In the Supreme Court of the United States

OCTOBER TERM, 1992

No. 9, Original

UNITED STATES OF AMERICA, PLAINTIFF

v.

STATE OF LOUISIANA, ET AL.
(ALABAMA AND MISSISSIPPI BOUNDARY CASE)

ON BILL OF COMPLAINT

MOTION FOR ENTRY OF A SUPPLEMENTAL DECREE

The United States of America and the State of Alabama jointly move that this Court enter a supplemental decree in the form and manner of the attached proposed decree. The basis for this motion is explained in the memorandum that follows.

Respectfully submitted.

JAMES H. EVANS
Attorney General
State of Alabama

WILLIAM C. BRYSON
Acting Solicitor General

JANUARY 1993

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MEMORANDUM IN SUPPORT OF JOINT MOTION FOR A SUPPLEMENTAL DECREE

This joint motion arises from ongoing litigation between the United States and the States of Alabama and Mississippi to resolve the seaward boundaries of those States for purposes of the Submerged Lands Act, 43 U.S.C. 1301 *et seq*. The location of the seaward boundary of Alabama and Mississippi depends on the juridical status of Mississippi Sound, which lies between the upland territory of those States and the Gulf of Mexico.

On February 26, 1985, this Court adopted the recommendation of its Special Master that the whole of Mississippi Sound constitutes historic inland waters, and it directed the parties to submit a proposed decree reflecting the Court's decision. *United States* v. *Louisiana (Alabama and Mississippi Boundary Case)*, 470 U.S. 93, 115 (1985). In the process of preparing that decree, the United States and Mississippi encountered additional issues, which were resolved through supplemental proceedings before the Master and this Court. See *United States* v. *Louisiana (Alabama and Mississippi Boundary Case)*, 485 U.S. 88 (1988). The United States and Mississippi ultimately reached agreement on the location of Mississippi's coastline based on the status of Mississippi Sound as historic inland waters. The coordinates of that nonambulatory line are set out in this Court's decree of November 5, 1990. *United States* v. *Louisiana (Alabama and Mississippi Boundary Case)*, 111 S. Ct. 377 (1990).

The United States and Alabama have now reached agreement on the location of the Alabama coastline. The coordinates of that nonambulatory line are described in the attached proposed decree. The line begins at the terminus of the Mississippi coastline (see 111 S. Ct. at 378) and continues eastward to Alabama's border with Florida. The United States and Alabama believe that the proposed supplemental decree is consistent with this Court's decisions, and they accordingly submit it for entry as a final supplemental decree. The entry of this decree will resolve all outstanding issues in this original action

concerning the seaward boundaries of the States of Alabama and Mississippi.

Respectfully submitted.

JAMES H. EVANS
Attorney General
State of Alabama

WILLIAM C. BRYSON
Acting Solicitor General

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PROPOSED SUPPLEMENTAL DECREE

By its decision of February 26, 1985, the Court overruled the exceptions of the United States to the Report of its Special Master insofar as it challenged the Master's determination that the whole of Mississippi Sound constitutes historic inland waters, and, to this extent, adopted the Master's recommendations and confirmed his Report.

On March 1, 1988, the Court resolved the disagreement between the United States and Mississippi as to that portion of the Mississippi coastline at issue in the above-captioned litigation and directed the parties to submit to the Special Master a proposed appropriate decree defining the claims of Alabama and Mississippi with respect to Mississippi Sound. On August 17, 1990, the parties agreed on and submitted

to the Special Master a proposed decree in accordance with the Court's decision of March 1, 1988, which was approved by the Court on November 5, 1990. Pursuant to that Supplemental Decree, the baseline (coastline) of the State of Mississippi as well as a portion of the baseline of the State of Alabama was delimited and, by stipulation of the parties, fixed, as described by coordinates in that decree. That portion of the Alabama coastline not described by coordinates in the decree remained ambulatory.

