

1 LAW OFFICES  
2 DANIEL J. OEHLER  
3 2001 Highway 95, Suite 15  
4 Bullhead City, Arizona 86442  
5 (928) 758-3988  
6 (928) 763-3227 (fax)  
7 [djolaw@frontiernet.net](mailto:djolaw@frontiernet.net)  
8 Daniel J. Oehler, Arizona State Bar No.: 002739  
9 Attorney for Defendants

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

8 NANCY KNIGHT,

9 Plaintiff,

10 vs.

11 GLEN LUDWIG and PEARL LUDWIG, Trustees  
12 of THE LUDWIG FAMILY TRUST; FAIRWAY  
13 CONSTRUCTORS, INC.; MEHDI AZARMI;  
14 JAMES B. ROBERTS and DONNA M.  
15 ROBERTS, husband and wife; JOHN DOES 1-10;  
16 JANE DOES 1-10; ABC CORPORATIONS 1-10;  
17 and XYZ PARTNERSHIPS 1-10.

18 Defendants.

NO.: CV-2018-04003

**NOTICE REGARDING  
PLAINTIFF'S MOTION FOR  
RECONSIDERATION**

17 NOTICE is hereby given, pursuant to A.R.C.P, Rule 7.1(e)(2), that Defendants are  
18 specifically precluded from responding to Plaintiff's Motion for Reconsideration unless the  
19 Court specifically orders otherwise.

20 Plaintiff, however, added a tag line to the Motion for Reconsideration that in the  
21 caption reads, in pertinent part, "...Adjudicate Count Two by Authority of the Arizona  
22 Constitution." On a fast forward basis, at the conclusion of Plaintiff's Motion on pages 13  
23 and 14, Plaintiff inserts her conclusion that provides some modicum of clarity to the caption  
24 appearing on page 1 suggesting some sort of State Constitution issue. More specifically, on  
25 page 13, Plaintiff discusses the dismissal of Count 1 of the Complaint, again requesting  
26 reconsideration of that dismissal. Plaintiff goes on to cite a United Nations Proclamation  
27 dealing with human rights and suggests that apparently the County of Mohave, State of  
28 Arizona, a body politic (that is not a party to this action), be ordered to take certain actions

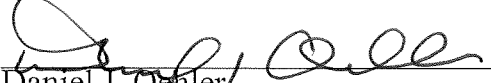
1 regarding the non-defendants' sign ordinance enforcement dealing with a nonexistent  
2 subdivision that Plaintiff refers to as Tract 4076 and Plaintiff is further requesting this Court,  
3 it would appear, to declare an Arizona state statute, A.R.S., §33-441, as being  
4 unconstitutional, ambiguous and capricious. Plaintiff's request in this Motion, if they are  
5 separate and apart from the Motion for Reconsideration and therefore are able to be  
6 addressed by Defendants herein are directed at two separate non-parties, namely, the County  
7 of Mohave and the State of Arizona who are not parties herein and the issues regarding the  
8 non-parties are not issues before the Court.

9 Plaintiff's Motion in general would appear to be Plaintiff's second effort to file an  
10 inappropriate ARCP rule violation response to Defendant's Reply regarding the pending  
11 Motion for Summary Judgment.

12 Plaintiff's pleading should be stricken from the record. Plaintiff should be ordered  
13 to pay Defendants' attorney's fees and costs in an amount deemed reasonable and appropriate  
14 by the Court.

15 RESPECTFULLY SUBMITTED this 11 day of March, 2020.

16 LAW OFFICES OF DANIEL J. OEHLER

17   
18 Daniel J. Oehler  
Attorney for Defendants

19 **COPY** of the foregoing emailed  
this 12<sup>th</sup> day of March, 2020, to:

20 Honorable Lee F. Jantzen  
21 Mohave County Superior Court  
22 Division 4  
23 401 E. Spring Street  
Kingman, Arizona 86401  
(928) 753-0785 Danielle  
[dlecher@courts.az.gov](mailto:dlecher@courts.az.gov)

24 Plaintiff Pro Per

25 Nancy Knight  
26 1803 E. Lipan Circle  
Fort Mohave, Arizona 86426  
(928) 768-1537  
[nancyknight@frontier.com](mailto:nancyknight@frontier.com)

27 By:   
28 Patricia L. Emond, Legal Assistant