

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
AT FAIRBANKS

RECEIVED  
NOV 20 2013

Wayne Sandstrom as Trustee )  
of the Bud and Vi Sandstrom )  
Family Trust )  
Plaintiff, )  
v. )  
John Does 1 through 4, State of )  
Alaska and all other persons )  
unknown claiming any right, )  
title estate, lien or interest in the )  
real property described in the )  
Complaint adverse to Plaintiffs )  
ownership or any cloud on )  
Plaintiff's title )  
Defendants. )

CASE NO. 4FA-13-2903 CIVIL

OFFICE OF THE ATTORNEY GENERAL  
400 PRINCE STREET  
STATE OF ALASKA

SUMMONS  
AND  
NOTICE TO BOTH PARTIES  
OF JUDICIAL ASSIGNMENT

To Defendant: State of Alaska c/o Attorney General's Office

You are hereby summoned and required to file with the court an answer to the complaint which accompanies this summons. Your answer must be filed with the court at 101 Lacey Street, Room 105, Fairbanks, AK 99701 within 20 days\* after the day you receive this summons. In addition, a copy of your answer must be sent to the plaintiff's attorney, Law Office of John J. Connors, P.C., whose address is P.O. Box 73693, Fairbanks, AK 99707.

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of address/Telephone Number* (TF955), available at the clerk's office or on the court system's website at [www.state.ak.us/courts/forms.htm](http://www.state.ak.us/courts/forms.htm), to inform the court. – OR – If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

**NOTICE OF JUDICIAL ASSIGNMENT**

To: Plaintiff and Defendant

You are hereby given notice that this case has been assigned to Judge Blankenship

SEAL

CLERK OF COURT

November 14, 2013

By: Tracy Speed  
Deputy Clerk

Date

\*The State or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.

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NOV 20 2013

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

CLERK OF THE COURT  
400 BROADWAY  
FAIRBANKS, ALASKA 99701  
COURT HOUSE

Wayne Sandstrom  
As Trustee of the Bud and Vi  
Sandstrom Family Trust,  
Plaintiff,

v.

John Does 1 through 4, State  
Alaska and all other persons  
unknown claiming any right,  
title estate, lien or interest  
in the real property described  
in the Complaint adverse to  
plaintiff's ownership or any  
cloud on Plaintiff's title,  
Defendant.

FILED in the Trial Courts  
State of Alaska, Fourth District

NOV 13 2013

by \_\_\_\_\_ Deputy

Case No. 4FA-13- 02903 Civil

COMPLAINT TO QUIET TITLE

1. Wayne Sandstrom is the Trustee of the Bud and Vi Sandstrom Family Trust, dated October 19, 2000, and is a resident of Fairbanks, Alaska.

2. The Bud and Vi Sandstrom Family Trust is the record owner of the following described real property situated in Fairbanks, Alaska within the Fourth Judicial District:

Lot 10, Block 27, LEMETA SUBDIVISION OF THE BRIDGET O'CONNOR Homestead according to the plat thereof filed October 13, 1948 as instrument number 110.34 and shown on the Record of Survey filed December 28, 2011 as Plat Number 2011-115, records of the Fairbanks Recording District Fourth Judicial District, hereafter also referred as "the property".

Law Office of John J Connors, P.C.  
PO Box 73093  
Fairbanks, AK 99707  
Telephone: (907) 457-3410  
Fax: (907) 457-3415

3. The 1948 record plat of Lemeta Subdivision depicts meander lines; and platted lot lines and the meander lines from the original Government Land office survey of 1911.

4. The "property" adjoins the Noyes Slough. Between the years of 1948 and December 2011 through the process of accretion; the property, Lot 10 Block 27, has increased in size by .92 acres. Meander lines are required to follow the ordinary high water line.

5. The Bud and Vi Sandstrom Family Trust ("The Trust") hold title in fee simple to the real property identified in paragraph 2 above.

6. The Trust has submitted a record of survey prepared by RCH Survey Ltd on 12/28/11 (Exhibit 1) in conjunction with the Trust's pending request to the Fairbanks North Star Borough (RP038-13 Lemeta) to re-plat the property Lot 10, block 27, Lemeta Subdivision into two lots of approximately 20,042 square feet and 38,358 square feet. The Trust has received preliminary approval for the replat. The final approval of the re-plat process is currently pending before the Fairbanks North Star Borough.

