

In The United States Court of Federal Claims

FILED
Dec 5 2017
U.S. COURT OF
FEDERAL CLAIMS

Bassam Abousaway, James Alban, Walter Alfaro, §
Charles Alexander, Jose and Eldi Almeida, §
Leon Attias and Maria Gamero, Salah Ayeshe, §
William Baber, Stephen and Paige Balderas, §
Robbin Barrow, Allen and Jennifer Berryman, §
Chase and Marci Bowman, Magdy Beshay, §
Stephen Brashier, Justin Brock, §
Ryan and Kathryn Bromm, Joshua Bryant, §
Artemio Casas, Bryan and Lisa Clawson, §
Ryan Clark, Roza Czaplicki, §
William and Ingrid Crandell, §
Michael Davila, Ivan Diaz, Michael Edminster, §
Francisco Espinoza, Jonathan Fink. §
Monique Fitzmaurice, Paul Fontenot, §
Joseph and Carol Franz, Cynthia Franze, §
Carolyn Gard, Jan Gaskamp, Richard Gigante, §
Luis and Myrna Gomez, Dee Gorszewski, §
Elaine Grimes, Imelda Guerra, Lorraine Hall, §
William and Sharon Hall, Pamela Hidinger, §
Haejo Hwang, Sharon and Thomas Janacek, §
Jared and Carrie Johnson, Juana Kalmus, §
Juzer Khokhri, Childa Kincaid, Terry Ledet, §
Andrew Lee, Jack Lesley, Aiyong Li, §
Giovanni and Julie Occhipinti, Barbara LaMantia, §
David Lee, Gwendolyn Lewis, Cynthia Lopez, §
Jeff and Donna Low, Homer Lozano, §
Scott and Andrea Maeker, Derrick Mar, §
Elizabeth Martin, John and Sheila McGaughy, §
Romeo and Pravda Miltchev, Diane Mitchell, §
Colin Moody, Tareneh Mozayani, §
Tommy and Sarah Murphy, Paul and Mary Nantz, §
James and Lisa Nicholson, Trish Nguyen, Robert O’Neal, §
Sheila Patterson, Ralph Pierotti, Kevin Powell, Ta Quan, §
Judith Quintero, Nathan Reese, Cynthia Franze as owner of §
Remodeling Renovations, Linda Richards, §
Bernice Robertson, Alyssa Rodriguez and Erik Delgado, §
Monte Rowe, Martin Sandoval, §

Case No 17-1881 L

Judge: _____

Roy and Rosie Sandoval, Christina Schulz,	§
Eric Shaklee, Shawn Shameli,	§
John and Eleanor Sheffer,	§
Lisa and Mahmoud Sleiman, Alma and Alex Soto,	§
Mural Sriramulu, Kiho Song and N. Sunghie, Eric Spann	§
Robert Sutton, Jay and Amy Thieme,	§
Robin and Donald Tooms, Christopher Valdiva,	§
Catherine van Zutphen and G. Michael Buttree,	§
Danicha Vargas, Kevin Vu, Mahesh Wadhwa,	§
Sharon Waite, Anjanette Whitener,	§
Jean and Bonnie Williams, Canetra Wilson,	§
Linda Wilson, Eckie Woodard, Chyi Wu, and Ali Zerouat	§
	§
Plaintiffs,	§
vs.	§
	§
The United States of America	§
	§
Defendant.	§

Complaint (Upstream)

Bassam Abousaway, James Alban, Walter Alfaro, Charles Alexander, Jose and Eldi Almeida, Leon Attias and Maria Gamero, Salah Ayesh, William Baber, Stephen and Paige Balderas, Robbin Barrow, Allen and Jennifer Berryman, Chase and Marci Bowman, Magdy Beshay, Stephen Brashier, Justin Brock, Ryan and Kathryn Bromm, Joshua Bryant, Artemio Casas, Bryan and Lisa Clawson, Ryan Clark, Roza Czaplicki, William and Ingrid Crandell, Roza Czaplicki, Michael Davila, Ivan Diaz, Michael Edminster, Francisco Espinoza, Jonathan Fink, Monique Fitzmaurice, Paul Fontenot, Joseph and Carol Franz, Cynthia Franze, Carolyn Gard, Jan Gaskamp, Richard Gigante, Luis and Myrna Gomez, Dee Gorszewski, Elaine Grimes, Imelda Guerra, Lorraine Hall, William and Sharon Hall, Pamela Hidinger, Haejo Hwang, Sharon and Thomas Janacek, Jared and Carrie Johnson, Juana Kalmus, Juzer Khokhri, Childa Kincaid, Terry Ledet, Andrew Lee, Jack Lesley, Aiying Li, Giovanni

and Julie Occhipinti, Barbara LaMantia, David Lee, Gwendolyn Lewis, Cynthia Lopez, Jeff and Donna Low, Homer Lozano, Scott and Andrea Maeker, Derrick Mar, Elizabeth Martin, John and Sheila McGaughty, Romeo and Pravda Miltchev, Diane Mitchell, Colin Moody, Tareneh Mozayani, Tommy and Sarah Murphy, Paul and Mary Nantz, Trish Nguyen, Robert O’Neal, James and Lisa Nicholson, Sheila Patterson, Ralph Pierotti, Kevin Powell, Ta Quan, Judith Quintero, Nathan Reese, Cynthia Franze as owner of Remodeling Renovations, Linda Richards, Bernice Robertson, Alyssa Rodriguez and Erik Delgado, Monte Rowe, Martin Sandoval, Roy and Rosie Sandoval, Christina Schulz, Eric Shaklee, Shawn Shameli, John and Eleanor Sheffer, Lisa and Mahmoud Sleiman, Alma and Alex Soto, Mural Sriramulu, Kiho Song and N. Sunghie, Eric Spann, Robert Sutton, Jay and Amy Thieme, Robin and Donald Tooms, Christopher Valdiva, Catherine van Zutphen and G. Michael Buttree, Danicha Vargas, Kevin Vu, Mahesh Wadhwa, Sharon Waite, Anjanette Whitener, Jean and Bonnie Williams, Canetra Wilson, Linda Wilson, Eckie Woodard, Chyi Wu, and Ali Zerouat file this Complaint against the United States for its taking of their real and personal property.

The U.S. Army Corps of Engineers (“Corps”) designed and operated a system of reservoirs in west Houston that resulted in sustained flooding of their residences and places of business, to such extent to operate a taking for public use. In return for that taking, Plaintiffs seek just compensation granted by the Fifth Amendment to the United States Constitution.

