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FILED
BY: DM
2019 APR 25 PM 3:53
D. J. TUNNELL
SUPERIOR COURT CLERK

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 vs.

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

**PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT'S
MOTION FOR EXTENSION OF TIME**

Honorable Judge Eric Gordon

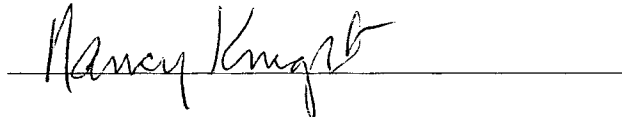
21 Plaintiff Pro Per, NANCY KNIGHT, hereby objects to Defendant's request for an
22 extension of time to respond to Plaintiff's two April 12, 2019 Motions for Declaratory
23 Judgment that (1) the CC&Rs have not been abandoned and have been enforced and (2)
24 for Declaratory Judgment on "advertising" signage that is a violation of the CC&Rs.

25 Good cause for the denial is Defendant's attorney claiming a need for the
26 extension of time due to his alleged travel beginning on April 23. Defendant's attorney
27 had sufficient time to respond from April 12 through April 23. Defendant's attorney was
28



1 notified on April 24 of Plaintiff's objection to an extension of time. Dilatory practices
2 brings the administration of justice into disrepute and Defendants have used dilatory
3 practices to continue to violate the CC&Rs. Mr. Oehler's failure to expedite litigation is a
4 violation of professional conduct and is evidenced most recently by the Honorable Judge
5 Carlisle's December 17, 2018 Status Conference summary in paragraph 5 that "Mr.
6 Oehler anticipates filing the motion for summary judgment by the middle of January."
7
8 The Defendant's realizing financial or other benefit from the delays in this matter is not
9 in the best interest of all concerned.
10

11 RESPECTFULLY submitted this 25th day of April, 2019.

12
13 A handwritten signature in cursive script, reading "Nancy Knight", is written over a horizontal line.

14 NANCY KNIGHT
15 Plaintiff Pro Per

16
17 **COPY** of the foregoing was emailed
18 on April 25, 2019 to:
19 djolaw@frontiernet.net

20 The law office of Daniel Oehler
21 2001 Highway 95, Suite 15
22 Bullhead City, Arizona 86442
23 Attorney for the Defendants
24
25
26
27
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