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Superior Court of California,
County of San Diego

9/25/2024 3:45:11 PM

Clerk of the Superior Court
By C. Salazar ,Deputy Clerk

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Attorney for Plaintiffs James C. Esch, as Trustee of the
James and Patricia Esch Trust Dated October 18,
2022, and Patricia A. McArdle Esch, as Trustee of the
James and Patricia Esch Trust Dated October 18, 2022

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO

NORTH COUNTY DIVISION

JAMES C. ESCH, as Trustee of the James and
Patricia Esch Trust Dated October 18, 2022, and
PATRICIA A. MCARDLE ESCH, as Trustee of
the James and Patricia Esch Trust Dated October
18, 2022,

Plaintiffs,

v.

RUSSELL D. NIELSEN, as Trustee of the
Nielsen Family Trust Dated February 22, 2022,
JANE R. NIELSEN, as Trustee of the Nielsen
Family Trust Dated February 22, 2022, and DOES
1 thru 100 inclusive,

Defendants.

Case No.: 24CU015407N

VERIFIED COMPLAINT FOR:

- 1. TRESPASS;**
- 2. WRONGFUL INJURY AND/OR
REMOVAL OF TIMBER, TREES,
AND/OR UNDERWOOD;**
- 3. TRESPASS TO CHATTELS;**
- 4. INTENTIONAL INFLECTION OF
EMOTIONAL DISTRESS;**
- 5. CIVIL HARASSMENT;**
- 6. QUIET TITLE; AND**
- 7. NEGLIGENCE.**

Unlimited Civil Case; Amount Demanded
Exceeds \$35,000.

JURY TRIAL DEMANDED

[IMAGED FILE]

1 Plaintiffs James C. Esch, as Trustee of the James and Patricia Esch Trust Dated October 18,
2 2022, (“**Dr. Esch**”) and Patricia A. McArdle Esch, as Trustee of the James and Patricia Esch Trust
3 Dated October 18, 2022, (“**Mrs. Esch**”) (collectively, Dr. Esch and Mrs. Esch are the “**Plaintiffs**” or
4 the “**Esches**”) hereby allege as follows:

5 **PARTIES**

6 1. At all times herein mentioned, Plaintiff Dr. Esch was an individual and a resident of
7 San Diego, California.

8 2. At all times herein mentioned, Plaintiff Mrs. Esch was an individual and a resident of
9 San Diego, California.

10 3. Together Dr. Esch and Mrs. Esch, in their roles as Trustees of the James and Patricia
11 Esch Trust Dated October 18, 2022, own the real property commonly known as 1770 Troy Lane,
12 Oceanside, CA 92054 (the “**Esch Property**”) with APN 154-230-40-00. Attached as **Exhibit A** is
13 the legal description for the Esch Property taken from the Quitclaim Deed recorded with the San
14 Diego County Recorder’s Office on October 28, 2022 as Document No. 2022-0416457.

15 4. At all times herein mentioned, on information and belief defendant Russell D. Nielsen
16 (“**Russell**”) was an individual and a resident of San Diego, California.

17 5. At all times herein mentioned, on information and belief defendant Jane R. Nielsen
18 (“**Mrs. Nielsen**”) was an individual and a resident of San Diego, California.

19 6. Collectively, Russell and Mrs. Nielsen are the “**Nielsens**”.

20 7. Together Russell and Mrs. Nielsen, in their roles as Trustees of the Nielsen Family
21 Trust Dated February 22, 2022, own the real property commonly known as 1768 Troy Lane,
22 Oceanside, CA 92054 (the “**Nielsen Property**”) with APN 154-230-68-00. Attached as **Exhibit B** is
23 the legal description for the Nielsen Property taken from the Individual Quitclaim Deed recorded with
24 the San Diego County Recorder’s Office on March 2, 2022 as Document No. 2022-0094583.

25 8. Plaintiffs are ignorant of the true names and capacities of the defendants sued herein
26 as DOES 1 through 100, inclusive, and therefore sues these defendants by fictitious names. Plaintiffs
27 will amend this Complaint to allege their true names and capacities when ascertained. Plaintiffs allege
28 on information and belief that each of the fictitiously named defendants are responsible in some

1 manner for the acts or omissions alleged in this Complaint, and that Plaintiffs' injuries and damages
2 were proximately caused by the acts or omissions of these defendants.