1. The Parties and Property at Issue

1.1 Plaintiffs are all individuals and families residing on the west side of Houston, asserting claims, not as a class, but independently alongside each other for compensation for property taken by federally-controlled flood-water captured and stored within the Addicks and

Barker reservoirs, as occurred in the last week of August 2017, and again whenever else in the future the Corps chooses. Plaintiffs owned the property in question that was taken at the time the taking occurred. Specifically, Plaintiffs are:

1.1.1 Bassam Abousaway, is a homeowner who resides in Katy, Texas. Mr. Abousaway owns a single-family home located at 22006 Hanneck Court, Katy Tx 77450 more particularly described as Cinco Ranch Greenway Village, Section 11, Block 3, Lot 10. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Abousaway seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.2 James Alban, is a homeowner who resides in Katy, Texas. Mr. Alban owns a single-family home located at 6031 Gablestone Lane, Katy, Texas 77450 more particularly described as Grand Lakes, Phase Three, Section 5, Block 1, Lot 17. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Alban seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.3 Walter Alfaro, is a homeowner who resides in Richmond, Texas. Mr. Alfaro owns a single-family home located at 7219 Spring Orchard, Richmond Texas 77407 more particularly described as Grand Mission, Section 7, Block 4 Lot 5. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Alfaro

seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.4 Charles Alexander, is a homeowner who resides in Katy, Texas. Mr. Alexander owns a single-family home located at 2839 Orchid Tree Lane, Katy, Texas more particularly described as Lot 12, Block 3, Raintree Village, Section 2, Par R/P.. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Alexander seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.5 Jose and Eldi Almeida, are homeowners who reside in Houston, Texas. Mr. and Mrs. Almeida own two single-family homes located at 16619 Park Lorne Drive, Houston, Texas 77084 and 4102 Glennale, Houston, Texas 77084 more particularly described as Lot 29, Block 1, Pine Forest Village and Lot 5, Block 4, Pine Forest Village respectively. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Almeida seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.6 Leo Attias and Maria Gamero, are homeowners who reside in Katy, Texas. Mr. Attias and Ms. Gamero own a single-family home located at 6214 Canyon Trace Court, Katy, Texas 77450 more particularly described as Canyon Gate Cinco Ranch, Section 4, Block 1, Lot 10.. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its

retention system, Mr. Attias and Ms. Gamero seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.7 Salah Ayesh, is a homeowner who resides in Houston, Texas. Mr. Ayesh owns a single-family home located at 10455 Sanibel Falls Court, Houston, Texas 77095 more particularly described as Lot 1, Block 2, Riata Ranch, Section 3. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Ayesh seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.8 William Baber, is a homeowner who resides in Katy, Texas. Mr. Baber owns a single-family home located at 6407 Holly Canyon Court, Katy, Texas 77450 more particularly described as Canyon Gate, Cinco Ranch, Section 7, Block 1, Lot 19. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Baber seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.9 Stephen and Paige Balderas, are homeowners who resided in Katy, Texas. Mr. and Mrs. Balderas owned a single-family home located at 6302 Townsgate Circle, Katy, Texas 77450 more particularly described as Cinco Ranch, Southpark Section 1, Block 1, Lot 29. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention

system, Mr. and Mrs. Balderas seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.10 Robbin Barrow, is a homeowner who resides in Richmond, Texas. Ms. Barrow owns a single-family home located at 7758 Elder Grove Lane, Richmond, Texas 77407 more particularly described as Twin Oaks Village, Section 7, Block 3, Lot 44. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Barrow seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.11 Allen and Jennifer Berryman, are homeowners who reside in Katy, Texas. Mr. and Mrs. Berryman own a single-family home located at 21503 Ganton Drive, Katy, Texas 77450 more particularly described as Kelliwood Greens, Section 1, Block 4, Lot 8.. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Berryman seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.12 Chase and Marci Bowman, are homeowners who reside in Katy, Texas. Mr. and Mrs. Bowman own a single-family home located at 5702 Walkabout Way, Katy, Texas 77450 more particularly described as Lot 5, Block 3, Cinco Ranch, Southpark, Section 3. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system,

Mr. and Mrs. Bowman seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.13 Magdy Beshay, is a homeowner who resides in Houston, Texas. Mr. Beshay owns a single-family home located at 10451 Sanibel Falls Court, Houston, Texas 77095 more particularly described as Lot 2, Block 2, Riata Ranch, Section 3. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Beshay seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.14 Steven Brashier is a homeowner who resides in Houston, Texas. Mr. Brashier owns a single-family home located at 19802 Redroot Drive, Houston, Texas 77084 more particularly described as Lot 1, Block 5, Westlake Place, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Brashier seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.15 Justin Brock, is a homeowner who resides in Katy, Texas. Mr. Brock owns a single-family home located at 21038 Kelliwood Park Lane, Katy, Texas 77450 more particularly described as Kelliwood Park, Block 1, Lot 8. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Brock

seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.16 Ryan and Kathryn Bromm, are homeowners who resides in Katy, Texas. Mr. and Mrs. Bromm own a single-family home located at 21307 Chickory Trail, Katy, Texas 77450 more particularly described as Grand Lakes, Phase Three, Section 11, Block 2, Lot 33. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Bromm seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.17 Joshua Bryant is a homeowner who resides in Houston, Texas Mr. Bryant owns a single-family home located at 4730 Whispering Falls Drive, Houston, Texas 77084 more particularly described as Lot 26, Block 21, Bear Creek Village, Section 7. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Bryant seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.18 Artemio Casas, is a homeowner who resides in Houston, Texas Mr. Casas owns a single-family home located at 16111 Aspenglenn Drive, 1003, Houston, Texas 77084 more particularly described as Unit 1003 Building J,1.22 Int Common Land & Ele, Aspen Club Condo Ph 2. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as

if part of its retention system, Mr. Casas seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.19 Ryan Clark is a homeowner who resides in Katy, Texas. Mr. Clark owns a single-family home located at 21422 Grand Hollow Lane, Katy, Texas 77450 more particularly described as Grand Lakes, Phase Three, Section 5, Block 1, Lot 46. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Clark seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.20 Bryan and Lisa Clawson, are homeowners who resides in Katy, Texas. Mr. and Mrs. Clawson own a single-family home located at 5303 Fairweather Court, Katy, Texas 77450 more particularly described as Cinco Ranch Meadow Place, Section 5, Block 2, Lot 14. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Clawson seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.21 William and Ingrid Crandell, are homeowners who resides in Houston, Texas. Mr. and Mrs. Crandell own a single-family home located at 5438 Lake Place Drive, Houston, Texas 77041 more particularly described as Lot 2, Block 1, Lakes on Eldridge, Section 9. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention

system, Mr. and Mrs. Crandell seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.22 Roza Czaplicki is a homeowner who resides in Katy, Texas. Ms. Czaplicki owns a single-family home located at 6515 Faulkner Ridge Drive, Katy, Texas more particularly described as Cinco Ranch Southpark, Section 1, Block 5, Lot 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Czaplicki seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.23 Michael Davila, is a homeowner who resides in Houston, Texas. Mr. Davila owns a single-family home located at 14311 Barkerview Court more particularly described as Lot 28, Block 5, Charlestown Colony, Section 2. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Davila seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.24 Ivan Diaz, is a homeowner who resides in Houston, Texas. Mr. Diaz owns a single-family home located at 4326 Hickory Grove, Houston, Texas 77084 more particularly described as Lot 38, Block 1, Bear Creek Village, Section 11. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Diaz

seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.25 Michael Edminster, is a homeowner who resides in Richmond, Texas. Mr. Edminster owns a single-family home located at 17827 Meadowcreek Trail, Richmond, Texas 77407, more particularly described as West Oaks Village, Section 3, Block 1, Lot 22. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Edminster seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.26 Francisco Espinoza, is a homeowner who resides in Houston, Texas. Mr. Espinoza owns a single-family home located ~~5706~~ Wynberry, Houston, Texas 77041 more particularly described as Lot 8, Block 6, Concord Bridge, Section 7. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Espinoza seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.27 Jonathan Fink, is a renter who resides in Katy, Texas. Mr. Fink rented property at 1002 Katy Gap Road, Apt. 431, Katy, Texas 77494. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Fink seeks to recover just compensation from the Corps for its taking of his personal property for public use.

