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March 18, 2022

North Dakota Supreme Court
Clerk of Court
600 East Blvd. Ave.
Bismarck, ND 58505-0530

Re: In the Matter of the Rose Henderson Peterson Mineral Trust, Dated March 26, 1987, Supreme Court Case No. 20210258

VIA Supreme Court E-Filing Portal Only

Dear Clerk of Court:

Pursuant to N.D. R. App. P. 28(k), this letter is to advise the Court of a pertinent and significant authority which has come to Petitioners/Appellees' attention after their brief has been filed. The citation is Twin City Technical LLC, et al v. Williams County, et al., 2022 ND 63, ¶ 6, N.W.2d.

This supplemental citation may be used to support the arguments made at ¶ 56 of the Brief of Petitioners/Appellees.

Thank you for your consideration of this matter.

Sincerely,

/s/ Michael T. Andrews

Michael T. Andrews

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cc. David Smith and Tyler Malm (via ND Supreme Court E-Filing Portal)