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FILED 2023NOV21 AM 9:25 TW



Christina Spurlock SuoCrtClerk

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 GROUNDS FOR PLAINTIFF SUING
INDISPENSABLE PARTIES**

**Hon. Judge Nielson
Visiting Judge**

21 COMES NOW Plaintiff Pro Per, NANCY KNIGHT, respectfully requests a
22 Declaratory Judgment, pursuant to Rule 57, to end the controversy over the Court's
23 imposition on the Plaintiff to sue the owners of over 200 Assessor Parcel Numbers
24 whereby the Plaintiff claims she has no grounds to do so. Plaintiff seeks a Declaratory
25 Judgment on the Grounds for suing Rule 19 Parties as imposed in the Court's Order and
26 Notice to Property Owners that was signed on September 13, 2023.
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MEMORANDUM OF POINTS AND AUTHORITIES



B8015CV201804003

1 1. On September 9, 2023, in anticipation of the Court providing the Plaintiff
2 with a Notice to Property Owners for mailing a Service Packet to Rule 19 Parties as
3 owners of Assessor Parcel Numbers in Desert Lakes Subdivision Tracts 4163, 4076-B
4 and 4076-D, Plaintiff emailed a copy of the required Excel Spreadsheet to the Clerk of
5 Mohave County Superior Court and to the Defense Counsel.
6

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8 2. On September 13, 2023 Plaintiff received the Court's Order and the Court's
9 Notice to Property Owners. The Court's Order contained the procedures and time
10 constraint for mailing the Service Packet of documents. The Notice to Property Owners
11 provided the Rule 19 parties with their instructions to follow as this case proceeded to
12 Trial.
13

14 3. On September 21, 2023, a letter was mailed from the Commission on
15 Judicial Conduct regarding Plaintiff's Complaint that was filed as Case No. 23-373.
16 Plaintiff had not yet received the letter and subsequently sent a second Complaint that
17 was mailed to the Commission on October 2, 2023.
18

19 4. Contrary to this Court's September 13, 2023 Notice to Property Owners,
20 Plaintiff believes the Notice to Property Owners should be limited to making the Rule 19
21 parties informed that they are not being sued by the Plaintiff and that they are being
22 brought into this case as indispensable and necessary parties based upon their interest in
23 real property subject to the Declarations of Covenants, Conditions and Restrictions for
24 Desert Lakes Golf Course & Estates Tracts 4163, 4076-B and/or 4076-D so that they can
25 decide what action to take regarding the pending trial by jury on an abandonment claim
26 made by the Defendants in this case.
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