

IN THE DISTRICT COURT OF THE STATE OF UTAH, IN AND FOR UTAH COUNTY.

Provo Reservoir Company  
A corporation--Plaintiff

5 / vs.

Provo City, Lincoln District.  
Reed Knudsen, Lewis Marriott,  
Lars Jacobsen, Albert Jacobsen  
Lewis Jacobsen, Isaac P. Nelson,  
Benjamin H. Knudsen, William D.  
Lewis, William C. Williamson et al

Separate answers of  
Reed Knudsen, Lewis Marriott,  
Lars Jacobsen, Albert Jacobsen,  
Lewis Jacobsen, Isaac P. Nelson,  
Benjamin H. Knudsen, William D.  
Lewis, William C. Williamson.

Now come Reed J. Knudsen, Lewis Marriott, Isaac P. Nelson, William C. Williamson, William D. Lewis, Benjamin H. Knudsen, and Lars Jacobsen Albert Jacobsen, and Lewis Jacobsen, the last three named defendants being the successors in interest of the estate of Lars Jacobsen Deceased, and having first obtained leave of this court, now make answer to the complaint of the plaintiff and affirmatively allege.

First. That they are the owners in severalty of about 80 acres of land situated sections 3 and 4 Township 7 South of Range 2, East of the Salt Lake Meridian, Utah County, Utah.

Second. That these said defendants and their predecessors in interest have owned, cultivated and irrigated the said 80 acres of land for 45 years without let, interference or hindrance from any person whatsoever.

Third. That it is necessary to successfully raise agricultural crops on the said land that the same be irrigated during the entire seasons of every crop growing season of every year.

Fourth. That the water which has been used on the said land has its source in the water of Provo River and is largely supplied from seepage and is taken out and used on the north side of Provo River below all other users.

Five. That one and one half second feet of water has been used on the said land for 45 years last past continuously in the irrigation season of each and every year and the same is necessary with economical use and without wast to successfully irrigate the said land for the purpose of raising agricultural crops.

Six. That the said plaintiff has not, nor ever had any right title interest or possession of any of the water herein claimed by these defendants or any of them and the use thereof is wholly the property of these defendants.

Wherefore the said defendants herein pray for judgment against the said plaintiffs and all others claiming or to claim any interest in the said second foot of water and that the title thereto be quieted in these defendants and for their costs.

J. E. Booth  
Attorneys for these defendants.

State of Utah, County of Utah.

Reed J. Knudsen being first duly sworn on his oath says that he is one of the defendants named in the foregoing answer that he has read the said answer and knows the contents thereof, and that the same is true of his knowledge except as to matters therein stated on his information and belief and as to those matters he believes it to be true.

Reed J. Knudsen

Subscribed and sworn to before me this 6th day of Jan. 1917.

J. E. Booth  
Notary Republic.



Commission expires March 9, 1919.

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Dist Court

Utah Co

Provo Reservoir Co

vs

Provo City et al

Separate Answer  
of Reed J. Knutson  
et al

IN DIST. COURT  
UTAH CO., UTAH.

\* FILED \*

JAN 8 - 1917

T. J. Epperson Clerk.

C. J. Woods Deputy.