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**FILED**  
TIME 9:57 AM

OCT 17 2023

CHRISTINA SPURLOCK  
CLERK SUPERIOR COURT  
BY: AS DEPUTY

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

21 Defendants.

Case No.: CV 2018 04003

**MOTION FOR DEFENDANTS TO  
JOIN RULE 19 PARTIES  
PURSUANT TO RULE 104**

**Hon. Judge Nielson**

21 COMES NOW, Plaintiff Pro Per, NANCY KNIGHT, hereby submitting her  
22 Motion for this Court to Order the Defendants to join Necessary or Indispensable Parties  
23 in their lawsuit on abandonment of the Desert Lakes Golf Course & Estates Declaration  
24 of Covenants, Conditions and Restrictions (CC&Rs).

25 The Defendant's separate action, by Motion for Summary Judgment on  
26 abandonment of the Declaration of CC&Rs, requires them to join every party who would  
27  
28



1 be affected by their action pursuant to Rule 104 or this Court must dismiss the matter of  
2 abandonment.

3  
4 **MEMORANDUM OF POINTS AND AUTHORITES**

5 Arizona Rule 104 d. "Necessary" and "indispensable" parties. A person who is not  
6 a party to the lawsuit may be "necessary" for a fair hearing of the lawsuit if the court  
7 cannot enter complete relief without the person, or if the person has an interest in the  
8 lawsuit that the court must resolve. Upon motion of any party, the necessary person will  
9 be made a party, served with the lawsuit, and required to participate in the lawsuit.  
10

11 If a necessary person cannot be made a party for any reason, then the court will  
12 determine if the absent party is "indispensable" and if so, whether the lawsuit should be  
13 dismissed. [ARCP 19(a), (b)]  
14

15 Real evidence in the record, submitted by the Defendants, proves that three  
16 hundred or more necessary parties cannot be made parties to Plaintiff's Count One for  
17 Breach of Contract nor for the attempted and threatened setback violations by Defendant  
18 Azarmi's Res. 2016-125 and Res. 2016-126.  
19

20 Count Two of Plaintiff's law suit is Injunctive Relief to stop Azarmi's "build to  
21 suit" advertising signs on residential lots and to stop any future attempt to reduce the  
22 setbacks in Desert Lakes Subdivision Tract 4076. None of the Rule 19 parties can be  
23 made a party for off-premises business advertising nor for attempts or threats upon the  
24 Declaration.  
25

26 No part of Plaintiff's grounds in this case can be imposed on 300 or more  
27 necessary or indispensable parties. This has already been made a part of this case in this  
28

1 Court's erroneous Order for Plaintiff to join parties that is entrapment for which she has  
2 no grounds and for this Court's unconstitutional Gag Order being imposed on the  
3 Plaintiff. This Court's Notice to Property Owners is malicious and is intended to support  
4 the Defendants all in violation of existing case law and Rules of procedure.  
5

6 Since these necessary parties can only be made a party to Defendant's lawsuit on  
7 abandonment of the CC&Rs, this Court must order the Defendants to serve the necessary  
8 parties or this court must dismiss the matter of abandonment of the CC&Rs.  
9

10 Plaintiff demands that the Defendants be Ordered to pay Plaintiff's attorney fees  
11 and costs from October 30, 2020 to September 27, 2022 for defense of the claims of  
12 abandonment in the sum of \$30,208.91. **Exhibit 1.** List of payments made to Attorney  
13 Coughlin.  
14

15 **RESPECTFULLY SUBMITTED** this 14<sup>th</sup> day of October, 2023.

16   
17 \_\_\_\_\_  
18 NANCY KNIGHT  
19 Plaintiff Pro Per

20 **COPY** of the foregoing was e-mailed on October 14, 2023 to:

21 djolaw10@gmail.com  
22 The law office of Daniel Oehler, Attorney for the Defendants  
23  
24  
25  
26  
27  
28

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

**Plaintiff's Attorney Fees and Costs**  
**Defense of Abandonment of CC&Rs**

**EXHIBIT 1**

# Exhibit 1 - Attorney Fees and Costs paid to Attorney Coughlin

<b>Sum of Total Paid</b>	<b>30208.91</b>
<b>1. Total Paid</b>	<b>650</b> Visa Receipt Oct. 30, 2020 Consult fee
<b>2. Total Paid</b>	<b>4400</b> Review File cc pmt
<b>3. Total Paid</b>	<b>25158.91</b> CV 2018 04003 for line items below
	6000 Dec 2020 Retainer
	1000 Sat 4/30 ck 3221 BofA Rec on Tuesday
	1000 Ck 3222 BofA for June monthly payment agreement
	1000 7/2 Ck 3223 BofA for July monthly payment agreement
	3000 ck 472 for Aug, Sept, Oct monthly payment agreement
	2128.39 for Nov bill balance
	1000 ck 474 for Dec monthly agreement
	1000 ck 479 for Jan 2022 monthly agreement
	1000 ck BofA for Feb 2022 monthly agreement
	1000 ck 486 Chase for march on 3/28
	1000 ck 489 Chase for April on 4/8
	1000 Chase ck for May on 4/30
	1000 Chase ck 491 for June on 6/1
	330.52 Chase ck 496 for July on 7/7 pd in full to July 2022
	Notice of Withdrawal effective 9/27/2022
	\$3700 Negotiated balance
	925 Chase ck 282 3/9/2023
	925 Chase ck 284 3/30
	925 Chase ck 285 4/28
	925 Chase ck 286 5/30/2023