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**MEMORANDUM**

TO: Honorable Mayor and Council Members

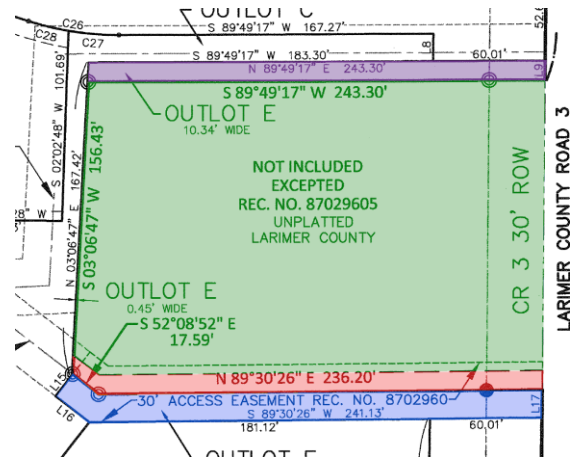
FROM: Law Office of Avi S. Rocklin, LLC <sup>AS</sup>

DATE: February 24, 2021

RE: Coonrad Property – Request for Disconnection

Attached please find a request from property owners, Brittany and Jonathan Coonrad, for disconnection of property from the Town. The property is located at 641 North County Road 3 and is an enclave of the Town. The title and jurisdictional issues are complicated. Based on a conversation with the Coonrads' counsel, this Memorandum provides a brief summary.

A depiction of the property at issue is shown below:



The Coonrads own and have clear title to the purple, green and blue portions of the property. The Coonrads are commencing a quiet title action to clarify their title to the red portion of the property and to create a single parcel and legal description for the entire property. Based on the Maplewood Annexation in 2007, the Town boundaries: (i) do not include green portion of the property; (ii) include the blue portion of the property; and (iii) may include the purple or red portions of the property. If the annexation map is read to include property described by deed, then the red and blue portions of the property were annexed into the Town. If the annexation map is read to include property described by monumentation, then the purple and blue portions were annexed into the Town.

The Coonrads do not want a portion of the property in the Town and a portion outside the boundaries of the Town and are thus requesting that the Town disconnect whatever portion of the property is in the Town. Since the scope of the property in the Town is unclear, the Coonrads are requesting that the Town affirmatively disconnect the purple, red and blue portions of the property.

As an aside, because of unclear title, the Thompson Crossing II developers, rather than resolve the title issues, created Outlot E, which includes the blue and purple portions of the property and only added to the confusion.