Thereafter, a dispute arose between the State of Alabama and the United States regarding their respective claims under the Submerged Lands Act, 43 U.S.C. 1301 *et seq.*, to offshore areas in which the baseline had not been fixed by the Court's November 5, 1990 Decree. The parties thereafter filed a joint motion with this Court, requesting that the Court invoke its continuing jurisdiction to supplement the November 5, 1990, Decree. 111 S. Ct. 377 (1990). With that motion the parties submitted for the Court's consideration a supplemental decree which would fix that portion of the Alabama baseline that had heretofore remained ambulatory, resolve the existing dispute, and avoid future jurisdictional controversies over the State of Alabama Submerged Lands Act grant.

Accordingly,

IT IS ORDERED, ADJUDGED AND DECREED as follows:

1. The parties' joint motion to supplement the Court's Decree of November 5, 1990 is granted.

2. For the purposes of the Court's Decree herein dated December 12, 1960, 364 U.S. 502 (defining the boundary line between the submerged lands of the United States and the submerged lands of the States bordering the Gulf of Mexico), the coastline of the States of Alabama and Mississippi shall be determined on the basis that the whole of Mississippi Sound constitutes state inland waters;

3. For the purposes of the said Decree of December 12, 1960, the coastline of Alabama includes:

(a) That portion of a straight line from a point on the eastern tip of Petit Bois Island where X = 215985 and Y = 77920 in the Alabama plane coordinate system, west zone, and X = 637152.89 and Y = 198279.25 in the Mississippi plane coordinate system, east zone, to a fixed point previously described as the western tip of Dauphin Island by the Court's Decree of November 5, 1990, where X = 238690 and Y = 84050 in the Alabama plane coordinate system, west zone, and X = 659783.79 and Y = 204674.56 in the Mississippi plane coordinate system, east zone, lying on the Alabama side of the Alabama-Mississippi boundary;

(b) A straight line from the fixed point previously described as the western tip of Dauphin Island where X = 238690 and Y = 84050 in the Alabama plane coordinate system, west zone, to a point on the western tip of Dauphin Island where X = 240239.49 and Y = 85266.90 in the same coordinate system;

(c) The baseline delimiting Dauphin Island determined by the following points in the Alabama plane coordinate system, west zone:

	E. COORD. X	N. COORD. Y
A LINE FROM	240491.79	84972.10
THROUGH	240848.85	84605.82
THROUGH	241013.42	84311.65
THROUGH	241205.05	84118.32
THROUGH	241590.69	84065.03
THROUGH	242142.09	83879.22
THROUGH	242413.48	83796.45
THROUGH	242694.43	83824.75
THROUGH	243220.74	83810.88
THROUGH	243580.37	83798.21
THROUGH	244027.43	83744.51
THROUGH	244536.27	83740.89
THROUGH	244878.06	83687.95
THROUGH	245246.75	83715.64
THROUGH	245641.25	83672.44
THROUGH	245973.56	83518.55
THROUGH	246464.50	83464.57
THROUGH	246886.11	83532.32
THROUGH	247307.57	83579.87
THROUGH	247711.06	83566.93
THROUGH	248158.99	83634.51
THROUGH	248606.77	83681.89
THROUGH	248905.97	83811.13
THROUGH	249204.96	83910.07
THROUGH	249538.75	83968.36

