

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA

-----X  
Ida Relich )  
 )  
 ) *Plaintiff,* )  
 )  
 - v. - )  
 )  
 ) Case Number 011013  
 )  
 )  
 Maurice Leigh, )  
 ) **COMPLAINT**  
 )  
 ) *Defendant.* )  
-----X

Plaintiff Ida Relich, by her attorney Tomasa Tirado, comes now before this court and says:

A Complaint is supposed to set out the factual and legal bases for each of the complaining party's claims. Most lawyers find drafting complaints to be a demanding art. They must be specific enough to meet statutory requirements and to survive expected motions to dismiss. Nonetheless, attorneys sometimes aim to draft complaints that are as loose and general as they can get away with. In part this is to avoid contradicting facts which may emerge later, but it is also to avoid giving more information to the other side than is strictly required. As you read through this Complaint see if you agree with the way that Ms. Tirado balanced those competing interests in this particular Complaint.

1. On or about October 18, 20\_\_\_, Defendant entered into a Contract of Sale with Plaintiff for the residential property located at 305 Oakmont Avenue (hereinafter "Property").

2. The sale of the subject Property was predicated upon the representations made by Defendant seller in the Disclosure Statement attached to this Complaint as Exhibit A.

3. Defendant's Disclosure Statement omits important and material information about the Property.

4. The omitted information affects the value of the Property.

5. The omitted information would, if known, have affected Plaintiff's decision-making process regarding the purchase of the Property.

6. The Property is widely reputed to be possessed by poltergeists.

7. Defendant and his visitors have reportedly seen these poltergeists on numerous occasions, and the presence of poltergeists has been reported upon in the local press. Defendant himself gave an interview with local news station KNXV approximately two years before listing the house for sale, in which he reported having seen the specter of an elderly woman hovering near the rear entrance to the Property, and of a younger man "walking" near its kitchen.

8. Plaintiff is relocating to Arizona from Texas, and had no reason to be familiar with the local lore regarding the Property.

When you review the elements of the contracts defenses at issue in this case, come back to consider these points and ask yourself what each numbered paragraph contributes and why the attorney framed them the way she did.

Proximity and juxtaposition suggest meaning to readers (whether they register it consciously or not). Consider the attorney's reasons for placing this point immediately after the one that precedes it.