

1 JOHN FRIEDEMANN, P.C. (#3607)
5103 E. Thomas Road
2 Phoenix, Arizona 85018
(602) 840-0314
3 e-mail: john@friedeman.com
Attorney for Exeter Trinity Properties

4 **IN THE UNITED STATES DISTRICT COURT**
5 **DISTRICT OF ARIZONA**

7 UNITED STATES OF AMERICA, 8 Plaintiff, 9 vs. 10 JOSEPH J. LIPARI, EILEEN H. LIPARI and EXETER TRINITY PROPERTIES, 11 L.L.C., 12 Defendants.	No. 3:10-CV-08142 JWS RESPONSE TO UNITED STATES' MOTION FOR SUMMARY JUDGMENT Honorable John W. Sedwick
---	---

13 The Defendant Exeter Trinity Properties, LLC, respectfully requests that the
14 Motion for Summary Judgment filed by the United States be denied. This Response is
15 supported by the Response of Defendant Exeter Trinity Properties, LLC, to United States'
16 Statement of Material Facts, by the Statement of Facts In Support of Cross-Motion for
17 Summary Judgment by Defendant Exeter Trinity Properties, LLC, and by the Memorandum
18 in Support of: Response to United States' Motion for Summary Judgment and Cross-Motion
19 for Summary Judgment by Defendant Exeter Trinity Properties, L.L.C., all of which are filed
20 concurrently herewith.

21 Dated: December 29, 2011.

22 RESPECTFULLY SUBMITTED,

23 /s/ John Friedeman

24 John Friedeman
5103 E. Thomas Road
25 Phoenix, AZ 85018
Attorney for Exeter Trinity Properties, LLC
26

JOHN FRIEDEMANN, P.C.
5103 East Thomas Road
Phoenix, Arizona 85018-7914
(602) 840-0314

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this December 30, 2011, I electronically filed the foregoing with the Clerk of Court and served the following attorney of record using the CM/ECF system:

Charles M. Duffy
P.O. Box 683
Ben Franklin Station
Washington, D.C. 20044-0683

I further certify that on the same day I mailed by U.S. Postal Service the foregoing to the following party who is not represented by counsel.

Joseph Lipari
156 Johnson Hill Drive
Waynesville, NC 28786
Defendant, pro per

/s/ John Friedeman

John Friedeman

JOHN FRIEDEMANN, P.C.
5103 East Thomas Road
Phoenix, Arizona 85018-7914
(602) 840-0314