contention is once you get down past the lot line it doesn't look like an ancient road. Why? Well, maybe because it's been expanded and a lot of dozer work and so on and so forth but I don't see the traditional big old maples and stone walls and wire fences framing the road. I see scars that are, you know, newer, perhaps related to logging but not -- you know, it doesn't make me say ah-huh, I can fit this good old evidence on the ground by correcting that one bearing.

Q. I believe the people that maybe triggered this whole dispute have land to the east of Cox

1 Brook.

2 A. I think of Cox Brook as running east west. I

3 know it doesn't.

4 Q. North then, north of it. In your research

5 did you find that such properties would otherwise

6 be landlocked but for a road that reaches from Cox

7 Brook over to them?

8 A. I didn't do that level of research.

9 Q. I notice that on this map that there are

10 some -- well, there's a little dot there. I don't

11 know, I should be asking Rob but did you walk the

12 length of that? And if you did, did you see any

13 cellar holes or --

14 A. I only walked the length of this. I didn't

15 go up north of these. I think that dot is an iron

16 pipe.

17 Q. Oh. And who put that iron pipe in, do you

18 know?

19 A. Likely Bill Lowe.

20 Q. What was Bill's assignment, do you know? Can

21 you tell from the result?

22 A. He was surveying land to the north of east.

23 Q. Any mention in the land records of the

24 Blodgett property back as far as you go to a road

25 other than Cox Brook?

1 A. Yes.

2 Q. What deeds and what references?

3 A. I'd have to look through this pile here but

4 there are some.

5 Q. What do you recall?

6 A. I recall reference to the pent road -- this

7 is -- there are the parcels right -- the smaller

8 parcels right down on Cox Brook and then there's

9 the larger parcel, I think it's 20-ish acres, 20 to

10 25 acres that Calvin owns and I think that mentions

11 the pent road as a boundary for part of it.

12 Q. And I may have asked you this, I apologize,

13 is there any other indication of any roads on the

14 Blodgett property today whether they're farm roads,

15 logging roads or otherwise?

16 A. Yeah, there are some depressions, some, you

17 know -- well, and I'm not even sure they're on the

18 Blodgett property. They may be on adjoining

19 property.

20 Q. When you found that bridge abutment or that

21 road when you could put the alignment together and

22 end up in that bridge abutment I'm wondering was it

23 as high -- this is going up or am I in the other

24 direction?

25 A. There's the Tartaglia Road. There's the

series of roads, yes.

Q. My recollection is that on the site walk we came up and went up as high as here. Well, there was a road I saw somewhere along there.

MR. BLODGETT: Right at the first -- well, my --

MR. GILLIES: Well, we have to swear you in to get you --

BY MR. GILLIES:

Q. So does that help? Was this as high up as you went?

A. I think I went higher than that and it wasn't as high as that.

Q. I guess what I'm asking you is on this map which we should also add to our exhibit list and you may want to --

A. That's fine I can read, well, except for the notes on it.

Q. Or we could do a photocopy on that too. But could you indicate about where you thought that road went?

A. In here somewhere, in other words, upstream from the Blodgetts and I think the property owner is a woman. That's the property that -- I think it's George and Elizabeth Jeffrey. That was 1943

so there's got to be a newer owner than that. Anyway, it's the next.

Q. Was it on land that could have belonged to the sawmill?

A. I don't believe the land ever did but the privilege might have extended up that far.

Q. So you treat privilege as a kind of easement?

A. I'm suggesting it's -- it has to do with running the sawmill and use of water. And I'm not sure, you know -- it is curious to me that the next road downstream would be starting at the privilege if that water were going to be used in an upstream sawmill. In other words, the possibility of an additional sawmill downstream that Smith Freeman owned exists, why would you have mill privileges downstream from your mill.

Q. I don't know. Maybe to compete with yourself for the stream flow. But is it possible that the 1873 road is the Tartaglia Road and that it was inadvertently forgotten and relaid out or relaid out?

A. There's only a difference of five years between the layout, and the survey of the Tartaglia Road fits the Tartaglia Road pretty well. And it doesn't -- that road doesn't go the lot line. It

1 does have some suggestion of continuing up. You
2 could imagine walking through the woods where one
3 could continue on over to the road in question.

