



June 2, 2021

Jaycee Sabapathy  
4 Prince Street  
Unit 206  
Charlottetown, PE  
C1A 4P5

Via email: [jaycee.sabapathy@outlook.com](mailto:jaycee.sabapathy@outlook.com)

**RE: 19096.200.01 Plan of Survey and Experts Report Supplementary Information**

Ms. Sabapathy,

Pursuant to Section 58, Experts Report of the *IRAC Rules of Practice and Procedure*, please find our response to the following as noted:

**1.a) Acknowledgement of the duty of the expert to advise the Commission and Impartially.**

It is the role of the Land Surveyor as a public officer to arrive at an opinion based on facts. Presentation such facts are represented as plans and reports. The Land Surveyor does represent a single client, but society at large and must be fair and impartial to all parties. Impartiality is the cornerstone of the opinion, as such as a Land Surveyor, I have developed a process to ensure that bias is not introduced into the opinion.

It is my duty as a Land Surveyor to provide an impartial opinion to every plan that is certified. The impartiality is not project specific. With regards to the East Suffolk Road Extension, the plan and report provided to the commission, lays out in detail, the methodology and processes used to arrive at an impartial opinion to assist the commission in its decision-making process.

**1.b) Expert's curriculum vitae**

See Attachment

Morris Geomatics & Engineering Ltd.  
P.O. Box 21016  
Charlottetown, PE, C1A 8Z3  
tel: (902)-213-0487  
email: [info@morrisgeomatics.ca](mailto:info@morrisgeomatics.ca)  
[morrisgeomatics.ca](http://morrisgeomatics.ca)



**1.c) An account and direction received from the Applicant for the expert's report.**

Included the "Report on the Status of the East Suffolk Road Extension" opening introduction.

**1.d) The facts and assumptions on which on which reports conclusions are based.**

The facts and assumptions are included within the body of the "Report on the Status of the East Suffolk Road Extension."

**1.e) Disclosure of any matters that fall outside the expert's area of expertise.**

The report and plan of survey has been prepared based on 30 plus years of experience practicing as a Prince Edward Island land Surveyor, a Canada Lands Surveyor, a Professional Engineer, and an articling student in Nova Scotia, New Brunswick, and Ontario, and is compiled from that expertise.

**1.d) Identification of any literature or other materials specifically relied upon in support of the opinion.**

As a former Provincial Chief Surveyor, tasked with providing opinion on road status, entrance ways and classification limits, I have amassed (and continue to collect) a vast library of documents used to assess the highways and boundaries. Such documents include Journals of the House (1800 to present), Journals of Majesty's Council (1825-1866), Statute law (1763 to present), Case Law, (1820 to present), Royal Gazette, recorder and other papers used by government (1820 to present) Maps and Atlas' and various journals, treatise, and papers. Such documents are accessed and reviewed and relied on daily.

Section 2.4 lists the Case Law referenced while compiling the report.

Section 11 lists the Books Journals and papers referenced while compiling the report.

Yours truly,

**Morris Geomatics & Engineering Ltd.**

A handwritten signature in black ink that reads "David R. J. Morris".

David R. J. Morris, P.Eng, PEILS, CLS  
President