

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

RECENT PAST PRESERVATION)
NETWORK, a Virginia non-profit corporation,)
P.O. Box 100505, Arlington, VA 22210;)
DION NEUTRA, 2440 Neutra Place, Los)
Angeles, CA 90039; and CHRISTINE)
MADRID FRENCH, 2522 Willard Drive,)
Charlottesville, VA 22903,)

Plaintiffs,)

v.)

JOHN LATSCHAR in his official capacity as)
SUPERINTENDENT OF GETTYSBURG)
NATIONAL MILITARY PARK, 97)
Taneytown Rd., Gettysburg, PA 17325;)
DENNIS REIDENBACH in his official)
capacity as ACTING DIRECTOR,)
NORTHEAST REGION OF THE)
NATIONAL PARK SERVICE, 200 Chestnut)
Street, Philadelphia, PA 19106; MARY)
BOMAR in her official capacity as)
DIRECTOR OF THE NATIONAL PARK)
SERVICE, 1849 C Street, N.W., Washington,)
D.C. 20240; DIRK KEMPTHORNE in his)
official capacity as SECRETARY OF THE)
UNITED STATES DEPARTMENT OF THE)
INTERIOR, 1849 C Street, N.W., Washington,)
D.C. 20240; THE NATIONAL PARK)
SERVICE, 1849 C Street, N.W., Washington,)
D.C. 20240; and THE UNITED STATES)
DEPARTMENT OF THE INTERIOR, 1849 C)
Street, N.W., Washington, D.C. 20240,)

Defendants.)

Case Number.: 1:06-CV-02077-TFH
Judge: Thomas F. Hogan
Deck Type: Administrative Agency
Review
Date Filed: 12/05/2006

DECLARATION OF JERRY
MATYIKO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT



Under penalty of perjury, I, Jerry Matyiko, declare as follows:

1. I am President and owner of Expert House Movers of MD, Inc, a company which specializes in moving structures.

2. I am a member of the International Association of Structural Movers, and have been a member since that organization's founding.

3. I have more than forty years of experience in moving structures. During that time, I have successfully moved a wide variety of historic and architecturally significant structures, including, but not limited to, houses, theaters, lighthouses, and an airport terminal. My experience with moving historic and architecturally significant structures includes relocation of poured-in-place concrete buildings such as the Gettysburg Cyclorama Center.

4. Some of the relocations for which I have been responsible are recognized as especially innovative, or even unprecedented. For example, I was responsible for relocating the tallest masonry structure ever to be moved. I was also responsible for relocating the heaviest structure ever moved on dolly wheels and for the longest relocation of a lighthouse ever, both of which are recognized as Guinness World Records.

5. In connection with this matter, I have reviewed detailed architectural plans and documents related to the design of the Cyclorama Center.

6. I have also conducted an on-site evaluation of the Cyclorama Center. As part of that evaluation, I met with Katie Lawhon, Public Affairs Specialist for Gettysburg National Military Park. I also examined both the exterior and the interior of the Cyclorama Center. In addition, I examined areas of Gettysburg National Military Park and the Borough of Gettysburg in the vicinity of the Cyclorama Center.

7. The Cyclorama Center, or portions thereof, can be removed from Ziegler's Grove and relocated to another site using dolly wheels and a grid of steel beams

8. There is at least one location outside of Gettysburg National Military Park to which the Cyclorama Center could be moved. Additional locations—both inside and outside of Gettysburg National Military Park—may also be possible, but cannot be confirmed at this time. The feasibility of additional locations would depend on a variety of factors such as topography, distance from the Cyclorama Center’s current location, applicable land use restrictions, and the location of physical constraints like utilities and roads.

9. Site planning would be required before the Cyclorama Center is removed and relocated from Ziegler’s Grove. The site planning process would be used to determine the specific details of the method by which the Cyclorama Center will be removed and relocated. The site planning process would also determine the precise route and timing of the move.

10. Site preparation would also be required prior to removing and relocating the Cyclorama Center. Specific site preparation activities would depend on the outcome of the site planning process. At a minimum, however, such activities would include construction work on the interior and exterior of the Cyclorama Center, temporary grading, and temporary and permanent landscaping.

11. The cost of removing the Cyclorama Center or portions thereof from Ziegler’s Grove and relocating it to another location would be approximately \$5 million. This figure does not include landscape work, construction of a temporary gravel pathway wide enough to accommodate the Cyclorama Center, any work that may be required on other buildings or structures, or preparation of the Cyclorama Center for relocation. Total and exact costs for the entire process of relocating and re-using the Cyclorama Center are likely to depend on a variety of factors, including how much of the Cyclorama Center will be moved, the exact location to which the building is relocated, permitting requirements, and the outcome of the site planning process.

Executed this 15 day of January, 2007.


Jerry Matyko
EXPERT Home Manner of M.D. Inc.