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IN THE SUPREME COURT
STATE OF ARIZONA

Supreme Court No. R-25-0020

**PETITION TO AMEND RULES
11(d) and 18(d), ARIZONA RULES
OF PROCEDURE FOR EVICTION
ACTIONS**

**REPLY TO COMMENTS TO THE
PETITION**

1 Pursuant to Rule 28 of the Rules of the Supreme Court, Community Legal
2 Services (“CLS”), DNA People’s Legal Services (“DNA”), Southern Arizona
3 Legal Aid (“SALA”) (collectively “civil legal aid”), and the William E. Morris
4 Institute for Justice (“MIJ”) respectfully reply to comments submitted in response
5 to the Petition to Amend Rules 11(d) and 18(d) of the Rules of Procedure for
6 Eviction Actions (“RPEA”). The proposed amendment to Rule 11(d) would
7 change “may” to “shall.” The proposed amendment to Rule 18(d) would add a
8 non-exhaustive list of examples of scenarios that would constitute “good cause” to
9 merit a continuance of an eviction hearing. Taken together, the proposed rules
10 changes would clarify the definition of “good cause” and provide clearer direction
11 to parties and judicial officers regarding when a court should grant a continuance.
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16 Petitioners’ proposed rules changes received support from a variety of
17 stakeholders in the Arizona legal community: the State Bar of Arizona, Disability
18 Rights Arizona (“DRAZ”), Organized Power in Numbers (“OPIN”), the Arizona
19 Commission on Access to Justice, and Charles Lucking with the law firm Barton
20 Mendez Soto, all filed comments in support of the proposed rules changes. Those
21 who provided supportive comments all recognized the common-sense merits of
22 adding clarifying language to Rules 11(d) and 18(d) that provide direction on
23 continuing eviction hearings.
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27 Zona Law Group P.C. on behalf of the Manufactured Housing Communities
28 of Arizona, the Justice of the Peace Bench in Maricopa County, and the law firm

1 Hull, Holliday & Holliday, P.L.C., all filed comments in opposition to the
2 proposed rules changes.

3
4 The comments, both those in support and in opposition, detail similar issues,
5 and we address those common themes collectively.

6 **I. Petitioners’ Proposed Rules Changes Help Clarify the Existing Rules**
7 **Pertaining to “Good Cause” and the Granting of Continuances**

8
9 The current RPEA Rule 11(d) states that a “court may order the continuance
10 of a trial date by up to three court days in justice court or ten days in superior court
11 on the request of a party for good cause shown....” The current RPEA Rule 18(d)
12 defines “good cause” as follows:
13

14 “Good cause” shall mean a stated, substantial reason, the
15 accommodation of which will serve the interests of
16 fairness and justice, without also causing a significant
17 delay or harm to another party. Good cause may include
18 relieving a person from the consequences of mistake or
19 inadvertence, but not from simple neglect.

20 The rules do not provide a clear, specific, and usable standard for a court to
21 determine when a party has good cause, or for a party to decipher if it has good
22 cause to request a continuance. By including the word “substantial,” the rule sets a
23 high – yet undefined – bar for when a court may find good cause. To remedy the
24 vagueness of the rules, the Petitioners propose changing “may” to “shall” in Rule
25 11(d), and deleting the words “substantial” and “without also causing significant
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1 delay or harm to another party” in Rule 18(d).¹ Petitioners also propose
2 conforming Rule 18(d) with Rule 15(a)(4) of the RPEA and Rule 60(b)(1) of the
3 Federal and Arizona Rules of Civil Procedure.² Further, Petitioners propose
4 providing a non-exhaustive list of examples of “good cause” to Rule 18(d).³
5

6 Commenters in opposition claim that the proposed rules changes are
7 inconsistent with current law.⁴ Specifically, commenters in opposition claim that
8 the proposed changes would take away judicial discretion⁵, create a system of
9 automatic and, potentially unlimited, continuances⁶, and unlawfully extend the
10 timeline for eviction actions.⁷ These assertions are incorrect and based on
11 misinterpretations of the proposals. With the proposed changes, Petitioners merely
12 seek to clarify the existing rules to make them more accessible by parties in
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17 ¹ Petition at 4.

18 ² *Id.*

19 ³ *Id.* at 5.

20 ⁴ Comment from Manufactured Housing Communities of Arizona at 10-11;
21 Comment from the Justice of the Peace Bench in Maricopa County at 1; Comment
22 from Hull, Holliday & Holliday, P.L.C. at 10.

23 ⁵ Comment from Manufactured Housing Communities of Arizona at 9-10;
24 Comment from the Justice of the Peace Bench in Maricopa County at 3; Comment
25 from Hull, Holliday & Holliday, P.L.C. at 3, 5-6.

