

FILED  
TIME 1:28 PM

JAN - 4 2013

MARY ELLEN DUNLAP  
CLERK OF SUPERIOR COURT  
By \_\_\_\_\_

1 P. RANDALL BAYS, ESQ./013479  
2 BAYS LAW, PC  
3 100 S. Seventh Street  
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7 Tombstone City Attorney

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

10 **CITY OF TOMBSTONE,** )  
11 )  
12 Plaintiff, )  
13 )  
14 v. )  
15 **BEATTY'S GUEST RANCH AND** )  
16 **ORCHARD, LLC, THOMAS BEATTY SR,** )  
17 **EDITH M BEATTY, BEATTY LIVING** )  
18 **TRUST,** )  
19 Defendants. )

**NO. CV201200499**

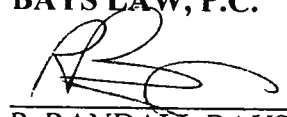
**OBJECTION TO THE DEMAND FOR JUDGMENT**

**BAYS LAW PC**  
100 S. Seventh Street  
SIERRA VISTA, AZ 85635  
Tel: (520)459-2639

20 Plaintiff, CITY OF TOMBSTONE, by and through its attorney, P. RANDALL BAYS,  
21 objects to the demand for judgment filed in this case for the reasons stated in the Motion to  
22 Dismiss filed on January 3, 2013 and the Motion to Set Aside Default filed on January 4, 2013  
23 which facts, laws and arguments are incorporated into this objection.

24 Respectfully submitted this 4<sup>th</sup> day of January, 2013

**BAYS LAW, P.C.**



\_\_\_\_\_  
P. RANDALL BAYS  
Tombstone City Attorney

25 Copy of the foregoing  
26 mailed this 4<sup>th</sup>  
27 day of January, 2013, to:

28 JOHN A MACKINNON  
LAW OFFICE OF JOHN A. MACKINNON, PLLC  
PO BOX 1836  
BISBEE AZ 85603  
Attorney for Defendants