

GORDON J. SCHOEFFLER

ATTORNEY AT LAW

E-mail: gordon@gjlawoffice.com

December 20, 2021

730 Jefferson St. (70501)
P.O. Box 4829
Lafayette, LA 70502
337-234-5505
Fax 337-261-0799

Case/Kurzweg & Others Properties, LLC
through registered agent, Victor Devin Gum
8675 Bluebonnet Blvd., Ste. A
Baton Rouge, LA 70810
Via Certified Mail/ RRR

Miller Hunting Club, LLC
through registered agent, Benjamin Miller
1451 W. Gum Ave.
Eunice, LA 70535
Via Certified Mail/ RRR

RE: Dredge/Fill Material placed in Pat's Throat Bayou, Sec. 35- T9S-R9E, Iberville Parish, LA (approximate Lat/Long coordinates 30 17' 20.7"N, 91 34' 306" W)

NO: N/A

To whom it may concern,

Please be advised, this firm has been retained to represent the interests of the Louisiana Crawfish Producers Association West, Inc. as well as numerous individual commercial fishermen who have been and will be adversely impacted by the placement of dredge/fill material in Pat's Throat Bayou, Sec. 35- T9S-R9E, in Iberville Parish, LA. The specific location of the fill material placed is at approximate Lat/Long coordinates 30° 17' 20.7"N, 91° 34' 306" W. Attached are photographs of the fill.

We understand that Case/Kurzweg claims ownership of the land and banks adjacent to Pat's Throat Bayou and that it leases said property to Miller Hunting Club, LLC for hunting purposes. We further understand that one or both placed fill across the bayou, in an effort to create a land bridge apparently for use by 4-wheelers and ATV/quads for hunting purposes. We are currently investigating whether a US Army Corps of Engineers permit was obtained for the placement of fill materials in the bayou.

Under any circumstance, this bridge serves as an impediment to vessel navigation and to the flow of water on and in the bayou. Pat's Throat Bayou is a major conduit of oxygenated river water that sustains commercial fisheries for hundreds, if not thousands, of acres of water-bottoms both upstream and downstream of the bayou, including the large fishery contained in Billy Little Lake upstream. Blocking the flow of water and vessel traffic on this bayou has and will cause future damage to the many commercial fishermen that utilize these fisheries- including loss of revenues. The impoundment also serves as a hazard to unwitting mariners as there are no warning or navigation lights/ reflectors on the structure.

Thus, please allow this letter to serve as formal notice of the harm, damages, problems, and hazard posed to my clients by the placement of dredge/fill material in Pat's Throat Bayou referenced herein, and your exposure to liability for damages as a result thereof. This letter shall further serve to put you on notice that the placement of said fill and material in Pat's Throat violates Federal navigation and Clean Water Act laws as well as Louisiana laws pertaining to the navigation (La. C.C. Art. 458), dams (La. R.S. 38:22, et seq), and drainage (La. R.S. 38:214, et seq).

Please allow this correspondence to further serve as formal demand for the immediate removal of the subject land bridge and full restoration of Pat's Throat Bayou to its condition prior to the placement of same. Should the bayou not be restored within a reasonable time, my clients will be seeking all relief afforded them by law.

I thank you for your attention to this matter. Should you or your legal counsel have any questions or concerns, do not hesitate to call or have your attorney call.

Sincerely yours,

GORDON J. SCHOEFFLER