26 ⁶ Comment from Manufactured Housing Communities of Arizona at 2, 5, 8,
27 11; Comment from the Justice of the Peace Bench in Maricopa County at 3-4;
28 Comment from Hull, Holliday & Holliday, P.L.C. at 5.

⁷ Comment from Manufactured Housing Communities of Arizona at 2, 8-10;
Comment from the Justice of the Peace Bench in Maricopa County at 3; Comment
from Hull, Holliday & Holliday, P.L.C. at 3-4.

1 eviction actions and courts hearing eviction cases.

2 As recognized by commentators supporting the Petition⁸, the change of “may”
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4 to “shall” in Rule 11(d) only makes a continuance mandatory if a court has found –
5 *in its discretion* – good cause.⁹ A requesting party must establish – and the court
6
7 must find – good cause before a court can grant a request for a continuance. Also,
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9 the list of scenarios provided in proposed Rule 18(d) is simply a list of examples
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11 that constitute good cause.¹⁰ If a party asserts one of the reasons listed in proposed
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13 Rule 18(d), a court maintains the discretion to evaluate the facts and evidence
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15 presented to determine if a party has established good cause. Despite the opposing
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17 commentators’ misinterpretation of the proposed rules amendments, the changes do
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19 not create a system of mandatory continuances for any reason a party may assert.

20 Further, the proposed rules changes do not provide blanket authority for
21
22 unlimited continuances. A court must exercise its judicial discretion to determine
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24 if a party has established good cause every time a party requests a continuance.

25 Additionally, the proposed rules changes do not extend or in any way alter
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27 the timeline of an eviction case as dictated by the current rules. Rule 11(d) allows
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29 courts to grant continuances for “up to three court days in justice court or ten days

30 ⁸ Comment from the State Bar of Arizona at 3-4; Comment from Organized
31 Power in Numbers at 7-9; Comment from the Arizona Commission on Access to
32 Justice at 2.

33 ⁹ Petition at 5.

34 ¹⁰ *Id.* at 4-5.

1 in superior court.” The proposed rules changes do not change that timeline. Under
2 the proposed rules changes, if a court finds good cause in its discretion to grant a
3 continuance, the duration of the continuance must still abide by the time limits
4 dictated by the current rule.
5

6 The proposed rules changes do not alter current law; the changes only make
7 the rules clearer to courts hearing eviction actions and to the parties in eviction
8 proceedings.
9

10 **II. Petitioners’ Proposed Rules Changes Are Necessary**

11 Commenters in opposition claim the proposed rules changes are unnecessary
12 and amount to “a solution in search of a problem.”¹¹ In support of this assertion,
13 commenters in opposition point out that, since the onset of the COVID-19
14 pandemic, all parties can attend court hearings remotely, thereby rendering
15 continuances unnecessary in most cases, especially if a party has a work conflict.¹²
16 Commenters in opposition suggest that, with remote hearings, such parties just
17 need to “find a spot to call in from”¹³ and recommend that parties can simply take
18 a break from their jobs and attend eviction hearings from their cars.¹⁴ Petitioners
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23 ¹¹ Comment from Hull, Holliday & Holliday, P.L.C. at 5. *See also* comment
24 from Manufactured Housing Communities at 2; Comment from the Justice of the
25 Peace Bench in Maricopa County at 1, 7-8.

26 ¹² Comment from the Justice of the Peace Bench in Maricopa County at 9-10;
27 Comment from Hull, Holliday & Holliday, P.L.C. at 4-5, 7-8.

28 ¹³ Comment from Hull, Holliday & Holliday, P.L.C. at 7.

¹⁴ Comment from the Justice of the Peace Bench in Maricopa County at 10.

1 recognize that the availability of remote hearings provide another option for parties
2 who are unable to attend hearings in person, but remote hearings do not solve all
3 possible issues that may merit a continuance of the hearing. For example, a party
4 may not be able to afford to take a day, or even an hour, off work and may not be
5 allowed to take a break or have a car or be able to find a quiet spot to attend a
6 remote hearing. And parties may have physical or mental health-related
7 disabilities that prevent them from attending their hearing virtually or by
8 telephone. As DRAZ points out, parties may have difficulty attending hearings,
9 even remotely, because they are blind or have low vision, have intellectual or
10 cognitive disabilities, or have communication or speech-related disabilities.¹⁵
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15 Further, not every party may have access to reliable internet or telephone
16 service. The Justice of the Peace Bench in Maricopa County acknowledges that
17 some parties may not have access to the internet but assumes that most parties have
18 access to reliable telephone service.¹⁶ In reality, many Arizonans, particularly
19 those who live in rural areas of the state, still have limited access to both internet
20 and telephone service.¹⁷
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25 ¹⁵ Comment from Disability Rights Arizona at 4-5, 7, 9.

