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#### IN THE

# SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1962.

No. 14 Original

STATE OF LOUISIANA, Plaintiff,

VS.

STATE OF MISSISSIPPI et als., Respondents.

### ANSWER OF JOSEPH S. ZUCCARO ET AL.

Joseph S. Zuccaro
Pro Se and of Callon, Zuccaro,
Wood & Pintard
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Landman Teller
Of Teller, Biedenharn & Rogers
1205 Monroe Street
Vicksburg, Mississippi
Attorneys for the Individual
Respondents, Joseph S. Zuccaro et al.

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COME Joseph S. Zuccaro, Marie K. Zuccaro, Anthony E. Zuccaro, Nell Kaiser Zuccaro, William S. Perkins, Marie Zuccaro Perkins and Fay Cade Zuccaro, adult residents and citizens of Adams County, Mississippi, who have been designated as Respondents in the Complaint of Louisiana herein on file; and said individual Respondents, by attorneys, respectfully say:

That, in the order permitting Louisiana to file its Complaint, this Honorable Court directed only that answer thereto be made by the State of Mississippi; that no formal process was issued for or served upon these Respondents, it being clearly inferable, if indeed not manifest, that this

Court intends to and shall limit the issues, the proceedings thereon and its determination herein to such controversy as may exist between the two states themselves; however, if mistaken in this and answer be expected or required of these Respondents, then they hereby adopt by reference as their answer the answer filed by the State of Mississippi.

## Respectfully submitted,

Joseph S. Zuccaro
Pro Se and of Callon, Zuccaro,
Wood & Pintard
Natchez, Mississippi

Landman Teller
Of Teller, Biedenharn & Rogers
1205 Monroe Street
Vicksburg, Mississippi
Attorneys for the Individual

Attorneys for the Individual Respondents, Joseph S. Zuccaro et al.

### PROOF OF SERVICE

Service effected on the State of Louisiana by mailing to Jimmie H. Davis, its Governor, Ellen Bryan Moore, its Register of State Land Office, the State Mineral Board of Louisiana and Jack P. F. Gremillion, its Attorney General, together with Carroll Buck, First Assistant Attorney General of the State of Louisiana, Edward R. Carmouche, Assistant Attorney General of the State of Louisiana, John L. Madden, Assistant Attorney General of the State of Louisiana, John A. Biven, Special Counsel to the Attorney General of the State of Louisiana; and likewise upon the Respondent, the Humble Oil & Refining Company, by mailing to its counsel of record, Joe A. Thompson, P. O. Box 1490, Jackson, Mississippi; Robert M. Bass, P. O. Box 1490, Jackson, Mississippi; Lee V. Russell, P. O. Box 1390, Hattiesburg, Mississippi; M. M. Roberts, P. O. Box 870, Hattiesburg, Mississippi, and E. L. Brunini, P. O. Box 119, Jackson, Mississippi; and service effected on the State of Mississippi by mailing to Joe T. Patterson, its Attorney General, and Martin R. McLendon, Assistant Attorney General of the State of Mississippi, all as more particularly shown by affidavit of the printer on file herein with the Clerk of the Supreme Court of the United States.

So certified this the ...... day of March, 1964.

Of Counsel for Joseph S. Zuccaro et al.



