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Christina Sourlock SupCR#1234

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 and

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

20 Defendants.

Case No.: CV 2018 04003

**ACTION FOR
DECLARATORY JUDGMENT ON
NON-AVOIDANCE OF ORDERS**

**Hon. Judge Nielson
Visiting Judge**

21
22 COMES NOW Plaintiff Pro Per, NANCY KNIGHT, respectfully requests a
23 Declaratory Judgment, pursuant to Rule 57, to end the controversy over whether Plaintiff
24 disobeyed, avoided or failed to follow Hon. Judge Jantzen's Order for her to Serve
25 Indispensable Parties dated February 2022.
26

27 **MEMORANDUM OF POINTS AND AUTHORITIES**
28

1 1. When Hon. Judge Jantzen signed the February 2022 Order for Plaintiff to
2 serve Rule 19 Parties, Plaintiff's attorney Coughlin filed an Appeal that was denied due
3 to the Court including Rule 54 (b) in the Order when no parties or claims were dismissed
4 with the Order.
5

6 2. Plaintiff's attorney began working with Defense Counsel Oehler for an
7 agreement on the language for the Proposed Order on the instructions for the Plaintiff to
8 follow in mailing the Service Packet of documents.
9

10 3. Plaintiff's attorney Coughlin withdrew during a Status Conference on
11 October 26, 2022 and the Court advised that any objections to Proposed Orders shall be
12 filed within 20 days.
13

14 4. On November 14, 2022 Plaintiff timely filed her Notice of Proposed Final
15 Orders and the Proposed Final Orders that was comprised of Plaintiff's October 28, 2022
16 Proposed Order and Defense Counsel Oehler's Proposed Final Form Order. Plaintiff
17 included a Proposed Summons and Proposed Waiver of Service Form designed for
18 service on Indispensable Parties that was intended to be clear that the necessary and
19 indispensable parties were being joined in the matter because the outcome of the case
20 could affect their rights but they were not being sued.
21
22

23 5. The Court reviewed the Proposed Orders and was to send out a response on
24 February 17, 2023 pursuant to a Status Conference on that day.
25

26 6. Judge Jantzen recused himself and this case was reassigned to the Hon
27 Judge Nielson of Navajo County as a visiting judge to Mohave County on May 4, 2023.
28

7. Judge Nielson held a Status Conference on or about June 8, 2023.

