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

Laki Syph,
Plaintiff,

v.

BASIS Phoenix Central; Michelle Astwood, Head of School; Michael Hancock, Head of Operations; BASIS.ed (BASIS Educational Group, LLC),
Defendants.

Case No. CV2025-029701

PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR MORE DEFINITE STATEMENT

INTRODUCTION
Defendants once again move for a more definite statement under Rule 12(e), this time directed at Plaintiff's First Amended Complaint. This motion, like their prior motion, is unnecessary and improper. Plaintiff's First Amended Complaint clearly sets forth the factual basis of his claims and the legal theories asserted, consistent with Arizona's notice pleading standards. Defendants' filing appears to be another attempt to delay answering the Complaint and moving the case into discovery.

LEGAL STANDARD
Arizona is a notice pleading state. Under Rule 8, Ariz. R. Civ. P., a complaint need only provide "a short and plain statement of the claim showing that the pleader is entitled to relief." The Arizona Supreme Court has held that Rule 8 requires only fair notice of the nature and basis of the claim, not detailed evidentiary facts. *Cullen v. Auto-Owners Ins. Co.*, 218 Ariz. 417, 419 ¶ 6 (2008).

A motion for more definite statement under Rule 12(e) is appropriate only where a pleading is so vague or ambiguous that the opposing party cannot reasonably be required to frame a response.

ARGUMENT
1. **The First Amended Complaint Provides Fair Notice.**
Plaintiff's Amended Complaint sets out the relevant facts of the March 4, 2025 incident, identifies the individuals involved, describes the resulting arrest and harm, and pleads specific causes of action including false arrest, negligence, intentional infliction of emotional distress, retaliation, and negligent infliction of physical harm. These allegations provide Defendants with ample notice of the claims and enable them to file an Answer.

2. **Defendants' Motion Is a Stall Tactic.**
Defendants previously filed a motion for more definite statement directed at the original Complaint, which Plaintiff cured by filing a First Amended Complaint. Rather than answering, Defendants repeat the same tactic, causing unnecessary delay. This contravenes Rule 1's mandate that the Rules "be construed, administered, and employed…to secure the just, speedy, and inexpensive determination of every action."

3. **The Proper Next Step Is for Defendants to Answer.**
Because the Amended Complaint satisfies Rule 8, Defendants should be ordered to file their Answer so that this case may proceed into discovery.

CONCLUSION
For the foregoing reasons, Plaintiff respectfully requests that this Court:
A. Deny Defendants' Motion for More Definite Statement; and
B. Order Defendants to file their Answer within ten (10) days.

DATED this 1st day of October 2025.

Respectfully submitted,

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Plaintiff Pro Se