

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](mailto: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

**RESPONSE TO MOTION  
FOR CORRECTION OF  
ERRORS OF LAW**

23 COME NOW, the original Defendants, GLEN LUDWIG and PEARL LUDWIG,  
24 Trustees of THE LUDWIG FAMILY TRUST; FAIRWAY CONSTRUCTORS, INC.; and  
25 MEHDI AZARMI (hereinafter referred to collectively as the “Defendants”), by and through  
26 their attorney, the undersigned, and in response to Plaintiff’s Motion for Correction of Errors  
27 of Law on Documents and Exhibits for Plaintiff to Include in the Service Packets dated  
28 October 2, 2023, wherein Plaintiff specifically states: “This is not a matter of  
reconsideration.” See, Plaintiff’s 10/2/2023 Motion, p. 6 §17. A fair reading of the 11 page  
Motion plus exhibits appears to be exactly that – a Motion for Reconsideration of this Court’s  
September 13, 2023 First Amended Order, and the second such motion filed within 16 days  
on the part of the Plaintiff to attempt to effectuate a change/amendment in this Court’s ruling  
on the Rule 19 parties service issues which have been fully briefed and argued multiple times


1 from and after February 17, 2023.

2 This last pleading taken in conjunction with Plaintiff's September 16, 2023 (filed  
3 September 21, 2023) Motion for Correction and these Defendants' response thereto filed  
4 September 22, 2023, collectively cannot be considered anything other than the Plaintiff's 26<sup>th</sup>  
5 reconsideration/correction request (see **Exhibit A** attached hereto) and further appears to be  
6 nothing short of a stall tactic by the Plaintiff to provide a self-inflicted basis to seek yet a  
7 further delay in the Court's service orders issued September 13, 2023, mandating a deadline  
8 of November 2, 2023, for Plaintiff to complete Plaintiff's first service attempt on the Rule 19  
9 parties.

10 Should this Court for any reason request/authorize a responsive pleading beyond the  
11 "Notice" filing on September 22, 2023, and this inquiry/notice pleading, the Defendants will  
12 certainly comply with any such directive.

13 RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of October, 2023.

14 LAW OFFICES OF DANIEL J. OEHLER

15   
16 Daniel J. Oehler,  
17 Attorney for Defendants

18 **COPY** of the foregoing emailed  
19 this 4<sup>th</sup> day of October, 2023, to:

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

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

By:   
Patricia L. Emond, Legal Assistant

**Knight v. Ludwig, et al.**  
**Mohave County Superior Court**  
**Docket No. CV-2018-04003**

**Response to Motion for Correction of Errors of Law**

**EXHIBIT A**

**Knight v. Ludwig, et al.**  
**Mohave County Superior Court**  
**Docket No. CV-2018-04003**

Plaintiff's Reconsideration/Correction Requests

1. 06/20/2018 motion to alter or amend orders 3 and 4
2. 08/27/2018 motion for clarification
3. 04/12/2019 motion for reconsideration of declaratory judgment (12/19/2018)
4. 04/26/2019 motion for reconsideration of dismissal of count 1 (6/11/2018)
5. 08/27/2019 motion for reconsideration of dismissal of count 1
6. 09/27/2019 motion for reconsideration of declaratory judgment (signage)
7. 10/18/2019 motion for leave to amend reconsideration of dismissal of count 1
8. 11/12/2019 motion for clarification of court order/reconsideration rulings dated 10/30/2019
9. 12/17/2019 motion for corrections hearing date 10/16/2019
10. 12/17/2019 motion for corrections for court notice order ruling 10/30/2019
11. 02/28/2020 motion for reconsideration of dismissal of count 1 based on new evidence
12. 02/28/2020 motion for clarification of procedure
13. 03/12/2020 motion to set aside dismissal of count 1 for fraud upon the court
14. 04/10/2020 motion for reconsideration for corrections to court order/minutes
15. 05/05/2020 motion for clarification of Plaintiff's rights to be argued on 5/11/2020
16. 05/20/2020 motion for reconsideration dismissal of Count 1
17. 08/17/2020 motion for court clarification of rationale for dismissal of count 1
18. 10/03/2022 motion to reconsider gag order on Plaintiff
19. 10/03/2022 motion to reconsider that Plaintiff is to join parties
20. 10/03/2022 motion to reconsider denial of leave to amend complaint
21. 03/23/2023 motion for reconsideration (bias)
22. 03/29/2023 first corrected motion for reconsideration (bias)
23. 05/15/2023 motion for reconsideration of final orders
24. 08/15/2023 motion for approval or revision
25. 09/16/2023 motion for correction of final order for due dates, etc.
26. 10/02/2023 motion for correction of errors of law on docs, etc.