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11 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

12 **IN AND FOR THE COUNTY OF MARICOPA**

13 **KATHRYN SHEARER, an individual d/b/a**
14 **KG KENNELS AND SPORTHORSES,**

No. CV2021-009843

ANSWER and COUNTERCLAIM

Plaintiffs,

**(Assigned to the Honorable Joan
Sinclair)**

v.

15 **JILL LUNSFORD and JUSTIN**
16 **LUNSFORD, married individuals. JOHN**
17 **DOES I -X; ABC PARTNERSHIPS I –**
18 **LIMITED LIABILITY COMPANIES;**
19 **AND XYZ CORPORATIONS I - X**

Defendants.

20 COMES NOW, the Defendant Jill Lunsford, by and through counsel undersigned, and
21 for her Answer to Plaintiff's Complaint does hereby admit, deny and affirmatively allege as
22 follows:

23 **PARTIES, JURISDICTION, VENUE AND TIER**

- 24 1. Defendant admits the allegations in paragraph 1 of the Complaint.
- 25 2. Defendant admits the allegations in paragraph 2 of the Complaint.
- 26 3. Defendant denies any tortious conduct; Defendant denies Plaintiff suffered any
27 damages.
- 28 4. Defendant denies the allegations in paragraph 4 of the Complaint.

1 5. Defendant admits the allegations in paragraph 5 of the Complaint.

2 6. Defendant admits the allegations in paragraph 6 of the Complaint.

3 **FACTS**

4 7. Defendant re-alleges all prior paragraphs as though fully set forth herein.

5
6 8. Upon information and belief, Defendant believes that Plaintiff does business as and is
7 the owner of KG Kennels and Sporthouse. Defendant is without sufficient information to
8 form a belief as to the truth and accuracy of the remaining allegations in paragraph 8 of the
9 complaint, and they are therefore denied.

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11 9. Defendant is without sufficient information to form a belief as to the truth and
12 accuracy of the allegations in paragraph 9 of the complaint, and they are therefore denied.

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14 10. Defendant is without sufficient information to form a belief as to the truth and
15 accuracy of the allegations in paragraph 10 of the complaint, and they are therefore denied.

16 11. Defendant admits the allegations in paragraph 11 of the Complaint.

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18 12. Upon information and belief, Defendant admits the allegations of Paragraph 12 of
19 the Complaint.

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21 13. Upon information and belief, Defendant admits the allegations of Paragraph 13 of
22 the Complaint.

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24 14. Defendant is without sufficient information to form a belief as to the truth and
25 accuracy of the allegations in paragraph 14 of the complaint, and they are therefore denied.

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27 15. Defendant is without sufficient information to form a belief as to the truth and
28 accuracy of the allegations in paragraph 15 of the complaint, and they are therefore denied.

16. Defendant is without sufficient information to form a belief as to the truth and
accuracy of the allegations in paragraph 16 of the complaint, and they are therefore denied.

1 17. Defendant is without sufficient information to form a belief as to the truth and
2 accuracy of the allegations in paragraph 17 of the complaint, and they are therefore denied.

3 18. Defendant denies the allegations in paragraph 18 of the Complaint.

4 19. Defendant denies the allegations in paragraph 19 of the Complaint.

5 20. Defendant admits that Plaintiff was able to capture a screenshot; however,
6 Defendant denies admitting publishing false statements, and publishing additional false
7 statements. Defendant affirmatively alleges that Exhibit A speaks for itself.
8

9 21. Defendant denies the allegations in paragraph 21 of the Complaint.

10 22. Defendant is without sufficient information to form a belief as to the truth and
11 accuracy of the allegations in paragraph 22 of the complaint, and they are therefore denied.
12

13 23. Defendant denies the allegations in paragraph 23 of the Complaint.

14 24. Defendant denies the allegations in paragraph 24 of the Complaint.

15 25. Defendant admits that Plaintiff sent a cease and desist letter; Defendant denies the
16 remaining allegations in paragraph 25 of the Complaint.
17

18 26. Defendant denies the allegations in paragraph 26 of the Complaint.

19 **COUNT I-DEFAMATION AND DEFAMATION PER SE**

20 27. Defendant re-alleges all prior paragraphs as though fully set forth herein.

21 28. Defendant denies the allegations in paragraph 28 of the Complaint.

22 29. Defendant denies the allegations in paragraph 29 of the Complaint.

