

1 **STEPHEN C. RICH, PLLC**
2 **3401 East Elwood, # 101**
3 **Phoenix, Arizona 85040**
4 **Telephone: (602) 710-2600**
5 **Facsimile: (602) 437-2596**
6 **E-mail: scr@srichlaw.com**

7 **Stephen C. Rich - 007488**
8 Attorney for Defendant

9
10 **SUPERIOR COURT OF THE STATE OF ARIZONA**
11 **COUNTY OF MARICOPA**

12 **FIERCE INVESTMENTS, LTD.,**
13 Plaintiff,

Case No. CV2018-003675

14 v.

ANSWER OF CHRISTINE REEVES

15 **AZTEC COPPER INC., an Arizona**
16 **Corporation, RON ARNOLD, an individual;**
17 **and CHRISTINE REEVES, an individual,**

(Assigned to The Daniel Kiley)

18 Defendant.

19 Defendant Christine Reeves ("Reeves") Answers the Complaint as follows:

20 1. Reeves admits the allegations contained in paragraphs 3, 5, 6, 7, 17 and 19 of the
21 Complaint.

22 2. Reeves denies each and every allegation set forth in paragraphs 1, 2, 13-16,
23 18, 20-24 of the Complaint.

24 3. Answering paragraphs 4, 8, 10-12 of the Complaint, Reeves lacks information
25 sufficient to evaluate the truthfulness of the allegations and therefore denies each and every
26 allegation set forth in those paragraphs.

27 4. Answering paragraph 9 of the Complaint, Reeves admits that Fierce acquired
28 some shares of Aztec Copper in 2002, but denies all other allegations contained therein. Reeves
affirmatively alleges that on or about April 4, 2011, the shares certificate of Fierce was canceled and
Fierce was no longer a shareholder.

1 5. Reeves denies each and every allegation in the Complaint not herein expressly
2 admitted or otherwise qualified.

3 6. Reeves alleges the following affirmative defenses:

4 (a) The Complaint fails to state a claim upon which relief may be granted.

5 (b) Reeves has not had sufficient opportunity to conduct discovery necessary to
6 determine which, if any, of the affirmative defenses set forth in Rule 8(c), Arizona Rules of Civil
7 Procedure, may apply. So rather than waive those defenses, Reeves asserts each and every defense
8 stated in Rule 8(c).

9 WHEREFORE, Reeves requests that the Complaint be dismissed; that Plaintiff take
10 nothing thereby; that Reeves be awarded his reasonable costs of suit incurred herein; and for such
11 other and further relief this Court deems just and proper.

12 DATED this 20th day of May 2019

13 STEPHEN C. RICH, PLLC

14 By /s/ Stephen C. Rich

15 Stephen C. Rich
16 3401 E Elwood St., #101
17 Phoenix, AZ 85040
18 Attorney for Defendants

19 ORIGINAL OF THE FOREGOING MAILED

20 This 20th day of May 2019 to:

21 Keith Beauchamp
22 Roopali H. Desai
23 COPPERSMITH BROCKELMAN PLC
24 2800 N. Central Ave., Suite 1900
25 Phoenix AZ 85004
26 Attorneys for Plaintiff

27 BY /s/ Stephen C. Rich