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— LAW FIRM —

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

Laki Syph,

Plaintiff,

vs.

BASIS Phoenix Central; Michelle Astwood,
Head of School, in her individual and official
capacity; Michael Hancock, Head of
Operations, in his individual and official
capacity; BASIS.ed (BASIS Educational
Group, LLC):

Defendants.

Case No. CV2025-029701

**DEFENDANTS' REPLY IN SPPORT OF
MOTION FOR MORE DEFINITE
STATEMENT RE [FIRST AMENDED]
COMPLAINT**

(Assigned to the Honorable
Jennifer Ryan-Touhill)

Defendants BASIS Phoenix Central, Michelle Astwood, Michael Hancock, and
BASIS Educational Group, LLC ("Defendants") hereby file their Reply to Plaintiff's
Response and in support of their Motion for More Definite Statement re [First Amended]
Complaint.

Defendants previously moved for a more definite statement in response to Plaintiff's
original Complaint. Plaintiff responded, arguing the sufficiency of his Complaint. On
September 26, 2025, the Court granted Defendants' original Motion stating, "Defendants

1 justifiably express doubt regarding the legal basis and factual support for the allegations in
2 the Complaint” and ordered Plaintiff to amend his Complaint. In the meantime, Plaintiff had
3 already filed his [First Amended] Complaint on September 17, 2025, prior to the Court issuing
4 its Order.

5 Based on Plaintiff’s [First Amended] Complaint having the same deficiencies as his
6 original Complaint, Defendants again moved for a more definite statement. In his Response
7 to this second Motion, Plaintiff suggests his [First Amended] Complaint is sufficient.
8 However, his [First Amended] Complaint added no context or allegations to support his
9 claims. While Plaintiff’s [First Amended] Complaint alleges certain events as the basis of his
10 claims, it remains unclear how these events relate to, much less support, his claims. The
11 allegations do not establish, support or even suggest the possibility that Plaintiff could satisfy
12 required elements to his claims. For example, Plaintiff continues to assert a medical
13 negligence claim, but no Defendant is a health care provider and there are no allegations that
14 any Defendant provided health care to Plaintiff. Similarly, Plaintiff continues to assert a false
15 arrest/wrongful imprisonment claim but he never alleges any Defendant (or Defendant
16 representative) detained him without his consent. Quite simply, Plaintiff’s claims remain
17 greatly misplaced.

18 Plaintiff’s Response fails to take into consideration the nature of the claims he asserts.
19 While Arizona follows a notice pleading standard, this standard requires that a Plaintiff “give
20 the opponent fair notice of the nature **and basis of the claim** and indicate generally the type
21 of litigation involved.” *Cullen v. Auto-Owners Ins. Co.*, 218 Ariz. 417, 419 (2008) (citing
22 *Mackey v. Spangler*, 81 Ariz. 113, 115 (1956) (emphasis added)). Defendants understand
23 generally the factual underpinning of Plaintiff feeling aggrieved, but his [First Amended]
24 Complaint fails to provide any basis for his claims. Defendants are seeking clarification of
25 the basis of the claims asserted by Plaintiff to respond appropriately thereto.

1 Contrary to Plaintiff's suggestion, the present Motion is not a "stall tactic", rather, an
2 effort for clarification. And the Court's prior Order granting Defendants' Motion for a More
3 Definitive Statement relating to the original Complaint supports the need for clarification, as
4 the legal and factual basis of Plaintiff's claims were not clarified through the [First Amended]
5 Complaint.

6 Based on the foregoing, pursuant to Arizona Rule of Civil Procedure 12(e), Plaintiff
7 should be required to file an amended Complaint to provide notice of the basis of his claims
8 and allow Defendants to respond to the merit thereof.

9 DATED this 8th day of October, 2025.

10 **GRASSO LAW FIRM, P.C.**

11
12 By /s/ Pamela L. Judd
13 Robert Grasso, Jr.
14 Robert J. Lydford
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16 ORIGINAL e-filed and e-served via AZTurboCourt
17 and e-mailed and mailed via First Class Mail
this 8th day of October, 2025, upon:

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21
22 By /s/ D. Bock
23
24
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