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8 Daniel J. Oehler, Arizona State Bar No.: 002739
9 Attorney for Defendants

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

**OBJECTION TO PLAINTIFF'S
MOTION/S TO AMEND
COMPLAINT**


23 COME NOW, the Defendants, by and through their attorney, the undersigned, and
24 respectfully request that this Court deny Plaintiff's motion/s to amend Plaintiff's Complaint. This
25 Objection is based upon the provisions and requirements of Arizona Rules of Civil Procedure
26 (A.R.C.P.), Rule 15, and more specifically, Rule 15(a)(4). No pleading has been filed (or if filed
27 none has been provided to the undersigned) that even marginally complies with the provisions of
28 Rule 15 in general, and specifically the provisions of Rule 15(a)(4).

Pursuant to this Court's determination on or about June 29, 2018, that the Plaintiff's
previously filed pleadings were to be considered a motion to amend, it should be noted that the
Plaintiff continues in random pleadings, including the pleading filed today, July 9, 2018, to attempt
to alter or amend this Court's prior orders such as Plaintiff's efforts to sue on behalf of Mohave
County taxpayers for certain but apparently not all of the subject Defendants for some \$12,500

1 allegedly expended by Mohave County to comply with its ordinance notice requirements; attempting
2 to impose restrictions and alleging violations against some but not all alleged CC&R wrongdoers;
3 continuing to complain about a potential award of attorney's fees; continuing to seek re-litigation
4 of a completely separate and independent cause of action (Mohave County Superior Court Case No.
5 CV-2016-04026); alleging apparent CC&R violations concerning parking a boat in Tract 4163, etc.
6 Effectively, it would be impossible to prepare in accordance with the Arizona Rules of Civil
7 Procedure and pleading practice applicable in the State of Arizona any responsive pleading regarding
8 what the amended complaint did or did not consist of. For these reasons, Plaintiff's request to
9 amend must be denied.

10 RESPECTFULLY SUBMITTED this 9th day of July, 2018.

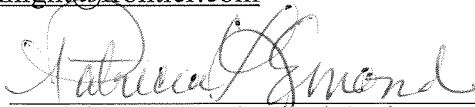
11 LAW OFFICES OF DANIEL J. OEHLER

12 
13 Daniel J. Oehler,
14 Attorney for Defendants

14 **COPY** of the foregoing emailed
15 this 9th day of July, 2018, to:

16 Honorable Derek Carlisle
17 Mohave County Superior Court
18 Division 2
19 2001 College Drive
20 Lake Havasu City, Arizona 86403
21 (928) 453-0739 Mary
22 making@courts.az.gov

23 Plaintiff Pro Per
24 Nancy Knight
25 1803 E. Lipan Circle
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23 By: 
24 Patricia L. Emond, Legal Assistant