3 9. Plaintiffs are informed and believe, and thereon allege, that each defendant, including
4 the DOE defendants, was, and is, the co-conspirator, agent, employee, servant, subsidiary, partner,
5 member, principal, joint venturer, associate, and/or representative of one or more of the other
6 defendants and that, at all times mentioned herein, each and every defendant was acting within the
7 course and scope of such conspiracy, agency, employment, service, subsidiary relationship,
8 partnership, membership, association, joint venture, or representative relationship or with the
9 knowledge and consent of each such other defendant or defendants.

10 10. Plaintiffs are informed and believe, and thereon alleges, that at all relevant times
11 defendants entered into a conspiracy in furtherance of the wrongful acts alleged in this Complaint.
12 Each defendant was aware that the other defendants planned to commit these wrongful acts. Each
13 defendant agreed with the other defendants and intended that these wrongful acts be committed.

14 11. Plaintiffs are informed and believe, and thereon alleges, that at all relevant times each
15 defendant aided and abetted the other defendants in their commission of the wrongful acts alleged in
16 this Complaint. Each defendant knew that the wrongful acts alleged in this Complaint were being
17 committed and/or were going to be committed by the other defendants against Plaintiff. Each
18 defendant gave substantial assistance and/or encouragement to the other defendants in furtherance of
19 these alleged wrongful acts. Each defendant's conduct was a substantial factor in causing harm to
20 Plaintiff.

21 **JURISDICTION AND VENUE**

22 12. This Court has jurisdiction of the parties, the Esch Property, the Nielsen Property, and
23 the subject matter of this action.

24 13. This Court is the proper venue for this action as the parties are all residents of
25 Oceanside, California, the Esch Property and the Nielsen Property are located in Oceanside,
26 California, and all the actions alleged herein occurred in Oceanside, California.

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STATEMENT OF FACTS

14. Dr. Esch is a Board-Certified Orthopedic Surgeon. After completing his residency at Northwestern University, Dr. Esch spent two years as a Naval orthopedic surgeon in San Diego and with the first Marine division in Vietnam. Dr. Esch ultimately spent 47 years practicing orthopaedic surgery in the City of Oceanside.

15. Mrs. Esch is a mother of five and grandmother of ten, has a degree in horticulture, and is a University of California Master Gardener. Mrs. Esch worked in the San Diego agriculture industry for over forty years as a grower, wholesaler, and retailer and nine years as an Agricultural Project Manager for the San Diego Resource Conservation District. For over 20 years, Mrs. Esch owned and operated a tour company (Fieldays) specializing in offering agricultural tours for local San Diego senior centers and the cruise industry.

16. In 2019, the Esches decided to buy the real property located at 1770 Troy Lane, Oceanside, CA 92054 ("**Esch Property**"), which has a beautiful home that the Esches adore and plan to live out their retirement in.

17. Unfortunately, the Nielsens own the property next door (the "**Nielsen Property**").

18. For the purposes of privacy, the Esches wanted a line of plantings on the Esch Property that ran solely on their side of the shared property line along the Esch and Nielsen Properties.

19. To that end, the Esches installed an irrigation line solely on the Esch Property that would service the plantings.

20. The Esches then, as seen in the Survey Plat attached as **Exhibit C**, installed plantings solely on the Esch Property along the Esch Property's shared property line with the Nielsen Property.

21. The Nielsens, for their part, installed a wooden fence, on information and belief, solely on the Nielsen Property along the Nielsen Property's shared property line with the Esch Property.

22. Sometime thereafter, Russell informed the Esches that, for reasons unknown, he was very upset that the Esches installed plants on the Esch Property.

23. Russell then told the Esches that the Esches had to remove the plants on the Esch Property.

24. Russell also argued that the irrigation line was *somehow* on the Nielsen Property.

25. On or about March 16, 2024, when the Esches failed to remove the plants on the Esch Property as demanded by Russell, as seen below, Russell went outside, grabbed a ladder and a saw, placed the ladder next to the fence on the Nielsen Property, reached over the fence with the saw, and cut down plants growing on the Esch Property:





26. Mrs. Esch ultimately reported Russell to the police for his actions.

27. Unfortunately, being reported to the police did not stop Russell.

28. On information and belief, on or about April 9, 2024 - while the Esches were out of town – Russell broke the Esches' irrigation line that provided water to the plantings on the Esch Property.