THROUGH	249890.17	84036.63
THROUGH	250276.60	84094.56
THROUGH	250934.57	84090.00
THROUGH	251636.34	84075.04
THROUGH	252313.25	84272.42
THROUGH	252936.89	84379.26
THROUGH	253683.35	84485.27
THROUGH	254464.61	84550.64
THROUGH	255158.29	84636.83
THROUGH	255930.50	84661.89
THROUGH	256527.80	84768.97
THROUGH	257100.01	85058.07
THROUGH	257636.92	85317.12
THROUGH	258244.41	85636.31
THROUGH	258841.55	85723.22
THROUGH	259456.50	85850.44
THROUGH	260045.14	85977.84
THROUGH	260695.58	86165.45
THROUGH	261143.78	86283.70
THROUGH	261758.98	86451.36
THROUGH	262312.84	86629.54
THROUGH	262734.31	86687.37
THROUGH	263076.76	86735.63
THROUGH	263313.48	86713.86
THROUGH	263594.99	86833.24
THROUGH	264034.80	87012.20
THROUGH	264447.62	87090.31
THROUGH	264763.68	87128.65
THROUGH	265255.32	87186.05
THROUGH	265712.59	87354.81
THROUGH	266107.99	87453.26
THROUGH	266626.20	87550.92
THROUGH	267179.63	87668.56

THROUGH	267829.73	87815.89
THROUGH	268532.21	87922.49
THROUGH	269120.58	88019.73
THROUGH	269691.59	88147.40
THROUGH	270166.31	88306.00
THROUGH	270736.80	88352.87
THROUGH	271281.56	88490.83
THROUGH	271843.72	88608.49
THROUGH	272300.62	88726.82
THROUGH	272915.73	88894.67
THROUGH	273600.55	88991.37
THROUGH	274162.58	89088.86
THROUGH	274601.79	89187.13
THROUGH	274953.35	89296.05
THROUGH	275348.70	89394.61
THROUGH	275796.68	89492.83
THROUGH	276227.06	89581.07
THROUGH	276657.61	89699.62
THROUGH	277219.49	89776.96
THROUGH	277763.57	89814.00
THROUGH	278326.00	89982.26
THROUGH	278870.45	90079.93
THROUGH	279397.35	90177.72
THROUGH	280073.43	90284.70
THROUGH	280530.15	90382.93
THROUGH	281179.60	90439.59
THROUGH	281697.41	90486.95
THROUGH	282180.19	90544.63
THROUGH	282829.76	90621.52
THROUGH	283435.09	90638.07
THROUGH	284014.48	90715.40
THROUGH	284698.99	90771.91
THROUGH	285269.60	90849.31

THROUGH	285910.08	90875.79
THROUGH	286568.75	91013.31
THROUGH	287138.94	91020.03
THROUGH	287726.72	91036.75
THROUGH	288393.56	91073.23
THROUGH	288937.49	91090.23
THROUGH	289499.19	91147.55
THROUGH	290086.68	91113.81
THROUGH	290674.16	91080.07
THROUGH	291340.88	91096.39
THROUGH	291946.02	91082.78
THROUGH	292454.92	91110.14
THROUGH	293078.13	91187.37
THROUGH	293674.68	91204.14
THROUGH	294332.04	91119.55
THROUGH	294753.40	91177.75
THROUGH	295306.03	91184.70
THROUGH	296007.66	91170.61
THROUGH	296717.82	91116.07
THROUGH	297498.39	91101.56
THROUGH	298419.12	91055.97
THROUGH	299339.74	90990.20
THROUGH	300171.70	90753.20
THROUGH	300916.74	90658.14
THROUGH	301609.33	90593.70
THROUGH	302275.16	90448.59
THROUGH	302836.46	90435.40
THROUGH	303432.29	90321.01
THROUGH	303913.82	90156.74
THROUGH	304570.40	89920.81
THROUGH	305148.05	89685.31
THROUGH	305664.13	89419.86
THROUGH	306268.49	89254.95

