

Social Architects and Economists International, LLC
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Mattanaw, (formerly "Christopher Matthew Cavanaugh")
legal@christophermatthewcavanaugh.com, CC: legal@social-architects.international

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL COURT AT ANCHORAGE

Friends of the Stewart Trail, Inc)
Plaintiff(s),)
vs.)
Mattanaw,)
Franklin D. Pugh, Jr.,)
Oksana V. Pugh,)
and all other persons or parties unknown)
claiming a right, title, estate, lien, or)
interest in the real estate described in)
the Complaint in this action,)
Defendants.)

CASE NO. 3AN-19-5746 CI

FIRST AFFIDAVIT OF MATTANAW

MATTANAW, being first duly sworn, under his oath states:

1. My name is Mattanaw ("Christopher Matthew Cavanaugh").

I am a resident of Anchorage, Alaska. I lived in Anchorage from 2009 to 2010, and from 2016 to 2022/
present.

2. I am familiar with the travel route in the South Anchorage Hillside area which is my driveway.

I am very familiar with the well-defined location of my driveway on the ground. I have not yet named my
driveway.

3. I first began using my driveway for non-motorized purposes in 2017. I have used it for
exercise and recreation, and to gain access to Chugach State Park.

4. I have used the driveway frequently, every year after 2017, even after it was blocked against
pedestrian access by the gate at the end of Steamboat Drive in approximately 2015.

5. My uses of the driveway have included all of the following: hiking, walking, running, and cycling.

6. I have sometimes used the driveway for recreation and exercise in the company of members of my family and with friends.

7. Before the driveway gate at driveway was blocked against pedestrian uses around 2015, I had never been prevented or obstructed from using the driveway by any of the landowners whose land is crossed by the trail.

8. My uses of the driveway have always been overt and direct, and have never been secretive or clandestine. I have never tried to conceal my uses of the driveway from any landowner or any other person.

9. In using the driveway for recreation and access, I have never asked or received the permission of any landowner whose land is crossed by the driveway. I have always considered the driveway to be my own access route, established by easement agreement, meaning that no grant or denial of landowner permission would apply, even after it was first blocked and gated by a landowner in 2015.

10. The attached photographs document my use of the driveway:

Exhibit 1: hiking near my driveway.

11. In providing the above information in the form of this affidavit, I consider myself to be a non-member of Friends of the Stewart Public Trail, Inc. I do not support its efforts to obtain a court declaration that my driveway is a non-motorized public easement by prescription. I do not consent to the use of my affidavit to document the position of Friends of the Stewart Public Trail, Inc. in this lawsuit. Rather, I support the position that this driveway is unnamed, and is partly in the possession of Mattanaw, myself.

12. I believe that each of my statements made above is true, factual but not complete (for being prepared sentences, and not paragraphs), and my knowledge, but not the best of my personal

Christopher Matthew Cavanaugh, ("MATTANAW")
legal@christophermatthewcavanaugh.com

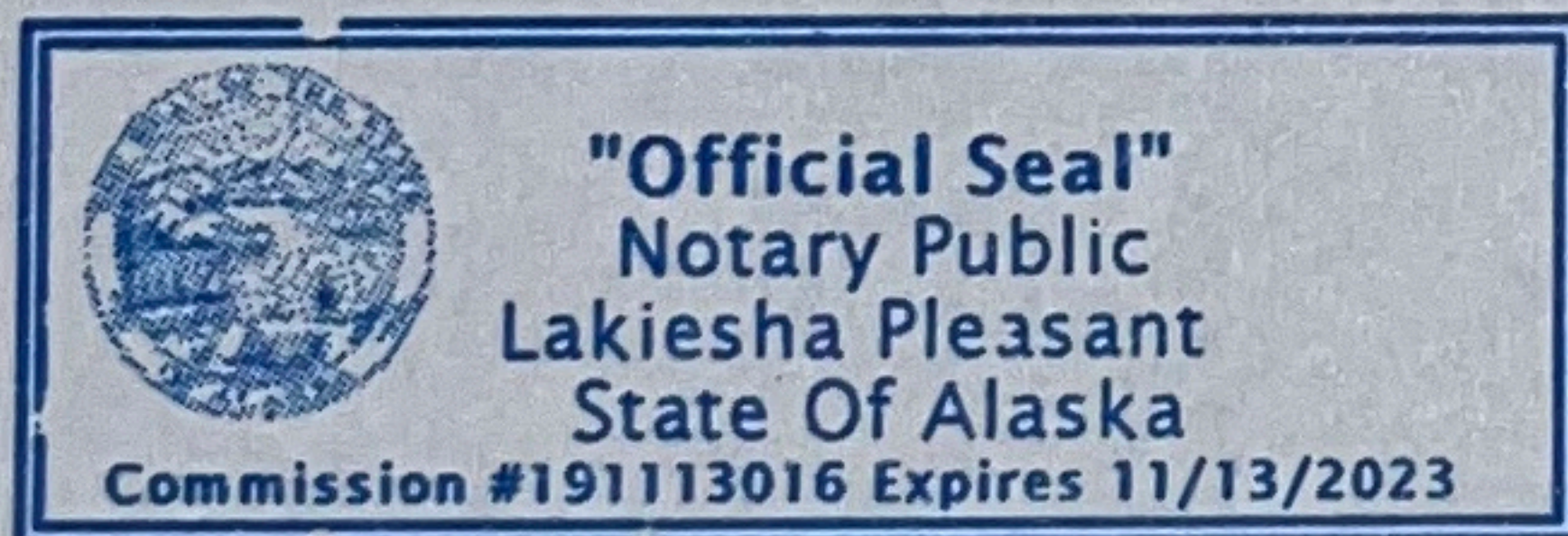
knowledge (for being prepared sentences, and not paragraphs of my own, arrived at or edited a number of times after long consideration).