1.1.28 Monique Fitzmaurice, is a homeowner who resides in Houston, Texas. Ms. Fitzmaurice owns a single-family home located at 11202 Velvet Grass Lane, Houston, Texas 77095 more particularly described as Lot 54, Block 2, Stone Gate, Section 8. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Fitzmaurice seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.29 Paul Fontenot, is a homeowner who resides in Houston, Texas. Mr. Fontenot owns a single-family home located at 4527 Hickory Downs Drive, Houston, Texas 77084 more particularly described as Lot 3, Block 1, Bear Creek Village, Section 9. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Fontenot seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.30 Cynthia Franze as owner of Remodeling Renovations, owns the single-family home located at 4318 Aspenglenn Drive, Houston, Texas 77084 more particularly described as Lot 2, Block 2, Bear Creek Village, Section 11. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Cynthia Franze, as owner of Remodeling Renovations seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.31 Joseph and Carol Franz, are homeowners who resides in Houston, Texas. Mr. and Mrs. Franz own a single-family home located at 15714 Laurel Heights Drive, Houston, Texas 77084 more particularly described as Lot 19, Block 14 Bear Creek Village Section 6. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Franz seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.32 Carolyn Gard, is a homeowner who resides in Houston, Texas. Ms. Gard owns a single-family home located at 15807 Tumbling Rapids Drive, Houston, Texas 77084 more particularly described as Lot 32, Block 7, Bear Creek Village, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Gard seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.33 Jan Gaskamp, is a homeowner who resides in Houston, Texas. Ms. Gaskamp owns a single-family home located at 12402 Aste Lane, Houston, Texas more particularly described as Lot 51, Block 21, Barwood Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Gaskamp seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.34 Richard Gigante, is a homeowner who resides in Katy, Texas. Mr. Gigante owns a single-family home located at 20906 Winlock Trace, Katy, Texas 77450 more particularly described as Cinco Ranch Meadow Place, Section 5, Block 2, Lot 38. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Gigante seeks to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.35 Luis Gomez and Myrna Gomez, are homeowners who resides in Houston, Texas. Mr. and Mrs. Gomez own a single-family home located at 13638 Wheatbridge Drive, Houston, Texas 77041 more particularly described as Lot 16, Block 5, Concord Bridge, Section 5. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Gomez seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.36 Dee Gorszewski is a renter who resides in Houston, Texas. Ms. Gorszewski rented property at 18325 Kingsland Blvd., Houston, Texas 77094. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Gorszewski seeks to recover just compensation from the Corps for its taking of her personal property for public use.

1.1.37 Elaine Grimes is a homeowner who resides in Houston, Texas. Ms. Grimes owns a single-family home located at 15702 Sandy Hill Drive more particularly described as Lot 23, Block 7,

Bear Creek Village, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Grimes seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.38 Imelda Guerra, is a homeowner who resides in Houston, Texas. Ms. Guerra owns a single-family home located at 13535 Clayton Hill Drive, Houston, Texas 77040 more particularly described as Lot 10, Block 7, Concord Bridge, Section 7. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Guerra seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.39 Lorraine Hall, is a homeowner who resides in Katy, Texas. Ms. Hall owns a single-family home located at 6223 Santiago Mountain Court more particularly described as Canyon Gate, Cinco Ranch, Section 1, Block 1, Lot 21. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Hall seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.40 William and Sharon Hall, are homeowners who reside in Katy, Texas. Mr. and Mrs. Hall own a single-family home located at 1718 Galleon Oaks, Katy, Texas 77450 more particularly described as Lot 37, Block 7, Nottingham Country, Section 10. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of

government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Hall seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.41 Pamela Hidinger is a homeowner who resides in Katy, Texas. Ms. Hidinger owns a single-family home located at 21906 Windbury Court, Katy, Texas 77450 more particularly described as Cinco Ranch, Greenway Village, Section 11, Block 2, Lot 8. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Hidinger seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.42 Haejo Hwang, is a homeowner who resides in Katy, Texas. Mr. Hwang owns a single-family home located at 5906 Bailey Springs Court, Katy, Texas 77450 more particularly described as Grand Lakes, Phase Three, Section 8, Block 1, Lot 26. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Hwang seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.43 Sharon and Thomas Janacek, are homeowners who reside in Houston, Texas. Mr. and Mrs. Janacek own a single-family home located at 15738 Fox Springs Drive, Houston, Texas 77084 more particularly described as Lot 130, Block 9, Bear Creek Village, Section 12. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention

system, Mr. and Mrs. Janacek seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.44 Jared and Carrie Johnson, are homeowners who reside in Katy, Texas. Mr. and Mrs. Johnson own a single-family home located at 6627 Everhill Circle, Katy, Texas 77450 more particularly described as Cinco Ranch, Southpark Section 1, Block 4, Lot 8. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Johnson seeks to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.45 Juana Kalmus, is a homeowner who reside in Katy, Texas. Ms. Kalmus owns a single-family home located at 2834 Orchid Tree Lane, Katy, Texas 77449 more particularly described as Lot 16, Block 3, Raintree Village, Section 2, Par R/P. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Kalmus seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.46 Juzer Khokhri, is a homeowner who resides in Houston, Texas. Mr. Khokhri owns a single-family home located at 16111 Aspenglenn, Houston, Texas more particularly described as Unit 507, Bldg, D. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Khokhri seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.47 Childa Kincaid, is a homeowner who resides in Houston, Texas. Ms. Kincaid owns a single-family home located at 17515 Sundrop Lane, Houston, Texas 77084 more particularly described as Lot 21, Block 3, Mayde Creek Farms, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Kincaid seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.48 Andrew Lee, is a homeowner who resides in Houston, Texas. Mr. Lee owns a single-family home located at 5514 Cardinal Bay, Houston, Texas more particularly described as Lot 7, Block 2, Lakes on Eldridge, Section 21. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Lee seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.49 Terry Ledet, is a homeowner who resides in Katy, Texas. Mr. Ledet owns a single-family home located at 21314 Grand Hollow Lane, Katy, Texas more particularly described as Grand Lakes, Phase Three, Section 5, Block 2, Lot 14. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Ledet seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.50 Gwendolyn Lewis is a renter who resides in Houston, Texas. Ms. Lewis rented property at 16111 Aspenglenn Drive, Unit 507, Houston, Texas 77084. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Lewis seeks to recover just compensation from the Corps for its taking of her personal property for public use.

