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In the Supreme Court

OF THE

United States

OCTOBER TERM, 1981

STATE OF CALIFORNIA ex rel.
STATE LANDS COMMISSION,
Plaintiff,

VS.

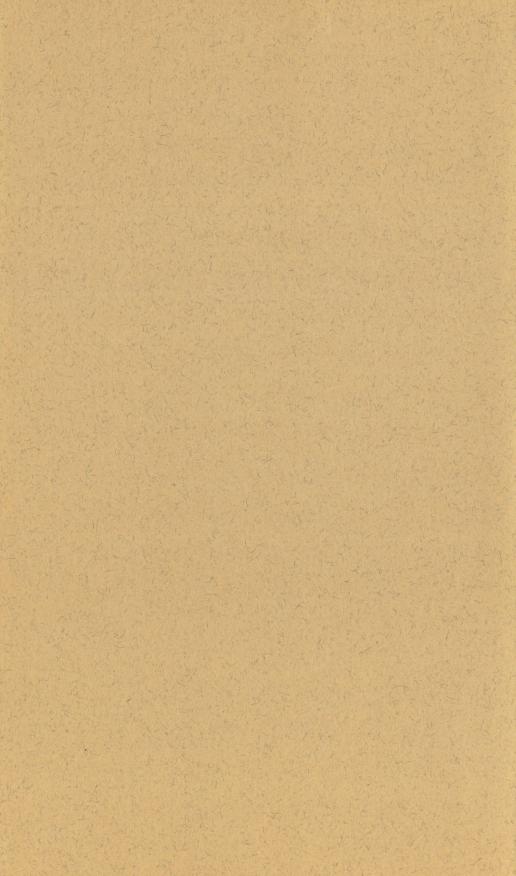
United States of America, Defendant.

On Bill of Complaint

MEMORANDUM FOR THE STATE OF CALIFORNIA EX REL. STATE LANDS COMMISSION IN OPPOSITION TO UNITED STATES' MOTION FOR JUDGMENT ON THE PLEADINGS

GEORGE DEUKMEJIAN
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STATE LANDS COMMISSION,
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vs.

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The State of California ex rel. State Lands Commission ("California") agrees that there is no disputed issue between the United States and California as to any material fact. California submits, however, that the facts alleged in the Complaint and admitted in the Answer, and the facts of which judicial notice has been requested entitle California as a matter of law to judgment as prayed for in its Complaint. On such basis, California submits that the motion

of the United States for judgment on the pleadings must be denied and requests that the Court set down this motion for argument in due course and invite the parties to file briefs in support of their respective positions.

Dated: November 18, 1981

GEORGE DEUKMEJIAN
Attorney General of the State of California

N. GREGORY TAYLOR
Assistant Attorney General

DENNIS M. EAGAN

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