

David Campbell, individually,  
appearing as JOHN C D DOE  
11106 W Lewis Ave, Avondale, Arizona  
Telephone: (602) 803-0212  
Email: Kjolseth1000@gmail.com  
Self-represented

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

MAUREEN GAUGHAN, bankruptcy trustee,  
for and on behalf of the bankruptcy  
estates of JOHN CD DOE, a single man,

Plaintiff,

v.

BIG BROTHERS BIG SISTERS OF  
AMERICA, a District of Columbia  
nonprofit corporation; BIG BROTHERS  
BIG SISTERS OF CENTRAL ARIZONA, an  
Arizona corporation; JOHN DOE 1-100;  
JANE DOE 1-100; and BLACK & WHITE  
CORPORATIONS 1-100,

Defendants.

Case No. CV2020-014920

**JOHN C D DOE'S RESPONSE TO  
MOTION TO STRIKE AND SANCTIONS  
REQUEST**

(Assigned to the Hon. Christopher A.  
Whitten)

I oppose only the motion to strike and sanctions request. My personal settlement assent and obligations are distinct from Trustee Gaughan's control of estate claims. I appear for myself only and claim no control over estate claims. If leave is required for me to address personal sanctions, I request it. I maintain that I have standing to seek this relief; a denial based on standing would not, by itself, establish bad faith.**I. RULE 11 SANCTIONS WERE NOT PROPERLY MOVED.**

Rule 11(c)(2) require a separate sanctions motion, written notice of the specific alleged violation, a good-faith consultation certificate, and ten days to withdraw or correct before filing. Defendants' October 13 combined opposition and strike motion includes none. Deny the Rule 11 request as procedurally defective.

1  
2 I allege childhood sexual abuse in a mentoring relationship involving Big Brothers  
3 Big Sisters of Central Arizona. Big Brothers Big Sisters of America is also a defendant in  
4 this case. The October 13 filing, submitted for Big Brothers Big Sisters of America by  
5 Lori V. Berke and for Big Brothers Big Sisters of Central Arizona by Quarles & Brady  
6 attorneys John M. O’Neal, Jeffrey D. Gardner, and Anthony F. Pusateri, asks me  
7 personally to pay their lawyers for seeking clarification whether I assented to settlement. I  
8 regard that demand as repulsive, vile, and profoundly revictimizing, especially from  
9 organizations whose missions center on children. A disputed standing issue does not  
10 establish bad faith.

11 **II. THE STATUTORY FEE REQUEST IS UNSUPPORTED**

12 A.R.S. § 12-349 permits fees on specified grounds; “without substantial  
13 justification” means groundless and not in good faith. § 12-349(A), (F). A standing  
14 objection alone does not show harassment, delay, unreasonable expansion, or bad faith.  
15 My October 5 filing sought clarification after the case was reported settled and placed on  
16 the dismissal calendar. Defendants raised bankruptcy standing in December 2024, more  
17 than four years after suit began. Denial for lack of standing is not itself sanctionable. Any  
18 fee award must state specific reasons. § 12-350.

19 **REQUEST**

20 Deny the motion to strike and requests for Rule 11 and A.R.S. § 12-349 fees.  
21 Alternatively, allow me to answer sanctions directed at me personally. If I lacked  
22 authority to request restoration of the case to the active calendar and reinstatement of the  
23 November 20, 2026 Pretrial/Trial-Setting Conference, the Court may deny that request  
24 without treating the ruling as a finding of bad faith.

25  
26 RESPECTFULLY SUBMITTED October 14, 2026

27 /s/ David Campbell  
28 individually,  
appearing as JOHN C D DOE

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  
27  
28

## CERTIFICATE OF SERVICE

I certify that on October 14, 2026, I served the foregoing response through  
AZTurboCourt and by email on counsel at these addresses:

Robert E. Pastor, Esq.  
Montoya, Lucero & Pastor, P.A.  
3200 N. Central Avenue, Suite 2550  
Phoenix, Arizona 85012  
Email: [repastor@mjpattorneys.com](mailto:repastor@mjpattorneys.com)  
Counsel for Plaintiff

Michael S. Daoudi, Esq.  
Law Offices of Michael Daoudi, P.C.  
560 Kirts Boulevard, Suite 104  
Troy, Michigan 48084  
Telephone: (248) 220-4377  
Email: [msd@msd4law.com](mailto:msd@msd4law.com)  
Counsel for Plaintiff

Lori V. Berke, Esq.  
The Berke Law Firm, PLLC  
1601 N. 7th Street, Suite 360  
Phoenix, Arizona 85006  
Telephone: (602) 254-8800  
Email: [lori@berkelawfirm.com](mailto:lori@berkelawfirm.com)  
Counsel for Big Brothers Big Sisters of America

John O'Neal, Esq.  
Quarles & Brady, LLP  
Two North Central Avenue, Suite 600  
Phoenix, Arizona 85004-2391  
Telephone: (602) 229-5200  
Email: [John.ONeal@quarles.com](mailto:John.ONeal@quarles.com)  
Counsel for Big Brothers Big Sisters of Central  
Arizona

Anthony Pusateri, Esq.  
Quarles & Brady, LLP  
Two North Central Avenue, Suite 600  
Phoenix, Arizona 85004-2391  
Telephone: (602) 229-5200  
Email: [Anthony.Pusateri@quarles.com](mailto:Anthony.Pusateri@quarles.com)  
Counsel for Big Brothers Big Sisters of Central  
Arizona

Dawn M. Maguire, Esq.  
Maguire Law, PLC  
10115 E. Bell Road, Suite 107, #498  
Scottsdale, Arizona 85260  
Telephone: (480) 304-8302  
Fax: (480) 304-8301  
Email: [Dawn@MaguireLawAZ.com](mailto:Dawn@MaguireLawAZ.com)  
Counsel for Chapter 7 Trustee Maureen  
Gaughan

Jeffrey D. Gardner, Esq.  
Quarles & Brady, LLP  
Two North Central Avenue, Suite 600  
Phoenix, Arizona 85004-2391  
Telephone: (602) 229-5224  
Email: [jeff.gardner@quarles.com](mailto:jeff.gardner@quarles.com)  
Counsel for Big Brothers Big Sisters of Central Arizona

/s/ David Campbell  
David Campbell, individually,  
appearing as JOHN C D DOE