1.1.51 Aiying Li, is a homeowner who resides in Katy, Texas. Mr. Li owns a single-family home located at 4211 Sand Terrace, Katy, Texas 77450 more particularly described as Fairways at Kelliwood, Section 1, Block 1, Lot 6. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Li seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.52 Giovanni and Julie Occhipinti, are homeowners who reside in Katy, Texas. Mr. and Mrs. Occhipinti own a single-family home located at 5511 Langhorne Court, Katy, Texas 77450 more particularly described as Cinco Ranch, Greenway Village, Section 12, Block 3, Lot 10. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Occhipinti seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.53 Barbara LaMantia, is a homeowner who resides in Katy, Texas. Ms. LaMantia owns a single-family home located at 3303 Pedernales Trails Lane, Katy, Texas more particularly described

as Cinco Ranch Equestrian Village, Section 3, Block 2, Lot 37. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. LaMantia seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.54 David Lee, is a homeowner who resides in Houston, Texas. Mr. Lee owns a single-family home located at 4035 Glennale, Houston, Texas 77084 more particularly described as Lot 9, Block 3, Pine Forest Village. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Lee seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.55 Jack Lesley, is a homeowner who resides in Richmond, Texas. Mr. Lee owns a single-family home located at 7510 Chathan Glen Lane, Richmond, Texas 77407 more particularly described as Grand Mission, Section 9, Block 1, Lot 48. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Lesley seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.56 Cynthia Lopez, is a homeowner who resides in Houston, Texas. Ms. Lopez owns a single-family home located at 15914 Tumbling Rapids Drive, Houston, Texas 77084 more particularly described as Bear Creek Village, Section 9, Lot 60, Block 16. As a result of the Corp's

design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Lopez seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.57 Jeff and Donna Low, are homeowners who reside in Katy, Texas. Mr. and Mrs. Low own a single-family home located at 5502 Langhorne Court, Katy, Texas 77450 more particularly described as Cinco Ranch Greenway Village, Section 12, Block 3, Lot 5. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Low seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.58 Homer Lozano, is a homeowner who resides in Katy, Texas. Mr. Lozano owns a single-family home located at 20719 Whitevine Way, Katy, Texas 77450 more particularly described as Cinco Ranch, Southpark Section 1, Block, 4, Lot 48. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Lozano seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.59 Scott and Andrea Maeker, are homeowners who reside in Katy, Texas. Mr. and Mrs. Maeker own a single-family home located at 6318 Holly Canyon Court, Katy, Texas 77450 more particularly described as Canyon Gate, Cinco Ranch, Section 7, Block 1, Lot 13. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps'

deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Maeker seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.60 Derrick Mar, is a homeowner who resides in Houston, Texas. Mr. Mar owns a single-family home located at 4110 Scone Street, Houston, Texas 77084 more particularly described as Lot 3, Block 6, Pine Forest Village. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Mar seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.61 Elizabeth Martin, is a homeowner who resides in Katy, Texas. Ms. Martin owns a single-family home located at 20410 Kelliwood Lakes Court, Katy, Texas 77450 more particularly described as Lot 8 \$ Res A1 and A2, Block 5, Kelliwood Lakes Section 1, Par R/P. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Martin seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.62 John and Sheila McGaughy, are homeowners who reside in Katy, Texas. Mr. and Mrs. McGaughy own a single-family home located at 6203 Faulkner Ridge Drive, Katy, Texas 77450 more particularly described as Cinco Ranch Southpark, Section 1, Block 1, Lot 9. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention

system, Mr. and Mrs. McGaughy seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.63 Romeo and Pravda Miltchev own a single-family home they rent out as investment property located at 20410 Wildview Court, Katy, Texas 77450 more particularly described as Cinco Ranch Equestrian Village, Section 3, Block 3, Lot 11. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Miltchev seek to recover just compensation from the Corps for its taking of their real property for public use.

1.1.64 Diane Mitchell, is a homeowner who resides in Houston, Texas. Ms. Mitchell owns a single-family home located at 4743 Blueberry Hill Drive, Houston, Texas 77084 more particularly described as Lot 9, Block 21, Bear Creek Village, Section 7. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Mitchell seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.65 Colin Moody, is a homeowner who resides in Katy, Texas. Mr. Moody owns a single-family home located at 20935 Field Manor Lane, Katy, Texas more particularly described as Grand Lakes, Phase 3, Section 9, Block 1, Lot 16. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Moody

seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.66 Tareneh Mozayani, is a homeowner who resides in Houston, Texas. Mr. Mozayani owns a single-family home located at 15626 Sandy Drive, Houston, Texas more particularly described as Lot 3, Block 10, Bear Creek Village, Section 6. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Mozayani seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.67 Tommy and Sarah Murphy, are homeowners who reside in Houston, Texas. Mr. and Mrs. Murphy own a single-family home located at 15627 Creekhaven Drive, Houston, Texas 77084 more particularly described as Lot 20, Block 19, Bear Creek Village, Section 10 R/P.. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Murphy seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.68 Paul and Mary Nantz, are homeowners who reside in Houston, Texas. Mr. and Mrs. Nantz own a single-family home located at 10422 Sanibel Falls Court, Houston, Texas more particularly described as Lot 19, Block 2, Riata Ranch, Section 3. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs.

Nantz seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.69 Trish Nguyen, is a homeowner who resides in Houston, Texas. Ms. Nguyen owns a single-family home located at 15603 Creekhaven Drive, Houston, Texas 77084 more particularly described as Lot 26, Block 19, Bear Creek Village Section 10 R/P. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Nguyen seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.70 James and Lisa Nicholson, are homeowners who reside in Katy, Texas. Mr. and Mrs. Nicholson own a single-family home located at 20714 Grenoble Lane, Katy, Texas 77450 more particularly described as Cinco Ranch Southpark, Section 1, Block 1, Lot 13. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Nicholson seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.71 Robert O'Neal, is a homeowner who resides in Houston, Texas. Mr. O'Neal owns a single-family home located at 15603 Pine Mountain Drive, Houston, Texas 77084 more particularly described as Lot 8, Block 9, Bear Creek Village, Section 6. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. O'Neal

seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.72 Sheila Patterson, is a homeowner who resides in Houston, Texas. Ms. Patterson owns a single-family home located at 5919 Saddle Bred Drive, Houston, Texas 77084 more particularly described as Lot 10, Block 1 of Savannah Estates. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Patterson seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.73 Ralph Pierotti is a homeowner who resides in Houston, Texas. Mr. Pierotti owns a single-family home located at 1906 Marlberry Lane, Houston, Texas 77084 more particularly described as Lot 11, Block 1, Mayde Creek Farms, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Pierotti seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.74 Kevin Powell, is a renter who was residing at 20802 Grenoble Lane, Katy, Texas 77450. Mr. Powell was renting a single-family home more particularly described as Cinco Ranch, Southpark, Section 1, Block 1, Lot 15. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Powell

seeks to recover just compensation from the Corps for its taking of his personal property for public use.

1.1.75 Ta Quan, is a homeowner who resides in Houston, Texas. Ms. Quan owns a single-family home located at 10010 Red Mesa Drive, Houston, Texas 77095 more particularly described as Lot 15, Block 2, Stone Gate, Section 12. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Quan seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.76 Judith Quintero is a homeowner who resides in Katy Texas. Ms. Quintero owns a single-family home located at 20715 Whitevine Way, Katy, Texas 77450 more particularly described as Lot 49, Block 4, Cinco Ranch, Southpark Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Quintero seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.77 Nathan Reese, is a homeowner who resides in Katy Texas. Mr. Reese owns a single-family home located at 5507 Langhorne Court, Katy, Texas 77450 more particularly described as Cinco Ranch, Greenway Village, Section 12, Block 3, Lot 11. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Reese

seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.78 Linda Richards, is a homeowner who resides in Katy, Texas. Ms. Richards owns a single-family home located at 2810 Orchid Tree Lane, Katy, Texas 77449 more particularly described as Lot 22, Block 2, Raintree Village, Section 2, Par R/P. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Richards seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.79 Bernice Robertson, is a homeowner who resides in Houston, Texas. Ms. Robertson owns a single-family home located at 5722 Georgetown Colony, Houston, Texas 77084 more particularly described as Lot 42, Block 4, Georgetown Colony Section 2. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Robertson seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.80 Alyssa Rodriguez and Erik Delgado, are homeowners who reside in Houston, Texas. Ms. Rodriguez and Mr. Delgado owned a single-family home located at 5327 Pine Cliff Drive, Houston, Texas 77084 more particularly described as Lot 23, Block 31, Bear Creek Village, Section 12. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as

if part of its retention system, Ms. Rodriguez and Mr. Delgado seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.81 Monte Rowe was a renter residing in Houston, Texas. Mr. Rowe was renting a home located at 18438 Lakeview Circle, Houston, Texas 77084 more particularly described as Lot 13, Block 3, Park Harbor Estates, Section 2. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Rowe seeks to recover just compensation from the Corps for its taking of his personal property for public use.