4 Q. Help me understand this -- well, why don't we
5 have this marked and then I can ask questions about
6 it.

7 (Recess)

8 BY MR. GILLIES:

9 Q. What's the color, different colored -- what's
10 the colors mean in No. 6?

11 A. The colors mean I wanted to have different
12 colors. The yellow line -- the black lines
13 generally are the tax parcel data layer. The
14 yellow lines are my effort at overlaying the town
15 lotting plan. The various other lines -- and then
16 the sort of dashed black and white lines are the
17 VCGI --

18 Q. These?

19 A. Yes, that's the road layer, the GIS road
20 layer maintained or housed at Vermont Center for
21 Geographic Information. And then the various other
22 colored lines were playing around with, you know,
23 the 1873 road layout having rotated it. This map
24 is based on grid north so having rotated that
25 degree north I've plotted it.

1 Q. Do any of the colors represent Rob's layout?

2 A. The green one does.

3 Q. Do any of the lines represent roads you found
4 on the ground or are these all --

5 A. These are all theoretical, you know, what if
6 you started here where does it end you, what if you
7 started, you know, used the description unchanged,
8 in other words, not correcting the area A.

9 Q. Now looking at 4, this is the one that has
10 the chain of title, and this is Rob's work but
11 you've added some things on it?

12 A. Right.

13 Q. First of all, did you find he made any
14 mistakes?

15 A. Some.

16 Q. Sorry.

17 A. It's always easier to criticize.

18 Q. Your turn is coming.

19 A. Right, exactly. Oh, I found a book and page
20 reference that -- I found a deed reference that I
21 don't think was correct. Mostly what I added were
22 my -- things to clarify my in own head what we were
23 talking about.

24 Q. So if we're looking up in the upper left-hand
25 corner that's just a typo or a transposition of

some sort?

A. Well, I'm not sure. He's got a book 28 255
1955 deed as though that's where Blodgetts got the
parcel from but, in fact, they got it in 1980 book
36 so it's just a wrong --

Q. But most of your notes are at the bottom of
the chain?

A. Right, because I was going back farther. And
here's another -- I mean, this may be nit-picking
but Rob's got a note that says road mentioned.
when I look at that the implication being the road
in question but, in fact, it mentions the main
road. It's not mentioning -- it mentions the Cox
Brook Road.

Q. You wouldn't consider that a material defect?

A. No, no, but misleading.

Q. And this was the document, Exhibit 4, that
you also used or did you have -- did you go through
the whole process or did you sort of boot strap on
this --

A. I used this as a --

Q. -- model, guide?

A. -- jumping off place. I mean, I checked all
the deeds all the way back through. And just so
you understand my shorthand if you see a C with a

square around it it means I copied that deed.

Q. Oh.

A. I don't think there's one on there but an M
with a square around it means I've got a map of it.

MR. GILLIES: Good. I think I'm done.

I just want to take a little break and
I'll be right back.

MR. CUSICK: Sure.

(Recess)

MR. GILLIES: I'm done. Want to
switch places.

(Whereupon, the deposition was
adjourned at 11:10 a.m.)

SIGNATURE PAGE

I have carefully read the foregoing deposition and the answers made by me are true.

PAUL HANNAN

STATE OF _____
COUNTY OF _____

At _____ in
said County, this _____ day of
_____, 20____, personally appeared
the above-named PAUL HANNAN, and made oath
that the foregoing answers, subscribed by PAUL
HANNAN, are true.

Before me,

Notary Public

My commission expires:

CERTIFICATE

I, Virginia L. Simmer, Registered Professional Reporter, certify:

That the foregoing proceedings were reported stenographically by me at the time and place herein set forth;

That the foregoing is a true and correct transcript of my shorthand notes so taken;

That the witness was sworn by me as a Notary Public for the State of Vermont;

That I am not a relative or employee of any attorney of the parties nor financially interested in the action.

The certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Virginia L. Simmer

My Commission expires February 10, 2015.

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