

IN THE CHANCERY COURT FOR HAMILTON COUNTY, TENNESSEE

THE ROMAN CATHOLIC DIOCESE OF KNOXVILLE,)

Petitioner,)

vs.)

HAMILTON COUNTY, TENNESSEE DEPARTMENT)
OF HEALTH,)

Respondent.)

Case No. 18-0704

Part 2

RESPONSE TO PETITION

Hamilton County responds to the Petition filed by the Roman Catholic Diocese of Knoxville as follows:

1. Paragraphs 1 through 4 of the Petition are admitted.
2. Paragraphs 5 through 6 of the Petition cannot be admitted or denied without the aid of discovery; however, Hamilton County has no reason to dispute the statements contained therein.
3. Paragraph 7 of the Petition is a legal conclusion which requires no response of Hamilton County, and Hamilton County will rely upon the Court's interpretation of the law relative to this Petition.
4. Paragraphs 8 and 9 of the Petition are admitted.
5. Paragraph 10 of the Petition cannot be admitted or denied without the independent research of Hamilton County; however, Hamilton County has no reason to dispute the statement.
6. Paragraphs 11 and 12 of the Petition are admitted.

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7. Paragraph 13 of the Petition cannot be admitted or denied without the independent research of Hamilton County; however, Hamilton County has no reason to dispute the statement.


8. Paragraph 14 of the Petition is a legal conclusion which requires no response of Hamilton County, and Hamilton County will rely upon the Court's interpretation of the law relative to this Petition.

9. Paragraph 15 of the Petition contains legal conclusions which require no response of Hamilton County, and contain information which cannot be either admitted or denied by Hamilton County. As to any legal conclusion, Hamilton County will rely upon the Court's interpretation of the law relative to this Petition. As to any information which cannot be either admitted or denied, Hamilton County has no reason to dispute the statements contained therein.

10. Paragraph 16 of the Petition cannot be admitted or denied without the aid of discovery; however, Hamilton County has no reason to dispute the statements contained therein.

Wherefore, having fully answered, Hamilton County requests that this Court order such relief as it determines is appropriate, with all costs taxed against the Petitioner.

HAMILTON COUNTY ATTORNEY'S OFFICE

By: 
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing pleading has been served upon all parties or counsel for all parties at interest in this case by hand-delivering a copy of said pleading or by placing a copy of said pleading in the United States Mail addressed to said parties or counsel at their last known address listed below with sufficient postage thereon to carry the same to its destination this the 20th day of December, 2018:

Buddy B. Presley, Esq.
Terrance L. Jones, Esq.
The Presley Law Firm
13 E. 7th Street
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Rheubin M. Taylor