

**FILED**  
TIME 4:05 P M

OCT 25 2023

CHRISTINA SPURLOCK  
CLERK SUPERIOR COURT  
BY: VN DEPUTY

1 Nancy Knight  
2 1803 E. Lipan Cir.  
3 Fort Mohave, AZ 86426  
4 Telephone: (928) 768-1537  
nancyknight@frontier.com

5 Plaintiff Pro Per

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

8 NANCY KNIGHT,

9 Plaintiff,

10 V.

11 LUDWIG; ET. AL.

12 Defendants.

) Case No.: **CV 2018 04003**

) **AFFIDAVIT OF DAMAGES AND**  
) **ATTORNEY FEES PURSUANT TO**  
) **PLAINTIFF'S MAY 17, 2023**  
) **MEMORANDUM OF POINTS**  
) **AND AUTHORITES, RULE 11 AND**  
) **STATUTE §12-349**

13 )  
14 )  
15 )  
16 ) **HON. JUDGE NIELSON**

17  
18 This Court has the authority to award damages from Attorney Oehler of up to  
19 \$5,000 pursuant to § 12-349 - Unjustified actions; attorney fees, expenses and double  
20 damages; exceptions; definition.

21 This Court has the authority to award attorney fees and costs from the Defendants  
22 as billed by Plaintiff's Attorney Coughlin pursuant to § 12-349 - Unjustified actions;  
23 attorney fees, expenses and double damages; exceptions; definition.

24 **§ 12-349 A.** Except as otherwise provided by and not inconsistent with another  
25 statute, in any civil action commenced or appealed in a court of record in this state, the  
26 court shall assess reasonable attorney fees, expenses and, at the court's discretion, double  
27 damages of not to exceed five thousand dollars against an attorney or party, including this  
28 state and political subdivisions of this state, if the attorney or party does any of the



1 following: (1.) Brings or defends a claim without substantial justification. (2.) Brings or  
2 defends a claim solely or primarily for delay or harassment. (3.) Unreasonably expands or  
3 delays the proceeding. Emphasis Supplied.

4 Defending “build to suit” signs as “for sale” signs violated 1, 2, and 3 above.

5 Defending Injunctive Relief with an Abandonment claim violated 1, 2, and 3  
6 above.

7 **A.** Your affiant has reviewed the record of costs and fees associated with  
8 Plaintiff’s need to retain attorney Coughlin in defense of fraud claims made by attorney  
9 Oehler using Statute §33-441 to delay Injunctive Relief on the defendant’s off-premises  
10 “build to suit” advertising signs. This Court has been provided photographs of the  
11 dilapidated signs that posed a risk of harm to persons and property for years at the hands  
12 of attorney Oehler. This Court has the determination of the Arizona Department of Real  
13 Estate that the signs are the developer’s signs and are not for sale nor for lease signs.  
14

15  
16 Attorney Coughlin’s consult fee was \$650 and his fee for review of the file was  
17 \$4,400. The Court has been provided Plaintiff’s list of payments for these two entries.  
18 Receipts from Attorney Coughlin dated Oct. 30, 2020 and Nov. 24, 2020 respectively are  
19 attached as **Exhibit A**.  
20

21  
22 But for the limit of \$5,000, double damages would be  $\$650 + \$4,400 \times 2$  or  
23 \$10,100.

24 Plaintiff respectfully requests the full amount of \$5,000 plus interest from the date  
25 of the Court’s Judgment against attorney Oehler until paid in full to the Plaintiff.  
26

27 **B.** Your affiant has reviewed the fees and costs associated with retaining  
28 attorney Coughlin for the period of December 3, 2020 when the \$6,000 Retainer was paid

1 to June 5, 2023 when Plaintiff's account was paid in full.

2 Recovery of Plaintiff's attorney fees and costs from the Defendants for the  
3 unjustified claim of abandonment of the Declaration or abandonment of Deed  
4 Restrictions for sections of the CC&Rs is respectfully requested to be the full amount of  
5 \$25,158.91 plus interest until paid in full to the Plaintiff.  
6

7 Receipts from Attorney Coughlin including the Fee Agreement dated Nov. 30,  
8 2020 and Statements of hours billed and costs from December 3, 2020 to June 5, 2023 are  
9 attached as **Exhibit B**.  
10

11 But for Affidavit Fraud as submitted by the Defendants and the abuse of discretion  
12 by the former biased and now recused Court, the matter of abandonment of the  
13 Declaration would not have proceeded this far. According to case law, the Declaration  
14 has not been abandoned. According to Rule 12 (b)(6) Plaintiff has to infer that the  
15 majority of the Defendant's claim of abandonment is for setback violations. Those  
16 setback violations have been proven to have been committed by the Defendants, their  
17 family members and close associates. The Unclean Hands Doctrine applies to the claim  
18 of abandonment. No party who causes abandonment should be allowed to claim  
19 abandonment.  
20  
21  
22

23 But for the former biased and now recused Court entering a Rule 54 (b) Final  
24 Judgment for Plaintiff Knight to join the Rule 19 Indispensable Parties attorney  
25 Coughlin's Appeal would not have been dismissed due to no claims nor parties being  
26 dismissed with the Court's Order.  
27  
28

Fees and costs are subject to Rule 11 for Attorney Oehler for Statute §33-441

1 fraud and for impugning the character of Plaintiff Knight with a Gag Order that reflects  
2 badly on her capacity to function as President of the Unincorporated Association.

3  
4 Engaging in litigation misconduct is prohibited by Rule 11(b)(1) and (3).

