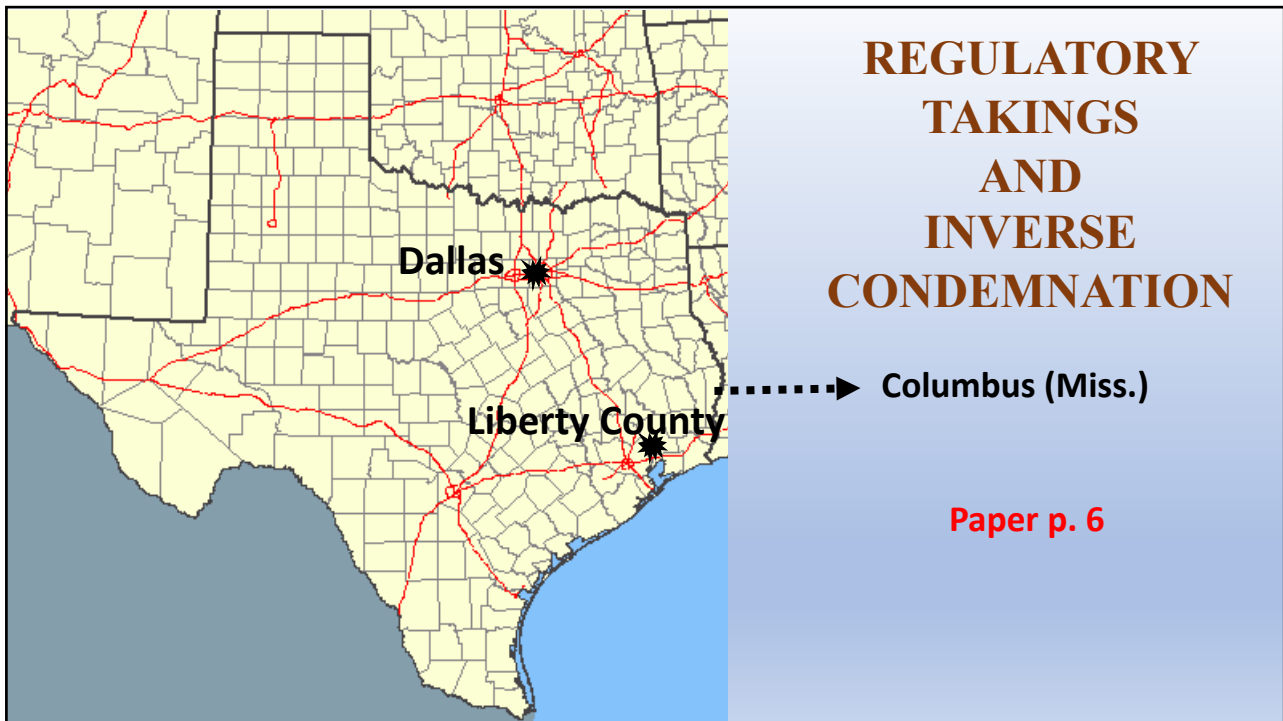


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2

## ***Background***

- ***Lingle case (USSC 2005) , four taking categories***
  - (1) Permanent physical invasion: *Loretto*
  - (2) Deprivation of all economic uses: *Lucas*
  - (3) Exactions: *Nolan, Dolan, Flower Mound*
  - (4) Interference, investment-backed expectations: *Penn Central*
- **Sec. 212.904 LGC now governs many municipal exactions**
- **Having a contract does not preclude taking claim**

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## ***Updates***      *Golden Glow Tanning Salon v. City of Columbus*



4

REGULATORY TAKINGS AND INVERSE CONDEMNATION

**Updates**      *Golden Glow Tanning Salon v. City of Columbus*

- **COVID closing ordinance was neither:**  
permanent physical invasion: *Loretto*  
nor  
deprivation of all economic uses: *Lucas*

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REGULATORY TAKINGS AND INVERSE CONDEMNATION

**Updates**      *Golden Glow Tanning Salon v. City of Columbus*

- **COVID closing ordinance was neither:**  
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