

UNITED STATES
DISTRICT COURT
WESTERN DISTRICT
OF LOUISIANA
PORT ARTHUR
PIPELINE, LLC
(v.)
9.29 Acres of Land,
More or Less, in
Calcasieu Parish,
Louisiana and the Estate
of Kenneth Paul Lyons,
through an unknown
representative, Helen
Jean Schumacher
Lyons, Robert Charles
Babcock, Deborah
McLemore Babcock and
Dorothy Lyons Belile,
Phillip M. Lyons, Richard
J. Lyons and Marie
Elder Lyons in their
Capacity as Co-Trustees
and Representatives of
Lyons Family Trust
CIVIL ACTION
NO. 2:23-cv-01385-
JDC-KK
JUDGE Cain
MAGISTRATE Kay
AMENDED FRCP RULE
71.1(D) NOTICE OF
COMMENCEMENT OF
CONDEMNATION
ACTION
To: The Estate of Ken-
neth Paul Lyons, through
an unknown represen-
tative
Helen Jean Schumacher
Lyons
531 W. Lincoln Street
Sulphur, LA 70663
Robert Charles Babcock
450 Kim Street
Sulphur, LA 70663
Deborah McLemore
Babcock
450 Kim Street
Sulphur, LA 70663
Dorothy Lyons Belile, in
her capacity as Co-Trust-
ee of the Lyons Family
Trust
1003 Castian Lane
Houston, TX 77090
Marie Elder Lyons, in her
capacity as Co-Trustee
of the Lyons Family Trust
12438 Meadow Lake
Drive
Houston, TX 77077
Phillip M. Lyons, Sr., in
his capacity as Co-Trust-
ee of the Lyons Family
Trust
223 West Sherwood
Drive
Alvin, TX 77511
Richard Joseph Lyons, in
his capacity as Co-Trust-
ee of the Lyons Family
Trust
1416 Park Street
Winnie, TX 77665
PLEASE TAKE NOTICE,
that on March 26, 2024 a
Complaint for Condem-
nation was filed in the
above-captioned matter
by Plaintiff, Port Arthur
Pipeline, LLC, ("Port Ar-
thur"), in which you are a
defendant.
NATURE OF ACTION
The above-captioned
matter is an action by
Port Arthur, pursuant to
the Natural Gas Act, 15
U.S.C. § 717(h), and its
Certificate of Public Con-
venience and Necessity
issued by the Federal
Regulatory Commission
(hereinafter "FERC") in
FERC Docket No. CP18-
7-000, CP17-21-000, &
CP17-21-001; and for
the condemnation of a
servitude encumbering
the property described
below in which you as-
sert an ownership in-
terest.
DESCRIPTION OF
DEFENDANTS'
PROPERTY AND
INTEREST TO BE
TAKEN
The property from which
the acreage to be con-
demned is to be taken,
and the owners of each
tract, is described as
follows:
CO-OWNERSHIP
oThe Estate of Kenneth
Paul Lyons, through an
unknown representative
(as to all tracts)
oHelen Jean Schumach-
er Lyons (as to all tracts)
oLyons Family Trust (as
to all tracts)
oRobert Charles Bab-
cock (as to all tracts ex-
cept CAL-462 and CAL-
464)
oDeborah McLemore
Babcock (as to all tracts
except CAL-462 and
CAL-464)
Property from which tract
to be expropriated:
oApproximately 129.11
Acre tract in Section
28, Township 9 South,
Range 10 West, Calca-
sieu Parish.
Calcasieu Parish Tax
Parcels: 01321129,
01321128, 01164023,
01256912 and 01234536
Specific tracts to be ap-
propriated, as depicted
on Exhibit A:
oCAL-266
oCAL-270
oCAL-459
oCAL-461
oCAL-462
oCAL-463
oCAL-464
Comprising total acreage
of 4.07 acres for perma-
nent pipeline servitude,
3.96 acres for temporary
workspace, and addition-
al temporary workspace
of 1.26 acres as noted
on Exhibit A.
Pursuant to the Certi-
ficate of Public Conve-
nience and Necessity
issued to Port Arthur by
FERC, Port Arthur needs
and is entitled to acquire
a right-of-way servitude
on the Property, as de-
scribed in Exhibit A to the
complaint.
USE FOR WHICH THE
PROPERTY IS TO BE
TAKEN
Port Arthur is planning to
construct and operate a
new, approximately 139-
mile, 42-inch diameter
lateral pipeline to the
Port Arthur LNG liquified
natural gas terminal lo-
cated in Cameron Par-
ish, Louisiana, as well as
new compression station
and appurtenant facili-
ties. On your property,
Port Arthur is planning
to construct, utilize and
maintain a pipeline and a
temporary access road.
The use of the particu-
lar acreage to be con-
demned includes perma-
nent pipeline easement
and temporary work-
space.
AUTHORITY FOR
THE TAKING
Port Arthur has the right
of eminent domain under
the Natural Gas Act, 15
U.S.C. § 717f (h).
APPEARANCE
OR ANSWER
YOU ARE FURTHER
NOTIFIED that if you
have an objection or
defense to the condem-
nation, you may serve
on the undersigned
counsel for Port Arthur,
within twenty-one (21)
days after service of the
notice on you, an answer
identifying the por-tion of
the property in which you
claim an interest; stating
the nature and extent
of the interest claimed;
and stating all your ob-
jections and defenses
to condemnation of the
property. Your failure to
serve an answer will con-
stitute your consent to:
(1) the taking of the sub-
ject property rights; (2)
the Court's authority to
proceed to hear the ac-
tion; and (3) the Court's
authority to adjudge the
just compensation you
might have as a result of
the condemnation.
YOU ARE FURTHER
NOTIFIED that if you
have no objection or de-
fense to the condemna-
tion of the Property, you
may serve on Port Ar-
thur's attorney a notice of
appearance, designating
any portion of the Prop-
erty in which you claim
an interest, and there-
after, you shall receive
notice of all proceedings
affecting the Property.
YOU ARE FURTHER
NOTIFIED that at the trial
of the issue of just com-
pensation, whether or
not you have answered
or served a notice of
appearance, you may
present evidence regard-
ing the amount of com-
pensation to be paid for
the Property in which you
have an interest and you
may share in the distribu-
tion of the compensation
award.
Respectfully submitted:
/s/Alan J. Berteau
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Apr 20, 25, May 2 3
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