5         **Rule 11 (b) Representations to the Court.** By signing a pleading, motion, or  
6 other document, the attorney or party certifies that to the best of the person's knowledge,  
7 information, and belief formed after reasonable inquiry: (1) it is not being presented for  
8 any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase  
9 the cost of litigation; (3) the factual contentions have evidentiary support or, if  
10 specifically so identified, will likely have evidentiary support after a reasonable  
11 opportunity for further investigation or discovery. Emphasis Supplied.

12  
13  
14         Defense Counsel Oehler and the Defendant parties willfully violated Rule 11.

15                         **RESPECTFULLY SUBMITTED** this 23rd day of October, 2023

16  
17     
18

19   Nancy Knight, Plaintiff Pro Per

20         Original of the Foregoing Mailed on October 23, 2023 to:  
21         Clerk of Mohave County Superior Court  
22         PO Box 7000  
23         Kingman, AZ 86402

24         Copy emailed on October 23, 2023 to:  
25         djolaw10@gmail.com attorney for the Defendants

26         kalerma@courts.az.gov judicial assistant to visiting Judge Nielson  
27  
28

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

**AFFIDAVIT**  
**EXHIBIT A**

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<b>Total Paid</b>	<b>650</b>	Visa Receipt Oct. 30, 2020 Consult fee
<b>Total Paid</b>	<b>4400</b>	Review File cc pmt

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<b>J. Jeffrey Coughlin PLLC</b>	
1570 Plaza West Dr	10/30/2020
Prescott, AZ 86303-5679	2:03 PM
<hr/>	
<b>Custom Amount</b>	<b>\$650.00</b>
<b>Total</b>	<b>\$650.00</b>
<hr/>	
Receipt T9E9	Visa 3897
Authorization 09390A	

*Knight*

<b>J. Jeffrey Coughlin PLLC</b>	
1570 Plaza West Dr	11/24/2020
Prescott, AZ 86303-5679	3:38 PM
<hr/>	
<b>Custom Amount</b>	<b>\$4,400.00</b>
<b>Total</b>	<b>\$4,400.00</b>
<hr/>	
Receipt ZUMu	MasterCard
Authorization 02493B	4339

*Knight*



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

**AFFIDAVIT**  
**EXHIBIT B**

**Total Paid 25158.91 CV 2018 04003**

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

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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

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LAW OFFICES OF  
**J. JEFFREY COUGHLIN PLLC**

1570 PLAZA WEST DRIVE  
PRESCOTT, ARIZONA 86303

November 30, 2020

*Sent via email to:*  
[nancyknight@frontier.com](mailto:nancyknight@frontier.com)

Nancy and William Knight  
1803 Lipan Circle  
Fort Mohave, AZ 86426

**Re: CC&R Violations**

Nancy and William,

You have requested that this firm (the "Firm") represent you with regard to certain legal matters. This letter confirms the basis of my representation of you and the fee agreement with respect to the representation.

1. **Scope of Engagement.** I will be entering an appearance for you Nancy in Mohave County case No. CV-2018-04003 and represent you with regard to the current claims you have against the defendants and advise you regarding the pursuit of those who have violated the CC&Rs in Tract 4076-B and potentially Tract 4076-A should you decide to purchase property in that tract.

I will have full responsibility for the representation. If, at any time, you have any questions on this matter or the service you are receiving, please telephone me or email me at once.

2. **Fees.** The Firm's schedule of hourly and flat rates for an attorney is based on years of experience, specialization and level of professional attainment. I will charge you \$250.00 per hour for all legal work performed on this file.

The fees for the type of work envisioned are significantly influenced by the criteria for reasonableness specified by the Arizona Rules of Professional Conduct and the American Bar Association Code of Professional Responsibility which include the time and labor required for the tasks performed; the difficulty, novelty or complexity of the problem presented; the skill required to perform the tasks in a professional manner; the time constraints imposed by the client or the nature of the matter; the fees customarily charged for similar services; and the nature of the results obtained for the client.

In addition to the hourly rate, you will be billed for all costs and expenses incurred on your behalf, including filing fees, recording fees, court costs, copying charges, FAX charges, publication fees, printing charges, transportation expenses, transcript and/or deposition costs, photocopies (currently .20 per page), postage, delivery charges, computer research, extraordinary secretarial service charges (\$40.00 per hour), expert and witness fees, parking fees or other out-of-pocket costs. These costs will be detailed on your billing statement and may increase from time to time. If the Firm must incur a substantial disbursement (i.e. over \$200.00) on your behalf, I may ask that the cost be paid directly by you.

3. **Annual Increases.** To account for inflation, unless the parties otherwise agree in writing, the Firm shall have the right to increase the stated hourly rates of each category of lawyer or other professional referenced above on January 1 of each calendar year.

4. **Advanced fees and costs.** This firm's policy is to require an amount representing advanced fees and costs from clients prior to beginning work on their behalf. In your case, I have determined that a \$6,000.00 advanced fee is appropriate. I will draw from that fee when I prepare your monthly billing. I will return to you any unused portion of the fee at the conclusion of my representation. In the event the advanced fee is depleted, I will continue to send you monthly statements without requiring you to replenish the advanced fee so long as you make monthly payments of at least \$1,000.00.

5. **Billing Procedure.** The Firm renders statements for all professional services, fees and costs on a monthly basis, except in those cases when it is more appropriate to bill you upon completion of a matter. Unless otherwise requested, the Firm's billings contain a brief summary of the nature of the services rendered, and the fees and the costs advanced. You may receive a statement that is prepared before the Firm is able to determine the amount of all disbursements or costs, in which case you will be billed for those costs after they are determined.

