

William M. Brown
6751 E. Amber Sun Drive
Scottsdale, AZ 85266
(480) 595-9131

MICHAEL N. JEANES, CLERK
BY *G. Ramirez* DEP
G. RAMIREZ, FILED
17 NOV -1 PM 2:19

Plaintiff on his own behalf

SUPERIOR COURT OF ARIZONA

MARICOPA COUNTY

William M. Brown, an individual,

Case No. CV2017-055475

Plaintiff,

Plaintiff's Response to
Defendants' Objection to
Plaintiff's Motion to Transfer
Related Civil Case

(Assigned to the Hon. John R.
Hannah, Jr.)

(Hon. Sherry K. Stephens,
CV2017-013317)

vs.

Terravita Country Club, Inc., an Arizona non-profit corporation; Sterling J. Laaveg, President TCC, Inc., and his spouse; Paul David Tolk, Vice-President TCC, Inc., and his spouse; William H. Greig, Secretary TCC, Inc., and his spouse; Michael T. Ellington, Treasurer TCC, Inc., and his spouse; John Does I-X and Jane Does I-X and their spouses; Carpenter, Hazlewood, Delgado & Bolen, PLC; Joshua M. Bolen

024053 and Anjali J. Patel 028138

Defendants.

Based upon the pleadings in the instant matter (CV2017-055475), the pleadings in CV2017-013317 (the matter Plaintiff seeks to have transferred from Judge Stephens' division to Judge Hannah's division) and the pleadings in CV2016-091991 (the matter which gave rise to CV2017-013317) incorporated by reference and prior to Defendants' objection, Plaintiff would have agreed the motion to transfer was at issue, however the truth of Defendants' objection demands rebuttal.

"In CV2016-091991, TCC filed suit against Ms. Bell seeking injunctive relief against her and an order requiring her to ensure her occupants (William M. Brown), guests and invitees complied with TCC's rules and regulations. TCC voluntarily dismissed its lawsuit against Ms. Bell, and the Court ordered TCC to reimburse Ms. Bell her \$237.00 appearance fee." (Defendants' Objection)

Plaintiff, William M. Brown, has been a legal and equitable owner of 6751 East Amber Sun Drive, Scottsdale, Arizona (Terravita) 85266-7029, Maricopa County, continuously since May 31, 1996. (Plaintiff's Verified Complaint, Application for An Order to Show Cause)

"The Court has before it Defendant's *Motion to Dismiss Plaintiff's Complaint* filed on May 23, 2016.

LET THE RECORD REFLECT Defendant has presented documentation to Plaintiff rendering Plaintiff's request for preliminary and permanent injunctions and the Complaint moot." (Return Hearing, Case Dismissed, Hon. Robert H. Oberbillig, May 24, 2016)

"Despite TCC's diligent efforts to tender payment to Ms. Bell, Ms. Bell refused to accept payment, thereby forcing TCC to file the Judgment Satisfaction Matter so it could lodge payment of the judgment with the Court and obtain a satisfaction of the judgment." (Defendants' Objection)

Ms. Bell ("Ms. Bell and Mr. Brown") received multiple demands and threats of litigation (Exhibit A, document is forged, groundless, contains a material misstatement or false claim) from the Defendants on the heels of their discreditable complaint (CV2016-091991) for exercising her legal right to choose not to accept less than the full amount of Judgment awarded her by the Hon. Randall H. Warner, July 28, 2016.

"...Plaintiff failed to file his Motion in both this Records Request Matter (CV2017-055475) and the Judgment Satisfaction Matter (CV2017-

013317). Plaintiff only filed his Motion in this records request matter denying the parties in the Records Request Matter the right to either object to or respond to Plaintiff's Motion. In particular, Ms. Bell is not a party to this Records Request Matter and is, therefore, denied the opportunity to respond to Plaintiff's Motion." (Defendants' Objection)

As it would be charitable not to comment on the immediate foregoing affirmations by officers of the court, Plaintiff leaves the incredulity of the statements to speak for themselves.

Plaintiff filed the original Motion to Transfer Related Civil Case with the Clerk of the Superior Court with filed copies with the Hon. Sherry K. Stephens and Hon. John R. Hannah, Jr. on October 11, 2017.

Plaintiff respectfully requests CV2017-013317 be transferred from Judge Stephen's division to Judge Hannah's division.

William M. Brown
6751 East Amber Sun Drive
Scottsdale, Arizona 85266-7029

A handwritten signature in black ink, appearing to read 'William M. Brown', written over a horizontal line.

