

1 OFFICE OF THE CITY ATTORNEY  
2 JULIE M. KRIEGH, City Attorney State Bar No. 021175  
3 200 West Washington, Suite 1300  
4 Phoenix, Arizona 85003-1611  
5 Telephone (602) 262-6761  
6 [law.civil.minute.entries@phoenix.gov](mailto:law.civil.minute.entries@phoenix.gov)

7 Les S. Tuskai, Assistant Chief Counsel, 012582  
8 Attorney for Defendant City of Phoenix

9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
10 **IN AND FOR THE COUNTY OF MARICOPA**

11 Jeremy Thacker,

12 Plaintiff(s),

13 vs.

14 City of Phoenix, and Laura Pastor, in  
15 her capacity as District 4  
16 Councilwoman,

17 Defendants.

Case No. CV2025-007652

**DEFENDANTS' ANSWER TO  
PLAINTIFF'S COMPLAINT**

(Assigned to the Honorable Randall H.  
Warner)

18 Defendants, City of Phoenix and Laura Pastor in her capacity as District 4  
19 Councilperson ("Defendants"), for their Answer to Plaintiff's Complaint admit, deny and  
20 assert as follows.

21 1. Defendants admit that this Court has jurisdiction over the subject-matter,  
22 the parties, and that venue is proper.

23 2. Defendants admit this case arises out of a Public Records Request  
24 ("PRR").

3. Defendants admit that Arizona's Public Records law is governed by A.R.S.  
§ 39-121 et. seq.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

4. Defendants admit that Plaintiff made two PRR.

5. Defendants deny each and every allegation and paragraph of Plaintiff's Complaint not heretofore expressly admitted.

6. Defendants assert that Plaintiff's PRRs have been fulfilled.

7. Defendants assert that Plaintiff's PRRs were fulfilled by the City of Phoenix Communications Office.

8. Defendants assert any and all affirmative defenses available to them including, but not limited to, privilege, best interests, confidentiality, etc.

9. Defendants assert any and all affirmative defenses which may be revealed by discovery. Defendants reserve the right to amend their Answer at any time to include these newly revealed affirmative defenses. In the alternative, Defendants' Answer should be read in conformity with the evidence as is provided under Arizona law.

WHEREFORE having answered Plaintiff's Complaint, Defendants request that it be denied and that he take nothing thereby. Additionally, Defendants seek the following affirmative relief:

1. For an award of their attorneys' fees and costs incurred in this matter.
2. For such other and further relief the Court deems just and proper.

RESPECTFULLY SUBMITTED this 2<sup>nd</sup> day of April, 2025.

JULIE M. KRIEGH, CITY ATTORNEY

By/s/: Les S. Tuskai  
Les S. Tuskai  
Assistant Chief Counsel  
200 West Washington, Suite 1300  
Phoenix, Arizona 85003-1611  
Attorneys for Defendant City of Phoenix

1 Original of the foregoing electronically  
2 filed and COPY electronically served on  
3 April 2, 2025, to:

4 Joshua W. Carden  
5 Joshua Carden Law Firm, P.C.  
6 16427 North Scottsdale Road, Suite 410  
7 Scottsdale, AZ 85254  
8 [joshua@cardenlivesay.com](mailto:joshua@cardenlivesay.com)  
9 Attorneys for Plaintiff

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
By: /s/ Stacy Duran  
LST:ca #Answer 4907-5058-8462 v.1.doc