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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

**MOTION TO STRIKE
PLAINTIFF'S REPLY TO
DEFENDANTS' RESPONSE
TO PLAINTIFF'S 10/31/2023
MOTION TO REQUIRE
DEFENDANTS TO JOIN
RULE 19 PARTIES**

23 COME NOW, the Defendants, GLEN LUDWIG and PEARL LUDWIG, Trustees of
24 THE LUDWIG FAMILY TRUST; FAIRWAY CONSTRUCTORS, INC.; and MEHDI
25 AZARMI (hereinafter referred to collectively as the "Defendants"), by and through their
26 attorney, the undersigned, and respectfully supplement these Defendants' Motions to Strike
27 previously filed herein on September 5, 2023, and September 13, 2023, with the attached
28 request that Plaintiff's entire Reply filed herein on October 31, 2023, be stricken from the
record as well as the pleadings previously requested stricken. Many but not all of the issues
that were raised in both the September 5, 2023, and the September 13, 2023, Motions have
again surfaced in Plaintiff's Reply memo filed October 31, 2023. Plaintiff's most recent
writing has descended yet further and even more succinctly into violative provisions of
A.R.C.P. Rule 12(f) as being redundant, immaterial, impertinent or scandalous.

1 A snapshot of the content of what is categorized by Plaintiff as a Reply to a Response
2 where the redundant issue being addressed by Plaintiff was who should be required to join
3 the Rule 19 ARCP parties. This same repetitive issue has been raised by the Plaintiff for
4 perhaps the eighth time. Plaintiff's October 31, 2023 filing is an 11 page document with
5 exhibits that can most quickly be summarized as an unending litany degrading the judiciary,
6 the Court system, the Court's employees and legal counsel through Plaintiff's attacks and
7 Plaintiff's self-entered legal decisions and allegations including that the Plaintiff has the right
8 to make enforceable determinations of what orders Plaintiff is obligated to follow and what
9 decisions Plaintiff will not follow. If Plaintiff disagrees with an order, Plaintiff clearly
10 believes Plaintiff can personally void a decision or order. Plaintiff's attitude toward the law
11 and the Court system as a whole are witnessed in Plaintiff's Reply and even includes
12 Plaintiff's disdain for Court employees such as Clerks and Judicial Assistants. Here is an
13 overview to Plaintiff's voiced disdain for the legal system:

14 "It is in the interest of justice and judicial economy that this Court not be
15 trapped by Mr. Oehler's trickery that has been ongoing in this case for years.
16 Mr. Oehler violates his Oath to be truthful and has now resorted to the false
17 claim that Plaintiff has intended to refuse to accept and abide in orders by this
18 Court. He fraudulently also claims Plaintiff had no intention of following the
19 former Court's Rule 19 Order." Plaintiff's Reply, p. 1, lines 24-28, through
20 p. 2, line 1.

21 * * *

22 "Fraud upon the Court is Mr. Oehler's modus operandi on multiple points in
23 this case. He is a Trespasser." Plaintiff's Reply, p. 2, lines 10.5 - 11.5.

24 * * *

25 "The evidence is clear that Plaintiff fully intended to abide in this Court's
26 Order for her to serve the Rule 19 Parties until she became aware of a travesty
27 of justice..." Plaintiff's Reply, p. 2, lines 13 - 14.

28 * * *

"It included an unconstitutional Gag Order ..." Plaintiff's Reply, p. 2, lines 17
- 18.

* * *

"The July 2023 Minutes of the Status Conference that was provided to the
Plaintiff was wrought with error..." Plaintiff's Reply, p. 3, lines 8 - 9.

* * *

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1 “That case included due process violations and Fraud Upon the Court. All of
2 which apply to this case.” Plaintiff’s Reply, p. 3, lines 18.5 - 19.5.

3 * * *

4 “Plus the issue of racketeering was raised in that case by the Court aside from
5 the Petitioner’s Appeal.

6 Plaintiff has reported the apparent Real Estate Shell Game that Plaintiff
7 believes would be considered racketeering if this case goes to Appeal.”
8 Plaintiff’s Reply, p. 3, lines 19.5 - 23.3.

9 * * *

10 “Judgment is a void judgment if the court that rendered judgment lacked
11 jurisdiction of the subject matter, or of the parties, or acted in a manner
12 inconsistent with due process.” Plaintiff’s Reply, p. 4, lines 5 - 7.5.

13 * * *

14 “Judgment is void even before reversal, ...” Plaintiff’s Reply, p. 4, line 10.

15 * * *

16 “Courts are constituted by authority and they cannot go beyond that power
17 delegated to them.” Plaintiff’s Reply, p. 4, lines 13 - 14.

18 * * *

19 “This court cannot make a void proceeding valid ...” Plaintiff’s Reply, p. 4,
20 line 25.

21 * * *

22 “Plaintiff is not suing the Rule 19 parties ...” Plaintiff’s Reply, p. 5, line 10.5.