23 30. Defendant denies the allegations in paragraph 30 of the Complaint.

24 31. Defendant denies the allegations in paragraph 31 of the Complaint.

25 32. Defendant denies the allegations in paragraph 32 of the Complaint.

26 33. Defendant denies the allegations in paragraph 33 of the Complaint.
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1 34. Defendant denies the allegations in paragraph 34 of the Complaint.

2 35. Defendant denies the allegations in paragraph 35 of the Complaint.

3 36. Defendant denies the allegations in paragraph 36 of the Complaint.

4 37. Defendant denies the allegations in paragraph 37 of the Complaint.

5 38. Defendant denies the allegations in paragraph 38 of the Complaint.

6 39. Defendant denies the allegations in paragraph 39 of the Complaint.

7 40. Defendant denies the allegations in paragraph 40 of the Complaint.

8 41. Defendant denies the allegations in paragraph 41 of the Complaint.

9 42. Defendant denies the allegations in paragraph 42 of the Complaint.

10 43. Defendant denies the allegations in paragraph 43 of the Complaint.

11 44. Defendant denies the allegations in paragraph 44 of the Complaint.

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14 **COUNT II-FALSE LIGHT INVASION OF PRIVACY**

15 45. Defendant re-alleges all prior paragraphs as though fully set forth herein.

16 46. Defendant denies the allegations in paragraph 46 of the Complaint.

17 47. Defendant denies the allegations in paragraph 47 of the Complaint.

18 48. Defendant denies the allegations in paragraph 48 of the Complaint.

19 49. Defendant denies the allegations in paragraph 49 of the Complaint.

20 50. Defendant denies the allegations in paragraph 50 of the Complaint.

21 51. Defendant denies the allegations in paragraph 51 of the Complaint.

22 52. Defendant denies the allegations in paragraph 52 of the Complaint.

23 53. Defendant denies any willful or malicious acts; Defendant admits Plaintiff is
24 seeking punitive damages. Defendant affirmatively alleges that Plaintiff is not entitled to
25 punitive or any other type of damages.
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1 54. Defendant denies the allegations in paragraph 54 of the Complaint.

2 55. Defendant denies the allegations in paragraph 55 of the Complaint.

3 **COUNT III-TORTIOUS INTERFERENCE WITH CURRENT AND**
4 **PROSPECTIVE BUSINESS RELATIONSHIPS**

5 56. Defendant re-alleges all prior paragraphs as though fully set forth herein.

6
7 57. Upon information and belief, Defendant admits the allegations in paragraph 57 of
8 the Complaint.

9 58. Defendant is without sufficient information or knowledge to form a belief as to the
10 reasonableness of Plaintiff's expectations; Defendant has no knowledge of the time, energy
11 and resources of Plaintiff; therefore Defendant denies the allegations in paragraph 58 of the
12 Complaint.
13

14 59. Defendant is without information or knowledge as to whether Plaintiff had existing
15 and/or prospective business relationships and therefore denies the allegations in paragraph 59
16 of the Complaint.
17

18 60. Defendant denies the allegations in paragraph 60 of the Complaint.

19 61. Defendant denies the allegations in paragraph 61 of the Complaint.

20 62. Defendant denies the allegations in paragraph 62 of the Complaint.

21 63. Defendant denies the allegations in paragraph 63 of the Complaint.

22 64. Defendant denies the allegations in paragraph 64 of the Complaint.

23 65. Defendant denies the allegations in paragraph 65 of the Complaint.

24 66. Defendant denies any willful or malicious acts; Defendant admits Plaintiff is
25 seeking punitive damages. Defendant affirmatively alleges that Plaintiff is not entitled to
26 punitive or any other type of damages.
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1 67. Defendant denies the allegations in paragraph 67 of the Complaint.

2 68. Defendant denies the allegations in paragraph 68 of the Complaint.

3 **COUNT IV-AIDING AND ABETTING**

4 69. Defendant re-alleges all prior paragraphs as though fully set forth herein.

5 70. Defendant denies the allegations in paragraph 70 of the Complaint.

6 71. Defendant denies the allegations in paragraph 71 of the Complaint.

7 72. Defendant denies the allegations in paragraph 72 of the Complaint.

8 73. Defendant denies the allegations in paragraph 73 of the Complaint.

