

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

<i>In re</i> FLINT WATER CASES)	Case No. 5:17-cv-10444-JEL-
)	MKM
<hr/>		
<i>Kimberly Gaddy, et al.</i>)	
)	
Plaintiffs)	Case No. 5:17-cv-11166-JEL-
)	MKM
vs.)	
)	
Governor Richard Snyder et al.,)	
)	
Defendants)	

**VEOLIA NORTH AMERICA, INC.’S SHORT FORM ANSWER TO
PLAINTIFFS’ MASTER SHORT FORM COMPLAINT, AFFIRMATIVE
DEFENSES, AND RELIANCE UPON JURY DEMAND**

NOW COMES the defendant, Veolia North America, Inc. ("VNA Inc."), by and through their attorneys, hereby provides this Answer to the Amended Short Form Complaint [Dkt. 49] filed by Plaintiffs in this matter on February 22, 2018 and, pursuant to this Court’s orders, states as follows:

1. By way of this Short Form Answer, VNA Inc. does not waive, and expressly reserves, any challenges they may have to the Court’s personal jurisdiction or venue.

2. VNA Inc. incorporates all responses, affirmative defenses, and jury demand set forth in VNA Inc.'s Answer to the Plaintiffs' Amended Master Long-Form Complaint and Jury Demand [Dkt. 262] filed in *LeeAnn Waters et al.*, vs. *Snyder et al.*, Case No. 5:17-cv-10164, on or about September 10, 2019, as if the same were set forth at length herein, and prays that Plaintiffs be denied all relief requested.
3. To the extent any specific response is required to the Short Form Complaint, VNA Inc. does not have enough knowledge or information to form a belief as to the truth of the allegations in ¶¶1-14, and therefore those and any remaining allegations are denied.
4. VNA Inc. further reserves the right to advance any additional defenses not otherwise set forth, as may be appropriate to this case.

WHEREFORE, VNA Inc. prays for relief as set forth in their Answer to Plaintiffs' Amended Master Long Form Complaint.

DATED: October 3, 2019

Respectfully submitted,

CAMPBELL CONROY & O'NEIL, P.C. BUSH SEYFERTH PLLC

/s/ James M. Campbell

James M. Campbell
Alaina N. Devine
One Constitution Wharf, Suite 310
Boston, MA 02129
(617) 241-3000

jmcampbell@campbell-trial-lawyers.com

adevine@campbell-trial-lawyers.com

/s/ Michael R. Williams

Cheryl A. Bush (P37031)
Michael R. Williams (P79827)
100 W. Big Beaver Road, Suite 400
Troy, MI 48084
(248) 822-7800

bush@bsplaw.com

williams@bsplaw.com

*Attorneys for Veolia Water North America Operating Services, LLC Veolia
North America, LLC, and Veolia North America, Inc.*

CERTIFICATE OF SERVICE

I, Alaina N. Devine, one of the counsel of record for the defendants Veolia Water North America Operating Services, LLC, Veolia North America, LLC, and Veolia North America, Inc., certify that on October 3, 2019, I caused the within answer to be filed electronically with the Clerk of Courts through the Court's ECF filing system which will cause it to be served automatically by electronic means to counsel of record for all parties.

/s/ Alaina N. Devine

Alaina N. Devine

adevine@campbell-trial-lawyers.com