

Carlisle

FILED
BY: *AC* *TR*
2018 MAY 21 PM 3:45
VINLYNN 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

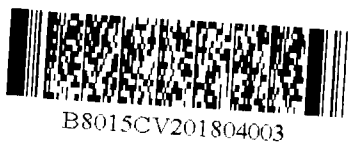
**PLAINTIFFS AFFIDAVIT OF COSTS:
BREACH OF CONTRACT - COUNT 2**

Honorable Derek Carlisle

20 STATE OF ARIZONA)
21)ss.
22 COUNTY OF MOHAVE)

23 Plaintiff, NANCY KNIGHT, being duly sworn, upon her oath, deposes and says"

24 1. That she is over the age of 18 years, has personal knowledge of the matters
25 testified to herein, and shall testify truthfully thereto.



1 2. That she submits this Affidavit in support of Plaintiff's request for costs incurred
2 by herself.

3 3. That she submits this Affidavit in support of reimbursement for the taxpayers of
4 Mohave County and is not acting as a representative of the Mohave County government.

5 4. Research payment in the amount of \$956.54 for the Plaintiff's personal time spent
6 on Assessor parcel number search and data analysis. The mailing list parcel numbers
7 receiving the setback reduction packet was provided by Mohave County Development
8 Services (227+235+224+12+36) = 722 parcel numbers among the approximately 672
9 packets that were mailed. Selecting the tax bill data for ownership of the parcel, copy and
10 pasting the pertinent data (owner's name and property description for the Tract number)
11 into an Excel spreadsheet is calculated at 3 minutes per parcel for 60 parcels per day (3
12 hours per day) for 12 days at the Plaintiff's 1998 research scientist salary of \$25.44 per
13 hour (as cited in the Social Security Administration's database) = **\$915.84**. Logging into
14 the Assessor's website for 12 days at 3 minutes per day at the same rate = **\$15.26**; 1 hour
15 for separating the tracts into separate Excel worksheets, sorting data, and printing data =
16 **\$25.44**. _____
17
18
19

20 5. Travel time, presentation time, and auto expenses in the amount of \$88.60 for the
21 Plaintiff's presentation before the Board of Supervisors in Kingman for the Denial of
22 setback reductions on October 3, 2016 is calculated at 4 hours of time at \$10 per hour plus
23 auto expenses at 54 cents per mile for 45 miles each way. _____
24
25

1 6. Reimbursement for Attorney Knochel's consult fee of \$90.00 for evaluation of
2 the CC&R matter. _____

3 7. Reimbursement for Paralegal services to Tiffany Sierra of \$400 for a draft Breach
4 of Contract Complaint. _____

5 8. City Graphics cost of printing letters \$108.75 for evaluation of support and
6 possible legal defense fund contributions as suggested by attorney Knochel to raise his
7 retainer fee of \$10,000. _____

8 9. US Post Office costs of \$109.21 to mail the letter by the cost effective method of
9 Every Door Direct Mail (EDDM) to one of two routes in Desert Lakes Golf Course and
10 Estates that encompassed Tract 4076B (617 addresses total). _____

11 10. \$307 filing fee. _____

12 11. In the interest of justice, the Court Orders the amount to be reimbursed to the
13 taxpayer's Mohave County General Fund is \$12,500.00 as estimated by Director Tim
14 Walsh (\$6,500 personnel time + \$6000 cost of supplies) for the costs associated with Mehdi
15 Azarmi's proposed BOS Resolutions. _____

1 **OATH OR AFFIRMATION**

2 NANCY KNIGHT, Plaintiff, being first duly sworn upon her oath, deposes and says:

3 That she has read the foregoing Affidavit and knows the contents thereof; that the same is
4 true of her own knowledge except as to those matters stated therein upon her information
5 and belief, and as to such matters she believes them to be true.
6

7 Dated this 21 day of May, 2018.

8 Nancy Knight
9 NANCY KNIGHT

10
11 SUBSCRIBED AND SWORN to (or affirmed) before me this 21 day of May, 2018

12 by Nancy Knight

13
14 My Commission Expires: _____

[Signature]
Deputy Clerk / Notary Public

15
16 **COPY** of the foregoing hand delivered
17 this 21 day of May, 2018 to:

18 The Law Office of Daniel Oehler
19 2001 highway 95, Suite 15
Bullhead City, Arizona 86442

20 Notice of the filing in Bullhead City
21 emailed to Mary King, District II
22 Lake Havasu City, AZ
making@courts.az.gov