

1996

Samuel L. Boyd v. Harmon City Inc., Matthew Hilton, Brinton B. Urbidge, Kirton McConkie and Bushnell, Michael Gotfredson, Nielsen and Senior, Terry Harmon, and Mrs. Terry Harmon : Brief of Appellee

Utah Court of Appeals

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IN THE COURT OF APPEALS OF THE STATE OF UTAH

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DOCKET NO. 960197 CA

SAMUEL L. BOYD,

Plaintiff/Appellant,,

v.

HARMON CITY, INC., a Utah corporation;  
MATTHEW HILTON, BRINTON BURBIDGE;  
KIRTON, McCONKIE & BUSHNELL, a Utah  
corporation; MICHAEL GOTTFREDSON;  
NIELSEN & SENIOR, a Utah corporation;  
TERRY HARMON, and MRS. TERRY  
HARMON,

Defendants/Appellees.

Case No. 960197-CA

Priority No. 15

BRIEF OF APPELEE NIELSEN & SENIOR

APPEAL FROM THE JUDGEMENT OF THE THIRD JUDICIAL DISTRICT COURT FOR  
SALT LAKE COUNTY, HONORABLE LESLIE A. LEWIS, DISTRICT JUDGE

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**FILED**

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COURT OF APPEALS

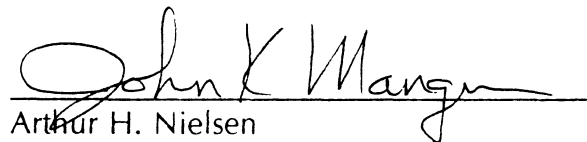


## ADOPTION BY REFERENCE

Appellee Nielsen & Senior, having earlier taken the lead on this appeal in preparing and filing a Motion for Summary Affirmance (filed in the Utah Supreme Court before transfer to this Court, which motion was denied), and having collaborated with and provided assistance to legal counsel for co-defendants Brinton Burbidge and Kirton McConkie & Bushnell, in the preparation of their Brief, dated April 15, 1996, hereby adopts by reference, pursuant to the provisions of Rule 24(h) of the Utah Rules of Appellate Procedure, the entirety of that Brief, and all of its various subparts, including its adoption, in Part VI, at page 24, of the further and separate Brief dated April 10, 1996 of co-defendants Harmon City, Inc., Terry Harmon and Doreen Harmon.

For all the reasons set forth therein, Nielsen & Senior submits that the trial court's rulings below were correct, and should be affirmed by this Court.

Respectfully submitted this 19<sup>th</sup> day of April, 1996.



Arthur H. Nielsen  
John K. Mangum  
NIELSEN & SENIOR, P.C.  
Attorneys for Defendant/Appellee  
Nielsen & Senior

CERTIFICATE OF SERVICE

I hereby certify that on this 19<sup>th</sup> day of April, 1996, I caused to be mailed, via first class mail, postage prepaid, two true and correct copies of the foregoing Brief of Appellee Nielsen & Senior to each of the following sets of attorneys:

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