9 74. Defendant denies any willful or malicious acts; Defendant admits Plaintiff is
10 seeking punitive damages. Defendant affirmatively alleges that Plaintiff is not entitled to
11 punitive or any other type of damages.
12

13 75. Defendant denies the allegations in paragraph 75 of the Complaint.

14 76. Defendant denies the allegations in paragraph 76 of the Complaint.

15 **COUNT V-INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

16 77. Defendant re-alleges all prior paragraphs as though fully set forth herein.

17 78. Defendant denies the allegations in paragraph 78 of the Complaint.

18 79. Defendant denies the allegations in paragraph 79 of the Complaint.

19 80. Defendant denies the allegations in paragraph 80 of the Complaint.

20 81. Defendant denies the allegations in paragraph 81 of the Complaint.

21 82. Defendant denies the allegations in paragraph 82 of the Complaint.

22 83. Defendant denies the allegations in paragraph 83 of the Complaint.

23 84. Defendant denies the allegations in paragraph 84 of the Complaint.

1 85. Defendant denies any willful or malicious acts; Defendant admits Plaintiff is
2 seeking punitive damages. Defendant affirmatively alleges that Plaintiff is not entitled to
3 punitive or any other type of damages.

4 86. Defendant denies the allegations in paragraph 86 of the Complaint.

5 87. Defendant denies the allegations in paragraph 87 of the Complaint.
6

7 **COUNT VI-APPLICATION FOR PERMANENT INJUNCTION**

8 88. Defendant re-alleges all prior paragraphs as though fully set forth herein.

9 89. Defendant denies the allegations in paragraph 89 of the Complaint.

10 90. Defendant denies the allegations in paragraph 90 of the Complaint.

11 91. Defendant denies the allegations in paragraph 91 of the Complaint.

12 92. Defendant denies the allegations in paragraph 92 of the Complaint.

13 93. Defendant denies the allegations in paragraph 93 of the Complaint.
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16 **GENERAL AND AFFIRMATIVE DEFENSES**

17 **94.** Plaintiff's Complaint fails to state a claim against Defendant upon which relief
18 can be granted.

19 95. Plaintiff's claimed injuries or other damages, if any, were the result in whole or in
20 part of the negligence or otherwise wrongful acts of Plaintiff, other parties and/or certain
21 non-parties, including but not limited to acts of contributory negligence and comparative
22 fault. *See* A.R.S. § 12-2501et seq.
23

24 96. Plaintiff has failed to allege any cognizable legal duty to support her claims.

25 97. Defendant's statements, if any were made, are not actionable because the
26 statements, if any, are true.
27
28

1 98. Defendant's statements, if any were made, are not actionable because the
2 statements, if any, are opinions.

3 99. Defendant's statements, if any were made, are not actionable because the
4 statements, if any, serve the public interest.

5 100. Defendant's statements, if any were made, are not actionable because the
6 Plaintiff already had a poor reputation.

7 101. Plaintiff cannot establish the elements of interference with business relations.

8 102. Plaintiff's claims, in whole or in part, may be barred by estoppel, laches and
9 waiver.
10

11 103. Plaintiff cannot establish the elements of aiding and abetting.

12 104. Plaintiffs' claimed injuries or other damages, if any, were caused in whole or
13 in part by Plaintiff's assumption of known risk.
14

15 105. Plaintiff cannot establish the elements of intentional infliction of emotional
16 distress.
17

18 106. Some or all of Plaintiffs' claims may be affected by spoliation of evidence by
19 parties other than this answering Defendant.
20

21 107. Plaintiff is barred from bringing any claims against Defendant because some or
22 all of the alleged consequences were avoidable and/or intentionally made by Plaintiff.

23 108. Plaintiff's claims may be barred in whole or in part by her failure to mitigate
24 damages.
25

26 109. Plaintiff's claims, in whole or in part, may be barred by the applicable statute of
27 limitations.

28 110. Plaintiff is not entitled to prejudgment interest.

1 111. As a general defense, Defendant notes that Plaintiffs damages are not proximately
2 caused by the alleged actions of Defendant.

