Rappahannock County

Piedmont District

NAME OF CEATERNAT

#261 - Priest, A.M., and Jessie P.

Number of Acres: Lot #19 - 20

Location: At Panorama on east side of Lee Highway, entirely within the Park Area.

Roads:

Fronts on the Lee Highway.

Soil: Gravelly loam; surface smooth and almost level.

History of Tract and condition of timber: Was cleared and cultivated, but purchased as a building lot several years ago. Not yet improved with fence or buildings.

Improvements: None.

Acreage and value of types:

Minerals:

Value of Land: \$ 300.00

Value of Improvements: \$

Value of Orchard: \$

Value of Minerals: \$

Value of Timber: \$

Value of Wood: \$

Value per acre for tract: \$

Incidental damages arising from the taking of this tract: \$ NONE

Ho. W. fri CLERK

County: Rappahannock District: Piedmont

#261 - Priest, A.M., and Jessie P.

Acreage Claimed:	Assessed:	.79 A.	Deed:	.79 A
Value Claimed:	Assessed:	80.00	Deed:	\$225.00

Location: At Panorama on east side of Lee Highway, entirely within the Park Area.

Incumbrances, counter claims or laps: None so far as known.

Roads: Fronts on the Lee Highway.

Soil: Gravelly loam; surface smooth and almost level.

History of tract and condition of timber: Was cleared and cultivated, but purchased as a building lot several years ago. Not yet improved with fence or buildings. Known as Lot #20.

Improvements: None.

Value---"Lot #19 - - \$200.00 Lot #20 - - \$225.00 Total Value- - \$425.00

Lot #19 contains 70/100 A. Lot #20 contains 79/100 A. STATE COMMISSION ON CONSERVATION AND DEVELOPMENT

.V. ANSWER AND OBJECTIONS. NUMBER <u>151-151-a</u> J. A. WILLIAMS, PAUL TAYLOR, R. L. CHEATHAM AND A. M. PRIEST.

The joint and separate answers of J. A. Williams, Paul Taylor, R. L. Cheatham and A. M. Priest to a petition exhibited against them and others in the Circuit Court of Rappahannock County, Virginia, by the State Commission on Conservation and Development, petitioner, and the objections of the said J. A. Williams, Paul Taylor, R. L. Cheatham and A. M. Priest to the said petition and the condemnation of land a of the said respondents.

These respondents , reserving to themselves the benefit of all just exceptions to the said petition, for answer thereto, or to so much thereof as they are advised that it is material that they should answer, answer and say, and make their objections to the said petition and the proceedings had thereon as follows:

That the postoffice addresses of respondents are as follows:

J. A. Williams, Luray, Virginia, R. L. Cheathem, Luray, Virginia, Paul Taylor, Luray, Virginia, A. M.Priest, 4419 P Street, Northwest, Washington, D. C.

That the said J. A. Williams, Paul Taylor, R. L. Cheatham, and A. M. Priest are the fee simple owners of a certain tract of land sought to be condemned by said petition, filed by the said State Commission and Conservation and Development. That the said land is situate in the counties of Rappahannock and Page in what

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The description of said land and the improvements thereon is as follows:

The said land consists of 300 acres, more or less. Two hundred(200) acres, more or less, of said land is situate on the mouth side of a highway known as the Lee Highway, in both of the said counties of Page and Rappahannock, in the Blue Ridge Mountains, and designated and known as the "Mary's Rock" tract; about one hundred (100) acres, more or less, of said land is situate on the north side of the said Lee Highway, and said tract is known and designated as the "Hotel" tract. Of the said tract of one hundred acres, more or less, about 35 acres are situate in Page County, and about 65 acres are situate in Rappahannock County. Said tracts of land with the improvements thereon are operated as a summer resort and is named Panorama. All of said land lies at or near the summit of the Blue Ridge Mountains, and is situate within the proposed boundaries of the proposed Shenandoah National Park.

The following improvements are on the tract of land, designated as the "Hotel" tract: A building known as the Tea House, situate in Page County, a building used as a filling station with the necessary equipment for a filling station, a building of sixteen rooms used as/hotel, eight cottages varying in size from cottage containing two bed rooms, a living room and bath to cottages containing six bed rooms, a living room and two baths, a building known as a Dining Hall, a building used as a kitchen, a garage and a bath house. That the special investigators or appraisal commission has valued both of the said tracts of land of about 200 acres and about 100 acres, together with the improvements thereon, at only sixteen thousand and five hundred dollars (\$16,500.00), the said sum of \$16,500.00 being the entire amount at which all of said land consisting of about 300 acres, together with the said improvements, was valued.

That these respondents, J. A. Williams, Paul Taylor, R. L. Cheatham and A. M. Priest aver and allege that the fair value of said land consisting of about 300 acres, together with the improvements, is greatly in excess of the said sum of sixteen thousand and five hundred dollars (\$16,500.00).

That the said value of \$16,500.00 placed upon the said land by the said appraisal commission is a grossly inadequate value and is so inadequate as to shock the conscience. That it would be inequitable and unconsionable to deprive these respondents of their land at the price of \$16,500.00 .

WHEREFORE, these respondents pray that if their lands are taken, that they may be allowed an adequate compensation therefor, that a jury may be impanelled to ascertain the quantum of damages, to which the said J. A. Williams, Paul Taylor, R. L. Cheatham and A. M. Priest are entitled, and for general relief, and they will

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year the said Land is situate in the counties of

Sappakamook and Page

State of Virginia, Page County, to-wit:

J. A. Williams, one of the respondents named in the sai foregoing answer, being duly sworn, says that the matters and things therein contained are true to the best of his knowledge and belief.

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Taken, sworn to and subscribed before me this 14th day of July, 1932.

A Commissioner in Chancery for the Circuit Court of Page County, Virginia.