6. **Terms of Payment.** All billing statements are due and payable upon receipt and considered to be past due if not paid within thirty (30) days after the date of the invoice, subject to the arrangement I have described in paragraph 4, above. Because of the added bookkeeping and accounting charges inherent in delayed payment, a service charge of one and one-half percent per month (18% per annum) may be imposed on all past-due balances. This Firm reserves the right to discontinue legal services until we are paid in full or until satisfactory payment arrangements are made.

7. **Cooperation by Client.** You agree to cooperate with the Firm during the representation by complying on a timely basis with all reasonable requests for information and assistance in connection with the representation. You agree to truthfully inform the Firm of all facts and information related to the representation and scope of engagement.

8. **Disposition of Documents.** Any documents, materials, or other items provided to the Firm in original form are the property of you and will be returned to you after the Firm makes copies unless you notify the Firm in writing to the contrary. The copies shall become the property of the Firm, unless the Firm receives written notice to the contrary. The Firm shall use reasonable efforts to preserve such documents, materials or other items. The Firm shall have no obligation to retain any documents, materials, other items or files pertaining to your affairs for more than five (5) years following the completion of the work on that matter. At the close of representation, the Firm will turn over your files to you on request. Delivery to you will be by personal visit to the Firm's office. The Firm shall have no obligation to turn over to you any of the Firm's files, except for copies made at your request and expense.

9. **Use of Internet.** Upon your request, the Firm may correspond or send files or documents over the "Internet." This Firm reserves the right to refuse to send any documents or correspondence over the Internet for any reason whatsoever. You are cautioned to exercise security measures commensurate with the sensitivity of the documents or files relating to your legal and business matters.

10. **Use of Client's Name.** You hereby authorize the Firm to use your name on a list of clients this Firm represents in connection with any professional business matters of this Firm. Your name will not be used for any other purpose.

11. **Termination.** You have the right to terminate the Firm's representation at any time. The Firm has the same right, subject to an obligation to give you reasonable notice, so that you may arrange for alternate representation. In addition, if your account is not paid in full within thirty-five (35) days of receipt of our statement, the Firm reserves the right to immediately discontinue legal services until the Firm is paid in full or until satisfactory payment arrangements are made.

12. **Disputes.** Any controversy, dispute, or question arising out of, in connection with, or in relation to this Agreement or its interpretation, performance or nonperformance, or any breach thereof, shall be determined by arbitration conducted in accordance with the then-existing rules of the State Bar of Arizona and Arizona Fee Arbitration Committee, and any decision rendered by the Arbitrator shall be final and binding upon the parties; and Judgment upon any arbitration award, including an award of damages, may be entered in any court having jurisdiction thereof. The Arbitrator may not amend, modify, or substitute any of the terms or conditions of this Agreement and his jurisdiction is thereby limited.

13. **Advance Waiver of Conflicts.** The Firm represents many other companies and individuals. It is possible, if not probable, that some of the Firm's present or future clients could have disputes or transactions with you. Therefore, as a condition to the Firm undertaking this matter, you agree that the Firm may continue to represent or may undertake in the future to

represent existing or new clients in any matter that is not substantially related to the Firm's work for you, even if the interests of such entities in those other matters are directly adverse to you. The Firm agrees, however, that your prospective consent to conflicting representation contained in this paragraph shall not apply in any instances where, as a result of the Firm's representation of you, the Firm has obtained privileged, proprietary or other confidential information of a nonpublic nature that, if known to such other entity, could be used in any such other matter by such entity to your material disadvantage.

If the above is consistent with your understanding regarding my representation, please print two copies of this letter, sign both and return one to me by email at [jjcpllc@gmail.com](mailto:jjcpllc@gmail.com). Once you have signed the letter, please contact me to arrange for payment of the advanced fee. Should you have any questions, please do not hesitate to contact me.

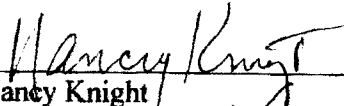
I appreciate the opportunity to represent you in this matter. I cannot and do not warrant or predict results or final developments. Be assured that it is my desire to afford you conscientious, faithful and diligent services, seeking at all times to achieve solutions that are reasonable for you.

Sincerely,

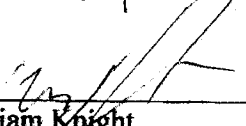
**J. JEFFREY COUGHLIN PLLC**

  
J. Jeffrey Coughlin

**ACCEPTED AND AGREED:**

  
\_\_\_\_\_  
Nancy Knight

11-30-2020  
Date

  
\_\_\_\_\_  
William Knight

11-30-20  
Date

<b>J. Jeffrey Coughlin PLLC</b>	
1570 Plaza West Dr	12/3/2020
Prescott, AZ 86303-5679	4:04 PM
<hr/>	
<b>Custom Amount</b>	<b>\$6,000.00</b>
<b>Total</b>	<b>\$6,000.00</b>
<hr/>	
Receipt bp2E	MasterCard
Authorization 00388B	4339

01/11/21  
Knight

**Fwd: AZ e-Filing Receipt for Submission ID 1095801**

Jeffrey Coughlin <jjcpllc@gmail.com>

Fri 12/4/2020 11:38 AM

To: Nelson, Anna <jjcpllc@live.com>

----- Forwarded message -----

From: <customerservice@ncourt.com>

Date: Fri, Dec 4, 2020 at 11:31 AM

Subject: AZ e-Filing Receipt for Submission ID 1095801

To: <jjcpllc@gmail.com>

**YOUR RECEIPT >>**

**Do not reply to this email.**

Name: Mohave Superior Court  
Address 1: 401 E. Spring Street  
Address 2:  
City: Kingman  
State: Arizona  
Zip: 86401