7. In conjunction with completion of the re-plat process it has been recommended that Plaintiff seek to quiet title to the portion of land which has accreted since October 1948, as depicted on Exhibit 1.

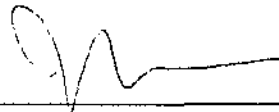
8. Plaintiff is not aware of any entity or person who asserts an adverse interest against the title to the accreted land.

9. There are no known liens, assessments or taxes which encumber the property.

Wherefore Plaintiff requests the following relief:

1. An order and decree quieting title to Lot 10, Block 27 of Lemeta Subdivision.
2. That any adverse actions, claims or right to title adverse to the Bud and Vi Sandstrom Family Trust in the property be quieted;
3. A decree permanently enjoining each defendant and all persons claiming under them, from asserting any adverse claim to Plaintiff's title to all the accreted property depicted on Exhibit 1.
4. That Plaintiff be provided with a Clerk's Deed declaring that the accreted portion of Lot 10, Block 27 as shown on Exhibit 1 is to be judicially recognized for all purposes as owned and possessed by Plaintiff.
5. That Plaintiff be awarded costs of this action and for such other further relief as the court deems just and proper.

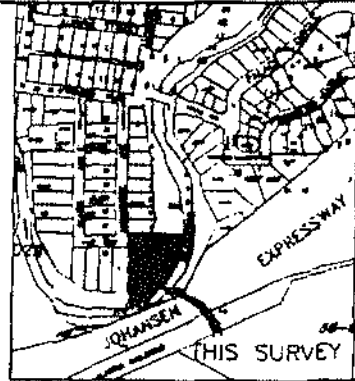
Dated this 12th day of November, 2013



\_\_\_\_\_  
John J. Connors, ABA 8506104  
Law Offices of John J. Connors, P.C.  
Attorney for Wayne Sandstrom

**NOTES**

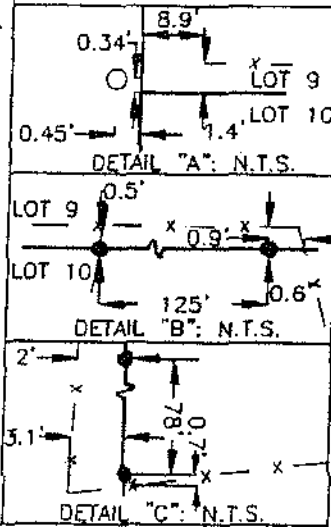
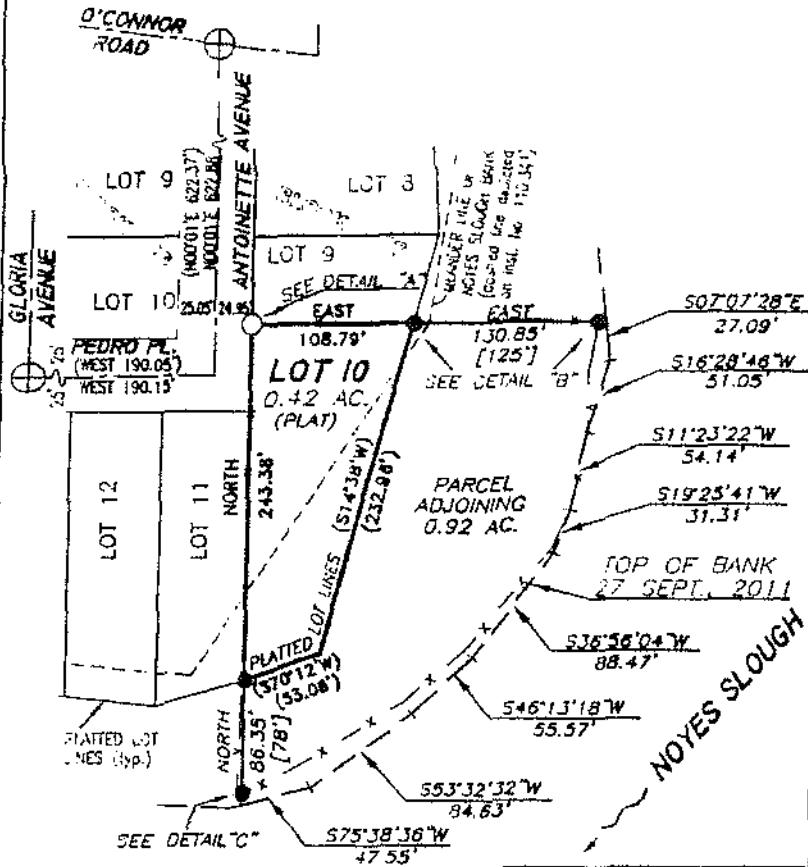
1. THE BASIS OF BEARINGS WAS ESTABLISHED FROM THE RECORD PLAT (INST. #110,341, F.R.D.) FROM THE RECOVERED MONUMENTS DEPICTED AT THE CENTERLINE INTERSECTIONS OF PEDRO PLACE/GLORIA AVENUE AND O'CONNOR ROAD/ANTOINETTE AVE., BEING CALCULATED AS N16°58'46"E, A DISTANCE OF 650.79', AND HAVING A MEASURED INVERSE OF N16°58'46"E, A DISTANCE OF 651.32'.
2. PROLONGATION OF THE PLATTED LOT LINES WAS USED IN THIS SURVEY, VERSUS OTHER METHODS OF EXTENSION SUCH AS; PRORATION OR PERPENDICULAR INTERSECTIONS, BECAUSE OF THE EXISTING FENCE THAT WAS ERECTED BY THE OWNER OF LOT 10.
3. OWNERSHIP OF PARCEL ADJOINING LOT 10 MAY BE SUBJECT TO ACTION OF QUIET TITLE.



