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9 State Bar No. 05670

10 PCCN: 36116

11 Attorney for Plaintiffs

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

13 **IN AND FOR THE COUNTY OF PIMA**

14 **TIFFANY BREDFELDT AND
15 PHILIP BREDFELDT, HUSBAND
16 AND WIFE**

17 **Plaintiffs,**

18 **and**

19 **TODD GREENE,**

20 **Defendant.**

NO. C20131650

**PLAINTIFFS' RESPONSE TO
DEFENDANT'S "CHRONOLOGY OF
TIFFANY BREDFELDT'S 2006
FRAUDS"**

Assigned to: Hon. Carmine Cornelio

21 As the court might recall, this matter involves a Plaintiff who has been harassed for
22 years by Defendant, to the extent that she must ply her trade in a secured office.

23 The genesis of this case was in either 2005 or 2006 when Plaintiff Tiffany Bredfeldt
24 boarded her horse at a stable which abutted Defendant's residence. When Plaintiff Tiffany
25 Bredfeldt would go to the stall in the evening to muck out her horse's stall, she would not
26 wear a wedding ring.

27 In response to this lawsuit, Defendant's allegations inter alia included the argument
28 that somehow Plaintiff Tiffany Bredfeldt was misleading him by not wearing her wedding
ring while she would speak with him at the stable.

In granting injunctive relief in favor of Plaintiffs, the court informed Defendant that
he still had first amendment rights to speak his mind about restraining orders, but to leave
Plaintiffs out of his publications.

Then, on July 2, 2013, in response to nothing, Defendant filed "Chronology of
Tiffany Bredfeldt's 2006 Frauds." Even assuming arguendo that Plaintiff Tiffany Bredfeldt

1 is a chronic liar, her veracity is totally irrelevant to the necessity to restrain Defendant's
2 conduct.

3 It is guessed that Defendant's most recent filing is an attempt at an end-run around
4 the court's earlier ruling.

5 In his trial testimony, Defendant made it clear that his actions were an attempt at
6 retribution and retaliation against Plaintiffs, and it appears that Defendant has no intention
7 to stop.

8 Since Defendant's said filing is entirely irrelevant, since it seeks no relief, since it
9 re-states and re-argues what has already been before the court, and since its only purpose
10 appears to be to continue harassing and defaming Plaintiffs, it is requested that said
11 pleadings be stricken in its entirety.

12 ARCP, rule 12 (f) states:

13 Upon motion made by a party before responding to a pleading
14 or, if no response pleading is permitted by these Rules, upon
15 motion made by a party within twenty days after service of the
16 pleading upon the party or upon the court's own initiative at
17 any time, the court may order stricken from a pleading any
18 insufficient defense or any redundant, immaterial, impertinent,
19 or scandalous matter.

20 Defendant's chronology of "Tiffany Bredfeldt's 2006 Frauds" hits almost every nail
21 squarely on the head. There is no way to describe it other than being redundant, immaterial,
22 impertinent, and scandalous.

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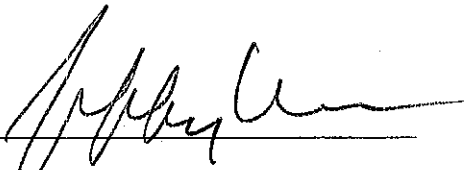
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1 Accordingly, Plaintiffs request that Defendant's said pleading be ordered stricken,
2 removed from the court file and removed from AGAVE, and that Plaintiffs be awarded their
3 attorney fees of \$350.00 pursuant to ARCP, rule 11(a).

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5 DATED this 10 day of July, 2013.

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8 JEFFREY A. MARKS
9 Attorney for Plaintiffs

10 Given to a messenger for delivery
11 this 10 day of July, 2013 to:

12 Hon. Carmine Cornelio
13 Pima County Superior Court
14 110 W. Congress Street
15 Tucson, AZ 85701

16 Copy of the above was mailed
17 this 10 day of July, 2013 to:

18 Todd Greene, pro se
19 3661 N. Campbell Ave., PMB 216
20 Tucson, AZ 85719
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27
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