Name(s): NANCY KNIGHT

Description	Case Number	Application Fee	Filing Fee	Total
Notice Of Appearance	B8015CV201804003	\$6.50	\$0.00	\$6.50
Certificate Of Service For Notice of Appearance	B8015CV201804003	\$6.50	\$0.00	\$6.50
eService Fee	B8015CV201804003	\$3.80	\$0.00	\$3.80

**Vendor: eUniversa**

**Service Fee: \$0.51**

**EFSP Filing ID: 1095801**

**Receipt Number: 821753414308235945**

**Total Amount Paid: \$17.31**

**Receipt Date: 12/4/2020 9:31:06 AM**

**Keyword / Matter Number:**

**Organization**

Name

First Name J.

Last Name Jeffrey Coughlin

Email [jjcpllc@gmail.com](mailto:jjcpllc@gmail.com)

Street 1570 Plaza West Drive

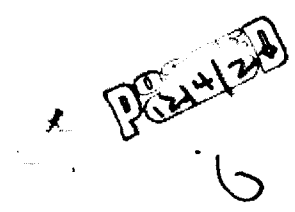
City Prescott

State/Territory AZ

Zip 86303

Card Type Visa

Card Number \*\*\*\*\*0793



**IMPORTANT INFORMATION >>**



# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: February 12, 2021

Statement No. 2393

Account No. 226.00

Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

**Payments received after 02/12/2021 are not included on this statement.**

## Fees

			Hours	
2/03/2020	JC	Reviewed Nancy's website, compared with Covenants, Conditions and Restrictions re: committee membership and email to her re: same (.3) email from and telephone call to Nancy re: website and strategy (.2)	0.50	125.00
2/07/2020	JC	Email from Nancy re: a new draft of a motion to amend complaint and began review	0.40	100.00
2/16/2020	JC	Email from and to Nancy re: conference, status conference	0.10	25.00
2/17/2020	JC	Conference with Nancy re: amended complaint	1.00	250.00
1/05/2021	JC	Reviewed emails from Nancy and responded to latest email (.3) prepared for telephone conference with Dan Oehler (.4) telephone conference with Oehler re: plans to amend complaint to add defendants and address issue of abandonment and to discuss with judge on Jan. 11(.5)	1.20	300.00
1/11/2021	JC	Prepared for status conference with court (.4) telephone call with Nancy to discuss same (.2) attended status conference with Nancy, Oehler, Judge Jantzen (.2) telephone call to Nancy to discuss strategy (.3)	1.10	275.00
		For Current Services Rendered	4.30	1,075.00

## Recapitulation

Timekeeper	Hours	Rate	Total
J. Jeffrey Coughlin	4.30	\$250.00	\$1,075.00

Nancy Knight  
Account No. 226.00  
RE: CC&Rs

Statement Date: 02/12/2021  
Statement No. 2393  
Page No. 2

Advances

2/04/2020	Filing fee, 12/4/2020, Notice Of Appearance and Certificate of Service	17.31
2/04/2020	Processor fee for advanced fee	210.15
	<b>Total Advances</b>	<b>227.46</b>
	<b>Total Current Work</b>	<b>1,302.46</b>

Payments

1/29/2021	Payment	-1,302.46
	<b>Balance Due</b>	<b>\$0.00</b>

Client Funds

1/25/2020	Deposit to client funds	4,245.85
1/25/2020	Withdrawal from client funds	-4,245.85
2/03/2020	Deposit to client funds	5,789.85
1/29/2021	Payment	-1,302.46
	<b>Ending Client Funds Balance</b>	<b>\$4,487.39</b>

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: February 19, 2021  
Statement No. 2401  
Account No. 226.00

Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

***Payments received after 02/19/2021 are not included on this statement.***

## Fees

			Hours	
2/03/2020	JC	Reviewed Nancy's website, compared with Covenants, Conditions and Restrictions re: committee membership and email to her re: same (.3) email from and telephone call to Nancy re: website and strategy (.2)	0.50	125.00
2/07/2020	JC	Email from Nancy re: a new draft of a motion to amend complaint and began review	0.40	100.00
2/16/2020	JC	Email from and to Nancy re: conference, status conference	0.10	25.00
2/17/2020	JC	Conference with Nancy re: amended complaint	1.00	250.00
1/05/2021	JC	Reviewed emails from Nancy and responded to latest email (.3) prepared for telephone conference with Dan Oehler (.4) telephone conference with Oehler re: plans to amend complaint to add defendants and address issue of abandonment and to discuss with judge on Jan. 11(.5)	1.20	300.00
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		For Current Services Rendered	4.30	1,075.00

## Recapitulation

<u>Timekeeper</u>	Hours	Rate	Total
J. Jeffrey Coughlin	4.30	\$250.00	\$1,075.00

Nancy Knight  
Account No. 226.00  
RE: CC&Rs

Statement Date: 02/19/2021  
Statement No. 2401  
Page No. 2

**Advances**

2/04/2020	Filing fee, 12/4/2020, Notice Of Appearance and Certificate of Service	17.31
2/04/2020	Processor fee for advanced fee	210.15
	<b>Total Advances</b>	<b>227.46</b>
	<b>Total Current Work</b>	<b>1,302.46</b>

