

[PROVISIONAL TRANSLATION FROM PERSIAN]

[Translator's notes appear in square brackets]

[Personal information has been **redacted**.]

The Honourable Judge of Legal Branch 7 of the City of Ahvaz

With greetings and respect,

With reference to the writ of expert opinion, with archival number 930041, about the complaint of Rostam Derakhshan and other complainants against the defendant, Ahvaz Municipal Council, I, the selected expert, [attended] the court and studied the contents of the case. After coordinating with the plaintiffs, together with the gentlemen, Sohrab and Sam Derakhshan [the complainants], [I] visited the Baha'i cemetery, which is under investigation. [It] is situated in Kianpars, before the petrol station, next to the pool of the Department of Communications of Region 8 of Ahvaz. I therefore present my expert opinion as described in the following:

Considering the necessary investigations, the control of the registered aerial-divided maps, and referring to the Ahvaz Property and Deeds Registration Office and Ahvaz Municipality, [I find that] the disputed area and its location is part of the registration plate number 5, located in section 8 of Ahvaz and does not have a sub-registration plate number.

According to the request of that esteemed official, in the minutes of the meeting with the writ of the expert opinion regarding the determination of the disputed area, [after] studying the records, conducting a field visit, and using the Global Positioning System [GPS] device, the excerpt from the aerial map of the State Mapping Organization that determines the location of the Baha'i cemetery, with an area of 3857/33 square metres, which is presented and marked in red near the Zoroastrian cemetery, is presented [herewith] (Appendix No. 1).

On the day of the visit, it was observed that the entrance to the Baha'i cemetery was blocked with a prefabricated wall. According to the honourable legal representative of Ahvaz Municipality, this action was taken by the municipality; at the moment, entrance to the cemetery is not possible.

According to the records, all six plots of land No. 5, in Section 8, Ahvaz, plus all its parts and annexes, including the arable and non-arable lands with an area of 493 hectares, according to document No. 4448, dated 21 Esfand 1332 [12 March 1954] of the Ahvaz Deeds Office 5, have been ceded by the Ministry of Agriculture to the Mazdistan Development Corporation....

It is necessary to explain that large quantities of [land] No 5 have been separated and many transfers have been made to it. The shares of the corporation and the farmers regarding the mentioned [area] have not been separated, so far, and according to the official documents, overall, the Mazdistan Corporation and the stakeholder farmers have, so far, transferred a large portion of their property to others. It is worth mentioning that the disputed place does not have an official ownership document for the forest land and its buildings.

According to the approved tariff of the official experts of the judiciary, the fee and expert fee will be 7,000,000 (seven million) rials in total. Considering the amount paid on the account of (five million

rials), please order that the necessary action be taken, with your approval, for the payment of the remaining amount.

Respectfully,

Fasihi Karami

The Official Expert of the Judiciary

[Handwritten note at the bottom of the page:]

[Illegible]

[Signature] 5 Shahrivar 1393 [27 August 2014]

[The map is attached to the letter]

Attachment no 1

Subject: Case number 930041 Branch 7 of the Legal Court of the City of Ahvaz

Map and location of the Baha'i Cemetery (disputed site) located in part of No. 5 of Main Ward 8 of Ahvaz