23 * * *

24 “The Gag Order is ... an abuse of discretion by both Courts, as presided over
25 by Judges Jantzen and Nielson, ...” Plaintiff’s Reply, p. 5, lines 11.5 - 13.

26 * * *

27 “The Gag Order ... is a violation of Mrs. Knight’s first amendment right to free
28 speech.” Plaintiff’s Reply, p. 5, lines 13 - 14.

* * *

“The Gag Order is also a violation of due process...” Plaintiff’s Reply, p. 5,
line 14.

* * *

“Plaintiff ... following the law of cases.” Plaintiff’s Reply, p. 5, lines
23.5 - 24.5.

* * *

1 “... signed by Judge Jantzen should not have been an unappealable Order
2 entered and signed as a Rule 54(b) Final Judgment. It appears to have been
3 written with the deliberate intent to be unappealable.” Plaintiff’s Reply, p. 5,
4 lines 26 - 28.

5 * * *

6 “It was an error and an abuse of discretion to not follow the law of cases for
7 Judge Jantzen’s Rule 19 Order. That Order should be considered Void...”
8 Plaintiff’s Reply, p. 6, lines 5 - 7.5.

9 * * *

10 “An order that cannot be fulfilled due to inadvertence by the Court is Void.”
11 Plaintiff’s Reply, p. 6, lines 9 - 10.

12 * * *

13 “It is also a Void Order for inadvertence to following the Constitution by
14 including a Gag Order that was imposed on the Plaintiff for no cause.”
15 Plaintiff’s Reply, p. 6, lines 11.5 - 13.

16 * * *

17 “Mr. Oehler likewise used deception ...” Plaintiff’s Reply, p. 7, line 8.

18 * * *

19 “These are the great lengths attorney Oehler goes to for relief of his client’s
20 misdeeds and in violation of an attorney’s Oath.” Plaintiff’s Reply, p. 7, lines
21 11.5 - 13.

22 * * *

23 “Attorney Oehler fooled the Plaintiff... That was fraud.” Plaintiff’s Reply,
24 p. 8, lines 1 and 4.

25 * * *

26 “A trial judge’s legal conclusions that are based on fraud, inadvertence, abuse
27 of discretion, defy the law of the case doctrine and violate a party’s
28 constitutional rights...” Plaintiff’s Reply, p. 8, lines 5 - 8.

* * *

“Void Judgment. One which has no legal force or effect...” Plaintiff’s Reply,
p. 8, line 11.

* * *

“... an order procured by fraud...” Plaintiff’s Reply, p. 8, line 18.

* * *

“A Void judgment is one which, from its inception, was a complete nullity and
without legal effect.” Plaintiff’s Reply, p. 8, lines 21 - 22.

* * *

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1 “Loss of Jurisdiction of the Court ... When unlawful activity of a judge
2 exists; ...” Plaintiff’s Reply, p. 8, lines 23 - 24.

3 * * *

4 “How is the Court not following statutory law in sanctioning Mr. Oehler for
5 Fraud...” Plaintiff’s Reply, p. 9, lines 6.5 - 7.5.

6 * * *

7 “This Court accepted this case from Judge Moss, a close friend of Defendant
8 Azarmi, when the now recused Court’s jurisdiction was in question and he was
9 accused of bias and therefore recused himself.” Plaintiff’s Reply, p. 9, lines
10 12 - 14.

11 * * *

12 “This Court has continued to accept this case by not granting a Change of
13 Venue. This Court has failed its duty to rule on Plaintiff’s Motions in over 60
14 days.” Plaintiff’s Reply, p. 9, lines 15.5 - 18.

15 * * *

16 “This Court’s Order ... would be reversed immediately...” Plaintiff’s Reply,
17 p. 9, lines 23.5 - 24.5.

18 * * *

19 “... that were supported by Affidavit Fraud...” Plaintiff’s Reply, p. 10, line 8.

20 * * *

21 “It is time to stop the nonsense and trickery that has been imposed upon the
22 Plaintiff for years in this matter.” Plaintiff’s Reply, p. 10, line 18.5 - 19.5.

23 * * *

24 “Void Judgments constitute no justification and all persons concerned in
25 executing such judgments or sentences, are considered, in law, as trespassers.”
26 Plaintiff’s Reply, p. 11, lines 5 - 6.

27 * * *

28 “This Court cannot make a void proceeding valid and he does not have to
abide in any order by the biased and now recused Judge Jantzen.”

* * *

“... it is crucial that you be appraised of errors you may have caused, directly
or indirectly.” Plaintiff’s Reply, Exhibit 1 Extrinsic Evidence, lines 1 - 2.

* * *

“...a serious civil rights issue has been imposed by the Court in his signings.”
Plaintiff’s Reply, Exhibit 1 Extrinsic Evidence, bottom of page 1.

