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FILED  
2015 APR -7 PM 2: 03  
MARY ELLEN DURLAP  
CLERK OF SUPERIOR COURT  
By DEPUTY JR SV

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF COCHISE

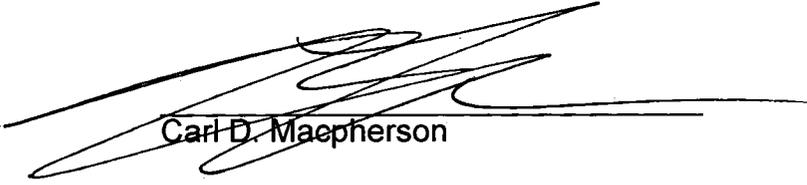
10	DANNY R. HATCH, JR. and DENICE R. HATCH, husband and wife,	)	NO. CV 201400128
11		)	
12	Plaintiffs,	)	PLAINTIFF'S ANSWER TO DEFENDANT'S STATEMENT OF FACTS
13	vs.	)	
14	RONALD J. KLUMP and JANE DOE KLUMP, husband and wife, ROY J. KLUMP and JANE DOE KLUMP, husband and wife, 15 and DAYLA HEAP and JOHN DOE HEAP, 16 wife and husband,	)	Assigned: Hon. John Keliher
17	Defendants	)	

18 Pursuant to Rule (C)(2) Plaintiff's submit the following statement of facts in support  
19 in their answer to Defendant's Motion for Summary Judgment;  
20 1. Plaintiff's have resided at 3983 North Sheppard Road since August 2003.  
21 2. That from August 2003 through December 30, 2013 Plaintiff's did post the  
22 easterly 60 feet of subject property as a private driveway.  
23 3. That during said time Defendant's never used subject property.  
24 4. Since the purchase of subject property the Plaintiff's have always paid taxes  
25 thereon which includes the easterly 60 foot strip.  
26 5. Plaintiff's deny the Defendant's statement of facts in paragraphs 9 and 10.  
27 6. Plaintiff's deny the allegations contained in paragraphs 20 and 21 for reason that  
28 saying is untrue.

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7. Plaintiff's further adopt the statements contained in the affidavits attached to their separate statement of facts in support of their response to the Motion of Summary Judgment.

DATED this 2 day of April, 2015.



Carl D. Macpherson

Copy of the foregoing to:  
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