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Representing  Self, without a Lawyer or  Attorney for  Petitioner OR  Respondent

### SUPERIOR COURT OF ARIZONA IN MARICOPA COUNTY

Jie Cao, Haining Xia, Stone Xia  
Name of Plaintiff or Petitioner

Case Number: CV2019-055353

Matt Quinn, Lorne Polger, Michael Schern  
Name of Defendant or Respondent

Title: Motion for Entry of Default Judgment against  
Matt Quinn  
(AMENDED)

Explain what you want the Court to order. The Judge may grant, deny, or change your request (or "motion"). A ruling will be issued by "minute entry."

On November 20, 2019, the Plaintiffs filed in the Maricopa Superior Court a Complaint alleging certain scheme of fraud by the Defendant resulting in a void termination of Dorsey Condominium Association ("Dorsey") and a fraudulent title transfer of the Plaintiffs' unit 106 at Dorsey. Defendant was served with a Summon and Complaint on November 21, 2019 but failed to answer within 20 days of service.

On December 13, 2019, the Plaintiffs filed an Application and Affidavit for Default and gave notice to the Defendant. The Defendant failed to plead within 10 working days. The Plaintiffs hereby request the court to enter into a default pursuant to Rule 55(b)(1) Arizona Rules of Civil Procedure and order the following:

- (i) the Condominium Termination Agreement recorded with Maricopa County on April 9, 2019 be void.
- (ii) the Warranty Deed transfer title of Unit 106 to PFP recorded with Maricopa County on November 15, 2019 be void.
- (iii) Quinn be enjoined from acting as trustee or attorney-in-fact for the Plaintiffs.
- (iv) A total damage of \$81,000 as sought in the Complaint be awarded in whole to the Plaintiffs.
- (v) Other costs in the total sum of \$6,208 be awarded in whole to the Plaintiffs, including: (a) court filing fee of \$333, (b) mailing costs of \$75, (c) copying and printing costs of \$100, (d) transportation cost (to court, government authorities, legal counseling, post office) in the amount of \$500, (e) service of process fee of \$200, (f) our self-representing time

(over 250 hours researching over legal documents, CC&R, Bylaws, State and Federal Laws, and preparation of court documents) in the amount of \$5,000.

(vi) Defendant immediately surrender unit 106 to the Plaintiffs.

(vii) Defendant restore unit 106 to its origin condition, including but not limited to, wall, floor, fixture, appliance, furnishing and personal items. In the event that furnishing and personal items are destroyed by Defendant, Plaintiffs request a teble damage in the amount of \$100,410.

Furnishing and personal Items in the unit, including:

a. Furniture \$14,770

b. Appliances \$8,000

c. Household items \$3,750

d. Paintings/Arts \$2,100

e. Electronics/Electric \$1,950

f. Kitchen ware/tools \$2,750

g. Personal items \$1,750

Total: \$34,470 Treble Damage:  $\$34,470 * 3 = \$100,410$

In the event that any other interior of the unit, including wall, floor, fixture be destroyed by Defedent, Plaintiffs request an additional trebe damage for the unit itself (in lieu of recovering title) in the amount of \$1,350,000.

Value of the Unit (excluding furnishing/personal items): \$450,000 Treble Damage:  $\$450,000 * 3 = 1,350,000$

Note 1: Defendant, while the case is pending before Jugde Campagnolo, broke into the unit, changed locks, removed everything inside, and started altering the interior of the unit. Plaintiffs are not aware of the extent of alteration.

Plaintiffs filed a motion for treble damage with the court on January 6, 2020.

Note 2: On January 8, 2020, concerned about further deterioration, the Plaintiffs, following the instruction of a sheriff, went to the rental office to request a sheriff dispatched to lockup the unit. While calling the sheriff, the manager for Defendant (Megan Renze) called in the Tempe police and falsely accused the Plaintiffs of illegal trespassing to the rental office which is a "public accommodation". The false accusation resulted in the arrest of one of th Plaintiffs.

Today's Date:

01/14/2020

  
Your Signature

**This page must be completed and attached to the LAST page of your Motion/Request**

I filed the ORIGINAL of the attached document(s) with the Clerk of the Superior Court in Maricopa County on: 01 / 14 / 2020  
Month Date Year

I mailed/delivered a COPY of the attached document(s) to the Judicial Officer assigned to my case, Judge (or Commissioner): Popham, on 01 / 14 / 2020 (Judicial Officer assigned to your case)  
Month Date Year

I mailed/delivered a COPY of the attached document(s) on this date: 01 / 14 / 2020 To: Matt Quinn  
Month Date Year


**(You must mail a copy of all documents to the other side and his/her lawyer)**

Matt Quinn

|                                    |                             |
|------------------------------------|-----------------------------|
| Name of Other Side                 | Name of Other Side's Lawyer |
| <u>Dorsey Place Condo Ass. Inc</u> |                             |
| Address                            | Lawyer's Address            |
| <u>825 N 23rd Ave. Ste 100</u>     |                             |
| <u>Phoenix, AZ 85021</u>           |                             |
| City, State, Zip                   | City, State, Zip            |

**By signing below, I state to the Court, under penalty of law, that the information stated on these pages is true and correct to the best of my knowledge and belief.**

**I further state that I have filed/mailed the attached document(s) as shown above. I understand that if I do not file/mail the attached document(s) as shown above, the judge in my case will not read my request/motion.**

  
Your signature