CAUSE NO. 29,696

ANDREW MEYER, BETTE BROWN, DARWYN HANNA, Individuals, and ENVIRONMENTAL STEWARDSHIP,	§	IN THE
Plaintiffs,	§ §	21st JUDICIAL DISTRICT COURT
v.	\$ §	
LOST PINES GROUNDWATER	§	
CONSERVATION DISTRICT, Defendant.	§ §	OF BASTROP COUNTY, TEXAS

LOST PINES GROUNDWATER CONSERVATION DISTRICT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE:

Defendant Lost Pines Groundwater Conservation District ("Defendant") files this its Original Answer and would respectfully represent to the Court as follows:

I. GENERAL DENIAL

Reserving its right to plead further and consistently with its rights under Rule 92 of the Texas Rules of Civil Procedure, Defendant enters a general denial of the matters pleaded in Plaintiffs' Petition for Judicial Review and demands strict proof thereof.

II. PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Defendant prays that upon final hearing and trial hereof, Plaintiffs take nothing by their actions, that Defendant go hence without day and recover its attorney's fees and costs as allowed by applicable law, and that Defendant have such other and further relief to which it may be justly entitled.

Respectfully submitted,

GRAVES, DOUGHERTY, HEARON & MOODY, P.C. 401 Congress Avenue, Suite 2200 Austin, TX 78701 (512) 480-5717 (512) 536-9917 (facsimile) dlein@gdhm.com

By: /s/David P. Lein

Robin A. Melvin State Bar No. 13929590 David P. Lein State Bar No. 24032537

ATTORNEYS FOR DEFENDANT LOST PINES GROUNDWATER DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on the following via first class mail and email on December 3, 2014:

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/s/David P. Lein
David P. Lein

Henderson, Molly

From:

Henderson, Molly

Sent:

Wednesday, December 03, 2014 3:21 PM

To:

'Eric Allmon'; 'Don@GandTlaw.com'; 'ebogart@obrlaw.net'

Čc:

Lein, David; Melvin, Robin A.

Subject:

No 29 696 Meyer et al v Lost Pines Groundwater Conservation District

Attachments:

No. 29,696 LPGCD Original Answer.PDF

Hello, please find Lost Pines Groundwater Conservation District's Original Answer, as filed today.

Hard copies will follow by mail.

Thank you.

Molly Henderson 512 480 5799 512 480 5809 Fax Assistant to Pete Schenkkan, Robin A. Melvin, Susan G. Conway Patrick F. Thompson, Andrea Moore Stover, Helen Currie Foster Kristina F. Rollins and F. Cartwright Weiland





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