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5 Daniel J. Oehler, Arizona State Bar No.: 002739
6 Attorney for Defendants

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

9 NANCY KNIGHT,

10 Plaintiff,

11 vs.

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

16 Defendants.

NO.: CV-2018-04003

**MOTION FOR EXTENSION
OF TIME TO RESPOND TO
REQUEST FOR PRODUCTION
OF DOCUMENTS AND THINGS
FILED APRIL 10, 2020**

17
18 COME NOW, the Defendants, by and through their attorney, the undersigned, and
19 respectfully request that this Court grant an extension of time to respond to Plaintiff's
20 Request for Production of Documents and Things filed April 10, 2020, for a period of time
21 not less than 30 days subsequent to this Court's ruling on the pending Motions for Summary
22 Judgment that were argued before this Court on Monday, May 11, 2020.

23 The basis of this request is that depending upon this Court's rulings on Defendants'
24 Motion for Summary Judgment, the production of any documentation requested by the
25 Plaintiff that may, in fact, be relevant and that are not otherwise vague, ambiguous, overly
26 broad, unduly burdensome and oppressive, may be either fully irrelevant if the matter is
27 dismissed or the content thereof significantly narrowed.


28 As an example, if this Court were to ultimately determine, on the relevancy,

1 reasonably and admissibility of the requested documents, and further find that the
2 requests were not ambiguous, overly broad, overly burdensome and vague, the costs of
3 production is likely to exceed \$10,000 and constitute thousands of pages of documentation
4 that may be fully needless and the expenses incurred by the Defendants may be passed on via
5 judgment against the Plaintiff to the Plaintiff.

6 Secondarily, as the Court is well aware, the Scheduling Order time for the subject
7 discovery has passed.

8 RESPECTFULLY SUBMITTED this 15 day of May, 2020.

9 LAW OFFICES OF DANIEL J. OEHLER

10 
11 Daniel J. Oehler,
12 Attorney for Defendants

12 **COPY** of the foregoing emailed
13 this 15th day of May, 2020, to:

14 Honorable Lee F. Jantzen
15 Mohave County Superior Court
16 Division 4
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18 Kingman, Arizona 86401
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27 By: 
28 Patricia L. Emond, Legal Assistant