

FILED

TIME 8:38 M

SEP 21 2023

CHRISTINA SPURLOCK
CLERK SUPERIOR COURT

BY: MS DEPUTY

1 Nancy Knight
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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

**MOTION FOR CORRECTION OF
FINAL ORDER FOR DUE DATES FOR
THE SERVICE PACKET MAILINGS
AND EXCEL SPREADSHEET COLUMNS**

Hon. Judge Nielson

19
20 Comes Now, Plaintiff Pro Per Nancy Knight, submitting to the Court her Motion
21 for Corrections to the Court's change in the Final Order for Due Dates and the columns
22 cited for the Excel Spreadsheet that had been agreed to by attorney Oehler and Plaintiff's
23 former attorney Coughlin.

24
25 The Excel Spreadsheet has already been verified for the names and addresses of
26 the current owners and submitted to both the Clerk of the Court and to attorney Oehler
27 that Column C be the name of the current owner and other columns have the address,
28



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1 city, state, and zip code. The file was transmitted by email to the two parties on
2 September 9, 2023 where the mailing address is in col D, the city is in col E, the state is
3 in col F, and the zip code is in col G. The Order is for the “name(s) and mailing address”
4 information be moved to column C that is considered an arbitrary and capricious Order
5 by this Court. The parsing out on the Excel Spreadsheet is for the purpose of sorting the
6 mailing addresses for APNs that are owned by multiple property owners where mailing
7 addresses may be different under different circumstances of how ownership is held. This
8 sorting resulted in only 223 envelopes being required to be mailed to about 443 owner
9 names held in trust or joint tenancy among 243 APNs. The Court also totally disregarded
10 Plaintiff’s request that any APN held in Trust or held in joint tenancy could be mailed to
11 the primary property owner for the proof of delivery signature on the Return Receipt as
12 listed for the Assessor’s Property Tax Statement. The Court is apparently biased and has
13 not considered Plaintiff’s reasonable requests. A Correction is appropriate for compliance
14 with the original method of creating the Excel Spreadsheet and for compliance to reduce
15 costs of service for APNs that are held by multiple parties. It is the intent of the
16 Legislature that costs should not be excessive for the service of documents which is why
17 they approved the Waiver of Service Form that would allow Plaintiff to recover costs if
18 the Parties do not return the Waiver of Service Form on the First Mailing.
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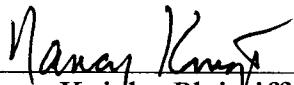
25 Per the first paragraph of the Final Order this apparent biased Court has now
26 caused substantial hardship for the Plaintiff to comply with the First Mailing by
27 November 2, 2023 that is only 52 days from the Order. The first original paragraph
28 agreed to by attorney Oehler and Plaintiff’s former attorney Coughlin gave Plaintiff 150

1 days to substantially comply with the first mailing and Plaintiff requested that substantial
2 be defined as an expenditure on her part of at least \$2,000 in postal costs. Depending on
3 the number of pages she has to copy for all of the documents to be inserted in the Service
4 Packet, her costs of copies is expected to be over \$1200 for just the 223 envelopes
5 required pursuant to the existing Excel Spreadsheet data. It is wrongful to require an
6 expenditure for copies and enclosed self-addressed and stamped envelopes to be over
7 \$2500.
8

9
10 This Court is complying with the Defendants attempt to cause dismissal of the
11 case before trial or bankrupt the Plaintiff.
12

13 This Court is pleaded to take all considerations for fairness for the due dates for
14 compliance and to not cause financial hardship upon the Plaintiff who is of advanced age
15 with limited financial abilities since the death of her husband. At the age of 79, she does
16 not know how much longer she can continue to earn wages to support her efforts for
17 justice in the two cases that involves these Defendants.
18

19 **RESPECTFULLY SUBMITTED** this 16th day of September, 2023
20

21 
22 _____
Nancy Knight, Plaintiff Pro Per

23 Copy of the foregoing was emailed this day to:
24 djolaw10@gmail.com (Attorney Daniel Oehler, Counsel for the Defendants)

25 kalerma@courts.az.gov (Judicial Assistant to Hon. Judge Nielson)
26

27 Copy to be mailed to the Higher Authorities in Plaintiff's Complaint against this Court.
28