**Payments**

1/29/2021	Payment	-1,302.46
	<b>Balance Due</b>	<b>\$0.00</b>

**Client Funds**

1/25/2020	Deposit to client funds	4,245.85
1/25/2020	Withdrawal from client funds	-4,245.85
2/03/2020	Deposit to client funds	6,000.00
1/29/2021	Payment	-1,302.46
	<b>Ending Client Funds Balance</b>	<b>\$4,697.54</b>

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445 4400

Statement Date April 27, 2021  
Statement No 2454  
Account No. 226 00  
Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

***Payments received after 04/27/2021 are not included on this statement.***

## Fees

			Hours	
3/02/2021	JC	Reviewed emails from Nancy, compared with Covenants, Conditions and Restrictions and existing complaint and responded to Feb. 28 email	0.40	100.00
3/15/2021	JC	Email from Nancy re: information in recent emails, reviewed same and attachments thereto and email to her re: recent responses (.4) reviewed multiple emails among Nancy, Robert Taylor, various Mohave County officials re: fraud claims and compared with file for full understanding of potential claims (.7)	1 10	275.00
3/16/2021	JC	Email from Nancy re: emails not responded to, searched emails for ones she identified, reviewed Covenants, Conditions and Restrictions re: basis for enforcing them, brief search of Mohave County Assessor's gis maps for current owners, scrutinized Nancy's proposed amended complaint and email to her with responses to multiple questions (1.6) email from Nancy, reviewed complaint against Millers and Public Records Request Form attached to Nancy's email to Board of Supervisors and email to Nancy re: same (.1) modified Nancy's Proposed Amended Complaint (5.1)	6.80	1,700.00
3/17/2021	JC	Emails from Nancy, legal research re: libel and finished drafting amended complaint	3 60	900.00
3/18/2021	JC	Email from Nancy with comments on draft amended complaint and responded to comments (.6) voice mail to Dan Oehler re: amended complaint and email to him attaching it for his review and consent to stipulate to filing it ( 1)	0.70	175.00
3/19/2021	JC	Emails from Nancy, reviewed CC&Rs and responded (.3) voice mail from Dan Oehler and returned call to discuss Proposed Amended Complaint and		

			Hours	
		status conference on Monday (.2); te ephone call from Nancy re. status (.2)	0.70	175.00
13/22/2021	JC	Prepared for and attended status conference with Judge Jantzen, Nancy and Dan Oehler	0.40	100.00
14/08/2021	JC	Reviewed and revised Motion to Amend complaint and reviewed proposed amended complaint for compliance with Rule 15	0.70	175.00
14/09/2021	JC	Email from Nancy re: multiple issues, considered same and replied with detailed response	2.20	550.00
14/12/2021	JC	Completed motion to amend complaint, completed preparing proposed amended complaint to file as exhibit to motion	2.50	625.00
		For Current Services Rendered	19.10	4,775.00

Recapitulation

Timekeeper	Hours	Rate	Total
J. Jeffrey Coughlin	19.10	\$250.00	\$4,775.00

Expenses

4/15/2021	Photocopy charges, 4/13/2021, Motion To Amend Complaint, Certificate of Service, Proposed Order	9.20
	Total Expenses	9.20

Advances

4/13/2021	Filing fee, 4/12/2021, Motion To Amend Complaint and Certificate of Service	17.31
	Total Advances	17.31

Total Current Work 4,801.51

Payments

4/06/2021	Payment	-3,000.00
4/23/2021	Payment	-1,697.54
	Total Payments	-4,697.54

Balance Due \$103.97

Client Funds

	Beginning Client Funds Balance	\$4,697.54
4/06/2021	Payment	-3,000.00
4/23/2021	Payment	-1,697.54
	Ending Client Funds Balance	\$0.00

**Fwd: AZ e-Filing Receipt for Submission ID 1151568**

Jeffrey Coughlin <jjcpllc@gmail.com>

Mon 4/12/2021 1:48 PM

To: Nelson, Anna <jjcpllc@live.com>

----- Forwarded message -----

From: <customerservice@ncourt.com>

Date: Mon, Apr 12, 2021 at 12:57 PM

Subject: AZ e-Filing Receipt for Submission ID 1151568

To: <jjcpllc@gmail.com>

YOUR RECEIPT >>

Do not reply to this email.

Name: Mohave Superior Court  
Address 1: 415 E. Spring St.  
Address 2:  
City: Kingman  
State: Arizona  
Zip: 86401



Name(s): NANCY KNIGHT

Receipt Item

Motion To Amend Complaint	B8015CV201804003	\$6.50	\$0.00	\$6.50
Certificate of Service For Motion To Amend Complaint	B8015CV201804003	\$6.50	\$0.00	\$6.50
eService Fee	B8015CV201804003	\$3.80	\$0.00	\$3.80

**Vendor: eUniversa** **Service Fee: \$0.51**  
**EFSP Filing ID: 1151568** **Receipt Number: 821138602498048633** **Total Amount Paid: \$17.31**  
**Receipt Date: 4/12/2021 9:57:46 AM** **Keyword / Matter Number:**

Organization

Name

First Name J.