1.1.82 Martin Sandoval, is a homeowner who resides in Richmond, Texas. Mr. Sandoval owns a single-family home located at 18139 Afton Hollow Lane, Richmond, Texas 77407 more particularly described as Twin Oaks Village, Section 7, Block 3, Lot 61. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Sandoval seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.83 Roy and Rosie Sandoval, are homeowners who reside in Katy, Texas. Mr. and Mrs. Sandoval own a single-family home located at 22003 Camden Bend Lane, Katy, Texas 77450 more particularly described as Lot 1, Block 2, Cinco at Willow Fork, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system,

Mr. and Mrs. Sandoval seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.84 Erik Shaklee was a renter residing in Houston, Texas. Mr. Shaklee was renting a unit located at 13330 West Road, #935, Houston, Texas. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Shaklee seeks to recover just compensation from the Corps for its taking of his personal property for public use.

1.1.85 Shawn Shameli, is a homeowner who resides in Richmond, Texas. Mr. Shameli owns a single-family home located at 23810 Dolci Lane, Richmond, Texas 77406 more particularly described as Lakes of Bella Terra, Section 22, Block 1, Lot 13. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Shameli seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.86 Christina Schulz, is a homeowner who resides in Katy, Texas. Ms. Schultz owns a single-family home located at 6206 Morgan Canyon Court, Katy, Texas 77450 more particularly described as Lot 28, Block 1, Canyon Gate Cinco Ranch, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Schulz seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.87 John and Eleanor Sheffer, are homeowners who reside in Houston, Texas. Mr. and Mrs. Sheffer own a single-family home located at 5503 Moultrie Lane, Houston, Texas 77084 more particularly described as Lot 38, Block 2, Georgetown Colony, Section 2. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Sheffer seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.88 Lisa and Mahmoud Sleiman, are homeowners who reside in Houston, Texas. Mr. and Mrs. Sleiman own a single-family home located at 6214 Canyon Rune Court, Houston, Texas more particularly described as Canyon Gate, Cinco Ranch, Section 4, Block 1, Lot 28. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Sleiman seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.89 Kiho Song and Sunghie Na, are homeowners who reside in Houston, Texas. Mr. Song and Ms. Na own a single-family home located at 4527 Turf Valley Drive, Houston, Texas 77084 more particularly described as Lot 29, Block 5, Bear Creek Village Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Song and Ms. Nah seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.90 Alma and Alex Soto, are homeowners who reside in Houston, Texas. Mr. and Ms. Soto own a single-family home located at 15523 Creekhaven Drive, Houston, Texas 77084 more particularly described as Lot, 28, Block 19, Bear Creek Village, Section 10. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Ms. Soto seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.91 Eric Spann, is a homeowner who resides in Houston, Texas. Mr. Spann owns a single-family home located at 10415 Sanibel Falls Court, Houston, Texas 77095 more particularly described as Lot 11, Block 2, Riata Ranch, Section 3. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Spann seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.92 Mural Sriramulu, is a homeowner who resides in Katy, Texas. Mr. Sriramulu owns a single-family home located at 6106 Marble Hollow Lane, Katy, Texas 77450 more particularly described as Grand Lakes, Phase Three, Section 9, Block 2, Lot 21. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Sriramulu seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.93 Robert Sutton, is a homeowner who resides in Houston, Texas. Mr. Sutton owns a single-family home located at 1926 Marlberry Lane, Houston, Texas 77084 more particularly described as Lot 16, Block 1, Mayde Creek Farms, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Sutton seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.94 Jay and Amy Thieme, are homeowners who reside in Katy, Texas. Mr. and Mrs. Thieme own a single-family home located at 21202 Crescent Star Court, Katy, Texas 77450 more particularly described as Lot 4, Block 3, Grand Lakes Phase 3, Section 8. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Thieme seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.95 Robin and Donald Tooms, are homeowners who reside in Katy, Texas. Mr. and Mrs. Tooms own a single-family home located at 6218 Royal Hollow Lane, Katy, Texas 77450 more particularly described as Grand Lakes, Phase 3, Section 9, Block 3, Lot 9. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Tooms seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.96 Christopher Valdivia, is a homeowner who resides in Houston, Texas. Mr. Valdivia owns a single-family home located at 17610 Maplecreek Drive, Houston, Texas 77084 more particularly described as Lot 33, Block 3, Mayde Creek Farms, Section 1. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Valdivia seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.97 Catherine van Zutphen and G. Michael Buttrey are homeowners who reside in Katy, Texas. Ms. van Zutphen and Mr. Buttrey own a single-family home located at 21927 Windmill Bluff Lane, Katy, Texas 77450 more particularly described as Cinco Ranch Greenway Village, Section 11, Block 3, Lot 21. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. van Zutphen and Mr. Buttrey seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.98 Danicha Vargas own a single-family home she rents out as investment property located at 13907 Wheatbridge Drive, Houston, Texas 77041 more particularly described as Lot 26, Block 4, Concord Bridge, Section 6. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Vargas seeks to recover just compensation from the Corps for its taking of her real property for public use.

1.1.99 Kevin Vu, is a homeowner who resides in Houston, Texas. Mr. Vu owns a single-family home located at 13634 Wheatbridge Drive, Houston, Texas 77041 more particularly

described as Lot 17, Block 5, Concord Bridge, Section 5. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Vu seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.100 Mahesh Wadhwa, is a homeowner who resides in Houston, Texas. Mr. Wadhwa owns a single-family home located at 9727 Pine Pass, Houston, Texas more particularly described as Lot 18, Block 1, Woodedge Village, Section 3. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Wadhwa seeks to recover just compensation from the Corps for its taking of his real and personal property for public use.

1.1.101 Sharon Waite, is a renter who was residing in Houston, Texas Ms. Waite was renting a unit located at 18325 Kingsland Blvd, Unit 410 more particularly described as Res. A. Block 1 of Flagstone Estates As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Waite seeks to recover just compensation from the Corps for its taking of her personal property for public use.

1.1.102 Anjanette Whitener, is a homeowner who resides in Katy, Texas. Ms. Whitener owns a single-family home located at 21266 Willowfork Drive, Katy, Texas 77450 . As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention

system, Ms. Whitener seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.103 Jean and Bonnie Williams, are homeowners who reside in Houston, Texas. Mr. and Mrs. Williams own a single-family home located at 5518 Fort Sumter, Houston, Texas more particularly described as Lot 11, Block 2, Georgetown Colony, Section 2. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. and Mrs. Williams seek to recover just compensation from the Corps for its taking of their real and personal property for public use.

