

Notice of Lis Pendens Page 1 of 4
Gary Christensen Washington County Recorder
09/18/2024 10:15:08 AM Fee \$40.00 By JUAB
TITLE & ABSTRACT COMPANY

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Attorneys for The Wright Direction, LLC

IN THE FIFTH JUDICIAL DISTRICT COURT
WASHINGTON COUNTY, STATE OF UTAH

THE WRIGHT DIRECTION, LLC, a Utah
limited liability company

Plaintiffs,
v.

ZIONS LANDING DEVELOPMENT
GROUP, LLC, a Wyoming limited liability
company, SMARTFI TOQUERVILLE, LLC,
an unknown business entity, all persons
unknown, claiming any legal or equitable
right or interest in the property described in
the Complaint; and Does 1-10, inclusive.

Defendants.

AND RELATED COUNTERCLAIMS,
CROSS-CLAIMS, AND THIRD-PARTY
CLAIMS

AMENDED NOTICE OF LIS PENDENS

Civil No. 230500055

Judge Jay Winward

Pursuant to Utah Code Annotated Section 78B-6-1303 and the Court's order as reflected
in the September 5, 2024 minute entry, The Wright Direction, LLC ("Wright Direction") hereby
submits this Amended Notice of Lis Pendens to clarify the *Notice of Lis Pendens* recorded on
March 17, 2023 as Doc. # 20230007226 that was recorded in the Washington County Recorder's
office and to provide notice that Wright Direction is asserting claims in the above-captioned case

that affect title and/or possession of real property. Specifically, Wright Direction seeks an order confirming its easement rights (unless otherwise agreed by the parties in writing or ordered by the court) relating to the use of the long-established road on Parcel 3151-A-HV, the legal description of which is provided below:

Commencing at the south sixteenth (1/16th) corner of sections 32 & 33, Township 40 South, Range 13 West, Salt Lake Base and Meridian; thence N0°56'02" E along the east section line, 55.36 feet to the point of beginning; running thence N 60°58'54" W 377.47 feet; thence northwesterly along the arc of a 1531.75 foot radius curve to the right a distance of 253.16 feet, through a central angle of 09°28'11" (long chord bears: N 56°14'49" W 252.87 feet); thence N 51°30'44" W 32.25 feet; thence westerly along the arc of a 407.37 foot radius curve to the left a distance of 265.54 feet, through a central angle of 37°20'54" (long chord bears: N 70°11'11" W 260.87 feet); thence N 88°51'38" W 107.79 feet; thence northwesterly along the arc of a 240.67 foot radius curve to the right a distance of 301.79 feet, through a central angle of 71°50'52" (long chord bears: N 52°56'12" W 282.40 feet); thence N 17°00'45" W 22.86 feet; thence northwesterly along the arc of a 285.72 foot radius curve to the left a distance of 166.21 feet, through a central angle of 33°19'45" (long chord bears: N33°40'38" W 163.87 feet); thence N 50°20'30" W 161.49 feet; thence northerly along the arc of a 330.61 foot radius curve to the right a distance of 367.87 feet, through a central angle of 63°45'14" (long chord bears: N18°27'53" W 349.19 feet); thence N13°24'44" E 58.55 feet; thence northerly along the arc of a 409.41 foot radius curve to the right a distance of 15.90 feet, through a central of 02°13'33" (long chord bears: N14°31'30E 15.90 feet); thence N15°38'16" E 176.69 feet; thence northwesterly along the arc of a 420.00 foot radius curve to the left a distance of 742.96 feet, through a central angle of 101°21'11" (long chord bears: N35°02'19" W 649 feet) thence N42°54'54" W 262.77 feet; thence northwesterly along the arc of a 181.49 foot radius curve to the right a distance of 247.73 feet, through a central angle of 78°12'31" (long chord bears: N46°36'38" W 228.94 feet); thence N07°30'23" W 28.48 feet; thence northwesterly along the arc of a 246.95 foot radius curve to the left a distance of 247.29 feet, through a central angle of 57°22'26" (long chord bears: N36°11'36" W 237.08 feet); thence N64°52'49" W 12.50 feet; thence northwesterly along the arc of a 406.15 foot radius curve to the right a distance of 253.16 feet, through a central angle of 35°42'50" (long chord bears: N47°01'24" W 249.08 feet); thence N29°09'59" W 115.14 feet to the point of ending.

DATED: September 16, 2024

SMITH LC

/s/ Steven C. Smith
STEVEN C. SMITH
KIPP S. MUIR
Attorneys for The Wright Direction, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 8, 2024, I electronically filed a true and correct copy of the forgoing **AMENDED NOTICE OF LIS PENDENS** with the Clerk of the Court by using the electronic filing system which will send a Notice of Electronic Filing ("NEF") to the following:

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I declare under criminal penalty of Utah Code Section 78B-5-705 that this Certificate of Service is true and correct.

Dated: September 16, 2024

/s/ Kaylene Garrett

Kaylene Garrett, paralegal

SMITH LC

Steven B. Smith

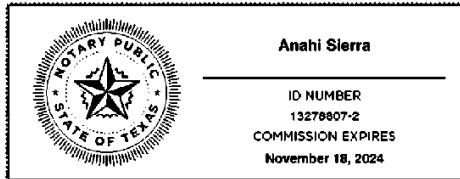
Steven C. Smith, Attorney

STATE OF Texas)
: ss.
COUNTY OF Montgomery)

On the 18th of September, 2024, before me, a Notary Public in and for the said state, appeared Steven C. Smith, Attorney for SMITH LC personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

Anahi Sierra

Notary Public



Electronically signed and notarized online using the Proof platform.