

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 djolaw10@gmail.com

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 NANCY KNIGHT,

13 Plaintiff,

14 vs.

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

22 Defendants.

NO.: CV-2018-04003

**MOTION TO STRIKE
PLAINTIFF'S REPLY FILED
MARCH 9, 2023**

23 COME NOW, Defendants LUDWIG FAMILY TRUST, FAIRWAY
24 CONSTRUCTORS, INC., and MEHDI AZARMI, by and through their attorney, the
25 undersigned, and respectfully file this Motion to Strike Plaintiff's Reply filed March 9, 2023.

26 On or about March 9, 2023, Plaintiff filed an 11-page Reply to Defendants' most
27 recent Motion to Strike various pleading in this matter. Defendants urge this Court to strike
28 Plaintiff's "Reply" for the exact reasons that Plaintiff's original motion should be stricken,
including but not necessarily limited to ARCP Rule 7(f)(1)(2)(A) and (C).

Plaintiff's original motion filed on or about February 28, 2023, or March 1, 2023, and
Reply filed March 9, 2023, were not and are not proper, authorized, by statute, rule or order
(Rule 7.1). Plaintiff's initial Motion to Strike Defendants' 2019 Summary Judgment Motion
exceeded the two-page limit by 12 pages regarding the original Motion and nine pages

1 regarding Plaintiff's March 9, 2023, Reply (Rule 7(f)(2)(A)) and Plaintiff's Reply is also in
2 violation of Rule 7(2)(C) which prohibits any reply.

3 Previously on or about March 9, 2023, Defendants filed their Good Faith Consultation
4 Certificate that continues to be applicable to Plaintiff's Reply per ARCP Rule 7.1(h).

5 Defendants again request additional fees and costs in preparation of this pleading.

6 RESPECTFULLY SUBMITTED this 13th day of March, 2023.

7 LAW OFFICES OF DANIEL J. OEHLER

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9 Daniel J. Oehler,
10 Attorney for Defendants

11 **COPY** of the foregoing emailed
12 this 13th day of March, 2023, to:

13 Honorable Lee F. Jantzen
14 Mohave County Superior Court
15 Division 4
16 401 E. Spring Street
17 Kingman, Arizona 86401
18 (928) 753-0785 Danielle
19 dlecher@courts.az.gov

20 Honorable Rick Lambert
21 Mohave County Superior Court
22 Division 7
23 415 Spring Street
24 Kingman, Arizona 86401
25 Phone: (928)-753-0762 (Stephanie)
26 division7@mohavecourts.com

27 Plaintiff
28 Nancy Knight
1803 E. Lipan Circle
Fort Mohave, Arizona 86426
(928) 768-1537
nancyknight@frontier.com

By: 
Daniel J. Oehler