29. As a result of his actions above, on information and belief Russell then requested that the City of Oceanside shut off the water to the Esches' Property.

30. The Esches were provided no notice – whether from the Nielsens or otherwise – that the water to their property was going to be shut off.

1 31. On information and belief, the Esches' water was shut off for several days, causing
2 damage to some of the Esches' appliances and further resulting damage.

3 32. When the Esches' daughter discovered the water off at the Esch Property, she reported
4 Russell to the police.

5 33. Undeterred by this second police report, on or about April 29, 2024 Russell *removed*
6 *some of the wooden boards on his fence, reached through the wholes he created, and cut the plants*
7 *growing on the Esch Property at or near their roots:*



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34. Russell's trash can was overflowing with the plants he cut on the Esch Property:



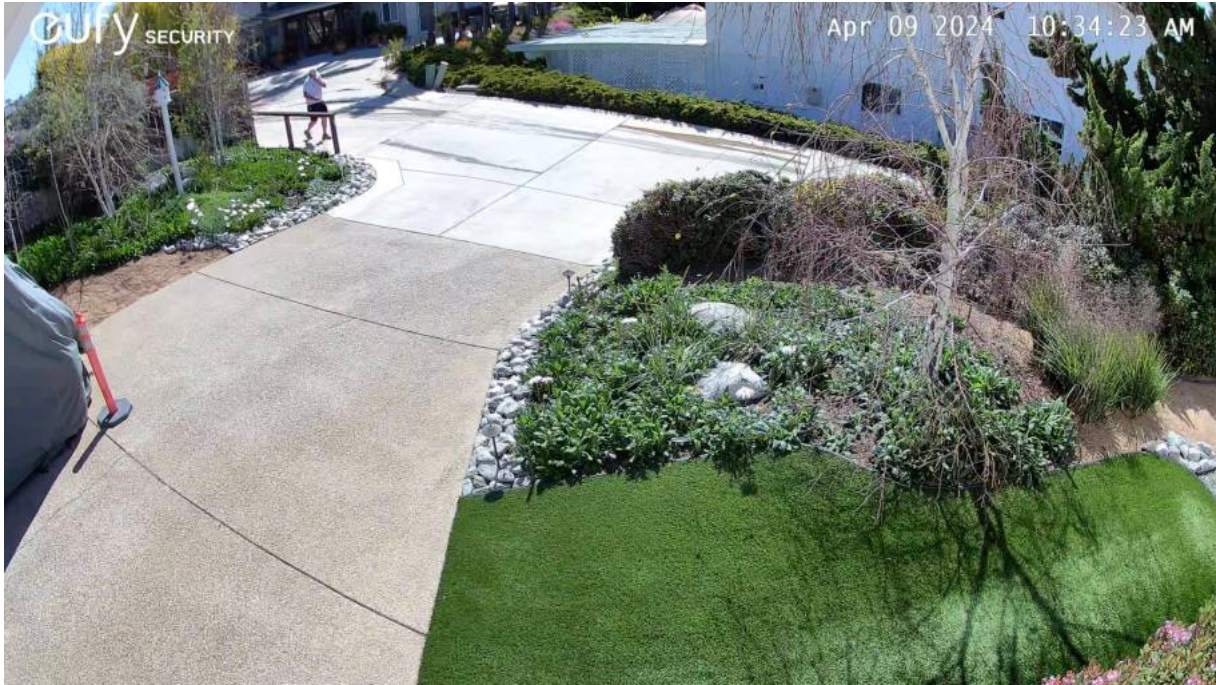
35. But Russell did not just stop at the cuttings.

36. On information and belief, on April 29, 2024 Russell broke the Esches' irrigation line that provided water to the plantings on the Esch Property a second time as seen below:



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1 37. Fortunately, the Esches' neighbor had a security camera that recorded water flowing
2 down the shared driveway at 10:27:09 AM and then 7 minutes or so later Russell walking down the
3 shared driveway from where the flowing water appeared to originate:



15 38. On information and belief, at some point Russell requested that the City of Oceanside
16 shut off the water to the Esches' Property *again* as, twenty or so minutes after Russell walked down
17 the shared driveway, someone from the City of Oceanside came to the Esch Property.

18 39. Fortunately, Mrs. Esch was home at the time and spoke with the person from the City
19 of Oceanside. In that conversation, Mrs. Esch learned that Russell had spoken with the water
20 technician and had promised to fix the Esches' damaged irrigation line.

