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8 Daniel J. Oehler, Arizona State Bar No.: 002739  
9 Attorney for Defendants

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
7 IN AND FOR THE COUNTY OF MOHAVE

8 NANCY KNIGHT,

9 Plaintiff,

10 vs.

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

18 Defendants.

NO.: CV-2018-04003

**MOTION TO STRIKE  
PLAINTIFF’S RESPONSE  
TO MOTION TO STRIKE  
FILED SEPTEMBER 21, 2023**

17 COME NOW, the Defendants, GLEN LUDWIG and PEARL LUDWIG, Trustees of  
18 THE LUDWIG FAMILY TRUST; FAIRWAY CONSTRUCTORS, INC.; and MEHDI  
19 AZARMI (hereinafter referred to collectively as the “Defendants”), by and through their  
20 attorney, the undersigned, and addresses Plaintiff’s “Response to Defendants’ September 13,  
21 2023 Motion to Strike Plaintiff’s September 9, 2023 Response Regarding Service Packet  
22 Documents” dated September 16, 2023, and filed herein on September 21, 2023.

23 Plaintiff’s Response, above referenced, is simply a continuation and reiteration  
24 perhaps an exacerbated reiteration of the erroneous statements, faulty assessment of the facts  
25 and issues, misstatements, false statements and pleading violations that saturated Plaintiff’s  
26 original pleading which was the subject matter of the undersigned’s September 13, 2023,  
27 Motion to Strike. Indeed, the provisions of Rule 12(f) are applicable. Plaintiff’s Response  
28 is redundant of multiple prior responses she has filed and/or motions that have been filed


1 containing immaterial, impertinent and scandalous statements directed at the Defendants and  
2 others who are or at one time have been required to respond or enter rulings against the  
3 Plaintiff which in turn automatically are labeled evidence of bias, collusion and conspiracy  
4 in the Plaintiff's opinion.

5 For the same reasons and law referenced in the Defendants' September 13, 2023,  
6 Motion to Strike, Plaintiff has in reality, again, enumerated the reasons that the original  
7 Motion should be struck as well as Plaintiff's filed September 21, 2023, Response thereto.

8 It is therefore respectfully requested that Plaintiff's Response filed September 21,  
9 2023, above referenced be stricken and that all pleadings stricken by the Court in this matter  
10 be immediately removed from the Mohave County Superior Court's "High Profile Case"  
11 website.

12 RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of September, 2023.

13 LAW OFFICES OF DANIEL J. OEHLER

14 

15 Daniel J. Oehler,  
16 Attorney for Defendants

17 **COPY** of the foregoing emailed  
18 this 22<sup>nd</sup> day of September, 2023, to:

19 Honorable Dale P. Nielson  
20 Navajo County Superior Court  
21 Post Office Box 668  
22 Holbrook, Arizona 86025  
23 (928) 524-4220  
24 Katelin Lerma, Judicial Assistant  
25 [kalerma@courts.az.gov](mailto:kalerma@courts.az.gov)

26 Plaintiff  
27 Nancy Knight  
28 1803 E. Lipan Circle  
Fort Mohave, Arizona 86426  
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By:   
Patricia L. Emond, Legal Assistant