3 112. Additional facts may come to light supporting additional affirmative defenses and
4 Defendant reserves the right to raise such other and further affirmative defenses, including
5 but not limited to any matter of avoidance or affirmative defense under Rule 8(d),
6 Ariz.R.Civ.Pro., or Rule 12, Ariz.R.Civ.Pro.
7

8 WHEREFORE, having fully answered Plaintiff's Complaint, Defendant respectfully
9 requests the court to enter judgment as follows:
10

- 11 A. Plaintiff's Complaint be dismissed with prejudice and that Plaintiff takes nothing
12 thereby;
- 13 B. Judgment be entered in Defendant's favor on Plaintiff's Complaint.
- 14 C. Defendant be awarded her attorneys' fees and costs.
- 15 D. For such other and further relief this court deems just under the circumstances.
16

17 **COUNTERCLAIM**

18 Defendant/Counterclaimant **JILL LUNSFORD**, for her counterclaim against the
19 Plaintiff/Counter Defendant **KATHRYN SHEARER, d/b/a KG KENNELS AND**
20 **SPORTHORSES**, alleges as follows:
21

22 **GENERAL ALLEGATIONS COMMON TO ALL COUNTS**

- 23 1. Counterclaimant incorporates by reference all paragraphs above in her Answer
24 as if fully set forth herein in this Counterclaim.
- 25 2. Counterclaimant has been in the equine business of training, lessons and sales
26 since 1997.
27
28

1 3. Counterclaimant is esteemed and has a credible reputation within the equine
2 industry in Arizona and a few other states.

3 4. Both Counterclaimant and Counter Defendant use social media to promote their
4 businesses and sell horses.

5 5. Both Counterclaimant and Counter Defendant are members of Face Book
6 Groups, such as The Plaid Horse Thermal Classifieds (“Group”) that connect people in the
7 equine industry.
8

9 6. In June 2021 Counter Defendant published or caused to be published statements
10 on Facebook regarding counterclaimant that were untrue, portrayed her in a negative light with
11 the intent for others to do the same.
12

13 7. In June 2021 Counter Defendant published derogatory statements in Facebook
14 groups that cater to Counterclaimant’s business activities.
15

16 8. The following are a few, but not all, of the statements made by Counter
17 Defendant about Counterclaimant:

18 a. “She lies. I have known her for a long time.”

19 i. This statement is false and given that the statement was in comments in a
20 Facebook Group created to connect people looking for services, horses,
21 riders, groomers etc. it is implied that statement “she lies” relates to
22 Counterclaimant’s business activities.
23

24 b. “...she was a drug addict that worked with animals.”

25 i. This is false. Counterclaimant is/was not a drug addict.
26

27 c. “She married him after he was convicted. She won’t let go.”
28

1 i. This is false. Counterclaimant married her husband, prior to his trial. In
2 fact, Counterclaimant did not think the case would go to trial. She thought
3 the authorities would arrest the responsible person.

4 d. "She married him after the conviction. I think that is a conscious decision to
5 marry a murderer."

6 i. See above.

7 e. "She continues to say he's innocent and she runs a kids riding program."

8 i. Counterclaimant believes that her husband is innocent. Combining this
9 statement with the fact that she runs a kids riding program is false and
10 disparaging given the context and implication that people should not trust
11 their kids in her care.
12

13 f. "The 'wife' runs a kids riding program in the valley and majority of students
14 did not know she was married to a murderer. She hides it. And her parents
15 have not disowned her at all. It's frustrating to see so many people lying."
16

17 i. Counterclaimant does not hide her personal circumstances and will
18 disclose any information that is asked.
19

20 g. "She is the one who said her parents disowned her which is far from the truth.
21 They help her every day."
22

23 Counterclaimant's parents did in fact disown her. They did not speak for over
24 one year. Her parents have not paid for any financial support in over 13
25 years.
26

27 h. "Jill was never disowned by her parents as they continue to support her both
28 personally and monetarily. The whole family is a mess."

1 See above.

- 2 i. "Her parents legit not only provided legal counsel for him but provide
3 monetary support."

4 See above

5
6 9. As a direct and proximate result of Counter Defendant's tortious conduct,
7 Counterclaimant's reputation has been damaged and will continue to be damaged.

8 10. As a direct and proximate result of Counter Defendant's tortious conduct,
9 Counterclaimant has sustained, and will continue to sustain general and special damages.

10 **COUNT I-DEFAMATION AND DEFAMATION PER SE**

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12 11. Counterclaimant incorporates by reference all paragraphs above as if fully set
13 forth herein in this Counterclaim.

14 12. The fabricated and malicious statements made by Counter Defendant are about
15 and concerning counterclaimant.