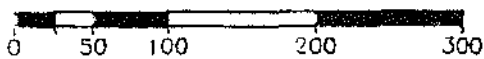
VICINITY MAP  
FNSB MAPPING SCALE 1" = 1/8 MILE

**LEGEND**

- RECOVERED REBAR
- SET REBAR AND CAP (STAMPED 4473-5)
- ⊕ RECOVERED SI BRASS CAP (12.34')
- [123'] REFERENCE DISTANCE
- - - FENCE LINE
- - - TOP BANK OF SLOUGH



SCALE: 1"=100'



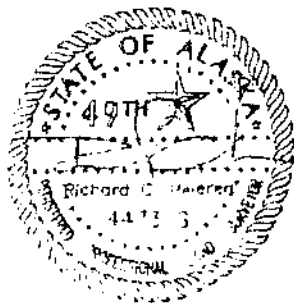
**CERTIFICATE OF REGISTERED LAND SURVEYOR**

I, RICHARD C. HEIEREN, A PROFESSIONAL LAND SURVEYOR REGISTERED IN THE STATE OF ALASKA, DO HEREBY CERTIFY THIS PLAT TO BE A TRUE AND CORRECT REPRESENTATION OF LANDS ACTUALLY SURVEYED BY ME OR UNDER MY DIRECT SUPERVISION, AND THAT THE DISTANCES AND BEARINGS ARE SHOWN CORRECTLY AND THAT ALL MONUMENTS REQUIRED HAVE BEEN SET

12-28-11  
DATE

2011-115  
Plat #  
Fairbanks

12-28-11



**RECORD OF SURVEY**  
**LEMETA SUBDIVISION**  
**LOT 10, BLOCK 27**  
**MEANDER LINE OF NOYES SLOUGH**  
**(INST. NO. 110,341, F.R.D.)**

LOCATION: WITHIN THE NW1/4 OF THE SE1/4  
SEC 3, T.1S, R.1W, F.M. AK.

**PREPARED FOR:**

WAYNE ROBERT SANDSTROM, TRUSTEE  
9UD & VI SANDSTROM FAMILY TRUST  
341 ANTOINETTE AVE.  
FAIRBANKS, AK 99701

**SURVEYOR:** RCH SURVEYS Ltd.

(907) 326 DRIVEWAY STREET STE 102  
101-141 FAIRBANKS, ALASKA 99701

FAIRBANKS RECORDING DISTRICT

EA Page 1 of 1



FILE COPY

CASE DESCRIPTION – SUPERIOR COURT

Case Number: 4FA-13-02903CI

Check the box that best describes the case. Mark one box only. If the caption is "In the Matter of", do not select Civil – Superior Court case. Use either Superior Court Miscellaneous Petition or appropriate Domestic Relations case type. For district court cases, use form CIV-125D.

CIVIL – SUPERIOR COURT

CONTRACT

Contract cases involving real property should be reported under the real property category.