1.1.104 Canetra Wilson, is a homeowner who resides in Houston, Texas. Ms. Wilson owns a single-family home located at 15615 Rolling Timbers Drive, Houston, Texas 77084 more particularly described as Lot 4, Block 23, Bear Creek Village, Section 7. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Wilson seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.105 Linda Wilson, is a homeowner who resides in Katy, Texas. Ms. Wilson owns a single-family home located at 21422 Delta Spring Lane, Katy, Texas 77450 more particularly described as Grand Lakes Phase Three, Section 11, Block 3, Lot 12. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Wilson

seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.1.106 Eckie Woodard, is a renter who was residing in Houston, Texas. Mr. Woodard was renting a unit located at 16111 Aspenglenn Drive, Apt. 908. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Ms. Woodard seeks to recover just compensation from the Corps for its taking of her personal property for public use.

1.1.107 Plaintiff Chyi Ping Wu is business owner whose business is in Katy, Texas. Mr. Wu owns AA Realty at located at 5205 S. Mason Road, Katy, Texas. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Wu seeks to recover just compensation from the Corps for its taking of her personal property for public use.

1.1.108 Ali Zerouat, is a homeowner who resides in Houston, Texas. Mr. Zerouat owns a single-family home located at 14403 S. Vista Glen Loop, Houston, Texas 77084 more particularly described as Lot 16, Block 5, Charlestown Colony, Section 2. As a result of the Corp's design and operation of the Addicks/Barker reservoir system, specifically, the Corps' deliberate storage of government-controlled water on adjacent private land as if part of its retention system, Mr. Zerouat seeks to recover just compensation from the Corps for its taking of her real and personal property for public use.

1.2 Defendant is the United States Government, including the Corps and any federal, state, or local agency or instrumentality working under the auspices of the federal government, all of whom may be served through the National Courts Section, Commercial Litigation Branch, Civil Division U.S. Department of Justice, Washington, DC 20530; telephone: 202-514-7300.

2. Jurisdiction

2.1 This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1491(a)(1), as this inverse condemnation action seeks monetary compensation from the United States pursuant to the Fifth Amendment of the U.S. Constitution.

2.2 The Government and the Corps have consented to venue in the Court of Federal Claims for takings claims.

3. No Previous Lawsuits

3.1 Plaintiffs have not begun any other lawsuits in state or federal court dealing with the same or similar facts involved in this action.

4. Facts

The Corps' Flood-Control System: Barker and Addicks Reservoirs and Dams

4.1 Between August 25th and August 29th, 2017, Hurricane Harvey hit Houston bringing with it rainfall for over four days. Despite Hurricane Harvey's heavy rainfall, which caused many areas in Houston to flood, most Plaintiffs suffered no such flood damage, and none suffered any flood damage as result of that heavy rainfall comparable to the flood damage caused by the subsequent reservoir waters.

4.2 In the 1940s the Corps addressed Houston's recurring problem of stifling rain and unpredictable flood paths by designing and developing the Barker¹ and Addicks² reservoir system.

¹ The Barker Reservoir and Dam consists of an earthen embankment that is 71,900 feet long, which runs

The Corps has continued to own and operate these reservoirs since that time.

4.3 The Reservoirs' primary objective is to prevent or reduce flood damage downstream along the Buffalo Bayou corridor by impounding as much floodwater as possible during significant weather events. The dam gates are situated at the northeast corner of the Barker reservoir and at the south-east side of the Addicks; both drain into tributaries that unite in the Buffalo Bayou, which cuts through Houston from the west-side reservoirs, through downtown, through the east side and into the ship channel. The gates remain open most of the time, but close at the Corps discretion. The Corps impounds the water when closing the dam gates. Certain auxiliary spillways are designed for water to flank around its sides, as opposed to the reservoir pools overtopping the crest elevation.

4.4 Under non-flooding conditions, the Corps opens the conduit gates to pass low-flow water (i.e., 300-500 cfs) down Buffalo Bayou so as to keep the Reservoirs empty and dry. When rains occur in the Reservoirs' watershed that are insufficient to cause downstream flooding, the Corps operates the Reservoirs so that their combined releases, together with downstream runoff between the dams and the Piney Point station, do not exceed 2,000 cfs. When the Corps predicts or observes significant rainfall sufficient to cause downstream flooding, it closes the conduit gates to detain and impound floodwater, thereby protecting downstream properties.

along the south, east, and northern sides of its reservoir. There is no embankment on its west side. The top of dam elevation ranges from 110.0 to 113.1 feet. Barker's design pool elevation is approximately 106 feet, and maximum project storage capacity is 209,000 acre-feet. Barker Dam includes auxiliary spillways at the northern and southern ends of the dam. The northern auxiliary spillway is roughly 3,000 feet long, with an average crest elevation of 105.5 feet. The southern auxiliary spillway is roughly 12,500 feet long, with an average crest elevation of 106.7 feet.

² The Addicks Dam consists of an earthen embankment that is 61,166 feet long, which runs along the south and east sides of its reservoir. There is no embankment on its west or north sides. The top of dam elevation ranges from approximately 117.4 to 121 feet. Addicks' design pool elevation is approximately 115 feet, and maximum project storage capacity is 200,800 acre-feet. Addicks Dam includes two auxiliary spillways at the northern and southern ends of the dam. Its northern auxiliary spillway has an average crest elevation of 112.5 feet. The southern auxiliary spillway is roughly 10,500 feet long, with an average crest elevation of 115.5.

4.5 The Corps keeps the gates closed until flows at the Piney Point station stabilize such that releases can be made without risk of downstream flooding, or until the Reservoirs' pool elevations rise to such an extent to require emergency releases. After it deems that the threat of downstream flooding has passed, the Corps opens the gates to release the impounded floodwater down Buffalo Bayou until the Reservoirs are empty.

4.6 Accordingly, these Reservoirs protect downstream structures by serving as "detention" basins (i.e., they detain floodwater that would otherwise flow into Buffalo Bayou). The Corps designs, operates, and controls the Reservoirs so that all land within their respective project boundaries –including those beyond the government owned land ("GOL")– will store the purposefully impounded floodwater.

Limits of government owned land, effect of development on flow rates and pool sizes

4.7 The Corps recognized what the above figures reflect, that "[b]oth Addicks and Barker Dams can impound or store more water than the Corps owns real estate to store it on."

4.8 The Corps began acquiring some of the real property that would become part of the GOL in the early 1940s. Upon information and belief, the Corps only purchased land within the 100-year pool level (i.e., the pool elevation associated with a 100-year flood).

4.9 In summary, the Addicks and Barker have, respectively, 42% and 60% of their storage capacity beyond the GOL limits. Accordingly, pool elevations from any significant rainfall will inevitably result in the intentional storage of impounded floodwater on private property in the "fringe areas" that extend beyond the GOL limits but are within the Reservoirs' respective pool areas. Upon information and belief, the Corps does not own any property in this "fringe area," never attempted to purchase an inundation, flowage, or drainage easement, and never obtained

permission from any landowners in the “fringe area” to store impounded floodwater on their tracts. These “fringe areas” comprise roughly 8,700 acres.

4.10 In addition to the existing limitations of the reservoir capacity, the Corps was also aware that increased urbanization, coupled with the Corps’ standard Reservoir regulation procedures, would lead to more frequent, bigger, and longer impoundments of floodwater. A USGS study had hypothesized that “complete urbanization increases the magnitude of a 2-year flood nine times and increases the magnitude of a 50-year flood five times.” The Corps’ Chief of Operations Division summarized the Corps’ knowledge of these factors in an internal email, which stated in part that:

These changes in the dams and reservoirs and the land use of the areas downstream and upstream of the dams and reservoirs has resulted in an increase in the volume of flows into the reservoirs, the rate at which the flows get to the reservoirs, the size of the pool generated within the reservoirs, and the time it takes to empty the reservoirs. This can be seen by looking at the top 10 pools for Addicks and Barker Reservoirs. Of the top 10 at Addicks, 8 have occurred since 1990. Of the top 10 at Barker, 9 have occurred since 1990.

