

1 Quarles & Brady LLP
2 One Renaissance Square
3 Two North Central Avenue
4 Suite 600
5 Phoenix, AZ 85004-2322
6 TELEPHONE 602-229-5200

7 Lauren Elliott Stine (#025083)
8 Lauren.Stine@quarles.com
9 Daniel G. Roberts (#033273)
10 Daniel.Roberts@quarles.com

11 *Attorneys for Defendant*

12 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
13 IN AND FOR THE COUNTY OF MARICOPA

14 THOMAS J. GUSICH, an individual,
15 Plaintiff,

16 v.

17 SUN CITY GRAND COMMUNITY
18 ASSOCIATION, INC., an Arizona nonprofit
19 corporation,

20 Defendant.

NO. CV2025-002634

**DEFENDANT'S MOTION TO
EXCEED PAGE LIMIT FOR
RESPONSE TO PLAINTIFF'S
APPLICATION FOR A
PRELIMINARY INJUNCTION**

(Assigned to the Hon. Jennifer Ryan-
Touhill)

21 Defendant Sun City Grand Community Association, Inc. (“Defendant” or the
22 “Association”) by and through undersigned counsel, hereby moves to exceed the page
23 limitation for its *Response* (“Response”) to *Plaintiff’s Application for a Preliminary*
24 *Injunction and Memorandum in Support Thereof* (“Application”).

25 Generally, pursuant to Ariz.R.Civ.P Rule 7.1(a)(3), “a responsive memorandum may
26 not exceed 17 pages, exclusive of attachments and any required statement of facts”
27 Defendant is seeking to extend the 17-page limitation by less than five (5) pages for its
28 Response. Good cause exists to allow Defendant these additional pages. Plaintiff requested,
and the Court granted, a similar request to exceed the page limitation on the Application, to
which Defendant now responds. Defendant cannot adequately set forth all relevant facts
and applicable legal theories into a supporting memorandum of only 17 pages. This request

1 for an additional 5 pages is reasonable and necessary under the circumstances. A proposed
2 order for this motion is submitted herewith.

3 RESPECTFULLY SUBMITTED this 19th day of May, 2025.

4 QUARLES & BRADY LLP
5 One Renaissance Square
6 Two North Central Avenue, Suite 600
7 Phoenix, AZ 85004-2322

8 By: /s/ Lauren Elliott Stine
9 Lauren Elliott Stine
10 Daniel G. Roberts

11 *Attorneys for Defendant Sun City Grand
12 Community Association, Inc.*

13 EFILED with the Clerk of the Court this 19th day of May, 2025, and
14 COPY of the foregoing mailed/mailed the 19th day of May, 2025 to:

15 Jonathan A. Dessaulles
16 David E. Wood
17 Dessaulles Law Group
18 7243 North 16th Street
19 Phoenix, AZ 85020
20 jdessaulles@dessaulleslaw.com
21 dwood@dessaulleslaw.com
22 *Attorneys for Plaintiff*

23 Curtis Ekmark
24 Ekmark Pecor Law, PLLC
25 P.O. Box 56
26 Scottsdale, AZ 85252
27 curtis@ekmarkpecorlaw.com

28 /s/ Kim Simmons