

IN THE IOWA DISTRICT COURT FOR LINN COUNTY

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| <b>Hawkeye Land Company,</b><br><br>Petitioner,<br><br>vs.<br><br><b>Iowa Utilities Commission and Metro<br/>Fibernet LLC d/b/a Metronet,</b><br><br>Respondents. | CASE NO.: CVCV108100<br><br><b>ANSWER OF RESPONDENT<br/>METRO FIBERNET LLC</b> |
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COMES NOW, Respondent Metro Fibernet LLC d/b/a Metronet ("Metronet"), by and through its undersigned counsel, and for its Answer to Petition for Judicial Review, states:

1. Metronet admits the allegations in paragraph 1 of the Petition.
2. Metronet denies the allegations in paragraph 2 of the Petition for lack of knowledge or information.
3. Metronet admits venue in Linn County is proper but denies all other the allegations in paragraph 3 of the Petition for lack of knowledge or information.
4. Metronet admits the allegations in paragraph 4 of the Petition.
5. Metronet admits the allegations in paragraph 5 of the Petition.
6. Metronet admits the allegations in paragraph 6 of the Petition to the extent they recite a procedural history, but Metronet denies any inferences or other allegations contained therein.
7. Metronet denies the allegations in paragraph 7 of the Petition and states that the statute speaks for itself.

8. Metronet denies the allegations in paragraph 8 of the Petition to the extent it alleges that the Department of Transportation enacted the rule cited in paragraph 8 of the Petition.

9. Metronet admits the allegations in paragraph 9 of the Petition.

10. Paragraph 10 of the Petition does not contain any factual assertions and instead states Hawkeye Land Company's position. To the extent a response is required, Metronet denies the allegations in paragraph 10 of the Petition.

11. Metronet admits that the IUC's decision denied the relief requested by Hawkeye Land Company and admits that the IUC's decision ordered Metronet to pay \$750 for the crossings at issue. However, Metronet denies any other allegations or inferences in paragraph 11 of the Petition.

12. Metronet denies the allegations in paragraph 12 of the Petition.

13. Metronet denies the allegations in paragraph 13 of the Petition.

14. Metronet denies the allegations in paragraph 14 of the Petition.

15. Metronet denies the allegations in paragraph 15 of the Petition.

WHEREFORE Respondent Metro Fibernet LLC d/b/a Metronet respectfully requests that the Court dismiss all claims raised in the Petition for Judicial Review with prejudice at Petitioner's costs, and for all other relief deemed just and proper.



By: \_\_\_\_\_  
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d/b/a Metronet

**Certificate of Service**

I hereby certify that on July 28, 2025, I electronically filed the foregoing document with the Clerk of the Court by using the Iowa Judicial Branch electronic filing system which will send a notice of electronic filing to all parties of record.

/s/ William M. Reasoner