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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

**GOOD FAITH  
CONSULTATION  
CERTIFICATE**

23 COMES NOW, the undersigned, and advises the Court in the form of this Certificate,  
24 pursuant to the provisions of the Arizona Rules of Civil Procedure, Rules 12(f) and (j), and  
25 Rule 7.1(h), that the undersigned has attempted to set forth the reasons under both fact and  
26 law that the Plaintiff should withdraw the following pleadings:

27 A. Plaintiff's proposed "Final Order for Service of Indispensable Parties" filed  
28 with this Court on or about August 15, 2023;

B. Plaintiff's "Notice to Property Owners" filed on or about August 15, 2023  
(hereinafter referenced as "Plaintiff's Proposed Notice #1"), and appendages thereto  
denominated "Waiver of Service" and "Summons" all of which were believed to have been  
filed concurrently on August 15, 2023;

1 C. Plaintiff's "Amended Notice to Property Owners" filing date unknown,  
2 however, transmitted electronically to the undersigned on or about August 20, 2023  
3 (hereinafter referenced as "Plaintiff's Proposed Notice #2") and allegedly transmitted to the  
4 Clerk of the Court on August 21, 2023, and/or August 23, 2023; and, finally

5 D. Plaintiff's third apparent "Notice to Property Owners" that appears to have  
6 been appended to a document captioned "Notice of Plaintiff's Revision to Notice of Property  
7 Owners" dated August 25, 2023 (hereinafter referenced as "Plaintiff's Proposed Notice #3").

8 Thereafter, the undersigned transmitted to the Plaintiff electronically a multi-page  
9 letter requesting Plaintiff's withdrawal of each of the subject documents and advising the  
10 Plaintiff that the statements, allegations, purported facts and materials, individually and  
11 collectively, represent materials and pleadings that are redundant, immaterial, impertinent  
12 and/or scandalous, all categories of which are throughout the subject documents and in  
13 specific, direct and acute violation of Arizona Rules of Civil Procedure Rule 12(f). The  
14 subject request to withdraw those subject documents in their entirety was transmitted  
15 electronically to the Plaintiff on August 30, 2023 at 4:33 p.m.

16 Thereafter, Plaintiff responded to the undersigned on Thursday, August 31, 2023, at  
17 6:54 p.m. The Plaintiff's electronic transmittal made it abundantly and absolutely clear that  
18 the Plaintiff would not withdraw any of the documents or any parts thereof reiterating as is  
19 stated such false and erroneous statements including that the Defendants in this matter have  
20 transitioned to the role of plaintiffs and that Plaintiff has now been transposed and become  
21 the defendant as is succinctly set forth in Plaintiff's Waiver of Service form and proposed  
22 Summons to be served on the Rule 19 parties if service is via an "Acceptance" format.

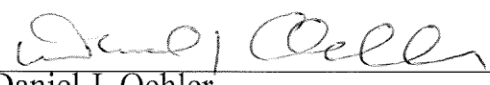
23 Thereafter, the undersigned reached out to the Plaintiff telephonically on Monday,  
24 September 4, 2023, and again asked that Plaintiff voluntarily withdraw the pleadings and  
25 discussed or pointed out to Plaintiff why and Plaintiff's fact allegations were clearly  
26 erroneous, false and that the Plaintiff cannot literally change the parties' positions of plaintiff  
27 versus defendant and who brought the action that is resulting in the Rule 19 parties being  
28 brought before the Court. The undersigned found no willingness to withdraw the documents

1 or any part thereof from the Plaintiff.

2 This certification by the undersigned is intended and submitted to the Court as the  
3 Good Faith Consultation Certificate required under and pursuant to the provisions of  
4 Rule 12(j), Arizona Rules of Civil Procedure.

5 RESPECTFULLY SUBMITTED this 5<sup>th</sup> day of September, 2023.

6 LAW OFFICES OF DANIEL J. OEHLER

7   
8 Daniel J. Oehler,  
9 Attorney for Defendants

10  
11 **COPY** of the foregoing emailed  
12 this 5<sup>th</sup> day of September, 2023, to:

13 Honorable Dale P. Nielson  
14 Navajo County Superior Court  
15 Post Office Box 668  
16 Holbrook, Arizona 86025  
17 (928) 524-4220  
18 Katelin Lerma, Judicial Assistant  
19 [kalerma@courts.az.gov](mailto:kalerma@courts.az.gov)

20 Plaintiff  
21 Nancy Knight  
22 1803 E. Lipan Circle  
23 Fort Mohave, Arizona 86426  
24 (928) 768-1537  
25 [nancyknight@frontier.com](mailto:nancyknight@frontier.com)

26  
27 By:   
28 Patricia L. Emond, Legal Assistant