21 40. Despite this promise, however, Russell never fixed the Esches' damaged irrigation
22 line.

23 41. Since late April 2024, Russell has removed **even more** boards from his fence in an
24 apparent attempt to have even easier access to the plants growing on the Esch Property so he could
25 cut them down.

26 42. To track Russell's cuttings, the Esches have tied pink string around each of the plants
27 that Russell cut down.
28

1 43. Sadly, due to Russell's actions, the Esches have lost a tremendous number of their
2 plantings and many are damaged.

3 44. As a result, the Esch Property now appears as seen below:



17 45. But Russell's bad acts did not end there.

18 46. The Esches caught Russell taking photos of their *teenage granddaughters* while they
19 were on the Esch Property.

20 47. When confronted, Russell refused to provide a reason why he was taking pictures of
21 the Esches' granddaughters.

22 48. Mrs. Esch has informed her granddaughters *under no circumstance to ever talk to*
23 *Russell (or even Mrs. Nielsen).*

24 49. Russell has also been caught taking pictures of Mrs. Esch and will often try to
25 approach her.

26 50. And since Russell removed the boards of his fence and cut down the Esches' privacy
27 plantings, he now has *wide open access* to continue watching and taking pictures of Mrs. Esch while
28

1 she is on the section of the Esch Property close to the Nielsen Property. As a result, Mrs. Esch tries
2 to avoid that part of the Esch Property if she knows Russell is outside.

3 51. Russell has also been very aggressive and hostile to the Esches, their family, and their
4 contractor.

5 52. Unfortunately, as seen above, reporting Russell to the police has done nothing to sop
6 him.

7 **FIRST CAUSE OF ACTION**

8 **Trespass**

9 **(By Plaintiffs Against Defendant Russell Nielsen)**

10 53. Plaintiffs incorporate each and every other allegation in this Complaint as if fully set
11 forth herein.

12 54. Plaintiffs own the Esch Property.

13 55. Defendant Russell intentionally and/or, although not intending to do so, recklessly
14 and/or negligently entered Plaintiffs' property and/or Defendant Russell intentionally and/or,
15 although not intending to do so, recklessly and/or negligently caused another person to enter
16 Plaintiffs' property.

17 56. Plaintiffs did not give permission for entry on to their property to Defendant Russell
18 and/or those he caused to enter.

19 57. Plaintiffs were harmed.

20 58. Defendant Russell's conduct was a substantial factor in causing Plaintiffs' harm.

21 59. Plaintiffs further request punitive damages against Defendant Russell. Defendant
22 Russell's conduct was intended by Defendant Russell to cause injury to Plaintiffs, constituted
23 despicable conduct carried on by Defendant Russell with a willful and conscious disregard of the
24 rights or safety of Plaintiffs, and/or constituted despicable conduct that subjected Plaintiffs to cruel
25 and unjust hardship in conscious disregard of Plaintiffs' rights.

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1 rights or safety of Plaintiffs, and/or constituted despicable conduct that subjected Plaintiffs to cruel
2 and unjust hardship in conscious disregard of Plaintiffs' rights.

3 **THIRD CAUSE OF ACTION**

4 **Trespass to Chattels**

5 **(By Plaintiffs Against Defendant Russell Nielsen)**

6 68. Plaintiffs incorporate each and every other allegation in this Complaint as if fully set
7 forth herein.

8 69. Plaintiffs own certain personal property located on and in the Esch Property.

9 70. Defendant Russell intentionally interfered with Plaintiffs' use or possession of the
10 personal property and/or damaged Plaintiffs' personal property.

11 71. Plaintiffs did not consent to Defendant Russell's conduct.

12 72. Plaintiffs were harmed.

13 73. Defendant Russell's conduct was a substantial factor in causing Plaintiffs' harm.

14 74. Plaintiffs further request punitive damages against Defendant Russell. Defendant
15 Russell's conduct was intended by Defendant Russell to cause injury to Plaintiffs, constituted
16 despicable conduct carried on by Defendant Russell with a willful and conscious disregard of the
17 rights or safety of Plaintiffs, and/or constituted despicable conduct that subjected Plaintiffs to cruel
18 and unjust hardship in conscious disregard of Plaintiffs' rights.

19 **FOURTH CAUSE OF ACTION**

20 **Intentional Infliction of Emotional Distress**

21 **(By Plaintiffs Against Defendant Russell Nielsen)**

22 75. Plaintiffs incorporate each and every other allegation in this Complaint as if fully set
23 forth herein.

