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 L. RICHARD MABERY, P.C.
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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> ,)	<i>CV</i> No. 4772
)	
Plaintiffs,)	Division 1 <i>rel</i>
)	
vs.)	
)	MOTION FOR ORDER
STEVE COSTELLO and KATHY)	TO SHOW CAUSE
COSTELLO, husband and wife, In)	
the Matter of THE VERDE DITCH)	
COMPANY,)	(OSC Hearing Requested)
)	
Defendants.)	

The Verde Ditch Company, through undersigned counsel, respectfully requests that the Court enter an Order to Show Cause as to why **STEVE COSTELLO** and **KATHY COSTELLO**, husband and wife, should not be ordered to appear and show cause why 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. Costellos have failed and refused to pay their Verde Ditch

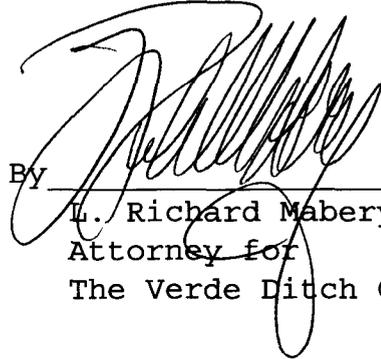
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assessment fees since January of 1994. Repeated attempts have been made to collect these past due assessments by the Verde Ditch, to no avail.

The Verde Ditch Company further requests that **STEVE COSTELLO** and **KATHY COSTELLO** 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 21st day of November, 2000.

L. RICHARD MABERY, P.C.

BY 

L. Richard Mabery
Attorney for
The Verde Ditch Company

klw\General\V Ditch-general\Past Due Assessments
#Costello\Motion for OSC

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