

1 Yolanda Moots
2 205 Pittsburg Ave
3 Bisbee AZ 85603
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FILED
2022 NOV 3 20 PM 11:53
CLERK OF SUPERIOR COURT
COCHISE COUNTY
BISBEE, ARIZONA

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

10 LYNELLE GAE,
11 Plaintiff,

Case No. CV2020-00537

12
13
14 vs.

DEFENDANT'S RESPONSE
TO PLAINTIFF'S
REQUEST FOR RELIEF

15
16 YOLANDA PEREZ MOOTS,
17
18 Defendant.

Assigned to Hon. T Dickerson

19
20
21 Yolanda Moots, Defendant in this matter and appearing pro se, asserts the
22 following:
23

24 Plaintiff fails to support any claim that Defendant's actions caused plaintiff
25 any damage.
26

27 There was no intentional interference with Plaintiff's privacy. Defendant
28 installed cameras in order to protect herself, her property and her pets. Any capture
29 of images which included the Plaintiff's backyard was incidental to monitoring
30 Defendant's own backyard and fenceline.
31

32 Plaintiff instigated the need for Defendant's measures when Plaintiff sprayed
33 unknown substances, including via a garden hose attachment, *from Plaintiff's*
34 *backyard* into Defendant's property on multiple occasions.
35

36 Defendant provided to Bisbee Police the evidence of Plaintiff's actions
37 obtained, in part, *from the video cameras about which the Plaintiff complains.*
38 (The police also took samples of the liquids that could be seen in the video as
39 emanating from Plaintiff's backyard.)
40

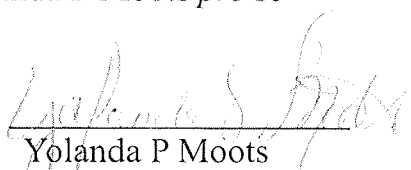
1 As the court noted (Pgs 6-7 of Order date Sept 16, 2021) the Plaintiff did not
2 allege damages from the “backyard cameras” and the court did not find any
3 **intentional** intrusion by Defendant.
4

5 Subsequent to the court's order, the Defendant promptly removed the
6 camera(s) which allowed her to monitor her own backyard (and may have included
7 partial images of a portion of Plaintiff's backyard.
8

9 Defendant moves this court to grant no more relief to Plaintiff and to close
10 this case.
11

12
13 Dated this 28th day of March, 2022
14

15 Yolanda P Moots *pro se*
16

17
18 By 
19 Yolanda P Moots
20
21

22
23 Original of the foregoing filed, hand-delivered, mailed and/or e-mailed on this
24 28th day of March, 2022 to:
25

26
27 Clerk of the Court
28 Cochise County Superior Court .
29 100 Quality Hill
30 Bisbee, Arizona 85603
31

32 Lynelle Gae
33 207 Pittsburg Ave
34 Bisbee AZ 85603
35
36
37