- Debt Collection (CISDEB)
- Claim Against Seller of Goods/Services (CISCLAIM)
- Employment Dispute (CISEMP)
- Other Contract (CISOCT)

TORT

- Intentional Tort (e.g. assault, battery, vandalism) (CISIT)
- Slander/Libel/Defamation (CISSLD)
- Product Liability (CISPL)
- Wrongful Death (CISPID)
- Automobile Negligence:
  - Personal Injury Only (CISPIA)
  - Property Damage Only (CISPDA)
  - Both (CISIDA)
- Other Negligence:
  - Personal Injury Only (CISPIO)
  - Property Damage Only (CISPDO)
  - Both (CISIDO)

MALPRACTICE

- Legal Malpractice (CISLMP)
- Medical Malpractice (CISMMP)
- Other Malpractice (CISOMP)

REAL PROPERTY

- Quiet Title (CISQIT)
- Foreclosure (CISFOR)
- Condemnation (CISCNDM)
- Real Estate Matter (CISREM)

OTHER CIVIL

- Arbitration Proceeding (CISAP)
- Confession of Judgment (CISCONF)
- Unfair Trade Practice (CISUTP)—incl. injunc. relief
- Consumer Protection (CISCP)—incl. injunc. relief (Clerk: Use form CIV-128 for CISUTP and CISCP.)
- Declaratory Judgment/Injunc. Relief (CISINJ)
- OSC Request – Admin Agency (CIOSC)
- Action to Enforce Administrative Agency Order (Incl Subpoena) (CIBW)
- Writ of Habeas Corpus (CIWHC)
- Election Contest or Recount Appeal (CISELE)
- Enforcement of Arbitration Order or Subpoena AS 09.43.070 (CIARB)
- Property Division—Domestic Partnership (CISPROP)
- Other Civil Complaint (CISOCI). Describe:

FORGIBLE ENTRY AND DETAINER – SUPERIOR COURT

- Eviction – F.E.D. (CISFED)

FOREIGN JUDGMENT – SUPERIOR COURT

- Registration of Foreign Judgment (CISFOJ)  
*Do not use for foreign support/custody order. See Domestic Relations category.*

POST-CONVICTION RELIEF TO SUPERIOR COURT

- Post-Conviction Relief (CISPCR)

DOMESTIC RELATIONS

DIVORCE WITHOUT CHILDREN

- Divorce Without Children (CISDIV)
- Uncontested Divorce Without Children – Superior Court (CISUDIV)

DIVORCE OR CUSTODY WITH CHILDREN

- Petition for Custody (CISCUS)
- Uncontested Complaint for Custody (CISUCUS)
- Divorce With Children (CISDVC)
- Uncontested Divorce With Children (CISUDVC)

LEGAL SEPARATION

- Legal Separation With Children (CICLS)
- Legal Separation Without Children (CISLS)

DOMESTIC RELATIONS OTHER

- Ex Parte Application for OSC for Failure to Comply with Admin Order for Genetic Testing (CIOSCP)
- Action to Modify or Enforce Administrative Child Support Order (CIPCS)
- Petition for Order re: PFD or Native Dividend (CIPND)
- Establishment of Paternity (CISPAT)
- Disestablishment of Paternity (CIDPAT)
- Foreign Custody Order – Registration, Modification or Enforcement under AS 25.30 (DR483)
- Foreign Support Order – Registration, Modification or Enforcement under AS 25.25 (CIUIFSA)
- Both Foreign Custody and Support Order – Registration, Modification or Enforcement under AS 25.30 and AS 25.25 (CIFCS)
- Foreign Domestic Relations Order (Not Custody or Support) – Registration, Modification or Enforcement (CIDRFJ)
- Petition for Annulment (CIANNUL)
- Petition for Visitation (CIVIS)

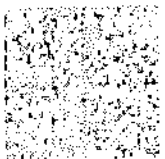
FILED in the Trial Court of Alaska, Eastern District  
NOV 13 2013  
Dennis

Law Office of  
**John J. Connors P.C.**  
*Attorney at Law*  
P.O. Box 73693  
Fairbanks, Alaska 99707

**CERTIFIED MAIL**



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OFFICE OF THE  
CLERK OF THE  
SUPERIOR COURT  
433 EAST 12TH AVENUE  
FAIRBANKS, ALASKA 99701

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