THROUGH	306924.94	88988.76
THROUGH	307634.62	88833.42
THROUGH	308274.89	88819.89
THROUGH	308748.98	88898.18
THROUGH	309476.70	88833.70
THROUGH	310161.04	88860.38
THROUGH	310880.04	88806.08
THROUGH	311616.90	88812.31
THROUGH	312309.75	88788.48
THROUGH	312985.68	88885.98
THROUGH	313459.92	88994.64
THROUGH	314171.36	89172.79
THROUGH	314847.17	89250.12
THROUGH	315672.47	89397.41
THROUGH	316234.25	89475.35
THROUGH	316839.88	89553.08
THROUGH	317515.17	89529.44
THROUGH	318086.23	89708.38
TO	318359.83	90040.37
A LINE FROM	309362.32	80499.88
THROUGH	309370.61	80408.91
THROUGH	309540.79	79407.88
THROUGH	309801.70	78972.10
THROUGH	310106.82	78596.70
THROUGH	310446.88	78190.81
THROUGH	310769.82	77865.84
THROUGH	311163.33	77611.21
THROUGH	311591.47	77265.49
THROUGH	312045.73	76879.23
THROUGH	312526.96	76614.06
THROUGH	312920.66	76389.76
THROUGH	313348.99	76074.36

THROUGH	313707.54	75840.15
THROUGH	314162.68	75615.55
THROUGH	314485.89	75331.01
THROUGH	314809.52	75127.30
THROUGH	315220.95	74933.24
THROUGH	315449.46	75002.79
TO	315572.98	75133.48
A LINE FROM	316237.86	74736.09
THROUGH	316429.31	74421.94
THROUGH	316761.32	74137.39
THROUGH	317252.83	74155.09
THROUGH	317805.05	74031.07
THROUGH	318216.92	73917.86
THROUGH	318681.85	73885.21
TO	318858.57	74126.77
A LINE FROM	319734.51	73809.20
THROUGH	320172.46	73645.37
THROUGH	320408.54	73472.46
THROUGH	320793.59	73258.39
THROUGH	321144.45	73226.34
TO	321276.78	73367.11
A LINE FROM	324818.43	70814.04
THROUGH	324993.50	70722.27
TO	325117.15	70883.31
A LINE FROM	333064.90	81503.36
THROUGH	333168.82	81209.91
THROUGH	333378.02	80915.98
THROUGH	333719.43	80752.77
THROUGH	334061.32	80690.57

THROUGH	334420.93	80668.71
THROUGH	334780.79	80697.36
THROUGH	335324.74	80694.87
THROUGH	335772.51	80763.53
THROUGH	336194.09	80862.63
THROUGH	336896.51	80980.66
THROUGH	337327.09	81130.25
THROUGH	337696.35	81300.31
THROUGH	338047.46	81339.14
THROUGH	338539.04	81397.54
THROUGH	339083.93	81607.24
THROUGH	339549.41	81716.29
THROUGH	339935.70	81775.18
THROUGH	340348.53	81884.47
THROUGH	340752.50	81973.59
THROUGH	341217.96	82082.66
THROUGH	341613.15	82171.83
THROUGH	342087.16	82230.36
THROUGH	342526.61	82410.27
THROUGH	342992.15	82539.57
THROUGH	343554.02	82628.03
THROUGH	344124.44	82665.97
THROUGH	344633.62	82744.58
THROUGH	345090.33	82863.83
THROUGH	345608.10	82902.01
THROUGH	346011.57	82880.08
THROUGH	346477.09	83009.42
THROUGH	347117.85	83087.50
THROUGH	347715.13	83256.70
THROUGH	348180.05	83244.63
THROUGH	348759.47	83343.21
THROUGH	349479.14	83410.91
THROUGH	349953.03	83449.33

THROUGH	350514.82	83527.81
THROUGH	351102.43	83484.96
THROUGH	351672.90	83543.21
THROUGH	352155.65	83601.84
THROUGH	352726.25	83690.42
THROUGH	353331.77	83738.45
THROUGH	353946.10	83796.56
THROUGH	354516.48	83834.66
THROUGH	355069.16	83832.42
THROUGH	355771.25	83900.31
THROUGH	356288.91	83918.44
THROUGH	356806.58	83936.58
THROUGH	357359.37	83964.69
THROUGH	357736.51	83942.99
THROUGH	358245.00	83860.16
THROUGH	358771.24	83827.79
THROUGH	359323.76	83785.21
THROUGH	360034.18	83742.03
THROUGH	360569.58	83810.66
THROUGH	361341.53	83797.57
THROUGH	362166.47	83875.22
THROUGH	362885.71	83842.16
THROUGH	363675.39	83879.57
THROUGH	364131.80	83938.45
THROUGH	364509.47	84058.25
THROUGH	364922.01	84117.31
THROUGH	365369.37	84105.53
THROUGH	365939.40	84052.89
THROUGH	366456.94	84040.86
THROUGH	367044.73	84048.78
THROUGH	367588.41	83986.16
THROUGH	368141.19	84014.43
THROUGH	368606.17	84022.83

