

Atty. JOHN SULLIVAN
1909 E. Ray Rd., Suite 9198
Chandler, Arizona 85225
(480) 818-5070
Bar No. 023018
Attorney for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

AZNH REVOCABLE TRUST,
by and through
JOHN and SUSAN SULLIVAN,
TRUSTEES, REAL PARTIES IN
INTEREST

Plaintiff

v.

SUNLAND SPRINGS VILLAGE
HOMEOWNERS ASSOCIATION,

Defendant

No. CV2023-096192

**Motion for
Summary Judgment**

Oral Argument Requested

Tier 2 Case

**Assigned to:
Honorable Rodrick Coffey**

1 Plaintiff, AZNH Revocable Trust, respectfully submits this Motion for Summary Judgment,
2 pursuant to Ariz.R.Civ.P. 56, on all matters in controversy in this declaratory judgment action.

3 There is no genuine dispute as to any material fact and Plaintiff is entitled to judgment as a
4 matter of law. The parties disagree on the construction of A.R.S. § 33-1804. (PSOF # 1 & 2).

5 Plaintiff's Statement of Facts Supporting Summary Judgment ("PSOF") and Plaintiff's
6 Memorandum in Support of Summary Judgment are filed concurrently with this Motion.

7 Personal & Subject matter jurisdiction, as well as venue, are proper in the Superior Court for
8 Maricopa County. (PSOF # 12, 13 & 14).

1 The parties agree this action raises questions of law and not questions of fact, and no
2 witnesses are anticipated. (PSOF # 15).

3
4 Dated: Sept. 24, 2024

/s/ John F. Sullivan

5 John F. Sullivan, Esq. (Bar # 023018)

6 Attorney for Plaintiff

7 1909 E. Ray Rd.

8 Suite 9198

9 Chandler, AZ. 85225 480-818-5070

10 email: Info@SullivanAppeals.com
11

12 CERTIFICATE OF SERVICE

13
14 A copy hereof was served this date upon Defense counsel via the Court's electronic filing
15 service.

16 */s/ John F. Sullivan*

17 John F. Sullivan, Esq. (Bar # 023018)

18 Attorney for Plaintiff
19