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NANCY KNIGHT 1803 E. Lipan Cir.

Fort Mohave, AZ 86426 Telephone: (928) 768-1537

nancyknight@frontier.com

Plaintiff Pro Per

FILED

2020 JAN - 7 PM 1: 34

VIRLYHN TINNELL SUPERIOR COURT CLERK

## IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF MOHAVE

NANCY KNIGHT.

Plaintiff,

and

GLEN LUDWIG and PEARL LUDWIG, Trustees of THE LUDWIG FAMILY TRUST; FAIRWAY CONSTRUCTORS, INC.: MEHDI AZARMI; JAMES B. ROBERTS and )

DONNA M. ROBERTS, husband and wife; JOHN DOES 1-10; JANE DOES 1-10; ABC CORPORATIONS 1-10; and XYZ

PARTNERSHIPS 1-10.

Defendants.

Case No.: CV 2018-04003

RESPONSE TO DEFENDANT'S REQUEST FOR PRODUCTION OF **DOCUMENTS AND THINGS** 

COMES NOW Plaintiff Pro Per Nancy Knight, Pursuant to Arizona Rules of Civil Procedure 34, objecting to the copying of any and all documents and things described in Defendant's "DOCUMENTS TO BE PRODUCED" in Paragraphs 1, 3, and 5 due to the unduly burdensome copying of voluminous emails, Complaint Forms, Requests for Public Information Forms, documents, letters, etc. Plaintiff requests the Court to allow Plaintiff to produce the documents that she has copied to date for inspection at the office of Defense Counsel Oehler, and at his choosing, make copies for his file.



Plaintiff is willing to open her Frontier.com email account from her personal laptop or tablet using the Defense Counsel's WIFI and will allow the Defense Counsel to make copies of any and all email correspondences related to this case that was transmitted from this account.

Plaintiff has spent a minimum of eight hours searching her alternate personal email account and has copies of all of those relevant emails for the Defense Counsel to copy.

Plaintiff is unsure why the date of January 2014 to the present is relevant as Mohave County issues began on or about September 3, 2015 that resulted in the case of Knight v Chase (CV 2016 04026).

Defendant's paragraphs 2 and 4a-4d is completed for Defense Counsel to make copies.

RESPECTFULLY SUBMITTED this <u>day</u> of January, 2020.

Nancy Knight, Plaintiff Pro Per

Copies were emailed to djolaw @ frontier net net Afformer for Defendants Daniel J. Ochler Hywy 95, Bullherl City, AZ