24 76. Defendant Russell's conduct was extreme and outrageous.

25 77. Defendant Russell intended to cause Plaintiffs emotional distress and/or acted with
26 reckless disregard of the probability that Plaintiffs would suffer emotional distress knowing that
27 Plaintiffs were present when the conduct occurred.

28 78. Plaintiffs suffered severe emotional distress.

79. Defendant Russell's conduct was a substantial factor in causing Plaintiffs' severe emotional distress.

80. Plaintiffs further request punitive damages against Defendant Russell. Defendant Russell's conduct was intended by Defendant Russell to cause injury to Plaintiffs, constituted despicable conduct carried on by Defendant Russell with a willful and conscious disregard of the rights or safety of Plaintiffs, and/or constituted despicable conduct that subjected Plaintiffs to cruel and unjust hardship in conscious disregard of Plaintiffs' rights.

FIFTH CAUSE OF ACTION

Civil Harassment

(By Plaintiffs Against Defendant Russell Nielsen)

81. Plaintiffs incorporate each and every other allegation in this Complaint as if fully set forth herein.

82. Defendant Russell has engaged in a knowing and willful statement and/or pattern of conduct entailing a series of acts over a period of time, however short, evidencing a continuity of purpose:

- a. That is directed at Plaintiffs;
- b. That would place a reasonable person in fear for the person's safety or the safety of the person's immediate family;
- c. That seriously alarms, annoys, and/or harasses Plaintiffs;
- d. That serves no legitimate purpose;
- e. That would cause a reasonable person to suffer substantial emotional distress and actually causes substantial emotional distress to Plaintiffs; and
- f. That is not a constitutionally protected activity.

83. Plaintiffs request an order after hearing enjoining Defendant Russell Nielsen from harassing, intimidating, molesting, attacking, striking, stalking, threatening, sexually assaulting, battering, abusing, telephoning, including, but not limited to, making annoying telephone calls, as described in Section 653m of the Penal Code, destroying personal property, contacting, either directly

1 or indirectly, by mail or otherwise, or coming within a specified distance of, or disturbing the peace
2 of, Plaintiffs.

3 84. Plaintiffs further request costs and attorney's fees pursuant to Code of Civil Procedure
4 § 527.6(s).

5 **SIXTH CAUSE OF ACTION**

6 **Quiet Title**

7 **(By Plaintiffs Against All Defendants)**

8 85. Plaintiffs incorporate each and every other allegation in this Complaint as if fully set
9 forth herein.

10 86. Plaintiffs own the Esch Property.

11 87. The Esch Property shares a property line with the Nielsen Property.

12 88. There is a dispute as to the location of the shared property line of the Esch and Nielsen
13 Properties.

14 89. Plaintiffs seek to quiet title as of the filing date of this Verified Complaint as to the
15 shared property line of the Esch and Nielsen Properties against all adverse claims.

16 90. Plaintiffs request a Court order establishing and determining as of the filing date of
17 this Verified Complaint the shared property line of the Esch and Nielsen Properties to be that of the
18 Survey Plat attached as **Exhibit C**.

19 **SEVENTH CAUSE OF ACTION**

20 **Negligence**

21 **(By Plaintiffs Against All Defendants)**

22 91. Plaintiffs incorporate each and every other allegation in this Complaint as if fully set
23 forth herein.

24 92. Defendants had duties to Plaintiffs.

25 93. Defendants were negligent.

26 94. Plaintiffs were harmed.

27 95. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

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1 **PRAYER**

2 **WHEREFORE**, Plaintiffs pray for judgment against defendants as follows:

3 1. For an award of consequential, compensatory, general, special, double, and treble
4 damages and other damages according to proof;

5 2. For an order an order after hearing enjoining Defendant Russell Nielsen from
6 harassing, intimidating, molesting, attacking, striking, stalking, threatening, sexually assaulting,
7 battering, abusing, telephoning, including, but not limited to, making annoying telephone calls, as
8 described in Section 653m of the Penal Code, destroying personal property, contacting, either directly
9 or indirectly, by mail or otherwise, or coming within a specified distance of, or disturbing the peace
10 of, Plaintiffs;

11 3. For a Court order establishing and determining as of the filing date of this Verified
12 Complaint the shared property line of the Esch and Nielsen Properties to be that of the Survey Plat
13 attached as Exhibit C;

14 4. For exemplary and punitive damages;

15 5. For reasonable attorney's fees and costs as allowed by contract or law;

16 6. For interest at the maximum legal rate; and

17 7. For such other and further relief as the Court may deem just and proper.

