

**IN THE CIRCUIT COURT, FOURTH JUDICIAL CIRCUIT,
IN AND FOR DUVAL COUNTY, FLORIDA**

LARUE AND LORI ELLIS,

Husband and wife;

Plaintiff

v.

CASE NO: 2015-ca-1413

THE CITY OF JACKSONVILLE,

et al,

Defendants.

ANSWER

Defendant, St. Johns River Water Management District ("SJRWMD"), by and through its undersigned counsel, hereby answers the Complaint of Plaintiffs, Larue and Lori Ellis, paragraph by paragraph as follows:

GENERAL ALLEGATIONS

1. Without knowledge.
2. Without knowledge.
3. Admitted.
4. Without knowledge.
5. Without knowledge.
6. Without knowledge.
7. Without knowledge.

8. Without knowledge.
9. Without knowledge.
10. Without knowledge.
11. Without knowledge.
12. Without knowledge.
13. Without knowledge.
14. Without knowledge.
15. Without knowledge.
16. Without knowledge.
17. Without knowledge.
18. Without knowledge.
19. Without knowledge.
20. Without knowledge.
21. Without knowledge.
22. Without knowledge.
23. Without knowledge.
24. Without knowledge.
25. Without knowledge.
26. Without knowledge.
27. Without knowledge.
28. Without knowledge.
29. Without knowledge.
30. Without knowledge.

31. Without knowledge.

32. Without knowledge.

33. Admitted Plaintiffs have provided proper notice of this action to SJRWMD.

34. Without knowledge.

COUNT I

35. SJRWMD reiterates and adopts the foregoing responses.

36. Without knowledge.

37. Without knowledge.

38. Without knowledge.

39. Without knowledge.

40. Without knowledge.

41. Without knowledge.

42. Without knowledge.

COUNT II

43. SJRWMD reiterates and adopts the foregoing responses to paragraphs 1-34.

44. Without knowledge.

45. Without knowledge.

46. Without knowledge.

47. Without knowledge.

48. Without knowledge.

49. Without knowledge.

50. Without knowledge.

51. Without knowledge.

52. Without knowledge.

53. Without knowledge.

54. Without knowledge.

55. Without knowledge.

COUNT III

56. Admitted.

57. SJRWMD reiterates and adopts the foregoing responses to paragraphs 34-54.

58. Admitted.

59. Admitted.

60. Without knowledge.

61. Without knowledge.

62. Without knowledge.

63. Denied.

64. Without knowledge.

65. Without knowledge.

COUNT IV

66. SJRWMD reiterates and adopts the foregoing responses to paragraphs 1-34.

67. Admitted.

68. Admitted.

69. Without knowledge.

70. Without knowledge.

71. Without knowledge.

72. Without knowledge.

73. Without knowledge.

74. Without knowledge.

75. Without knowledge.

COUNT V

76. Admitted.

77. SJRWMD reiterates and adopts the foregoing responses to paragraphs 1-34.

78. Without knowledge.

79. Without knowledge.

80. Without knowledge.

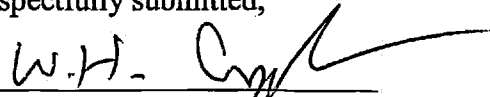
81. Without knowledge.

82. Without knowledge.

83. Without knowledge.

84. Without knowledge.

Respectfully submitted,



WILLIAM H. CONGDON

Florida Bar No.: 0283606

General Counsel

Office of General Counsel

St. Johns River Water Mgt. Dist.

4049 Reid Street

Palatka, FL 32177

wcongdon@sjrwmd.com

(386) 329-4314

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by electronic mail
this 15th day of December, 2015, to the following:

Kevin A. Schoepel, Esquire
kschoepel@ds-law.net

Matthew A. Marrone, Esquire
mmarrone@wwhgd.com

Jason R. Teal, Esquire
JTeal@coj.net

R. Thomas Roberts, Esquire
rtroberts@mdwgc.com

David S. Johnson
ddjohnson@shb.com

Tiffany C. Raush
traush@shb.com



William H. Congdon