Card Type Visa

Card Number \*\*\*\*\*0793



Judy Jurecki <jjcoughlinlaw@gmail.com>

**Fwd: AZ e-Filing Receipt for Submission ID 1165389**  
message

Jeffrey Coughlin <jjcpllc@gmail.com>  
To: jjcoughlinlaw@gmail.com

Thu, May 6, 2021 at 12:59 PM

----- Forwarded message -----

From: Jeffrey Coughlin <jjcpllc@gmail.com>  
Date: Thu, May 6, 2021 at 11:14 AM  
Subject: Fwd: AZ e-Filing Receipt for Submission ID 1165389  
To: Nelson, Anna <jjcpllc@live.com>

----- Forwarded message -----

From: <customerservice@ncourt.com>  
Date: Thu, May 6, 2021 at 10:41 AM  
Subject: AZ e-Filing Receipt for Submission ID 1165389  
To: <jjcpllc@gmail.com>

YOUR RECEIPT >>

Do not reply to this email.

Name: Mohave Superior Court  
Address 1: 415 E. Spring St.  
Address 2:  
City: Kingman  
State: Arizona  
Zip: 86401

Name(s): NANCY KNIGHT

Plaintiff's Reply In Support Of Her Motion For Leave To Amend Complaint	B8015CV201804003	\$6.50	\$0.00	\$6.50
Certificate Of Service For Plaintiff's Reply In Support of Her Motion For Leave To Amend Complaint	B8015CV201804003	\$6.50	\$0.00	\$6.50
eService Fee	B8015CV201804003	\$3.80	\$0.00	\$3.80

Vendor: eUniversa

Service Fee: \$0.51

EFSP Filing ID: 1165389

Receipt Number: 821842456665312950

Total Amount Paid: \$17.31

Receipt Date: 5/6/2021 10:40:56 AM

Keyword / Matter Number:



# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: October 25, 2021  
Statement No. 2593  
Account No 226.00

Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

***Payments received after 10/25/2021 are not included on this statement.***

			Hours	
		Previous Balance		\$149.48
		<u>Fees</u>		
08/10/2021	JC	Prepared Joint scheduling order and email to Nancy for comment	0.60	150.00
08/16/2021	JC	Email from Nancy approving dates and sent to Oehler for review so we can file by Sept. 1	0.10	25.00
08/17/2021	JC	Email from Oehler with 4th supplemental Rule 26.1 Disclosure Statement, compared with last one and emailed to Nancy	0.30	75.00
08/23/2021	JC	Email from Nancy re: COVID and emails and responded (.1) searched emails for ones needing response, searched file for court orders Nancy referred to and responded to individual email questions (.6) reviewed file for court order on scheduling order and email to Dan Oehler re. expected input on scheduling order (.1)	0.80	200.00
08/25/2021	JC	Email from Oehler re: scheduling order and responded, email from Nancy re: motion concerning necessary and interested parties	0.20	50.00
08/31/2021	JC	Telephone call to Dan Oehler to discuss proposed scheduling order	0.50	125.00
09/01/2021	JC	Email from Nancy and responded re: scheduling order and necessary and interested parties issue (.3) legal research re: necessary, indispensable parties (1.6)	1.90	475.00
09/07/2021	JC	Revised the proposed scheduling order to reflect the time needed to deal with Rule 19 and email to Dan re: same	0.40	100.00

Nancy Knight  
 Account No. 226.00  
 RE: CC&Rs

Statement Date: 10/25/2021  
 Statement No. 2593  
 Page No. 2

			Hours	
09/17/2021	JC	Email from Nancy re: fees for Defendants' Rule 26.1 Disclosure Statements, reviewed same and email to Nancy for explanation	0.20	50.00
09/21/2021	JC	Emails from Nancy re: Defendants' 3d and 4th supplemental Rule 26.1 Disclosure Statements, relevance, fees, reviewed same, standards for Rule 26.1 Disclosure Statement in rules and responded to Nancy re: whether to file a motion for fees	0.50	125.00
09/22/2021	JC	Email from Nancy responding to mine re: disclosures and responded to same	0.30	75.00
09/23/2021	JC	Email from Nancy with questions about disclosures and responded	0.30	75.00
09/28/2021	JC	Email to, voice mail to and telephone call from Dan Oehler re: extending scheduling order three weeks and modified scheduling order accordingly to file	0.40	100.00
09/29/2021	JC	Finalized Proposed scheduling order. reviewed Notice of Filing Proposed Order and authorized filing today	0.20	50.00
10/05/2021	JC	Email from Nancy re: consult on County case, legal research accrual of fraud cause of action and email to Nancy re: same	0.60	150.00
10/06/2021	JC	Reviewed Judge Jantzen's signed scheduling order and compared with one we submitted to ensure dates remained the same (.2) email from Nancy re: action against Mohave County, legal research claim against county (.6)	0.80	200.00
10/18/2021	JC	Continued drafting brief on joinder of other property owners and whose responsibility it is	1.20	300.00
10/19/2021	JC	Drafted Rule 19 brief	5.50	1,375.00
10/20/2021	JC	Completed and filed Brief concerning compliance with Rule 19	4.00	1,000.00
10/25/2021	JC	Prepared for status conference (.4) attended status conference and email to Nancy to call me (.7)	1.10	275.00
		For Current Services Rendered	19.90	4,975.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
J. Jeffrey Coughlin	19.90	\$250.00	\$4,975.00

Advances

09/23/2021	Service fee for filing Notice of Filing Proposed Scheduling Order	3.91
	Total Advances	3.91
	Total Current Work	4,978.91

Nancy Knight  
Account No. 226.00  
RE: CC&Rs

Statement Date: 10/25/2021  
Statement No. 2593  
Page No. 3

Payments

10/14/2021	Payment	-2,000.00
10/25/2021	Payment	-1,000.00
	Total Payments	-3,000.00
	Balance Due	<u>\$2,128.39</u>