18 **JURY TRIAL**

19 Plaintiffs hereby demand a jury trial on all such triable causes of action and issues.
20

21 **SEVERANCE LAW, PC**

22
23 Dated: September 25, 2024



Dominick Severance, Esq.
Attorney for Plaintiffs James C. Esch, as
Trustee of the James and Patricia Esch Trust
Dated October 18, 2022, and Patricia A.
McArdle Esch, as Trustee of the James and
Patricia Esch Trust Dated October 18, 2022

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The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

James C Esch

James C. Esch, as Trustee of the James and Patricia Esch Trust Dated October 18, 2022

1 **VERIFICATION**

2 I have read the foregoing Verified Complaint and know its contents. I am a party to this action.
3 The matters stated in the foregoing document are true of my own knowledge except as to those matters
4 which are stated on information and belief, and as to those matters I believe them to be true.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct.

7
8 Dated: September 25, 2024



9 Patricia A. McArdle Esch, as Trustee of the
10 James and Patricia Esch Trust Dated October
11 18, 2022
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PARCEL A:

PARCEL B:

BEGINNING AT THE MOST SOUTHERLY CORNER OF SAID PARCEL 2; THENCE: SOUTHWESTERLY ALONG THE SOUTHWESTERLY LINE OF PARCEL 2 A DISTANCE OF 11.06 FEET; THENCE NORTH 53° 57' 46" EAST 103.10 FEET; THENCE EASTERLY TO A POINT ON THE SOUTHEASTERLY LINE OF PARCEL 2 WHICH BEARS NORTH 53° 57' 46" EAST 113.89 FEET FROM THE TRUE POINT OF BEGINNING; THENCE SOUTH 53° 57' 46" WEST 113.89 FEET TO THE POINT OF BEGINNING.

AN EASEMENT AND RIGHT OF WAY FOR SEWER LINE PURPOSES,
OVER, UNDER, ALONG AND ACROSS THE SOUTHEASTERLY 15.00 FEET
OF PARCEL 2 OF PARCEL MAP NO. 9561, WHICH HAS A BEARING OF
SOUTH 53° 10' 00" WEST AND A LENGTH OF 163.75 FEET.

AN EASEMENT AND RIGHT OF WAY FOR WATER LINE PURPOSES
OVER, UNDER, ALONG, AND ACROSS THE SOUTHWESTERLY 5.00 FEET
AND THE SOUTHERLY 5.00 FEET OF PARCEL 1, CONTIGUOUS TO TROY
LANE AND THE SOUTHWESTERLY 5.00 FEET OF PARCEL 2,
CONTIGUOUS TO TROY LANE, ALL BEING IN PARCEL MAP NO. 9561.

AN EASEMENT AND RIGHT OF WAY INGRESS AND EGRESS FOR ROAD
AND PUBLIC UTILITY PURPOSES OVER, UNDER, ALONG, AND ACROSS
THAT PORTION OF PARCEL 3 OF PARCEL MAP NO. 9561, LYING
NORTHERLY OF THE FOLLOWING DESCRIBED LINE:

- 18 -

POINT OF BEGINNING; THENCE ALONG A CURVE CONCAVE
SOUTHERLY TANGENT TO SAID LINE A RADIUS OF 5.00 FEET
THROUGH A CENTRAL ANGLE OF 90 FEET MORE OR LESS TO A POINT
ON THE NORTHEASTERLY LINE OF SAID PARCEL, SAID POINT BEING
SOUTH 35° 10' 00" EAST FROM THE MOST NORTHERLY CORNER OF
SAID PARCEL 3.

1 **EXHIBIT B**

2 **NIELSEN PROPERTY LEGAL DESCRIPTION**

3 Real property in the City of Oceanside, County of San Diego, State of California,
4 described as follows:

5 **PARCEL A:**

6 PARCEL 2 OF PARCEL MAP NO. 9561, IN THE CITY OF OCEANSIDE,
7 COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, FILED IN THE OFFICE
8 OF THE COUNTY RECORDER OF SAN DIEGO COUNTY ON JANUARY 8,
9 1980.