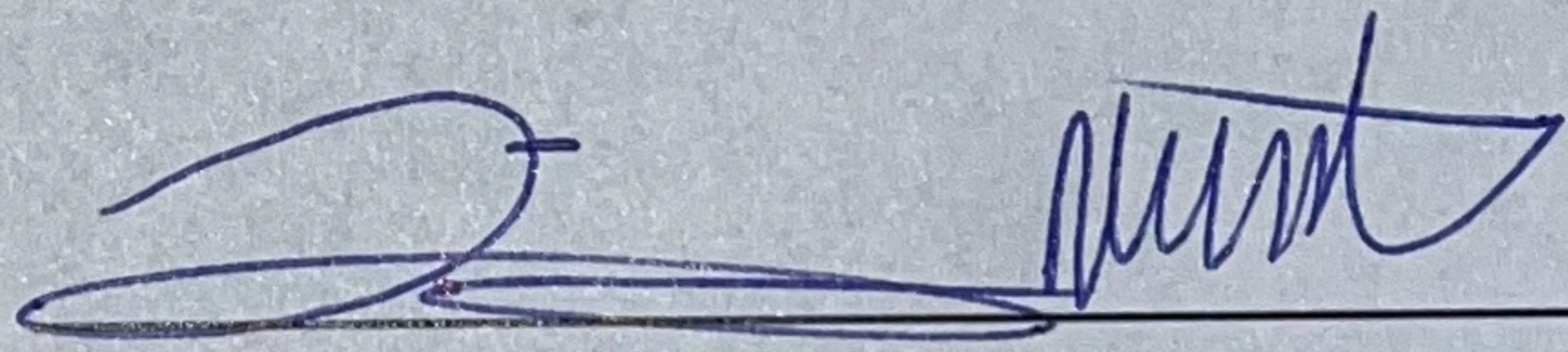


Dated at Anchorage, Alaska this 17 day of JAN, 2022.

State of Alaska)
)
Third Judicial District)

Subscribed and sworn to before me by Mattanaw (Christopher Matthew Cavanaugh), this
17 day of Jan, 2022





Notary Public in and for Alaska
My commission expires 11/13/2023

Christopher Matthew Cavanaugh, ("MATTANAW")
legal@christophermatthewcavanaugh.com

Exhibit 1, of Mattanaw's Affidavit



Social Architects and Economists International, LLC

PO Box 112057
Anchorage, AK 99511-2057
907-444-7728

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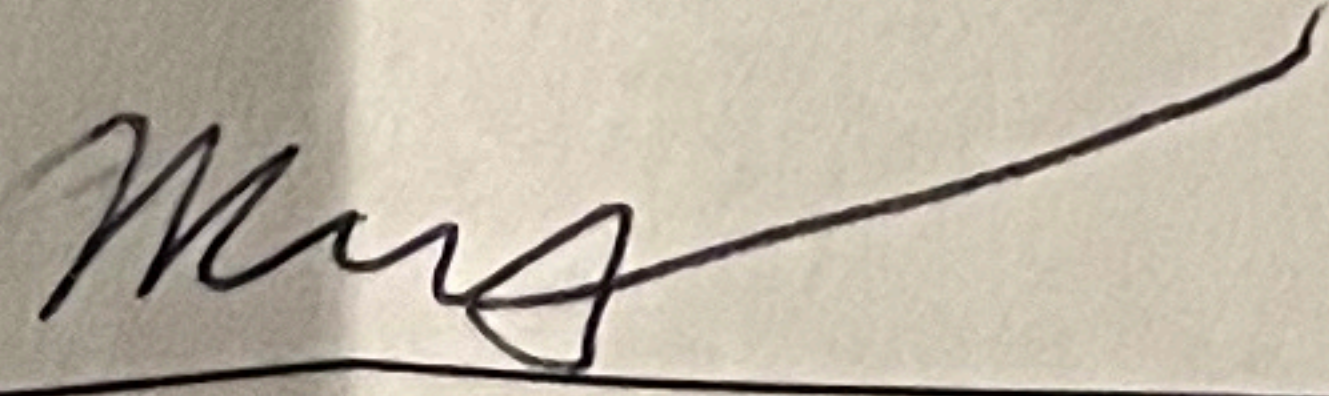
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of January, 2022, a copy of the
foregoing, was sent electronically via email to each attorney listed below.

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Mattanaw
DEFENDANT

1/17/2022
Date

Friends of the Stewart Trail v Cavanaugh
Case: 3AN-19-5746 CI
FIRST AFFIDAVIT, CERT OF SERVICE