



No. 36, Original

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In the Supreme Court of the United States

OCTOBER TERM, 1973

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THE STATE OF TEXAS, PLAINTIFF

v.

THE STATE OF LOUISIANA

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ANSWER OF THE UNITED STATES TO COMPLAINT OF TEXAS

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ROBERT H. BORK,  
*Solicitor General,*  
*Department of Justice,*  
*Washington, D.C. 20530.*

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## ANSWER OF THE UNITED STATES TO COMPLAINT OF TEXAS

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The United States of America, by its Solicitor General, answers the complaint of the State of Texas as follows:

### I

The United States admits the allegations of paragraph I of the complaint.

### II

The United States denies the allegations contained in paragraph II of the complaint.

### III

The United States admits that the islands referred to in the second sentence of paragraph III of the complaint are located west of the geographic middle of the Sabine River, and are therefore within the bound-

ary of the State of Texas. The United States is at this time without knowledge or information sufficient to form a belief as to whether such islands have been patented and are privately owned.

#### IV

The United States is at this time without knowledge or information sufficient to form a belief as to the truth of the allegation in paragraph IV of the complaint that John's, or Dooms, Island is no longer in existence.

#### V

The United States denies the allegations of paragraphs V and VI of the complaint.

#### VI

The United States denies the allegations contained in the first sentence of paragraph VII. The United States is at this time without knowledge or information sufficient to form a belief as to whether Texas has ever recognized or acquiesced in any boundary line or extension resulting from construction of jetties at the mouth of the Sabine, or has exercised jurisdiction east of the jetties. The United States admits that the State of Texas has passed legislation purporting to establish a boundary east of the jetties.

WHEREFORE, the United States prays for relief consistent with the positions asserted by the United States herein and in its complaint in this action.

Respectfully submitted.

ROBERT H. BORK,  
*Solicitor General.*

JANUARY 1974.