10 EXCEPTING THEREFROM THAT PORTION LYING NORTHEASTERLY OF
11 THE NORTHEAST LINE OF PARCEL 4 OF SAID PARCEL MAP NO. 9561,
12 AND THE NORTHWEST PRODUCTION OF SAID NORTHEAST LINE.

13 THE ABOVE LEGAL DESCRIPTION IS PURSUANT TO CERTIFICATE OF
14 COMPLIANCE NO. PLA-09-2000 RECORDED DECEMBER 14, 2000 AS
15 INSTRUMENT NO. 2000-0682618 OF OFFICIAL RECORDS.

16 **PARCEL B:**

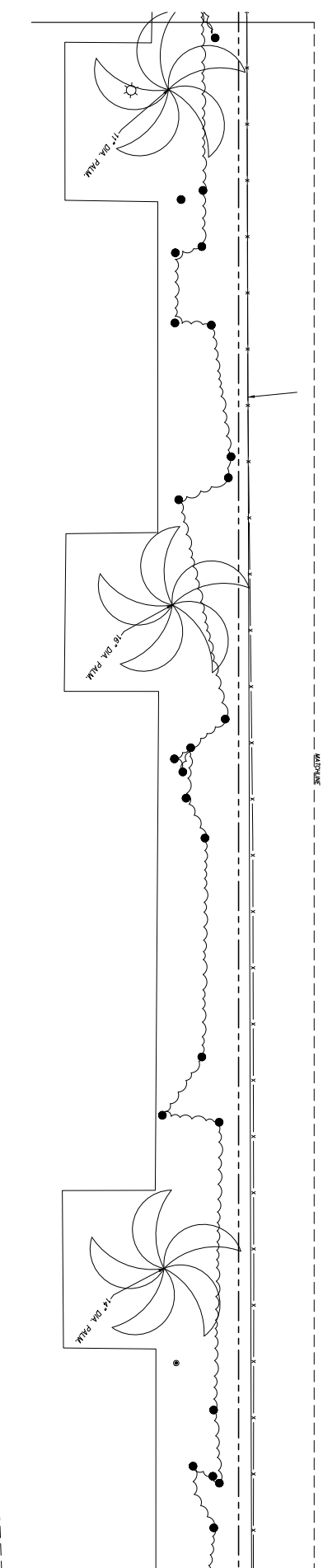
17 AN EASEMENT AND RIGHT OF WAY FOR INGRESS AND EGRESS FOR
18 ROAD AND PUBLIC UTILITIES OVER, UNDER, ALONG AND ACROSS THE
19 SOUTHWESTERLY 93.89 FEET OF PARCEL 4 OF PARCEL MAP NO. 9561,
20 IN THE CITY OF OCEANSIDE, COUNTY OF SAN DIEGO, STATE OF
21 CALIFORNIA, FILED IN THE OFFICE OF THE COUNTY RECORDER OF
22 SAN DIEGO COUNTY ON JANUARY 8, 1980.

23 **PARCEL C:**

24 AN EASEMENT AND RIGHT OF WAY FOR WATER LINE PURPOSES OVER,
25 UNDER, ALONG, AND ACROSS THE SOUTHWESTERLY 5.00 FEET AND
26 THE SOUTHERLY 5.00 FEET, CONTIGUOUS TO TROY LANE, OF PARCEL
27 1 OF PARCEL MAP NO. 9561, IN THE CITY OF OCEANSIDE, COUNTY OF
28 SAN DIEGO, STATE OF CALIFORNIA, FILED IN THE OFFICE OF THE
COUNTY RECORDER OF SAN DIEGO COUNTY ON JANUARY 8, 1980.

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EXHIBIT C
SURVEY PLAT
[exhibit follows]



BALBO REGISTRATION LINE
 LOCATION OF BALBO TIED WITH PINK FLAGGING

 PAUL TREE
 LANSFORD LIGHT
 GLAD POST

 BOUNDING LINE
 BLINDS OPENING
 TRUCE
 BLACK HILL
 PROPERTY LINE
 SHORT OF MAX LINE
 LOT LINE
 CENTER LINE

ESCH LOT SURVEY
1770 TROY LANE
OCEANSIDE, CA



REVISION	DATE	BY	REVISION	DATE	BY
ORIGINAL	09/24/2024	ME			



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TOPOGRAPHIC DETAIL
NOT TO SCALE