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8 Daniel J. Oehler, Arizona State Bar No.: 002739
9 Attorney for Defendants

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

11 NANCY KNIGHT,
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13 Plaintiff,
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15 vs.

16 GLEN LUDWIG and PEARL LUDWIG, Trustees
17 of THE LUDWIG FAMILY TRUST; FAIRWAY
18 CONSTRUCTORS, INC.; MEHDI AZARMI;
19 JAMES B. ROBERTS and DONNA M.
20 ROBERTS, husband and wife; JOHN DOES 1-10;
21 JANE DOES 1-10; ABC CORPORATIONS 1-10;
22 and XYZ PARTNERSHIPS 1-10.
23
24 Defendants.

NO.: CV-2018-04003

**APPLICATION FOR
ATTORNEY'S FEES
AND COSTS PURSUANT
TO ORDER DATED
FEBRUARY 17, 2023**

25 Defendants, by and through undersigned counsel, hereby submit their Application for
26 Attorney Fees and Costs pursuant to this Court's Order of February 17, 2023, that reads as
27 follows:

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“IT IS ORDERED the Plaintiff pay attorney’s fees for the motions
filed from September 29, 2022, to present except for the Plaintiff’s
Motion for Summary Judgment filed on February 2, 2023.”

25 Defendants request that the Court award to Defendants \$13,325.00 in reasonable fees
26 from Plaintiff plus \$97.14 costs for a total request in the amount of **\$13,422.14**. This
27 Application is supported by the attached Exhibit A - Matter History Report, the Affidavit of
28 ///

1 Attorney Fees and Statement of Costs filed by Daniel J. Oehler on a date even herewith, and
2 this Court's entire verified file in this matter.

3 RESPECTFULLY SUBMITTED this 28th day of April, 2023.

4 LAW OFFICES OF DANIEL J. OEHLER

5 

6 Daniel J. Oehler,
7 Attorney for Defendants

8 **COPY** of the foregoing emailed
9 this 28th day of April, 2023, to:

10 Plaintiff Pro Per

11 Nancy Knight

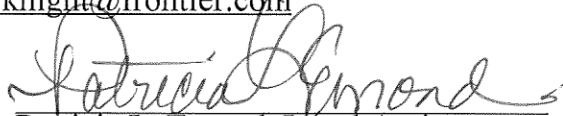
12 1803 E. Lipan Circle

13 Fort Mohave, Arizona 86426

14 (928) 768-1537

15 nancyknight@frontier.com

16 By:

17 

18 Patricia L. Emond, Legal Assistant

Knight v. Ludwig, et al.
Mohave County Superior Court
Docket No. CV-2018-04003

Application for Attorney's Fees and Costs

EXHIBIT A

Matter History Report

LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi / Fairway Constructors, Inc.
 Matter Number: 18B1 adv. Knight
 Matter Type: CIVIL
 Billing Mode: Hourly
 Dates Included on Report: 10/01/2022 - 04/04/2023

<u>Date</u>	<u>Description</u>	<u>Time</u>	<u>Total</u>
10/03/2022	Plaintiff's Motion to Amend Complaint	0.30	97.50
10/03/2022	Review of Plaintiff Knight's Motion for Reconsideration 3 total; Review of Plaintiff Knight's Motion for Consolidation filed 10/3/22	0.70	227.50
10/04/2022	Phone call with Atty. Elias re possible Joinder per Plaintiff's motions; Email to Atty. Elias re 2018 pending action	0.50	162.50
10/24/2022	Review and notate 4 recent pleadings in Mohave County (± 200 pages); Prepare for hearing	1.80	585.00
10/26/2022	Review 10/22 filings and memoranda	0.80	260.00
11/08/2022	Complete draft of Objections; prepare file memo	2.25	731.25
11/09/2022	Second draft of Objection 3	1.70	552.50
11/11/2022	Work on Responses to 3 Plaintiff's motions; draft 5 + final 5; phone calls with office re amendments	6.50	2,112.50
11/15/2022	Case law research on "unclean hands" as equitable defense Answer Plaintiff's counter claims re Plaintiff's November 2 claims	0.80	260.00
11/17/2022	First draft-response to "unclean hands" motion	0.80	260.00
11/18/2022	Final form Response "unclean hands" motion	0.60	195.00
11/19/2022	Fraud issue research and review of Plaintiff's pleadings; prepare file memo	1.60	520.00
11/21/2022	Work on Response re Plaintiff's "fraud" issue; review of Plaintiff's reply re unclean hands; work on Injunction	3.80	1,235.00
11/22/2022	Work on motions; phone call with client	2.25	731.25
11/23/2022	Second draft and final Response to motions to amend	6.50	2,112.50
11/29/2022	Reply to fraud claims; prepare file memo; phone call with Doug McKee (3)	0.75	243.75
11/30/2022	Review of status for hearing issues; message from McKee; phone Call with Doug	0.50	162.50
12/01/2022	Request for Status Conference; prepare file memo	0.15	48.75
12/05/2022	Response from Plaintiff re status conference; prepare file memo	0.25	81.25
12/07/2022	Review of Motion in Objection to Defendants request for Status Conference; research re: Rule 7 and local Rule 12F	0.70	227.50
12/08/2022	Motion to strike- draft; final form	0.50	162.50
12/09/2022	Final form #2; filing	0.25	81.25
02/16/2023	Preparation for Status Conference; review of six pending motions; responses and replies; prepare file memo	4.75	1,543.75
02/17/2023	Attend Status Conference; prepare file memo	0.80	260.00
04/03/2023	Draft Affidavit of Fees & Costs for Plaintiff's denied motions Filed 09/28/2022 through 02/17/2023 exclusive of Plaintiff's Motion for Summary Judgment filed 02/02/2023; draft form of order	1.20	390.00
04/04/2023	Final attorney fee application and form of order	0.25	81.25

Matter History Report

LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi / Fairway Constructors, Inc.
Matter Number: 18B1 adv. Knight
Matter Type: CIVIL
Billing Mode: Hourly
Dates Included on Report: 10/01/2022 - 04/04/2023

COSTS

<u>Filing Fees</u>		
11/11/2022	AZ Turbo Court	24.00
11/18/2022	AZ Turbo Court	10.61
11/23/2022	AZ Turbo Court	17.30
12/01/2022	AZ Turbo Court	10.61
12/09/2022	AZ Turbo Court	10.61
04/28/2023	AZ Turbo Court	<u>24.01</u>

TOTAL COSTS

\$97.14

SUMMARY

Billable Hours and Fees (41.00/hrs x \$325.00/hr)	13,325.00
Costs	<u>97.14</u>
TOTAL FEES AND COSTS	<u>\$13,422.14</u>