26 ¹⁶ Comment from the Justice of the Peace Bench in Maricopa County at 9.

27 ¹⁷ See Arizona Digital Equity Plan, Arizona Commerce Authority (Mar. 2024),
28 https://www.azcommerce.com/media/3ybeq2io/03202024-arizona_digital_equity_plan_march_2024.pdf; Jake Garcia, *Where the Internet Ends: Broadband Maps Illuminate Arizona's Access Gaps*, ASU Enterprise

1 The law firm Hull, Holliday & Holliday, states that the proposed rule
2 changes are unnecessary because:

3
4 [M]ost defendants in eviction hearings have multiple
5 weeks' notice of impending eviction proceedings, which
6 is ample time to make arrangements for time off work,
7 for child care, or to gather evidence and identify
8 witnesses to contest the eviction.¹⁸

9 In reality, most landlords provide tenants just a five-day pre-filing notice that tells
10 tenants to either pay past due rent or else they will be evicted.¹⁹ And once the case
11 is filed, a court sets an eviction hearing within three to six days.²⁰ That is an
12 eleven days' notice at most – not multiple weeks. As critically, though, a party
13 will *never* have knowledge of the specific date and time of an “impending”
14 eviction proceeding over a week in advance. Many parties hear about the specific
15 date and time of an eviction hearing only two or three days in advance – when they
16 receive the summons to appear in court. A party may not be able to take time off
17 work, afford child care, or locate evidence or witnesses during that short
18 timeframe.
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21 Commenter Hull, Holliday & Holliday further states that if a tenant still
22 needs a continuance after all other options are exhausted, then they can simply
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24
25 Technology (Sept. 19, 2024), [https://tech.asu.edu/features/where-internet-ends-
26 broadband-maps-illuminate-arizonas-access-gaps](https://tech.asu.edu/features/where-internet-ends-broadband-maps-illuminate-arizonas-access-gaps).

27 ¹⁸ Comment from Hull, Holliday & Holliday, P.L.C. at 7.

28 ¹⁹ A.R.S. § 33-1368(B).

²⁰ A.R.S. § 33-1377(B).

1 work something out with opposing counsel or obtain an order from the presiding
2 judge.²¹ This statement ignores the power and court procedure knowledge
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4 disparities between an unrepresented litigant and an opposing party's attorney, and
5 that it may be very difficult for an unrepresented party to obtain an order by the
6 presiding judge.
7

8 Despite opposing commentors' assertions that the proposed rules changes
9 are not needed, Petitioners maintain that the proposals are necessary to make the
10 existing rules governing continuances clearer and more easily understood.
11

12 **III. The Examples and Data Cited in the Petition Illustrate the Need for the** 13 **Proposed Rules Changes**

14 Commenters in opposition conclude that the anecdotal examples provided in
15 the Petition do not reflect what happens in eviction court.²² But Petitioners are in
16 eviction courts across Arizona day in and day out all year long. The examples
17 provided are just a small sample of what Petitioners experience on behalf of their
18 clients and what they witness unrepresented parties go through while in court.
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21 Commenters in opposition also disparage and attempt to discredit Petitioner
22 MIJ's eviction court studies.²³ Those studies represent careful planning, in-person
23 observations, the review of docket recordings, meticulous note taking, interviews
24

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26 ²¹ Comment from Hull, Holliday & Holliday, P.L.C. at 7.

27 ²² Comment from Hull, Holliday & Holliday, P.L.C. at 6.

28 ²³ Comment from Manufactured Housing Communities of Arizona at 2, 4-8;
Comment from the Justice of the Peace Bench in Maricopa County at 2, 10-12.

