

MANATT, PHELPS & PHILLIPS, LLP 1 FILED SUPERIOR COURT COUNTY OF SAN BERNARDINO SAN BERNARDINO DISTRICT GEORGE M. SONEFF, Bar No. 117128 gsoneff@manatt.com EDWARD G. BURG, Bar No. 104258 2 eburg@manatt.com 3 DAVID T. MORAN, Bar No. 217647 FEB 2 3 2016 dmoran@manatt.com 4 11355 West Olympic Boulevard Los Angeles, CA 90064-1614 (310) 312-4000 Telephone 5 (310) 312-4224 Facsimile 6 HILL, FARRER & BURRILL LLP 7 KEVÍN H. BROGAN, Bar No. 089427 KBrogan@hillfarrer.com DEAN F. DENNIS, Bar No. 112616 8 DDennis@hillfarrer.com One California Plaza, 37th Floor 9 300 South Grand Avenue Los Angeles, CA 90071-3147 (213) 620-0460 Telephone 10 (213) 624-4840 Facsimile 11 Attorneys for Defendant 12 Liberty Utilities (Apple Valley Ranchos Water) Corp. 13 SUPERIOR COURT OF THE STATE OF CALIFORNIA 14 COUNTY OF SAN BERNARDINO 15 16 TOWN OF APPLE VALLEY, a municipal Case No. CIVDS1600180 corporation, 17 Plaintiff, Assigned for All Purposes to: 18 Hon. Bryan F. Foster vs. 19 APPLE VALLEY RANCHOS WATER 20 COMPANY, a California corporation; DOES 1-1000; and ALL PERSONS 21 UNKNOWN CLAIMING AN INTEREST IN THE PROPERTY, 22 Complaint Filed: January 7, 2016 Trial Date: Defendants. None Set 23 24 25 ANSWER TO COMPLAINT BY DEFENDANT LIBERTY UTILITIES 26 (APPLE VALLEY RANCHOS WATER) CORP. 27 28

MANATT, PHELPS & PHILLIPS, LLP
ATTORNEYS AT LAW
LOS ANGELES

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ANSWER TO COMPLAINT BY DEFENDANT LIBERTY UTILITIES (APPLE VALLEY RANCHOS WATER) CORP.

Pursuant to Code Civ. Proc. §§1250.230 and 1250.320, defendant Liberty Utilities (Apple Valley Ranchos Water) Corp. (sued herein and formerly known as Apple Valley Ranchos Water Company) ("Liberty") answers the Complaint in Eminent

Domain, filed by plaintiff Town of Apple Valley ("Town") on January 7, 2016, as follows:

1

Liberty owns certain interests in the property described in the Complaint as "the Water System" or "the Property" (and referred to herein as "the Subject Property"). Liberty is entitled to compensation for the Subject Property, pursuant to Code Civ. Proc. § 1263.310 and case law.

2

The Subject Property is part of a larger water system ("Larger Property") owned by Liberty. Severance of the Subject Property from the Larger Property will damage the remainder of the Larger Property. Liberty is entitled to severance damages under Code Civ. Proc. § 1263.410 et seq. and case law.

3

Liberty is also entitled to compensation for improvements pertaining to the realty under Code Civ. Proc. §§ 1263.205 et seq. and case law.

Liberty is also entitled to compensation for lost goodwill under Code Civ. Proc. §§ 1263.510 et seq. and case law.

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