16
17 13. Without privilege, Counter Defendant communicated the fabricated and
18 malicious statements to various third parties via the internet and/or intentionally generated
19 such statements on the internet, which were accessible to third parties without password
20 protection.

21
22 14. The statements made by Counter Defendant injure Counterclaimant's business
23 reputation and are presumed harmful.

24 15. The statements made by Counter Defendant denote Counterclaimant's
25 behavior is incompatible with the proper conduct of business, trade or profession.

26
27 16. Counter Defendant published the False Statements knowing that they would
28 be widely disseminated and result in pecuniary loss, as well as irreparable harm.

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17. The statements were communicated to third-parties.

18. The statements caused material harm to Counterclaimant.

17, At the time the statements were made, Counter Defendant knew the statements were false, or acted in reckless disregard for the truth.

18. As a direct and proximate result of Counter Defendant posting the False Statements, Counterclaimant has sustained and will continue to sustain immediate and irreparable harm and injury including but not limited to, damage to representation, losses in revenues, loss of profits, loss of goodwill, loss of business advantage, opportunity, and/or expectancy.

19. As a direct and proximate cause of the conduct by Counter Defendant. Counterclaimant has suffered and will continue to suffer, humiliation, extreme emotional distress, anxiety, depression, stomach aches, headaches, lack of sleep, emotional pain and suffering, anguish, and loss of self-esteem.

20. Counter Defendant’s acts, omissions, conduct and transactions alleged herein were aggravated, outrageous, and guided by evil motives wherein Counter Defendant intended to harm to and/or consciously pursued a course of conduct knowing that it created a substantial risk of significant harm to Plaintiffs.

21. To dissuade Counter Defendant from pursuing a similar course of conduct in the future and to discourage other persons from similar conduct in the future, an award of punitive damages should be awarded against Counter-Defendant in the sum of sufficient magnitude to punish Defendant and to deter similar conduct by others.

COUNT II-FALSE LIGHT INVASION OF PRIVACY

1 22. All of the allegations contained within the paragraphs above and below are
2 hereby incorporated by reference as if fully set out herein.

3 23. In making and publishing the false statements, Counter Defendant caused
4 Counterclaimant to be portrayed out of context and in false light.

5 24. The False Statements are about and concerning Counterclaimant.

6 25. Counter Defendant communicated the False Statements to third parties via the
7 internet and/or intentionally made such statements on the Internet accessible to third parties
8 without password protection.
9

10 26. Counter Defendant's false statements are and would be highly offensive to a
11 reasonable person and have been published to third parties with the apparent intent of
12 causing harm to Counterclaimant.
13

14 27. In making and publishing the False Statements, Counter Defendant
15 knew the False Statements were false or acted in reckless disregard as to the
16 falsity of the False Statements.
17

18 28. As a direct and proximate cause of the conduct by Counter Defendant,
19 Counterclaimant has suffered and will continue to suffer, humiliation, extreme emotional
20 distress, anxiety, depression, stomach aches, headaches, lack of sleep, emotional pain and
21 suffering, anguish, and loss of self-esteem.
22

23 29. In making and publishing the False Statements, Counter Defendant acted
24 maliciously, willfully, wantonly and unlawfully.
25

26 30. For such willful and malicious acts, Counterclaimant hereby seeks punitive
27 damages in addition to actual damages.
28

1 31. Counter Defendant's acts, omissions, conduct and transactions alleged herein
2 were aggravated, outrageous, and guided by evil motives wherein Counter Defendant
3 intended to harm counterclaimant and/or consciously pursued a course of conduct knowing
4 that it created a substantial risk of significant harm to counterclaimant.

5 32. To dissuade Counter Defendant from pursuing a similar course of conduct in the
6 future and to discourage other persons from similar conduct in the future, an award of
7 punitive damages should be awarded against Counter Defendant in the sum of sufficient
8 magnitude to punish Defendant and to deter similar conduct by others.
9

10 **COUNT III-TORTIOUS INTERFERENCE WITH CURRENT AND PROSPECTIVE**
11 **BUSINESS RELATIONSHIPS**

12 33. All of the allegations contained within the paragraphs above and below are
13 hereby incorporated by reference as if fully set forth herein.
14

15 34. Counterclaimant has existing business relationships with individuals, entities,
16 and organizations relating to their businesses.