THROUGH	369237.28	83879.10
THROUGH	369728.32	83816.71
THROUGH	370034.56	83593.35
THROUGH	370420.34	83531.35
THROUGH	370885.00	83448.86
THROUGH	371446.45	83446.85
THROUGH	371999.16	83454.98
THROUGH	372481.55	83422.96
THROUGH	372972.64	83370.71
THROUGH	373630.59	83368.39
THROUGH	374130.53	83336.33
THROUGH	374534.11	83345.02
THROUGH	375069.34	83373.46
THROUGH	375692.20	83371.30
THROUGH	376314.99	83348.95
THROUGH	376999.09	83296.09
THROUGH	377595.43	83233.44
THROUGH	378306.08	83251.23
THROUGH	378762.13	83209.28
THROUGH	379288.29	83146.90
THROUGH	379919.72	83084.17
THROUGH	380604.06	83102.10
THROUGH	381261.98	83089.82
THROUGH	381919.70	83016.94
THROUGH	382638.87	82953.97
THROUGH	383288.02	82941.75
THROUGH	383910.69	82879.13
THROUGH	384480.86	82857.08
THROUGH	385129.91	82814.60
THROUGH	385840.54	82822.43
THROUGH	386393.38	82871.19
THROUGH	386998.58	82828.88
THROUGH	387621.32	82786.52

THROUGH	388147.40	82693.96
THROUGH	388629.75	82641.95
THROUGH	389191.09	82599.81
THROUGH	389708.53	82547.71
THROUGH	390182.42	82596.77
THROUGH	390901.73	82574.37
THROUGH	391393.04	82582.99
THROUGH	391954.59	82611.60
THROUGH	392533.59	82609.86
THROUGH	393059.69	82517.38
THROUGH	393550.70	82425.00
THROUGH	394094.65	82433.50
THROUGH	394726.24	82411.44
THROUGH	395217.46	82389.80
THROUGH	395629.90	82429.01
THROUGH	396077.20	82387.30
THROUGH	396349.16	82386.52
THROUGH	396744.02	82415.69
THROUGH	397173.87	82404.35
THROUGH	397516.09	82433.68
THROUGH	398016.32	82492.87
THROUGH	398446.30	82532.06
THROUGH	398893.83	82571.21
THROUGH	399472.64	82498.87
THROUGH	399955.51	82628.85
THROUGH	400394.60	82789.26
THROUGH	400448.04	83082.07
THROUGH	400930.74	83151.45
THROUGH	401264.13	83160.63
THROUGH	401737.85	83159.33
THROUGH	402027.37	83168.64
THROUGH	402299.46	83218.41
THROUGH	402711.92	83267.80

