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VIRLYNN TINNELL
SUPERIOR COURT CLERK

1 NANCY KNIGHT
2 1803 E. Lipan Circle
3 Fort Mohave, Arizona 86426
4 (928) 768-1537
5 nancyknight@frontier.com

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 vs.

12 GLEN LUDWIG and PEARL LUDWIG, Trustees of
13 THE LUDWIG FAMILY TRUST; FAIRWAY
14 CONSTRUCTORS, INC.; MEHDI AZARMI; JAMES B.
15 ROBERTS and DONNA M. ROBERTS, husband and
16 wife; JOHN DOES 1-10; JANE DOES 1-10; ABC
17 CORPORATIONS 1-10; and XYZ PARTNERSHIPS 1-
18 10.

19 Defendants

Case No.: CV 2018 04003

**OBJECTION TO APPLICATION FOR
ATTORNEY FEES**

20 Plaintiff Nancy Knight, through self-representation, hereby Objects to the
21 Defendants' Application for Attorney Fees. The fees and costs of \$9,246.25 is
22 unreasonable given the fact that attorney Oehler made false claims regarding Nancy
23 Knight's having no CC&Rs and that her home's builder, T&M Ranching and Development,
24 was not imposed with restrictions. Mr. Oehler's claims of Nancy Knight having no standing
25 whatsoever nor any CC&Rs associated with her property in Desert Lakes Golf Course and
26 Estates was malicious as Mr. Oehler had prior knowledge and records at his disposal to
27 tell the truth. Instead he put the Plaintiff in a position of constantly having to gather exhibits



1 to prove her standing and to prove T&M Ranching and Development was imposed with
2 the CC&Rs for Tract 4076B.

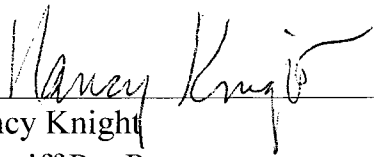
3 Evidence attached is proof of Attorney Oehler's prior knowledge that Nancy Knight
4 owned property in "Desert Lakes Golf Course and Estates, Tract 4076B" and her home's
5 lot was owned by "T&M Ranching and Development" in 2004 and 2005. Mr. Oehler
6 signed his name to the cited grammatical language in his Answer and Counterclaim for
7 Case No. CV 2016-04026 on March 14, 2016.

9 It has been the experience of the Plaintiff that Attorney Oehler practices his
10 profession with a constant manipulation of the facts and even resorted to alleged fraud in
11 the Mediation of this former case whereby questions of impropriety were raised regarding
12 the Honorable Judge Gurtler and subsequently the Court was mandated to file a
13 CORRECTION on December 29, 2017 striking the words "no fraud" from the record of
14 the Court's Settlement Agreement.

16 The Court should be outraged at the time Attorney Oehler caused it to waste on
17 reading voluminous exhibits and the hearing of Oral Arguments in its effort to determine
18 the Plaintiff's standing of authority to bring any action at all before the Court in the matter
19 at hand. A simple Declaratory Judgment regarding Tract 4076A would have been the more
20 appropriate position for Mr. Oehler to take at a cost of under \$200 using a boilerplate for
21 the document.
22

1 The Plaintiff hereby requests denial of the Defendant's Application for Attorney
2 Fees.

3 **RESPECTFULLY SUBMITTED** this 17 day of April, 2018.

4
5 
6 _____
7 Nancy Knight
8 Plaintiff Pro Per

8 **COPY** of the foregoing hand delivered
9 this 17 day of April, 2018 to:

10 Attorney for Defendants
11 Daniel J. Oehler, Esq.
12 Law Offices of Daniel J. Oehler
13 2001 Highway 95, Suite 15
14 Bullhead City, Arizona 86442

Evidence 3 pg
March 14, 15 - 2016
3150-11055

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**

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

10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
11 **IN AND FOR THE COUNTY OF MOHAVE**

12 **WILLIAM KNIGHT and NANCY**
13 **KNIGHT, husband and wife,**

14 **Plaintiffs,**

15 **vs.**

16 **LEWIS CHASE and ELIZABETH CHASE;**
17 **JOHN DOES I-X; JANE DOES I-X;**
18 **BLACK CORPORATIONS I-X,**

19 **Defendants.**

20 **LEWIS CHASE and ELIZABETH CHASE,**
21 **husband and wife,**

22 **Counter-Claimants,**

23 **vs.**

24 **WILLIAM KNIGHT and NANCY**
25 **KNIGHT, husband and wife,**

26 **Counter-Defendants.**

NO.: CV-2016-04026

ANSWER TO COMPLAINT AND COUNTERCLAIM

ANSWER

COME NOW, Defendants, LEWIS CHASE and ELIZABETH CHASE, and for their answer to Plaintiffs' Complaint state and allege as follows:

PARTIES AND JURISDICTION

1. Defendants admit the factual allegations set forth in paragraphs 1, 2 and 3 of

1 **COUNTERCLAIM**

2 COME NOW, Counterclaimants, LEWIS CHASE and ELIZABETH CHASE, and for their
3 Counterclaim against the Counterdefendants, WILLIAM KNIGHT and NANCY KNIGHT, husband
4 and wife, state and allege as follows:

5 **GENERAL ALLEGATIONS**

6 1. That Counterclaimants, LEWIS CHASE and ELIZABETH CHASE, are residents of
7 Mohave County, Arizona, and all acts herein complained of occurred in Mohave County, Arizona.

8 2. That Counterdefendants, WILLIAM KNIGHT and NANCY KNIGHT, husband and
9 wife, are residents of Mohave County, Arizona, and have initiated a cause of action herein thereby
10 submitting themselves to the jurisdiction of this Court.

11 3. Counterclaimants are the owners and occupants of a single family residence located
12 at 1795 East Lipan Circle, Fort Mohave, Arizona.

13 4. Counterdefendants are the owners and occupants of a single family residence located
14 1803 East Lipan Circle, Fort Mohave, Arizona.

15 5. Counterclaimants and Counterdefendants reside next to each other on adjoining lots
16 located in Desert Lakes Golf Course and Estates, Tract 4076-B.

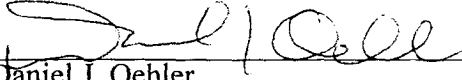
17 6. In 2004 and 2005, Counterclaimants' and Counterdefendants' lots were owned by a
18 common owner, T&M Ranching & Development, LLC, aka T&M Mohave Properties.

pertinent parts TT 2,
TT 5 & 6

1 5. For such other and further relief as the Court may deem proper.

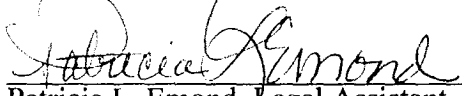
2 DATED this 14 day of March, 2016.

3 LAW OFFICES OF DANIEL J. OEHLER

4 
5 Daniel J. Oehler,
6 Attorney for Plaintiff

7 COPY of the foregoing emailed
8 this 15th day of March, 2016, to:

9 Attorney for Plaintiffs
10 Paul Lenkowsky, Esq.
11 Law Offices of Paul Lenkowsky
12 1181 Hancock Road
13 Bullhead City, Arizona 86442
14 (928) 758-4815
15 (928) 758-9749 fax
16 lenkowsky@citlink.net

17 By: 
18 Patricia L. Emond, Legal Assistant