

Exhibit 1

[13] Re: CV-2022-01480 Summons & Friday's Hearing

From  rheathesq@proton.me

★ 📧 📅 Dec 13, 2022

To Lecher, Danielle <DLecher@courts.az.gov>

CC Cameron Powell <cpowell@gwafirm.com>

Michael Wynne <mwynne@gcfirm.com>

Heather Martinez <hmartinez@gcfirm.com>

Tuesday, December 13th, 2022 at 1:31 PM



Hello Danielle,

I hope you're doing well. I notice that summons (which I believe were produced automatically by turbo-court) all indicate that an answer is due within 20 days of service. Per statute, the summons must require the contest to file an answer within five days after service of the summons (A.R.S. 16-675A). We've been looking online to see if we need to file a form to change this and cannot find anything. Can you please advise on how to proceed with changing the summons to reflect A.R.S. 16-675A? For your convenience, I've attached a pdf of A.R.S. 16-675, which includes a proposed form for structuring the summons.

Can you also please confirm that Friday's hearing in this matter is strictly procedural (for scheduling purposes only)? We want to make sure that our travel plans are set in case we need to argue anything substantive.

Thank you for your assistance!

Best regards,
Ryan

Ryan Heath

Founding Partner, Heath Law, PLLC
Office: (480) 432-0208
4022 East Greenway Road, Suite 11 - 106
Phoenix, Arizona 85032

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23.25 KB 1 file attached



 A.R.S. _ 16-675.PDF 23.25 KB

★ Dec 13, 2022

From Lecher, Danielle <DLecher@courts.az.gov>
To rheathesq@proton.me
CC Cameron Powell <cpowell@gwafirm.com>
Michael Wynne <mwynne@gcfirm.com>
Heather Martinez <hmartinez@gcfirm.com>
Spurlock, Christina <CSpurlock@courts.az.gov>
Vigil, Megan <mvigil@courts.az.gov>

Tuesday, December 13th, 2022 at 1:49 PM



The Return Hearing will discuss the scheduling of briefing, discovery, and oral arguments.

As far as amending the summons, I will let the Clerk's Office discuss that with you. There definitely needs to be an amendment, but I'm not sure how that is done in Turbocourt. I have copied them on this email.

Thank you.

Danielle Lecher
Judicial Assistant for
The Honorable Lee F. Jantzen
Division 4
Mohave County Superior Court

From: Heathlaw <rheathesq@proton.me>
Sent: Tuesday, December 13, 2022 1:31 PM
To: Lecher, Danielle <DLecher@courts.az.gov>
Cc: Cameron Powell <cpowell@gwafirm.com>; Michael Wynne <mwynne@gcfirm.com>; Heather Martinez <hmartinez@gcfirm.com>
Subject: Re: CV-2022-01480 Summons & Friday's Hearing

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Hello Danielle,

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Best regards,
Ryan

★ Dec 15, 2022

From  Vigil, Megan <mvigil@courts.az.gov>
To rheathesq@proton.me
Cameron Powell <cpowell@gwafirm.com>
Michael Wynne <mwynne@gcfirm.com>
Heather Martinez <hmartinez@gcfirm.com>
CC Lecher, Danielle <DLecher@courts.az.gov>

Thursday, December 15th, 2022 at 8:56 AM



Good morning,

If you have any summons that need to be re-issued with different language, please send them to efilemohave@courts.az.gov and they will be issued and returned to you electronically.

Thanks,

Megan Vigil

Court Services Supervisor
Mohave County Superior Court
415 E. Spring St.
Kingman, AZ 86401
928-753-0790 ext 4377
mvigil@courts.az.gov

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. If you are not the named addressee you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Please be aware that any information, including the sender's email address or any personally identifying information contained in the sender's email communication to this office, becomes part of Mohave County's public record and may be subject to disclosure under Arizona Law.

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From rheathesq@proton.me
To Vigil, Megan <mvigil@courts.az.gov>
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Heather Martinez <hmartinez@gcfirm.com>
Lecher, Danielle <DLecher@courts.az.gov>

★ Dec 15, 2022

Thursday, December 15th, 2022 at 9:26 AM



Will do.

Thank you!
Ryan

Ryan Heath

Founding Partner, Heath Law, PLLC
Office: (480) 432-0208
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Phoenix, Arizona 85032

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...

----- Original Message -----

On Thursday, December 15th, 2022 at 8:56 AM, Vigil, Megan <mvigil@courts.az.gov> wrote:

Good morning,

If you have any summons that need to be re-issued with different language, please send them to efilemohave@courts.az.gov and they will be issued and returned to you electronically.

Thanks,

Megan Vigil

Court Services Supervisor

Mohave County Superior Court

From: Vigil, Megan <mvigil@courts.az.gov>
To: rheathesq@proton.me
CC: Cameron Powell <cpowell@gwafirm.com>
 Michael Wynne <mwynne@gcfirm.com>
 Heather Martinez <hmartinez@gcfirm.com>
 Lecher, Danielle <DLecher@courts.az.gov>

Thursday, December 15th, 2022 at 9:50 AM



I see you submitted the subpoenas that have already been issued, I apologize if my instructions were not clear. You will need to submit new summons with the language you want on them already there, and then we will issue them.

From: Heathlaw <rheathesq@proton.me>
Sent: Thursday, December 15, 2022 9:27 AM
To: Vigil, Megan <mvigil@courts.az.gov>
Cc: cpowell@gwafirm.com; mwynne@gcfirm.com; hmartinez@gcfirm.com; Lecher, Danielle <DLecher@courts.az.gov>
Subject: RE: CV-2022-01480 Summons & Friday's Hearing

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Will do.

Thank you!

Ryan

Ryan Heath
 Founding Partner, Heath Law, PLLC
 Office: (480) 432-0208
 4022 East Greenway Road, Suite 11 - 106
 Phoenix, Arizona 85032

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Thanks,

Megan Vigil
 Court Services Supervisor
 Maricopa County Superior Court

★ Dec 15, 2022

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To Vigil, Megan <mvigil@courts.az.gov>
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Michael Wynne <mwynne@gcfirm.com>
Heather Martinez <hmartinez@gcfirm.com>
Lecher, Danielle <DLecher@courts.az.gov>

Thursday, December 15th, 2022 at 9:52 AM



Thank you for the clarification. We will get these to you as soon as possible.

Ryan Heath

Founding Partner, Heath Law, PLLC
Office: (480) 432-0208
4022 East Greenway Road, Suite 11 - 106
Phoenix, Arizona 85032

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Will do.

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Lecher, Danielle <DLecher@courts.az.gov>

★  Dec 15, 2022

Thursday, December 15th, 2022 at 12:46 PM



Hi Megan,

Do you prefer word or pdf format?

Thank you,
Ryan

Ryan Heath

Founding Partner, Heath Law, PLLC
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Thursday, December 15th, 2022 at 12:53 PM



PDF please!

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Lecher, Danielle <DLecher@courts.az.gov>

Thursday, December 15th, 2022 at 1:07 PM



Hi Megan,

Attached please find updated pdf's for each summons. I left the names open on the second page for you to fill in (for the court personnel's names). Also, I did not affix Court's seal.

Please let me know if you have any questions or concerns about these.

Kind regards,
Ryan

Ryan Heath
Founding Partner, Heath Law, PLLC
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Phoenix, Arizona 85032

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