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7 Attorneys for Defendant/Counterclaimant/Third-Party Plaintiff

8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
9 **IN AND FOR THE COUNTY OF PIMA**

10
11 NT PROPERTIES, LLC, an Arizona limited
12 liability company,

13 Plaintiff,

14 v.

15 666ISMONEY, LC, an Arizona limited liability
16 company, and SYCAMORE VISTA LAND FOR
17 SALE, LC, an Arizona limited liability company,

18 Defendants.

19 SYCAMORE VISTA LAND FOR SALE, LC,
20 an Arizona limited liability company,

21 Counterclaimant,

22 v.

23 NT PROPERTIES, LLC, an Arizona limited
24 liability company,

25 Counter-Defendant.

No. C20130421

**DECLARATION OF RAQUEL
BARANOW IN SUPPORT OF
SYCAMORE VISTA'S RESPONSE TO
CROSS MOTIONS FOR SUMMARY
JUDGMENT**

(Assigned to The Honorable Carmine
Cornelio)

(Oral Argument Requested)

1 SYCAMORE VISTA LAND FOR SALE, LC,
an Arizona limited liability company,

2 Third-Party Plaintiff,

3 v.

4 SYCAMORE VISTA NO. 5
5 HOMEOWNER'S ASSOCIATION, an Arizona
6 non-profit corporation; MICHAEL KAREL
7 LINDSEY and BELEN LINDSEY, Co-
8 Trustees, JOINT DECLARATION OF TRUST
9 MICHAEL KAREL LINDSEY AND BELEN
10 LINDSEY UAD 8-13-02; WILLIAM P.
11 PHILLIPS, an individual; CARMEN M.
12 RUMPS, Trustee, RUMPS REVOCABLE
13 LIVING TRUST DATED OCTOBER 25,
14 2001; EQUITY TRUST COMPANY
15 CUSTODIAN, FBO STEPHEN ANTHONY
16 PAGNUCCO, IRA; SOUTHERN ARIZONA
17 LAND TRUST, INC., an Arizona non-profit
18 corporation; CT LAND, LLC, an Arizona
19 limited liability company; OLD PUEBLO
20 ASSOCIATES, LLC, an Arizona limited
21 liability company; FRED T. BOICE, Trustee,
22 FRED T. BOICE AND ANN K. BOICE
23 LIVING TRUST AGREEMENT DATED
24 FEBRUARY 7, 1979; SALLY ANN HALL,
25 Trustee, SAH FAMILY TRUST UNDER
26 AGREEMENT DATED JULY 15, 2008;
HADRIANUS TERRA, L.L.C., an Arizona
limited liability company; NANCEE R. TRIPP,
a single woman; DAVID J. DUCKWILER and
RINA DUCKWILER, husband and wife; NEW
TUCSON MASTER HOMEOWNERS
ASSOCIATION INC., an Arizona non-profit
corporation; GILBERT B. NANEZ and
FRANCES G. NANEZ, husband and wife;
TUCSON ACQUISITION AND
DEVELOPMENT CORPORATION, an
Arizona corporation; DORIS E. HOLM, an
individual; RONALD D. HOFFMAN, an
individual; BONNIE L. HOFFMAN, an
individual; ROBERT N. BROWN, a married
man; DONALD E. BROUWER, an individual;
MARLENE F. BROUWER, an individual;
D.R. HORTON, INC., a Delaware
corporation; STEPHEN J. GREGORIO, an

1 unmarried man; MARJORIE C. KREILING,
2 an individual,

3 Third-Party Defendants.
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