

By:   
S. Delgado  
Deputy Clerk

1 **MARYELLEN SHEPPARD**  
2 **27200 North Highway 1**  
3 **Fort Bragg, CA 95437**

4 In Pro Per

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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF MENDOCINO**

9 MENDOCINO RAILWAY,  
10  
11 Plaintiff,

12 v.

13 JOHN MEYER; REDWOOD EMPIRE TITLE  
14 COMPANY OF MENDOCINO COUNTY;  
15 SHEPPARD INVESTMENTS; MARYELLEN  
16 SHEPPARD; MENDOCINO COUNTY  
17 TREASURER-TAX COLLECTOR; All other  
18 persons unknown claiming an interest  
19 in the property; and DOES 1 through  
20 100, inclusive,

21 Defendants.

Case No. SCU-K-CED 20-74939

[APN 038-180-53]

**ANSWER OF DEFENDANTS SHEPPARD  
INVESTMENTS AND MARYELLEN  
SHEPPARD**

22 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

23 Defendants SHEPPARD INVESTMENTS and MARYELLEN SHEPPARD

24 (hereinafter "Defendants") answers the Complaint of Plaintiff Mendocino Railway  
25 ("Plaintiff") as follows:

26 1. Answering paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 11 & 12 these answering  
27 Defendants lack sufficient information and belief as to the matters set forth  
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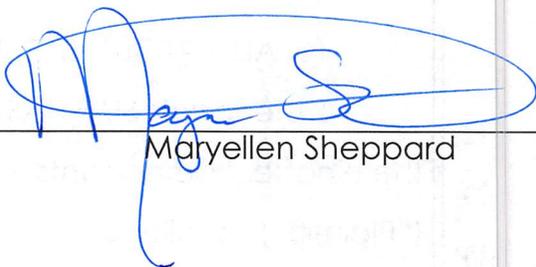
1 therein, and therefore denies generally and specifically each and every  
2 allegation therein.

3 2. With regard to paragraph 10, Defendants' allege their interest in the  
4 real property that is subject of the Complaint is as a lienholder and beneficiary  
5 per a Deed of Trust encumbering the property. Pursuant to the terms of the Deed  
6 of Trust, any condemnation award or settlement proceeds must be applied to  
7 the indebtedness secured by the Deed of Trust and to the repayment of all  
8 reasonable costs, expenses and attorneys' fees incurred by Defendants in  
9 connection with this action.

10 WHEREFORE, Defendants pray as follows:

- 11 1. For just compensation for the taking and/or damaging of Defendants'  
12 interests in the Subject Property;
- 13 2. For costs of suit incurred herein, including attorney's fees and other  
14 compensable litigation expenses;
- 15 3. For interest on the foregoing sums as allows by law; and
- 16 4. For such other further relief as the court deems just and proper.

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19 Dated: August 6  
~~June~~, \_\_\_\_\_, 2021

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22 By  \_\_\_\_\_  
Maryellen Sheppard

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**PROOF OF SERVICE**

Mendocino Railway v. John Meyer, et al.  
Mendocino Superior Court Case No.: SCUk-CVED-20-74939

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 27200 North Highway 1, Fort Bragg, California. On June \_\_, 2021, I served the within document(s):

**ANSWER OF DEFENDANTS SHEPPARD INVESTMENTS AND MARYELLEN SHEPPARD**

- ELECTRONIC MAIL:** By transmitting via e-mail the document listed above to the e-mail address set forth below.
- BY MAIL:** By placing a true copy of the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Glendale, California addressed as set forth in the attached service list
- OVERNIGHT DELIVERY:** By overnight delivery, I placed such document(s) listed above in a sealed envelope, for deposit in the designated box or other facility regularly maintained by United Parcel Service for overnight delivery and caused such envelope to be delivered to the office of the addressee via overnight delivery pursuant to C.C.P. §1013(c), with delivery fees fully prepaid or provided for.
- PERSONAL SERVICE:** By personally delivering the document(s) listed above to the person(s) listed below at the address indicated.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on <sup>August 6</sup> ~~June~~ \_\_, 2021, in Fort Bragg, California.

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**SERVICE LIST**

Mendocino Railway v. John Meyer, et al.  
Mendocino Superior Court Case No.: SCUK-CVED-20-74939

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