

2015 AUG 12 AM 11:33 ✓

DONNA McQUALITY, CLERK

**A. DIXON**

BY: \_\_\_\_\_

Peter J. Mollick Pro Se  
3124 W. Sunnyside Ave  
Phoenix, AZ 85029  
602-942-5151  
pmollick@cox.net

Verde Ditch Shareholder  
1185 S. Canal Circle, Camp Verde, AZ 86322

**IN THE SUPERIOR COURT IN THE STATE OF ARIZONA**  
**IN AND FOR THE COUNTY OF YAVAPAI**

GEORGE W. HANCE, et. Al., )  
 )  
 Plaintiffs, )  
 )  
 Vs. )  
 )  
 WALES ARNOLD. Et ux., et al., )  
 )  
 Defendants, )  
 )  
 )  
 )  
 In the matter of the VERDE DITCH )  
 COMPANY )  
 )  
 )  
 ----- )

No. P1300CV4772

Division 1

**Mr. MOLLICK'S REPLY  
TO THE COURTS RULING  
AND ORDERS FILED ON  
JUL 31<sup>st</sup>, 2015.**

To the Honorable Judge David L. Mackey,

I do not feel I have attempted to provide legal representation to any shareholder of the Verde Ditch. When I presented my opinions to the other shareholders of the Verde Ditch, I did provide at the top of each page in a header: *"These are Pete Mollick's Opinions on the meanings*

*of this MOU Agreement. This is not legal advice. I am not an attorney. Although I do understand contracts. There may be mistakes in these opinions, come to your own conclusions.”*

I have not attempted to counsel any shareholder on their individual parcel water rights. Any questions that were asked to me by an individual regarding water rights of their properties, I have responded to them by saying, talk to the Verde Ditch Company, the Arizona Department of Water Resources or an attorney. I did put emphasis on talking to an attorney to other shareholders.

I do apologize to the court for my lack of understanding of the court rules and legal proceedings. I am not an attorney and I am not schooled in the legal trade. I did not mean any disrespect to the Court. I believe some of the other shareholders including myself believe we are left out of the legal process without access to the Verde Ditch Company's attorney even though I believe shareholder assessment fees fund his legal duties to the Ditch Company. This overall process has been difficult and time consuming.

I have misunderstood the relationship that a shareholder of the Verde Ditch has with the Verde Ditch and the Court's authority over the Verde Ditch. I have attempted to relate the Arizona Revised Statutes to this relationship on the assumption that the shareholders have rights as stated in A.R.S. Title 10 - Corporations and Associations, but I had doubts about the applicability of these statutes to this Court. I have relied on the Hance Vs. Arnold Court Rules promulgated in 1989 for most of my information.

I have not solicited any shareholders for anything except their views on this MOU and asking them to attend meetings. I am quite sure all of the shareholders that have had contact with me know I am not an attorney as I have not represented myself as or claimed I am an attorney. I have asked for some of the shareholders to get together at a meeting to talk about this MOU agreement and help us all figure out some of the meanings and repercussions of the MOU agreement. I do not believe there have been any complaints to the Court about my interactions with the shareholders of the Verde Ditch. I have not heard of any complaints from any shareholders about my interactions with shareholders. I have received thanks from some of the shareholders regarding my actions.

I have previously put in a request on July 15<sup>th</sup>, 2015 to the Commissioners for a shareholder meeting for the shareholders in a forum where the shareholders could ask legitimate questions to the Ditch Attorney, the Commissioners and myself in a debatable scenario with follow up questions to get more viewpoints on this MOU. I was denied the request.

I do not believe I have instructed any shareholder to act one way or the other that would cause anyone to lose their water rights regarding participation or non participation of the

shareholder in this MOU agreement. I have never discussed with any shareholder whether they should sign onto or not sign onto this agreement. I have asked everyone to read this agreement and come to their own conclusions.

I do not remember using the word "represent" in any conversations or Court or Ditch Company document submittals. I will assure the Court there was no intent to offer legal representation to any shareholder and I do not believe any shareholder feels I was representing them.

I do understand the Courts jurisdiction of the Court proceedings and I will abide by the Court orders as stated in all court rulings.

**I would like to petition the court** to allow myself to use direct mail to inform other shareholders of the Verde Ditch of a shareholder meeting to get together for a question and answer session with a qualified water law attorney. I do have a commitment from a qualified water law attorney to speak at a meeting of shareholders and answer shareholder questions. I would not speak at the meeting except to moderate the meeting. Questions about the present pending MOU agreement between the VDC and SRP would not be addressed except as to direct shareholders to the various websites where they can view court submitted documents, such as the Verde Ditch Company website, VerdeDitch.com, the Yavapai County Court website and VerdeDitchShareholders.com. The main theme of the meeting would entail the advantages or disadvantages of an Irrigation District compared to a Ditch Company. If the Court would require, the mailing content would be submitted to the Court for Court approval and the shareholder meeting would be audio recorded and then transcribed for the court to review. An outside company would perform the audio recording and the transcribing service.

RESPECTFULLY SUBMITTED this 12 day of August 2015.

PETER J. MOLLICK

By: 

Peter J. Mollick Pro Se  
3124 W, Sunnyside Ave  
Phoenix, AZ 85029  
Shareholder of the VERDE DITCH COMPANY

Original Hand Delivered for filing this 12th day of August, 2015, to:

Clerk of the Court  
Yavapai County – Division 1  
2840 Commonwealth Drive  
Camp Verde, AZ 86322

AND COPY sent by U.S. mail this 12th day of August, 2015, to:

Hon. David L. Mackey  
Judge of the Superior Court  
Yavapai County Courthouse  
120 S. Cortez Street RM207  
Prescott, AZ 85301

AND COPY sent by email this 12th day of August, 2015, to:

Karen Philips  
1861 N. River View Drive  
Camp Verde, AZ 86322  
Karen.Philips@honeywell.com

Carrie J. Brennan  
Theresa M. Craig  
Office of the Attorney General  
1275 W. Washington  
Phoenix, AZ 85007-2997

Janet L. Miller  
Nicole D. Klobas  
Arizona Department of Water Resources  
3550 N. Central Avenue  
Phoenix, AZ 85012

Douglas A. Brown  
David A. Brown  
J. Albert Brown  
Brown & Brown Law Offices, P.C.  
Post Office Box 489  
Eagar, AZ 85929

Mark A. McGinnis - Patrick Sigi  
John B. Weldon, Jr.  
Salmon, Lewis & Weldon, P.L.C.  
2850 E. Camelback Rd., Suite 200  
Phoenix, AZ 85016

L. Richard Mayberry  
Law Offices of L. Richard Mabery, P.C.  
234 N. Montezuma Street  
Prescott, AZ 86301

Robyn L. Interpreter  
Susan B. Montgomery  
Montgomery & Interpreter, P.L.C.  
4835 E. Cactus Rd., Suite 210  
Scottsdale, AZ 85254-4194

Patrick Barry  
Yosef Negose  
U. S. Department of Justice  
Indian Resources Section, ENRD  
P.O. Box 7611  
Ben Franklin Station

AND COPY sent by U.S. mail this 12th day of August, 2015, to:

Don Ferguson  
1695 W. Bronco Drive  
Camp Verde, AZ 86322

Leroy Miller  
1733 W. Park Verde Road  
Camp Verde, AZ 86322

Bradford Gordon  
PO Box 830  
Camp Verde, AZ 86322