Client Funds

09/07/2021	Deposit to client funds	3,000.00
10/14/2021	Payment	-2,000.00
10/25/2021	Payment	-1,000.00
	Ending Client Funds Balance	<u>\$0.00</u>

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445 4400

Statement Date January 24, 2022

Statement No 2610

Account No. 226.00

Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

***Payments received after 01/24/2022 are not included on this statement.***

Previous Balance \$2,128.39

## Fees

			Hours	
10/26/2021	JC	Email from Nancy, reviewed community newspaper Nancy drafted and email to Nancy responding to certain questions	0.40	100.00
10/29/2021	JC	Telephone call from Nancy re: status of case and her intended publication	0.40	100.00
11/08/2021	JC	Legal research Rule 19 burden of joining parties	0.70	175.00
11/10/2021	JC	Email from Nancy re: case she found on joinder and legal research on cases citing hers	0.80	200.00
11/24/2021	JC	Reviewed Defendants' Motion to Join Parties pursuant to Rule 19(a) and legal research re: cases cited therein and began drafting response	2.70	675.00
11/29/2021	JC	Reviewed Nancy's research of party joinder, completed Response to Defendants' Motion to Join Parties, filed and served same	2.30	575.00
12/03/2021	JC	Reviewed attachments from Nancy re: claims against Mohave County, legal research re: time limits to pursue (.8) telephone call from Nancy to discuss (.3)	1.10	275.00
01/03/2022	JC	Reviewed Defendants' Response to joinder brief, researched arguments of law cited therein and compared with one we filed to prepare for oral argument	1.70	425.00
01/09/2022	JC	Prepared for oral argument on Rule 19 joinder	0.70	210.00

Nancy Knight  
Account No. 226.00  
RE: CC&Rs

Statement Date: 01/24/2022  
Statement No. 2610  
Page No. 2

			Hours	
01/10/2022	JC	Attended oral argument on joinder of parties (1.0) telephone conference with Nancy re: court's order (2) reviewed Cundiff orders and billings to determine costs and type of service (1.3)	2.50	750.00
01/18/2022	JC	Email from Nancy re filing a motion to reconsider Jantzen's ruling, reviewed brief concerning number of times I raised the issue that it is Defendants' responsibility to join parties and email to Nancy re: same	0.30	90.00
		For Current Services Rendered	13.60	3,575.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
J. Jeffrey Coughlin	10.10	\$250.00	\$2,525.00
J. Jeffrey Coughlin	3.50	300.00	1,050.00

Total Current Work 3,575.00

Payments

11/03/2021	Payment	-2,128.39
12/07/2021	Payment	-1,000.00
	Total Payments	-3,128.39
	Balance Due	\$2,575.00

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: March 21, 2022  
Statement No. 2665  
Account No. 226.00  
Page 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

***Payments received after 03/21/2022 are not included on this statement.***

Previous Balance \$2,575.00

## Fees

			Hours	
01/24/2022	JC	Email from Nancy re: strategy on two cases, reviewed file and Oehler's proposed order and responded	0.40	120.00
01/25/2022	JC	Emails from Nancy re: other lawsuit and being precluded from suing because of joinder issue in this case, joinder issues, appeal issues, reviewed Cundiff case for number of owners who contacted me after sending notice and email to Nancy re: advice on all	0.60	180.00
02/07/2022	JC	Telephone call from Dan Oehler re: new case Nancy filed and whether I represent her on same issues as our case (.1) email from Nancy re: appeal and timing and consultation on other case, reviewed legal research appellate rules and compared with other cases involving appeals to determine rough time estimate for appeal process and responded to Nancy's email (.5)	0.60	180.00
02/08/2022	JC	Reviewed civil and appellate rules of civil procedure re: contents for Notice of Appeal and prepared same regarding that the Plaintiff shall join every lot owner in Desert Lakes Golf Course & Estates Tracts 4076-B, 4076-D and 4163 as necessary/indispensable parties into this case pursuant to Rule 19(a), A.R.C.P	0.80	240.00
02/22/2022	JC	Reviewed order from Court of Appeals re: appeal fee due date, reviewed Rule 12 re: requirements and filed Notice of Payment (.3) email from Oehler re: whether I am representing Nancy in new matter and responded (.1)	0.40	120.00
02/28/2022	JC	Drafted Case Management Statement for Court of Appeals	2.60	780.00

Nancy Knight  
 Account No. 226.00  
 RE: CC&Rs

Statement Date: 03/21/2022  
 Statement No. 2665  
 Page No. 2

			Hours	
03/08/2022	JC	Reviewed Notice of Filing transcript, Notice of Arrangements to secure transcript and Court of Appeals rules for parties to receive service	0.30	90.00
03/09/2022	JC	Reviewed Dismissal of Appeal, sent to Nancy for review and began legal research re: reasons for dismissal and how to proceed	3.20	960.00
			8.90	2,670.00
			For Current Services Rendered	

		Recapitulation			
<u>Timekeeper</u>		<u>Hours</u>	<u>Rate</u>	<u>Total</u>	
J. Jeffrey Coughlin		8.90	\$300.00	\$2,670.00	

Advances

02/22/2022	Filing fee - Appeal Fee	290.30
03/01/2022	Filing fee for Notice of Transcript Order	10.61
03/01/2022	Filing Fee for Case Management Statement	10.61
03/08/2022	Fee for Transcript of Oral Arguments	144.00
	Total Advances	455.52
	Total Current Work	3,125.52

