

FILED

BY: *K R*

2019 MAY 29 AM 10: 28

VICKY TINNELL  
SUPERIOR COURT CLERK

1 Nancy Knight  
2 1803 E. Lipan Circle  
3 Fort Mohave, AZ 86426  
4 (928) 768-1537  
5 nancy@thebugle.com

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.

Case No.: **CV 2018-04003**

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

20 Defendants.

**PLAINTIFF'S WITNESS  
DISCLOSURE STATEMENT**

(Assigned to the Hon. Eric Gordon)

21 Plaintiff, Nancy Knight (hereinafter "Plaintiff"), through self-representation,  
22 pursuant to the November 19, 2018 Scheduling Order and pursuant to the Hon. Judge  
23 Gordon's extension of time from page 2 from April 30, 2019 to May 31, 2019 for "Areas  
24 of Expert Testimony" plus disclosure of "lay witnesses", date not extended, and also due  
25 on May 31, 2019.

PLAINTIFF'S WITNESS DISCLOSURE - 1



B8015CV201804003

1 Areas of expert testimony include real estate professionals, authors of Declarations  
2 of Covenants, Conditions, and Restrictions, Title Insurance personnel, Architectural  
3 Committee Members, Homeowner Association Board members, single family home  
4 contractors and subcontractors, Mohave County Supervisors, Mohave County  
5 Development Services/Planning and Zoning personnel including but not limited to  
6 Mohave County Development Services Director Walsh, Development Services Manager  
7 Ballard, former Development Services Director Hont, former County Supervisor Moss,  
8 and legal professionals including the Mohave County attorney and legal assistants  
9 familiar with the matter.  
10

11  
12 Per paragraph 3 of the Scheduling Order, the following are expected to testify as  
13 lay witnesses: 1) any adjacent lot property owner(s) affected by CC&R violations. 2) any  
14 property owner(s) that submitted the County Waiver of liability for the attempted and  
15 threatened violations of reduced setbacks throughout Desert Lakes as proposed by  
16 Defendant Azarmi. Names already provided to Defendants 3) Objecting property owners  
17 to the BOS resolution for reduced setbacks – names have already been disclosed to  
18 Defendants. 4) Any property owner(s) who had no problem with reduced setbacks for a  
19 home built by Fairway Constructors on land owned by the Ludwigs whose exact names  
20 and current addresses are unknown to the Plaintiff at this time. Defendant Azarmi cited  
21 these neighbors in his Board of Adjustment testimony but did not disclose their names.  
22 (refer to BOA minutes Supra Exhibit 8)Plaintiff expects these names in the Defendant's  
23 lay witness list. 5) Mr. and/or Mrs. Grice. 6) Mr. and/or Mrs. Roberts. 7) Mr. and/or Mrs.  
24  
25

1 Sanaye. 8) Judith Rovno. 9) Mr. and/or Mrs. Edwards. 10) Gina Harris. 11) Angelo  
2 Rinaldi. 12) Current occupants of the home at 1839 Lipan Blvd. 13) All Planning  
3 Commissioners at the September 2016 meeting. 14) All Board of Adjustment members  
4 voting on the setback variance proposed by Defendant Azarmi for the home sold to Mr.  
5 and Mrs. Roberts. 15) Donna Neiman former or current employee or associate of Angelo  
6 Rinaldi or employee at his former place of business.  
7

8 The contents of this Disclosure of expert areas and lay witnesses is provisional and  
9 subject to supplementation, amendment, explanation, change and amplification in light of  
10 contemporary events and the November 2018 "Public Request For Information" form  
11 that Plaintiff already disclosed to Defendants. Mohave County Development Services'  
12 response is incomplete to date and is pending disclosure.  
13

14 Plaintiff reserves the right to supplement this Disclosure as additional information  
15 becomes known and available to Plaintiff.  
16

17 RESPECTFULLY SUBMITTED this 29th day of May 2019.

18   
19 \_\_\_\_\_  
20 NANCY KNIGHT  
21 Plaintiff Pro Per

22 COPY of the foregoing emailed on this 29th day of May, 2019 to:  
23 djolaw@frontiernet.net

24 Attorney for Defendants

25 Daniel J. Oehler, Esq.

Law Offices of Daniel J. Oehler

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