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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



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

16  
17   
18 \_\_\_\_\_  
Nancy Knight  
Plaintiff Pro Per

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