Payments

02/04/2022	Payment	-1,000.00
03/02/2022	Payment	-1,000.00
	Total Payments	-2,000.00
	Balance Due	<u>\$3,700.52</u>

Aged Due Amounts					
0-30	31-60	61-90	91-120	121-180	181+
3,125.52	575.00	0.00	0.00	0.00	0.00

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: May 1, 2022

Statement No. 2717

Account No. 226.00

Page 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

**Payments received after 05/01/2022 are not included on this statement.**

Previous Balance \$3,700.52

### Fees

			Hours	
03/21/2022	JC	Email from Nancy re: Rule 19 issues and responded	0.40	120.00
03/22/2022	JC	Reviewed emails from Nancy which I responded to and did not respond to in preparation for telephone conference with her (.1) telephone conference with Nancy re: strategy for Special Action (.5)	0.60	180.00
		For Current Services Rendered	1.00	300.00

### Recapitulation

Timekeeper	Hours	Rate	Total
J. Jeffrey Coughlin	1.00	\$300.00	\$300.00

Total Current Work 300.00

### Payments

04/04/2022	Payment	-1,000.00
04/18/2022	Payment	-1,000.00
	Total Payments	-2,000.00

Balance Due \$2,000.52

### Aged Due Amounts

0-30	31-60	61-90	91-120	121-180	181+
300.00	1,700.52	0.00	0.00	0.00	0.00





# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: September 22, 2022

Statement No. 2889

Account No. 226.00

Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

***Payments received after 09/22/2022 are not included on this statement.***

			Hours	
Previous Balance				\$330.50
Fees				
			Hours	
1/27/2022	JC	Revised Notice to Property Owners and emailed to Oehler and Court	0.30	90.00
1/01/2022	JC	Prepared for and attended status conference	1.40	420.00
1/04/2022	JC	Telephone conference with Nancy re: 2018 case	0.80	240.00
1/10/2022	JC	Reviewed Oehler's Request for Status conference to compare with Nancy's documents for response to Motion to Dismiss	0.60	180.00
1/11/2022	JC	Reviewed all attachments from Nancy regarding materials she sent and received for response to deposition subpoena duces tecum, considered comments from Oehler and Jantzen at last status conference and compared with Oehler's Motion for status conference and gave instructions to secretary to send to Oehler's office	1.30	390.00
1/25/2022	JC	Drafted objection to Oehler's oral Motion to Dismiss	2.50	750.00
1/29/2022	JC	Completed drafting Objection to Motion to Dismiss with suggestions for procedure to join parties and filed same	4.50	1,350.00
1/31/2022	JC	Email from Nancy re: additional items to include in Objection and email to her addressing same	0.10	30.00
	JC	Email from Nancy re: typo and missing language in Objection to Motion to Dismiss, drafted Notice of Errata and informed Nancy of the correction (.3)n/c		n/
1/15/2022	JC	Reviewed Oehler's objection to plaintiffs' Proposed Order, Reply to Plaintiffs'		

Nancy Knight  
 Account No. 226.00  
 RE: CC&Rs

Statement Date: 09/22/2022  
 Statement No. 2889  
 Page No. 2

			Hours	
		Objection to Defendants' Motion to Dismiss and reviewed rules and court orders to prepare for oral argument tomorrow	1.70	510.0
/16/2022	JC	Prepared for oral argument on Motion to Dismiss and Notice to property owners (.7) attended oral argument (1.2)	1.90	570.0
/19/2022	JC	Drafted revised order with Oehler's and Court's modifications and attached in email to him	0.80	240.0
		For Current Services Rendered	<u>15.90</u>	<u>4,770.0</u>

		Recapitulation		
Timekeeper		Hours	Rate	Total
J. Jeffrey Coughlin		15.90	\$300.00	\$4,770.00

Advances

/29/2022	Filing fee - Objection to Motion to Dismiss	10.6
	Total Advances	10.6
	Total Current Work	4,780.6

Payments

/15/2022	Payment	-330.5
	Balance Due	<u>\$4,780.6</u>

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: January 1, 2023

Statement No. 2953

Account No. 226.00

Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

*Payments received after 01/01/2023 are not included on this statement.*

Previous Balance \$4,780.61

Balance Due \$4,780.61

Aged Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
0.00	0.00	0.00	4,780.61	0.00	0.00

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

928-445-4400

Statement Date: March 4, 2023  
Statement No. 3060  
Account No. 226.00

Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

*Payments received after 03/04/2023 are not included on this statement.*

	Previous Balance before Adjustments	\$4,780.61
04/2023	Write off per JJC	-1,080.61
	Previous Balance	\$3,700.00
	Balance Due	<u>\$3,700.00</u>

#### Aged Due Amounts

0-30	31-60	61-90	91-120	121-180	181+
0.00	0.00	0.00	0.00	3,700.00	0.00

# J. JEFFREY COUGHLIN PLLC

1570 Plaza West Drive  
Prescott, AZ 86303

*Emil 6-6-23*

928-445-4400

Statement Date: June 5, 2023  
Statement No. 3186  
Account No. 226.00  
Page: 1

Nancy Knight  
1803 E. Lipan Circle  
Fort Mohave, AZ 86426

RE CC&Rs

*Payments received after 06/05/2023 are not included on this statement.*

	Previous Balance		\$3,700.00
		Payments	
08/2023	Payment		-925.00
29/2023	Payment		-925.00
27/2023	Payment		-925.00
26/2023	Payment		-925.00
	Total Payments		<u>-3,700.00</u>
	Balance Due		<u>\$0.00</u>