

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

ANNE WHITE HAT, RAMON MEJIA,  
KAREN SAVAGE, SHARON LAVIGNE,  
HARRY JOSEPH, KATHERINE  
AASLESTAD, PETER AASLESTAD,  
THEDA LARSON WRIGHT, ALBERTA  
LARSON STEVENS, JUDITH LARSON  
HERNANDEZ, RISE ST. JAMES, 350 NEW  
ORLEANS, and LOUISIANA BUCKET  
BRIGADE,

*Plaintiffs,*

*v.*

JEFF LANDRY, in his official capacity as  
Attorney General of Louisiana, BO DUHE, in his  
official capacity as District Attorney of the 16<sup>th</sup>  
Judicial District Attorney's Office; RONALD J.  
THERIOT, in his official capacity as Sheriff of  
St. Martin Parish,

*Defendants.*

CIVIL ACTION

NO. 19-CV-00322

JUDGE JOHN W. deGRAVELLES

MAGISTRATE JUDGE  
ERIN WILDER-DOOMES

**ST. JOHN DECLARATION IN SUPPORT OF DEFENDANT'S OPPOSITION TO  
PLAINTIFFS' MOTION TO SUPPLEMENT**

I, Joseph Scott St. John, make this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Supplement. This declaration is based on my personal knowledge, and I could competently testify to its contents if called to do so.

1. I am a Deputy Solicitor General employed by the Louisiana Department of Justice. I am counsel for Attorney General Landry.

2. I am informed and believe the document attached hereto as Exhibit 10 was produced to Plaintiffs in response to a public records request. This appears to be the document referenced in Paragraphs 22, 99, and 100 of Plaintiffs' Proposed Supplemental Complaint. Page 4 of this documents states that "the UCAR pipeline runs directly through the long axis of the [Buena

Vista] cemetery.” In addition to redactions made by the State, UTM coordinates are redacted from this version.

3. I am informed and believe that the referenced “UCAR pipeline” corresponds to the right of way recorded at Book 428 Page 31, as amended at Book 456 Page 427, of St. James Parish, the recorded conveyances for which are attached to Defendants’ RJN as Exhibits 6 and 7.

4. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF LOUISIANA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana this 27th day of July 2020.

/s/ Joseph Scott St. John  
JOSEPH SCOTT ST. JOHN