4.11 The Corps also analyzed the probability of impounding floodwater beyond the GOL limits during various predicted weather events. For Addicks, the Corps calculated that GOL limits had a 38% probability of being exceeded during a 250-year storm (i.e., a .4% annual chance weather event).

4.12 For Barker, the Corps calculated that GOL limits had a 50% probability of being exceeded during a 100-year storm (i.e., a 1% annual chance weather event). Accordingly, it was highly foreseeable to the Corps that, during even a 100-year storm, the Corps’ standard reservoir regulation procedures would result in the intentional impoundment and storage of floodwater

beyond the GOL limits.

4.13 Since 2005 the Corps has discovered additional deficiencies in the dam system calling for risk reduction measures. Since adopting a plan to address these deficiencies—which includes setting the maximum pool elevations for Addicks and Barker significantly even lower, such that the Corps recognizes that a single rainfall event greater than approximately 16 inches would result in the Corps' storage of impounded floodwater beyond the GOL limits. For Barker, a single event rainfall greater than 12.9 inches would result in the storage of impounded floodwater beyond the GOL limits.

The Corps' Taking of Plaintiffs' Property

4.14 On August 25, 2017 at 8 p.m., as Hurricane Harvey began to inundate Houston, Texas with heavy rain the Corps ordered the floodgates to the two federally owned and operated systems of dams and reservoirs, the Addicks and Barker reservoirs, to be closed. The storm ultimately brought in over 30 inches of rain, nearly twice the volume of water beyond the GOL limits discussed above.

4.16 During the course of the storm, the Corps issued statements concerning the status of the reservoirs and its actions:

On Friday August 25, 2017, the Corps educated the public on the procedures ahead; he explained that “both reservoirs are normally kept dry to preserve their overall capacity to impound floodwater and reduce flood levels in Buffalo Bayou.” The Corps also explained that in accordance with the Corps' standard protocols, “when a rain event occurs, the gates are closed on the Addicks and Barker dams to reduce flooding impacts to residents downstream. When downstream runoff recedes to non-damaging stages, reservoir operations resume, and the gates are re-opened to release water back to normal levels.” (PR 17-028).

The same day, the Corps issued a subsequent press release confirming that the Reservoirs were currently empty and were

functioning under normal conditions. (PR 17-029).

On Sunday August 27, 2017, the Corps stated that it would likely have to release “intermittent amounts” of floodwater from both Addicks and Barker “to reduce the risk to the Houston metropolitan area.” The Corp’s local district commander, stated that “[t]hese structures continue to perform as they were designed to do, which is to protect against flooding in downtown Houston and the Houston Ship Channel.” The Corps also stated that structures will be impacted upstream from the Reservoirs, and that the Corps expected to retain floodwater for approximately one to three months after the rain subsides. (PR 17-030).

On August 28, 2017, the Corps announced that both reservoirs were rising by more than half a foot per hour, and that “according to Corps models,” upstream homes would start flooding in a matter of hours. The Corps also announced that it planned to start releasing impounded floodwater into Buffalo Bayou at 1,600 cfs, and would increase the release rate to 8,000 cfs over the next 6 to 10 hours. (PR 17-031).

In its next August 28th press release, the Corps admitted that, as of 5 p.m., the impounded floodwater from Addicks and Barker dams “extends beyond the government-owned reservoir land.” The Corps stated that at that time the pool elevations were 105 and 99 feet for Addicks and Barker, respectively. (PR 17-032). Thus, by August 28th, the Corps had intentionally impounded floodwaters in both Reservoirs on private property well beyond the GOL limits.

On August 30, 2017, the Corps indicated that it had made the decision to make increased controlled releases to maintain control of the Addicks and Barker Dams. (PR 17-033). The controlled releases eventually reached 16,000 cfs, and, as predicted, did massive damage to the downstream structures located in the Buffalo Bayou corridor. The Corps explained that the increased releases were necessary because pool elevations threatened the Corps’ structures, and because rapid inflows to the Reservoirs impacted the normal operation of the gates, and could have caused unacceptable risk to the spillway. (PR 17-033).

On August 31, 2017, the Corps confirmed there had been no breaches to the Addicks and Barker Dams. (PR 17-034).

4.17 In summary, the Corps purposefully operated both Reservoirs with the intent of impounding detained floodwater on private property owned by Plaintiffs. These operations were

consistent with the Reservoir's public purpose: to prevent flooding downstream in the Buffalo Bayou corridor and downtown Houston.

4.18 Plaintiffs' homes and property became a repository for reservoir water, ousting Plaintiffs from their homes, which along with their cars and personal effects, marinated for days (and in some cases weeks) before draining.

4.19 Plaintiffs suffered loss of personal property and their homes devalued, rendered completely uninhabitable, and permanently damaged. Plaintiffs will need to expend significant resources to remediate, repair, and/or rebuild their homes.

4.20 Due to the nature of the Corps' actions, Plaintiffs were largely unable to mitigate the damage to their real and personal property caused by the intentional flooding.

5. Cause of Action: Inverse Condemnation Taking

5.1 Plaintiffs adopt and incorporate by reference all allegations made above.

5.2 The Fifth Amendment to the U.S. Constitution provides that when the government takes private property for public use, the government must pay just compensation.

5.3 Under Texas law, Plaintiffs had private property interests in the personal and real property located at their residence. The Corps' intentional impoundment of reservoir water as described above took and destroyed Plaintiffs' private property.

5.4 Plaintiffs had distinct, reasonable, and investment-backed expectations that their properties would not be subject to flooding or such impoundment, in line with historical flooding patterns.

5.5 For its benefit and the benefit of the public, the Government intentionally impounded and detained floodwater on Plaintiffs' property and, in the process, preempted Plaintiffs'

rights to use and enjoy their property.

5.6 By purposefully inundating, destroying, damaging and/or devaluing Plaintiffs' property in August-September 2017, the Government took a permanent interest in Plaintiffs' property.

5.7 The inundation of, destruction of, substantial damage to and/or devaluation of Plaintiffs' property and businesses resulting from the Government's purposeful storage of detained floodwater in August-September 2017 therefore constitutes a physical taking of Plaintiffs' property by the Government without just compensation, all in violation of the takings clause of the Fifth Amendment to the United States Constitution.

5.8 In addition, the Government's above-described long-term flood control program, which enables it to impound and detain floodwaters at its discretion, further demonstrates and confirms the Government's permanent commitment to repeatedly store impounded floodwater on Plaintiffs' property whenever the Reservoir's pool elevations exceed the GOL limits. The Addicks and Barker Dams can both detain, impound, and store more water than the Government owns real estate on which to store it. Thus, by definition, and by application of fundamental hydrology principles, each time the Government impounds floodwater at pool elevations greater than 102 and 95.5 feet, for Addicks and Barker, respectively, the Government will flood properties and businesses located in the above-described "fringe areas."

5.9 Accordingly, the Government's violations of the takings clause of the Fifth Amendment to the United States Constitution are ongoing, continuous and permanent. Pursuant to this permanent, ongoing and continuous flood control program, which is carried out by and through the authorized actions of the Corps, the Government -- in violation of the takings clause of the Fifth

Amendment to the United States Constitution -- appropriated inundation, drainage and/or flowage easements over Plaintiffs' property without just compensation.