THROUGH	403133.25	83357.58
THROUGH	403501.78	83386.90
THROUGH	403984.25	83375.50
THROUGH	404291.45	83435.30
THROUGH	404695.09	83474.63
THROUGH	405081.54	83645.34
THROUGH	405423.99	83765.66
THROUGH	405801.76	83976.81
THROUGH	406144.39	84167.85
THROUGH	406530.27	84126.44
THROUGH	406924.90	84074.90
THROUGH	407372.42	84124.26
THROUGH	407811.04	84123.13
THROUGH	408258.70	84223.00
THROUGH	408837.85	84292.24
THROUGH	409522.28	84361.22
THROUGH	409934.81	84451.11
THROUGH	410470.17	84550.79
THROUGH	410996.78	84660.60
THROUGH	411637.61	84840.85
THROUGH	412418.71	84990.47
THROUGH	413068.07	85079.81
THROUGH	413586.09	85270.50
THROUGH	414183.03	85450.90
THROUGH	414849.99	85570.54
THROUGH	415657.42	85740.36
THROUGH	416491.02	85849.54
THROUGH	417324.66	85978.93
THROUGH	418000.45	86128.91
THROUGH	418798.97	86248.32
THROUGH	419597.59	86418.26
THROUGH	420141.58	86477.66
THROUGH	421115.65	86657.34

THROUGH	421861.76	86888.05
THROUGH	422712.94	87037.74
THROUGH	423397.41	87167.60
THROUGH	423967.70	87227.00
THROUGH	424573.05	87276.23
THROUGH	424836.41	87376.70
THROUGH	425003.05	87366.25
THROUGH	425652.12	87354.80
THROUGH	426275.28	87535.35
THROUGH	426696.34	87544.59
THROUGH	427108.82	87654.87
THROUGH	427617.80	87764.96
THROUGH	427889.90	87855.33
THROUGH	428232.02	87874.85
THROUGH	428609.22	87884.20
THROUGH	428986.33	87853.14
THROUGH	429425.10	87953.30
THROUGH	429933.91	87982.61
THROUGH	430293.61	88022.32
THROUGH	430653.32	88062.03
THROUGH	431057.06	88192.57
THROUGH	431486.95	88242.26
THROUGH	431934.31	88251.51
THROUGH	432329.06	88270.97
THROUGH	432750.24	88350.99
THROUGH	433294.10	88370.18
THROUGH	433759.13	88450.14
THROUGH	434180.17	88459.47
THROUGH	434469.79	88549.85
THROUGH	434882.19	88629.92
THROUGH	435329.59	88669.52
THROUGH	435768.30	88749.55
THROUGH	436119.30	88829.73

THROUGH	436487.85	88920.00
THROUGH	436891.52	89030.41
THROUGH	437312.61	89070.08
THROUGH	437751.30	89150.13
THROUGH	438128.62	89240.39
THROUGH	438602.47	89360.80
THROUGH	439006.13	89471.24
THROUGH	439471.18	89581.57
THROUGH	439865.91	89601.11
THROUGH	440208.02	89620.74
THROUGH	440532.73	89731.32
THROUGH	440866.22	89852.00
THROUGH	441190.85	89912.07
THROUGH	441559.38	90002.39
THROUGH	441919.07	90052.31
THROUGH	442348.83	90041.52
THROUGH	442787.44	90081.23
THROUGH	443024.36	90151.56
THROUGH	443357.69	90171.24
THROUGH	443691.00	90180.82
THROUGH	444112.06	90220.57
THROUGH	444550.67	90260.29
THROUGH	445006.90	90350.51
THROUGH	445375.32	90380.25
THROUGH	445708.79	90500.97
THROUGH	446147.42	90560.92
THROUGH	446506.95	90509.87
THROUGH	446884.06	90489.11
THROUGH	447164.82	90549.31
THROUGH	447375.35	90569.20
THROUGH	447813.96	90619.07
THROUGH	448331.42	90608.22
THROUGH	448857.71	90637.77

