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AM

Christina Spurlock SupDrtClerk

6 Plaintiff Pro Per

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF MOHAVE**

9 NANCY KNIGHT,

10 Plaintiff,

11 and

12 GLEN LUDWIG Trustee of THE LUDWIG
13 FAMILY TRUST; FAIRWAY
14 CONSTRUCTORS, INC.; MEHDI AZARMI;
15 JOHN DOES 1-10; JANE DOES 1-10; ABC
16 CORPORATIONS 1-10; and XYZ
17 PARTNERSHIPS 1-10.

18 Defendants.

Case No.: CV 2018-04003

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION TO STRIKE
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT DATED FEBRUARY 2, 2023**

Under Reassignment From Judge Jantzen
By Hon. Judge Lambert

19 Plaintiff Pro Per Nancy Knight ("Plaintiff") filed the Motion for Summary
20 Judgment ("MSJ") on February 2, 2023 as an urgency pending a Status Conference
21 scheduled for February 17, 2023.

22 On February 27, 2023, the Defendants sent Plaintiff a copy of their Motion to
23 Strike the entirety of Plaintiff's Motion for Summary Judgment for failure to follow the
24 requirements of Rule 56.

25 Given that the urgency has passed, and in the interest of judicial economy,
26 Plaintiff respectfully Responds that she agrees with the Striking of the Plaintiff's MSJ in
27
28



B8015CV201804003

1 its entirety as opposed to Plaintiff having to file for Leave to Amend the MSJ to cure the
2 defects in Rule 56.

3
4 Plaintiff believes the issue of the Defendant's not following Rule 12 for stating a
5 claim of "complete abandonment" is being resolved in Plaintiff's Motion to Strike
6 Defendant's MSJ that she filed on March 1, 2023.

7
8 **CONCLUSION**

9 Plaintiff pleads for this Court to Strike Plaintiff's Motion for Summary Judgment
10 for judicial economy as opposed to having the Plaintiff file a Motion for Leave to Amend
11 the MSJ for correcting her defects in not following the requirements of Rule 56.

12
13 Plaintiff pleads for this Court to deny Defendant's attorney fees and costs in
14 preparing their Motion to Strike Plaintiff's MSJ in its entirety.

15
16 **RESPECTFULLY SUBMITTED** this 6th day of March, 2023

17 
18 _____
19 Nancy Knight
20 Plaintiff Pro Per

21 Copy of the foregoing was emailed on March 6, 2023 to:
22 Daniel Oehler, Attorney for the Defendants
23 djolaw10@gmail.com
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26
27
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