5.10 The inundation, destruction of, substantial damage to and/or devaluation of Plaintiffs' homes, businesses, buildings, structures, equipment, and other real and personal property was the natural, direct, foreseeable and probable consequence of the Government's authorized actions.

5.11 As a direct result of the Corps' decisions and actions, Plaintiffs' homes and private property were flooded, which caused damage to personal property, such as personal vehicles and personal effects; damage to home improvements and the structures on the property; and decreased market value to the real estate resulting from the Corps' decision to appropriate Plaintiffs' property as a flooding easement. Specifically,

5.11.1 Bassam Abousaway, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.2 James Alban, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.3 Walter Alfaro, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and

the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.4 Charles Alexander, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.5 Jose and Eldi Almeida, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.6 Leo Attias and Maria Gamero, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.7 Salah Ayesh, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.8 William Baber, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.9 Stephen and Paige Balderas, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.10 Robbin Barrow, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.11 Allen and Jennifer Berryman, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.12 Chase and Marci Bowman, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.13 Magdy Beshay, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.14 Stephen Brashier has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and

the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.15 Justin Brock, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.16 Joshua Bryant, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.17 Ryan and Kathryn Bromm, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.18 Artemio Casas, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.19 Ryan Clark has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.20 Bryan and Lisa Clawson, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.21 William and Ingrid Crandell, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.22 Roza Czaplicki, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.23 Michael Davila, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.24 Alyssa Rodriguez and Erik Delgado, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.25 Ivan Diaz, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the

structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.26 Michael Edminster, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.27 Francisco Espinoza, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.28 Jonathan Fink, has suffered damages to personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.29 Monique Fitzmaurice, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.30 Paul Fontenot, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.31 Cynthia and Brian Franze, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.32 Joseph and Carol Franze, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.33 Carolyn Gard, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.34 Jan Gaskamp, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.35 Richard Gigante, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.36 Luis and Myrna Gomez, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home

improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.37 Dee Gorszewski has suffered damages to her personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.38 Elaine Grimes has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.39 Imelda Guerra, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.40 Lorraine Hall, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.41 William and Sharon Hall, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.42 Pamela Hidinger, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.43 Haejo Hwang, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.44 Sharon and Thomas Janacek, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.45 Jared and Carrie Johnson, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.46 Juana Kalmus, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.47 Juzer Khokhri, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and

the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.48 Childa Kincaid has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.49 Terry Ledet, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.50 Andrew Lee has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.51 Jack Lesley has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.52 Aiyng Li, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.53 Giovanni and Julie Occhipinti, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.54 Barbara LaMantia, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.55 David Lee, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.56 Gwendolyn Lewis has suffered damages to her personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.57 Cynthia Lopez, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.58 Jeff and Donna Low, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home

improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.59 Homer Lozano, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.60 Scott and Andrea Maeker, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.61 Derrick Mar, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.62 Elizabeth Martin, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.63 John and Sheila McGaughy, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.64 Romeo and Pravda Miltchev, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.65 Diane Mitchell, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.66 Colin Moody, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.67 Tareneh Mozayani, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.68 Tommy and Sarah Murphy, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.69 Paul and Mary Nantz, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home

improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.70 Trish Nguyen, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.71 Robert O'Neal, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.72 Sheila Patterson, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.73 Ralph Pierotti has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.74 Kevin Powell, has suffered damages to his personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.75 Ta Quan, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.76 Judith Quintero, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.77 Nathan Reese, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.78 Cynthia Franze as owner of Remodeling Renovations, has suffered damages to her real and personal property, including personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.79 Linda Richards, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.80 Bernice Robertson, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and

the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.81 Monte Rowe has suffered damages to his personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.82 Martin Sandoval, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.83 Roy and Rosie Sandoval, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.84 Christina Schulz, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.85 Eric Shaklee has suffered damages to his personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.86 Shawn Shameli, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and

the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.87 John and Eleanor Sheffer, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.88 Lisa and Mahmoud Sleiman, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.89 Kiho Song and N. Sunghie suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.90 Alma and Alex Soto have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.91 Eric Spann, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.92 Robert Sutton, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.93 Mural Sriramulu, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.94 Jay and Amy Thieme, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.95 Robin and Donald Tooms, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.96 Christopher Valdiva, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.97 Danicha Vargas has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and

the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.98 Catherine van Zutphen and G. Michael Buttrey have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.99 Kevin Vu, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.100 Mahesh Wadhwa, has suffered damages to his real and personal property, including personal vehicles and/or personal effects; damage to his physical home, home improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.101 Sharon Waite, has suffered damages to her personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.102 Anjanette Whitener, has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.103 Jean and Bonnie Williams, have suffered damages to their real and personal property, including personal vehicles and/or personal effects; damage to their physical home, home improvements, and the structures on the property; and decreased market value of their real property resulting from the Corps' decision to appropriate their property as a flooding easement.

5.11.104 Canetra Wilson has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.105 Linda Wilson has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.106 Eckie Woodard has suffered damages to his personal property, including personal vehicles and/or personal effects resulting from the Corps' decision to appropriate her property as a flooding easement.

5.11.107 Chyi Wu has suffered damages to his business property, including personal vehicles and/or personal effects; damage to his physical building and improvements, and the structures on the property; and decreased market value of his real property resulting from the Corps' decision to appropriate his property as a flooding easement.

5.11.108 Ali Zerouat has suffered damages to her real and personal property, including personal vehicles and/or personal effects; damage to her physical home, home improvements, and

the structures on the property; and decreased market value of her real property resulting from the Corps' decision to appropriate her property as a flooding easement.

5.12 The Corps' decisions and actions deprived Plaintiffs of the use, occupancy, and enjoyment of their homes and properties, which was a substantial and severe injury.

5.13 The United States has not compensated or offered to compensate Plaintiffs for the taking of their real and personal property.

6. Relief Sought

6.1 Compensation. As a direct result of (i) the inundation of, destruction of, substantial damage to and/or devaluation of Plaintiffs' property by the Government's intentional storage of detained floodwater on Plaintiff's property in August-September 2017, and (ii) the Government taking a permanent interest in Plaintiffs' property, including taking, exceeding and/or expanding inundation easements over Plaintiffs' property, Plaintiffs are entitled to recover just compensation and such other appropriate relief as the Court deems just and proper in an amount to be determined by the trier of fact. All losses sustained by Plaintiffs were reasonably foreseeable by the Government. All conditions precedent to Plaintiffs' claims for relief have been performed and/or occurred.

6.2 Attorneys' Fees, Litigation Expenses and Costs. Plaintiffs are also entitled to recover reasonable costs, disbursements, and expenses, including reasonable attorney, appraisal, and engineering fees, actually incurred in this proceeding pursuant to 42 U.S.C. § 4652, and Rule 54 of the Rules of the United States Court of Federal Claims.

7. Prayer

Plaintiffs pray that, after due proceedings, there be judgment rendered herein in their favor against the United States for all sums that are reasonable including, without limitation thereby, actual damages to Plaintiffs' real and personal property, reasonable fees and expenses incurred herein, together with pre- and post-judgment interest and all other relief, at law or in equity, to which Plaintiffs may be justly entitled.

Respectfully submitted,

VB Attorneys, PLLC

/s/ Vuk Vujasinovic

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