

1 John E. DeWulf (#006850)
2 Katherine DeStefano (#025441)
3 **COPPERSMITH BROCKELMAN PLC**
4 2800 North Central Avenue, Suite 1200
5 Phoenix, Arizona 85004
6 (602) 224-0999
7 jdewulf@cblawyers.com
8 kdestefano@cblawyers.com

9 *Attorneys for Defendants*

10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
11 **MARICOPA COUNTY**

12 NORMAN ZWICKY,) NO. CV2015-051911
13)
14 Plaintiff,) **ANSWER**
15)
16 v.) (Assigned to the Honorable John Hannah)
17)
18 PREMIERE VACATION COLLECTION)
OWNERS ASSOCIATION, f.k.a. Premiere)
Vacation Club, an Arizona nonprofit)
corporation,)
Defendant.)

19 Defendant Premiere Vacation Collection Owners Association answers Plaintiff's
20 Verified Complaint as follows:

- 21 1. Defendant admits that Plaintiff is a member of Premiere Vacation Collection
22 Owners Association, but lacks information upon which to admit or deny the remaining
23 allegations in Paragraph 1, and as such, denies them.
- 24 2. Defendant denies the allegations in Paragraph 2.
- 25 3. Defendant admits the allegations in Paragraph 3.
- 26 4. Paragraph 4 contains a legal conclusion to which no response is required. To
27 the extent a response is required, Defendant denies that Plaintiff is entitled to inspection of
28

1 the records requested on the grounds referenced in Paragraph 4.

2 5. Defendant denies the allegations in Paragraph 5.

3 6. Defendant denies the allegations in Paragraph 6.

4 7. Defendant denies the allegations in Paragraph 7.

5 8. Defendant denies the allegations in Paragraph 8.

6 9. Defendant denies the allegations in Paragraph 9.

7 10. Defendant denies the allegations in Paragraph 10.

8 11. In response to Paragraph 11, Defendant lacks sufficient information upon
9 which to admit or deny the allegations in this paragraph and as such, denies them.

10 12. Defendant denies the allegations in Paragraph 12.

11 13. In response to Paragraph 13, Defendant lacks sufficient information upon
12 which to admit or deny the allegations in this paragraph and as such, denies them.

13 14. In response to Paragraph 14, Defendant lacks sufficient information upon
14 which to admit or deny the allegations in this paragraph and as such, denies them.

15 15. Defendant denies the allegations in Paragraph 15.

16 16. Defendant denies the allegations in Paragraph 16.

17 17. Defendant denies the allegations in Paragraph 17.

18 18. Defendant admits that Plaintiff has accrued arrearages in an amount
19 exceeding \$10,000, but denies the remaining allegations in Paragraph 18.

20 19. Defendant denies the allegations in Paragraph 19.

21 20. Defendant denies the allegations in Paragraph 20.

22 21. Defendant denies each and every allegation in Plaintiff's Verified Complaint
23 that is not specifically admitted in this Answer, including any and all allegations implied in
24 Plaintiff's "WHEREFORE" paragraph and prayers for relief.

25 **AFFIRMATIVE DEFENSES**

26 1. Plaintiff's Verified Complaint fails to set forth facts sufficient to state a claim
27 against Defendant.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORIGINAL e-filed and a copy mailed
this 19th day of August, 2015, to:

Jon L. Phelps, Esq.
PHELPS & MOORE
4045 E. Union Hills Drive
Suite A-102
Phoenix, Arizona 85050
Attorneys for Plaintiff

By /s/ Verna Colwell