

STATE OF SOUTH DAKOTA

SOUTH DAKOTA ONE CALL NOTIFICATION BOARD

SOUTH DAKOTA ONE CALL NOTIFICATION BOARD, Plaintiff,	*	
	*	OC NO. 06-008
	*	
	*	
vs.	*	ANSWER OF JEREMY SCADDEN
	*	CONSTRUCTION TO COMPLAINT
JEREMY SCADDEN CONSTRUCTION, Defendant.	*	OF CITY OF BRANDON
	*	
	*	

COMES NOW Defendant JEREMY SCADDEN, dba JEREMY SCADDEN CONSTRUCTION, aka JEREMY SCADDEN CONSTRUCTION, INC., who makes and files this Answer to the referenced Complaint, and in support thereof, states and alleges as follows:

1. Defendant denies performing any performing any excavation work at 205 Fairway Ave., Brandon, SD. The Defendant did no excavation for utilities at this location. He did pile up a number of trees at a nearby location.

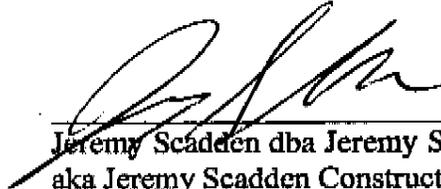
2. Defendant caused no damage whatsoever to any utilities services, private persons, or governmental entities at 205 Fairway Ave., Brandon, SD.

3. During Defendant's said work near 205 Fairway Ave., Brandon, SD, no injury occurred to the public's safety, and there was no inconvenience caused to the public.

4. That Defendant has been in the excavation business with his family since he was in high school, and is familiar with the location of most utilities in the vicinity of Brandon and Valley Springs, SD. The Defendant has considerable experience in regard to the location of utility services and does not act recklessly in conducting excavation business. The Defendant fully realizes the cost to individuals and the general public which can result in the event of disruption of utility services.

5. The Defendant hereby reserves his rights to present testimony and evidence, to cross-exam witnesses, and to make argument at any formal hearing conducted in this matter.

Dated this 1 day of NOVEMBER, 2006, at Brandon, SD.



Jeremy Scadden dba Jeremy Scadden Construction
aka Jeremy Scadden Construction, Inc.
P.O. Box 243
Valley Springs, SD 57068