

L. Richard Mabery
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FEB 25 2000
ROBERT G. WEAVER, Clerk
BY WENDY GUARLES
Deputy

State Bar I.D. No. 005188

Attorney for The Verde Ditch Company

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF YAVAPAI

GEORGE W. HANCE, <u>et al.</u> ,)	No. 4772
)	
Plaintiffs,)	Division 1 <i>WSP</i>
)	
vs.)	
)	MOTION FOR ORDER
WALES ARNOLD, <u>et ux.</u> , <u>et al.</u> ,)	TO SHOW CAUSE
In the Matter of)	
THE VERDE DITCH COMPANY,)	
)	(OSC Hearing Requested)
Defendants.)	
)	

COMES NOW, L. Richard Mabery, Counsel for The Verde Ditch Company, and moves the Court for an Order to Show Cause as to why GREGORY L. FREEMAN and HELEN FREEMAN should not be ordered to appear and show cause by judgment should not be entered against them, jointly and severally, for their failure to comply with the Court's Order Promulgating New Rules and Regulations for the Operation of the Verde Ditch dated August 8, 1989, on the grounds that the Freemans have refused to pay their Verde Ditch assessment

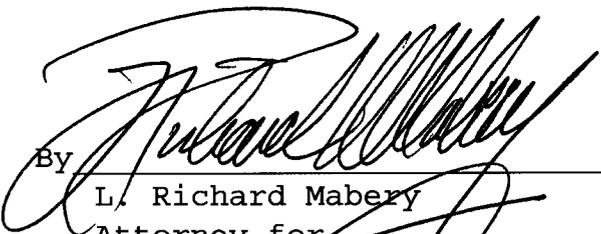
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fees for the years 1988 through 1997 and 1999. Repeated attempts have been made to collect these past due assessments by the Verde Ditch, to no avail.

The Verde Ditch Company further requests that **GREGORY L. FREEMAN** and **HELEN FREEMAN** be ordered to pay penalties, interest, attorney's fees and costs incurred herein, pursuant to Paragraph 6 of the Rules and Regulations for the Operation of the Verde Ditch, dated August 8, 1989.

RESPECTFULLY SUBMITTED this 23rd day of February, 2000.

L. RICHARD MABERY, P.C.

By 

L. Richard Mabery
Attorney for
The Verde Ditch Company

/pss

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