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FILED

OCT 6 1982

ALEXANDER L. STEVAS,

In the

Supreme Court of the United States

No. 92 Original

October Term, 1981

State of Arkansas,

Plaintiff,

VS.

State of Mississippi,

Defendant.

ANSWER TO COUNTERCLAIM

JOHN STEVEN CLARK Attorney General

By: JEFFREY A. BELL

Assistant Attorney General

Justice Building

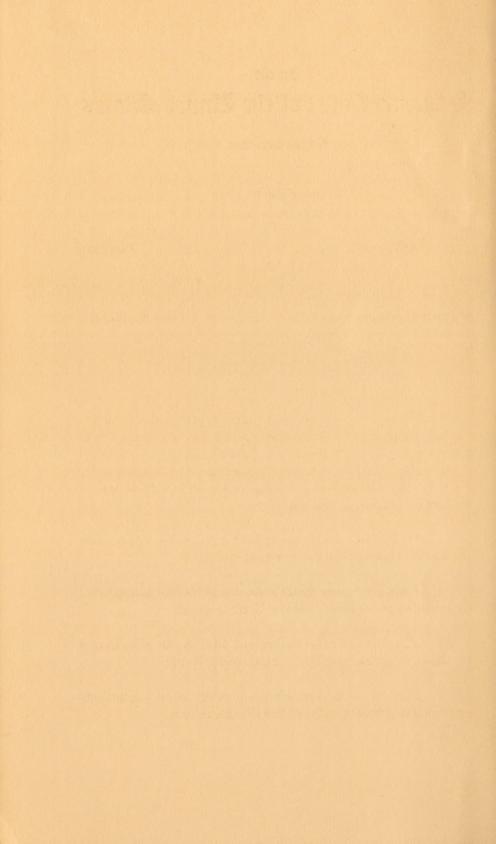
Little Rock, Arkansas 72201

(501) 371-2007

AND

WILLIAM H. DREW DREW & MAZZANTI P. O. Box 744 Lake Village, Arkansas 71653

Attorneys for Plaintiff -Counterdefendant State of Arkansas



In the

Supreme Court of the United States

al
1981
Plaintiff,
Defendant.

ANSWER TO COUNTERCLAIM

Comes now the State of Arkansas, plaintiff - counterdefendant in the above styled and numbered action, appearing by and through its counsel, Attorney General John Steven Clark, and for its Answer to the Counterclaim filed by the defendant - counterclaimant, the State of Mississippi, states as follows:

- 1. Plaintiff counterdefendant admits the allegations contained in paragraph I of the Counterclaim.
- 2. Plaintiff counterdefendant admits the allegations contained in paragraph II of the Counterclaim.
- 3. Plaintiff counterdefendant admits the allegations contained in paragraph III of the Counterclaim.
- 4. Plaintiff counterdefendant admits the allegations contained in paragraph IV of the Counterclaim.

- 5. Plaintiff counterdefendant admits the allegations contained in paragraph V of the Counterclaim.
- 6. Plaintiff counterdefendant denies, in their entirety, the allegations contained in paragraph VI of the Counterclaim. Plaintiff counterdefendant further denies that the Exhibits to such Counterclaim establish the allegations raised in said paragraph VI. Plaintiff counterdefendant readopts and reaffirms the allegations made in paragraphs IX, X, and XI of its Complaint as correctly explaining the series of changes which occurred on the Mississippi River in the area in controversy.
- 7. Plaintiff counterdefendant admits the allegations contained in paragraph VII of the Counterclaim, with the exception that it neither admits nor denies that it has been unnecessary heretofore to determine the exact boundary line between Arkansas and Mississippi in the area involved.

WHEREFORE, PREMISES CONSIDERED, plaintiff - counterdefendant respectfully prays:

- 1. That the prayer for relief in the plaintiff counterdefendant's original Complaint be granted in its entirety, and that the Court fix the Eastern boundary line of the State of Arkansas in the abandoned bed of the Mississippi River as described in paragraph IX of said Complaint;
- 2. That the prayer in the Counterclaim filed by defendant counterclaimant State of Mississippi be denied in its entirety;
- 3. That all costs in this action be assessed against the defendant counterclaimant:

4. And for such other and further relief, general or special, as the Court may deem just and proper.

Respectfully submitted,

JOHN STEVEN CLARK Attorney General

BY: JEFFREY A. BELL

Assistant Attorney General

Justice Building

Little Rock, Arkansas 72201

(501) 371-2007

AND

WILLIAM H. DREW DREW & MAZZANTI P. O. Box 744 Lake Village, Arkansas 71653

Attorneys for Plaintiff-Counterdefendant State of Arkansas

PROOF OF SERVICE

- I, John Steven Clark, Attorney General of the State of Arkansas, and a member of the Bar of the Supreme Court of the United States, hereby certify that on the 14th day of October, 1982, I served copies of the foregoing Answer to Counterclaim as follows:
- (1) Upon the Supreme Court of the United States, by mailing sixty (60) copies in a duly addressed envelope, with postage prepaid, to the Clerk, United States Supreme Court, 1 First Street, N.E., Washington, D.C., 20543; and
- (2) On the State of Mississippi, by mailing three (3) copies in a duly addressed envelope, with postage prepaid, to Bill Allain, Attorney General of the State of Mississippi, P. O. Box 220, Jackson, Mississippi, 39205.

JOHN STEVEN CLARK Attorney General of Arkansas