

1 DOUGLAS E. BROWN - SBN 010791
2 DAVID A. BROWN - SBN 006827
3 J ALBERT BROWN - SBN 030918
4 Post Office Box 489
5 Eagar, Arizona 85925
6 **BROWN & BROWN LAW OFFICES, P.C.**
7 Phone: (928) 333-4717
8 Fax: (928) 333-3566
9 DouglasBrown@outlook.com
10 David@b-b-law.com
11 JABrown@b-b-law.com

12 *Attorneys for the Monroe Lane Neighborhood Coalition*

13 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

14 **IN AND FOR THE COUNTY OF YAVAPAI**

15 GEORGE W. HANCE, et al.,

16 Plaintiff,

17 vs.

18 WALES ARNOLD, et ux., et al.,

19 Defendant.

20 In the matter of the VERDE DITCH
21 COMPANY

No. P1300 CV4772

Division 1

REPLY TO RESPONSES TO MOTION
FOR EXTENSION OF TIME TO OBJECT

-and-

OBJECTIONS TO PROPOSED
MEMORANDUM OF
UNDERSTANDING

SUPERIOR COURT
YAVAPAI COUNTY, ARIZONA
2015 FEB 19 PM 3:05
DONNA McQUALITY, CLERK

BY: J YOUNT

22 The undersigned counsel represents the Monroe Lane Neighborhood
23 Coalition ("the Coalition") in the above-captioned proceedings. Members of the Coalition
24 are identified on ATTACHMENT A. Responses from counsel for the Verde Ditch
25 Company and the Salt River Project were received on Thursday, February 12, 2015 and
26 Friday, February 13, 2015. After considering these responses and meeting with counsel for
the Salt River Project on Friday, the Coalition's counsel is withdrawing the motion for
extension of time in part (but not altogether) for the reasons stated herein. One of the

1 reasons that the Coalition is partially withdrawing its motion for extension of time is
2 because its objections to the proposed memorandum of understanding, as described in the
3 Court's Order Regarding Petition for Approval of a Memorandum of Understanding and
4 Authority for the Verde Ditch Commissioners to Proceed ("the Memorandum of
5 Understanding" and "the December 2014 Order," as the case may be) are being filed herein
6 and thus in compliance with the February 17, 2015 deadline originally set by the Court.

7 **REPLY TO RESPONSES TO**
8 **MOTION FOR EXTENSION OF TIME TO OBJECT.**

9 With reference to the deadlines and hearings set in the December 2014
10 Order, the Coalition withdraws in part and modifies in part its motion for an extension of
11 time as follows:

- 12 1. The motion to vacate the February 17, 2015 deadline is withdrawn
13 (*see* the objections to the Memorandum of Understanding below).
- 14 2. The Coalition withdraws its motion to vacate the March 5, 2015
15 hearing, provided that undersigned counsel may appear
16 telephonically.
- 17 3. The Coalition continues to object to the August 3, 2015 hearing date
18 and moves that it be vacated and replaced with a brief telephonic
19 status conference. Counsel for the Salt River Project indicated to the
20 undersigned counsel that it does not have a problem with this
21 proposal.

22 ///

23 ///

24 ///

25 ///

1 RESPECTFULLY SUBMITTED this 17th day of February 2015.

2 BROWN & BROWN LAW OFFICES, P.C.

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

Douglas E. Brown
David A. Brown
J Albert Brown
Post Office Box 489
Eagar, Arizona 85925

7 ORIGINAL of the foregoing mailed
8 for filing this 17th day February, 2015 with:

9 Clerk of the Superior Court
10 Yavapai County - Division I
11 120 South Cortez Street
12 Prescott, Arizona 86303

13 COPIES of the foregoing mailed and
14 emailed this 17th day of February, 2015, to:

15 Honorable David L. Mackey (jjaramil@courts.az.gov)
16 Judge of the Superior Court and
17 Master of the Verde Ditch
18 Yavapai County Courthouse
19 120 South Cortez Street RM207
20 Prescott, Arizona 86303

21 L. Richard Mabery, Esq. (maberypc@cableone.net)
22 Law Offices of L. Richard Mabery, P.C.
23 234 North Montezuma Street
24 Prescott, Arizona 86301
25 Attorney for Verde Ditch Company

26 ///

///

///

///

27 John B. Weldon, Jr. (jbw@slwplc.com)
28 Mark A. McGinnis (mam@slwplc.com)
29 SALMON, LEWIS & WELDON, P.L.C.
30 2850 East Camelback Road, Suite 200

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

Phoenix, Arizona 85016
Attorneys for the Salt River Project

Kennir Isaacson

1
2 **ATTACHMENT A**

3 **Members of the Monroe Lane Neighborhood Coalition**

4 Alan Cooley
5 1697 South Monroe Lane
6 Camp Verde, Arizona 86322

7 Steven M. Borruso
8 1925 South Monroe Lane
9 Camp Verde, Arizona 86322

10 Tim and Tamira Woodward
11 1725 Saki Minie Road
12 Camp Verde, Arizona 86322

13 Delbert "Chip" Norton Jr. and Kathleen
14 Mary Davis
15 Post Office Box 1671 (Mailing)
16 1825 Monroe Lane (Physical)
17 Camp Verde, Arizona 86322

18 Larry Watkins and Roxanne Stell
19 Post Office Box 30368
20 Flagstaff, Arizona 86003-0360

21 Kevin Norton
22 536 West Sact Minie Road
23 Camp Verde, Arizona 86322

24 Rhonda Besanceney
25 1925 South Monroe Lane
26 Camp Verde, Arizona 86322