William M. Brown

Plaintiff, Pro Se

Certificate of Service

Original filed this 1st day of November 2017 with:

Clerk, Superior Court
Maricopa County Superior Court
18380 N. 40th Street
Phoenix, Arizona 85032

Copy by facsimile, (602) 372-8637, this 1st day of November 2017 to:

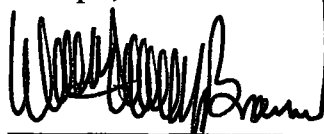
Hon. Sherry K. Stephens
Maricopa County Superior Court
South Court Tower
175 W. Madison Street
Phoenix, Arizona 85003-2243

Copy delivered this 1st day of November 2017 to:

Hon. John R. Hannah, Jr.
Maricopa County Superior Court
Northeast Court-G
18380 N. 40th Street, Courtroom 108
Phoenix, Arizona 85032-1484

Copy mailed this 1st day of November 2017 to:

Carpenter, Hazlewood, Delgado & Bolen, PLC
1400 E. Southern Avenue, Suite 400
Tempe, Arizona 85282



William M. Brown
Plaintiff, Pro Se

Exhibit A



CARPENTER HAZLEWOOD

Carpenter, Hazlewood, Delgado & Bolen, PLC

ATTORNEYS AT LAW

PHOENIX
1400 East Southern Avenue, Suite 400
Tempe, Arizona 85282-5891
T 480-427-2800
F 480-427-2801

Josh M. Bolen, Esq.
Licensed in Arizona, Colorado, New Mexico and Texas
e-mail: josh@carpenterhazlewood.com
direct: 480-427-2862

April 19, 2017

VIA E-MAIL AND FIRST CLASS MAIL

(wmbs-pp@msn.com)

Anita R. Bell
6751 East Amber Sun Drive
Scottsdale, Arizona 85266

Re: A.R.S. 33-420 Demand for Release of Judgment 2016-0562112

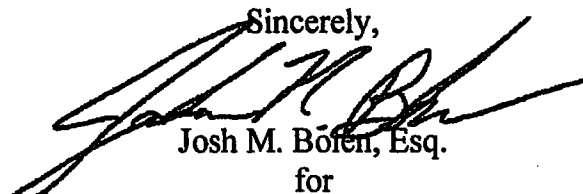
Dear Ms. Bell and Mr. Brown:

As you know, we are the attorneys who represent the Terravita Country Club, Inc. (the "Country Club"). This letter is written to demand that you immediately release the Judgment Recorded against the Country Club in the Office of the Maricopa County Recorder's Office at 2016-0562112 ("Judgment"). See copy of the Judgment attached.

The Country Club paid the Judgment in full and the Judgment has been satisfied. Therefore, pursuant to A.R.S. 33-420(C), the County Club requests that the Judgment be released within twenty (20) days from the date of this letter. We ask that you send this law firm a copy of the recorded release. If the Judgment is not released, we will seek all legal recourse under A.R.S. §33-420. However, we truly hope that this will not be necessary.

If you have any questions or concerns, feel free to put your questions in writing to this office at the address listed above.

Sincerely,



Josh M. Bolen, Esq.

for

CARPENTER, HAZLEWOOD, DELGADO & BOLEN, PLC

Enclosure

ALBUQUERQUE • AUSTIN • DURANGO • PHOENIX • PRESCOTT
SALT LAKE CITY • SAN ANTONIO • SANTA FE • TUCSON

CARPENTERHAZLEWOOD.COM
NATIONWIDE T 800-743-9324 • F 800-743-0494



CARPENTER HAZLEWOOD
Carpenter, Hazlewood, Delgado & Bolan, LLP
ATTORNEYS AT LAW

PHOENIX
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Tempe, Arizona 85282-5691
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F 480-427-2801

Anjali J. Patel, Esq.
Licensed In Arizona
e-mail: anjali@carpenterhazlewood.com
direct: 480-427-2865

July 18, 2017

VIA E-MAIL AND FIRST CLASS MAIL

(wmbbs-pp@msn.com)

Anita R. Bell
6751 East Amber Sun Drive
Scottsdale, Arizona 85266

**Re: A.R.S. 33-420 Final Demand for Release of Judgment
2016-0562112**

Dear Ms. Bell and Mr. Brown:

As you know, we are the attorneys who represent the Terravita Country Club, Inc. (the "Country Club"). We are writing to you to follow up on our correspondence, dated April 19, 2017, demanding that you immediately release the Judgment Recorded against the Country Club in the Office of the Maricopa County Recorder's Office at No. 2016-0562112 ("Judgment"). Please see a copy of the Judgment and prior correspondence attached. To date, you have failed to respond to our demand that you release the Judgment against the Country Club.

On more than one occasion, the Country Club has attempted to pay the Judgment in full in order to satisfy the Judgment. Please, once again, find a check enclosed for payment and satisfaction, in full, of the Judgment. Based on such enclosed payment and pursuant to A.R.S. § 33-420(C), the County Club requests that the Judgment be released within twenty (20) days from the date of this letter. We appreciate your anticipated cooperation with our demand and ask that you send this law firm a copy of the recorded release of the Judgment.

This is our final demand. If you fail to release the Judgment as requested, the Country Club will seek any and all legal recourse pursuant to A.R.S. § 33-420 and Arizona law. However, we truly hope that such additional action will not be necessary.

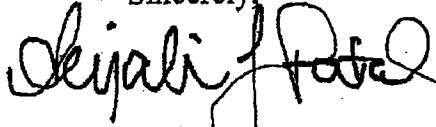
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CARPENTER, HAZLEWOOD, DELGADO & BOLEN, LLP
TERRAVCC.0147
July 18, 2017
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If you have any questions or concerns, please feel free to put your questions in writing to this office and direct them to the address listed above.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anjali J. Patel". The signature is written in black ink and is positioned above the printed name.

Anjali J. Patel, Esq.

for

CARPENTER, HAZLEWOOD, DELGADO & BOLEN, LLP

Enclosures
cc: TCC