



434 Fayetteville Street
Suite 2800
Raleigh, NC 27601
Tel (919) 755-8700 Fax (919) 755-8800
www.foxrothschild.com

KAREN M. KEMERAIT
Direct No: 919.755.8764
Email: kkemerait@foxrothschild.com

January 18, 2022

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

Via Electronic Submittal

**Re: In the Matter of WLI Investments, LLC, Complainant, v. Pluris
Hampstead, LLC and Old North State Water Company, LLC,
Respondents.
NCUC Docket Nos. Docket No. W-1300, Sub 77 and W-1305, Sub 35
Response to Complaint and Petition for Declaratory Ruling and
Motion to Dismiss Complaint**

Dear Ms. Dunston:

Attached for filing and approval, please find the Response to Complaint and
Petition for Declaratory Ruling and Motion to Dismiss Complaint of Pluris Hampstead,
LLC and Old North State Water Company, LLC in the above referenced dockets.

Thank you and your staff for your assistance.

Sincerely,

/s/ Karen M. Kemerait

Karen M. Kemerait

pbb

Enclosure

cc: All parties of record

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota Nevada
New Jersey New York North Carolina Pennsylvania South Carolina Texas Virginia Washington

129714513.1 01/18/2022 18:39:01 - 1/18/2022 2:57:22 PM

OFFICIAL COPY

Jan 18 2022