17 35. Counterclaimant has a reasonable expectation of future business
18 relationships with existing colleagues, prospective buyers, and others with whom
19 Counterclaimant does business or with whom Counterclaimant may reasonably expect to
20 do business. This expectancy is based, in part, on the considerable time, energy, and
21 resources it takes to develop the goodwill and reputation associated with
22 Counterclaimant's reputation.
23
24

25 36. At all material times hereto, Counter Defendant was aware of
26 Counterclaimant's existing and/or prospective business relationships.
27
28

1 37. Upon information and belief, Counter Defendant intentionally and/or
2 purposely interfered with Counterclaimant's existing and prospective relationships by
3 unlawfully making the False Statements.

4 38. Counter Defendant communicated the False Statements to third parties via the
5 internet and/or intentionally made such statements on the Internet accessible to third parties
6 without password protection.

7
8 39. As a direct and proximate result of Counter Defendant's conduct,
9 Counterclaimant has sustained and will continue to sustain immediate and irreparable harm
10 and injury including but not limited to, damage to representation, losses in revenues, loss of
11 profits, loss of goodwill, loss of business relations with existing and future business
12 prospects, and loss of competitive business advantage, opportunity, and/or expectancy.
13

14 **COUNT IV-AIDING AND ABETTING**

15 40. All of the allegations contained within the paragraphs above and below are
16 hereby incorporated by reference as if fully set forth herein.
17

18 41. Upon information and belief, Counter Defendant posted the false disparaging
19 statements on Facebook group pages with the intention to encourage and/or substantially
20 assist others to defame Counterclaimant.
21

22 42. Upon information and belief, Counter Defendant has knowingly enabled others
23 to defame and harass Counterclaimant and interfere with Counterclaimant's existing and
24 prospective business relationships.
25

26 43. As a direct and proximate result of Counter Defendant's conduct,
27 Counterclaimant has sustained and will continue to sustain immediate and irreparable harm
28 and injury including but not limited to, damage to representation, losses in revenues, loss of

1 profits, loss of goodwill, loss of business relations with existing and future business
2 prospects, and loss of competitive business advantage, opportunity, and/or expectancy.

3 44. Counter Defendant's conduct was intentional, malicious and done for the
4 purpose of causing injury to Counterclaimant.

5 45. For such willful and malicious acts, Counterclaimant hereby seeks punitive
6 damages in addition to actual damages

7
8 46. Counter Defendant's acts, omissions, conduct and transactions alleged herein
9 were aggravated, outrageous, and guided by evil motives wherein Counter Defendant
10 intended to harm Counterclaimant and/or consciously pursued a course of conduct knowing
11 that it created a substantial risk of significant harm to Counterclaimant.
12

13 47. To dissuade Counter Defendant from pursuing a similar course of conduct in
14 the future and to discourage other persons from similar conduct in the future, an award of
15 punitive damages should be awarded against Counter Defendant in the sum of sufficient
16 magnitude to punish Counter Defendant and to deter similar conduct by others.
17

18 **WHEREFORE**, Counterclaimant requests that judgment be entered in their favor
19 and against Counter Defendant as follows:

- 20
- 21 A. Actual damages in an amount to be proven at trial;
 - 22 B. Presumed damages for libel per se;
 - 23 C. General, special and punitive damages to be proven at trial
 - 24 D. Its reasonable attorneys' fees and costs;
 - 25 E. Prejudgment and post judgment interest on all damages at the highest rate
26 allowed by law from the date of injury until paid in full; and
27
- 28

1 F. For such other and further relief as this Court deems just and proper under
2 the circumstances.

3 RESPECTFULLY SUBMITTED this 29 day of July, 2021 .

4 **G. DAVID DELOZIER, P.C.**

5
6 By: /s/ Christy C. Brown
7 G. David DeLozier
8 Christy C. Brown
9 Attorneys for Defendant/Counterclaimant

10 ORIGINAL of the foregoing e-filed this
11 29 day of July, 2021 with:

12 Clerk of the Court
13 Maricopa County Superior Court

14 COPIES of the foregoing electronically
15 delivered this 29 day of July, 2021 to:

16 The Honorable Joan Sinclair

17 Daniel R. Warner, Esq.
18 8283 N. Hayden Road Ste. 229
19 Scottsdale, Arizona 85258
20 *Attorneys for Plaintiff*

21 /s/CCB
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