THROUGH	449278.79	90697.79
THROUGH	449734.96	90757.76
THROUGH	450182.35	90817.74
THROUGH	450866.72	90998.63
THROUGH	451454.54	91139.26
THROUGH	452112.64	91360.62
THROUGH	452630.45	91622.58
THROUGH	453095.47	91763.39
THROUGH	453551.80	91964.84
THROUGH	454078.26	92145.99
THROUGH	454683.58	92276.55
THROUGH	455209.95	92397.11
THROUGH	455710.07	92568.22
THROUGH	456096.04	92628.36
THROUGH	456534.65	92708.64
THROUGH	456990.81	92799.01
THROUGH	457385.59	92899.55
THROUGH	457885.64	93020.19
THROUGH	458280.44	93140.95
THROUGH	458675.19	93221.31
THROUGH	458955.89	93271.49
THROUGH	459271.79	93422.66
THROUGH	459675.36	93553.53
THROUGH	460149.07	93674.22
THROUGH	460596.54	93855.56
THROUGH	461070.28	93996.47
THROUGH	461421.21	94127.42
THROUGH	461912.46	94248.11
THROUGH	462377.40	94378.95
THROUGH	462772.12	94449.25
THROUGH	463079.18	94570.15
THROUGH	463210.60	94438.69
THROUGH	463570.26	94539.35

THROUGH	464087.77	94629.74
THROUGH	464631.61	94740.32
THROUGH	465079.00	94881.31
THROUGH	465570.28	95062.67
THROUGH	466131.66	95193.46
THROUGH	466596.60	95354.65
THROUGH	467061.55	95525.95
THROUGH	467552.76	95646.73
THROUGH	468158.10	95918.94
THROUGH	468798.42	96090.10
THROUGH	469307.24	96322.01
THROUGH	469780.91	96463.03
THROUGH	470193.23	96664.72
THROUGH	470772.13	96815.78
THROUGH	471245.77	96946.72
THROUGH	471833.42	97087.68
THROUGH	472368.41	97178.18
THROUGH	472903.44	97319.20
THROUGH	473263.04	97409.84
THROUGH	473850.70	97591.24
THROUGH	474473.39	97712.02
THROUGH	474911.95	97873.34
THROUGH	475447.00	98075.00
THROUGH	475894.29	98185.82
THROUGH	476402.97	98316.81
THROUGH	476920.39	98397.28
THROUGH	477393.97	98498.00
THROUGH	477806.18	98629.07
THROUGH	478428.87	98790.32
THROUGH	478946.30	98921.33
THROUGH	479411.09	99001.88
THROUGH	479919.72	99082.41
THROUGH	480366.90	99041.75

THROUGH	480893.00	99001.06
THROUGH	481199.70	98606.93
THROUGH	481322.14	97990.65
THROUGH	481479.95	97929.96
THROUGH	481970.97	97838.79
THROUGH	482269.23	98070.98
THROUGH	482400.89	98333.57
THROUGH	482646.54	98585.99
THROUGH	482909.74	98868.72
THROUGH	483111.46	98959.54
THROUGH	483435.89	98918.98
THROUGH	483953.36	99191.50
THROUGH	484391.89	99403.44
THROUGH	485058.36	99544.58
THROUGH	485488.00	99504.00
THROUGH	485716.07	99705.94
THROUGH	486058.04	99715.91
THROUGH	486408.84	99867.30
THROUGH	486908.66	99917.63
THROUGH	487320.85	100109.42
THROUGH	487820.68	100200.16
THROUGH	488469.63	100452.49
THROUGH	488934.38	100543.26
THROUGH	489407.93	100775.46
THROUGH	489898.99	100906.64
THROUGH	490293.63	101159.08
THROUGH	491003.88	101249.81
THROUGH	491547.53	101370.90
THROUGH	492029.80	101481.91
THROUGH	492617.29	101613.11
THROUGH	493160.94	101734.22
THROUGH	493748.41	101825.03
TO	494142.98	101915.88.

4. The baseline described in Paragraph 3 above shall be fixed as of the date of this decree for purposes of determining the Submerged Lands Act grant to the State of Alabama and shall from that date no longer be ambulatory.

5. The parties shall bear their own costs of these proceedings.

6. The Court retains jurisdiction to entertain such further proceedings, enter such orders, and issue such writs as from time to time may be deemed necessary or advisable to effectuate and supplement the decree and the rights of the respective parties.