1 of justices of the peace, and the review and analysis of court files over the course
2 of 20 years. MIJ's first study led to the creation of the RPEA and both of MIJ's
3 studies have been reviewed and cited in public reporting about how justice courts
4 operate in Maricopa County and the City of Phoenix.²⁴ Public reporting has
5 confirmed MIJ's primary findings and observations.²⁵ Since the publication of its
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8 2020 study, MIJ has done follow-up observations and, while the court has
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12 ²⁴ See e.g., Serena O'Sullivan, *Why Eviction Filings are Rising Across*
13 *Maricopa County*, KTAR News (Nov. 20, 2024), [https://ktar.com/arizona-](https://ktar.com/arizona-news/arizona-eviction-crisis-maricopa-county/5629025/)
14 [news/arizona-eviction-crisis-maricopa-county/5629025/](https://ktar.com/arizona-news/arizona-eviction-crisis-maricopa-county/5629025/); Colleen Sikora, *Phoenix*
15 *Renters Facing Evictions Should Have a Permanent Right to Counsel, Advocates*
16 *Say*, 12News (Sept. 26, 2024),
17 [https://www.12news.com/article/news/local/valley/advocates-call-permanent-right-](https://www.12news.com/article/news/local/valley/advocates-call-permanent-right-to-counsel-in-phoenix-renters-facing-eviction/75-e00a8f68-3fb0-4aa6-9ef3-a2464993097d)
18 [to-counsel-in-phoenix-renters-facing-eviction/75-e00a8f68-3fb0-4aa6-9ef3-](https://www.12news.com/article/news/local/valley/advocates-call-permanent-right-to-counsel-in-phoenix-renters-facing-eviction/75-e00a8f68-3fb0-4aa6-9ef3-a2464993097d)
19 [a2464993097d](https://www.12news.com/article/news/local/valley/advocates-call-permanent-right-to-counsel-in-phoenix-renters-facing-eviction/75-e00a8f68-3fb0-4aa6-9ef3-a2464993097d); Vitalist Health Foundation, *Spark Report: Building Healthy*
20 *Communities: Tenants Eviction Assistance Project and Maintaining Stable*
21 *Housing* (Jun. 2021); Katherine Davis-Young, *Study: Maricopa County Eviction*
22 *Judges Rarely Rule in Tenants'*
23 *Favor*, KJZZ Phoenix (May 22, 2020), [https://www.kjzz.org/2020-05-22/content-](https://www.kjzz.org/2020-05-22/content-1581886-study-maricopa-county-eviction-judges-rarely-rule-tenants-favor)
24 [1581886-study-maricopa-county-eviction-judges-rarely-rule-tenants-favor](https://www.kjzz.org/2020-05-22/content-1581886-study-maricopa-county-eviction-judges-rarely-rule-tenants-favor).

25 ²⁵ See e.g., Morgan Fischer, *A Day in Eviction Court, Where the Valley*
26 *Housing Crisis Wrecks Lives*, Phoenix New Times (Dec. 10, 2024),
27 [https://www.phoenixnewtimes.com/news/in-maricopa-county-eviction-court-](https://www.phoenixnewtimes.com/news/in-maricopa-county-eviction-court-housing-crisis-ruins-lives-20725128)
28 [housing-crisis-ruins-lives-20725128](https://www.phoenixnewtimes.com/news/in-maricopa-county-eviction-court-housing-crisis-ruins-lives-20725128); Emily Bregel, *Most Tenants No-Shows at*
Rapid-Fire Eviction Hearings, Arizona Daily Star (Nov. 15, 2018),
[https://tucson.com/news/most-tenants-no-shows-at-rapid-fire-eviction-](https://tucson.com/news/most-tenants-no-shows-at-rapid-fire-eviction-hearings/article_c0578da5-e29a-510a-9594-17a0eebcb570.html)
[hearings/article_c0578da5-e29a-510a-9594-17a0eebcb570.html](https://tucson.com/news/most-tenants-no-shows-at-rapid-fire-eviction-hearings/article_c0578da5-e29a-510a-9594-17a0eebcb570.html); Alden Woods and
Agnel Philip, *In the Phoenix Area, Rapid Evictions Leave Delinquent Renters with*
Almost No Options, The Arizona Republic (Sept. 13, 2018),
[https://www.azcentral.com/story/news/local/arizona-](https://www.azcentral.com/story/news/local/arizona-investigations/2018/09/13/maricopa-county-justice-courts-rapid-evictions-leave-renters-few-options/865658002/)
[investigations/2018/09/13/maricopa-county-justice-courts-rapid-evictions-leave-](https://www.azcentral.com/story/news/local/arizona-investigations/2018/09/13/maricopa-county-justice-courts-rapid-evictions-leave-renters-few-options/865658002/)
[renters-few-options/865658002/](https://www.azcentral.com/story/news/local/arizona-investigations/2018/09/13/maricopa-county-justice-courts-rapid-evictions-leave-renters-few-options/865658002/).

1 implemented some changes since the COVID-19 pandemic, most of the concerns
2 outlined in the two published studies remain.

3
4 The examples and data provided in the Petition are sound, unbiased, and
5 accurately portray the experiences of parties in eviction hearings.

6 **IV. Federally Mandated Court Obligations Should Be Explicitly Included in**
7 **the Rules to Ensure Clarity and Consistency**

8
9 Commenters in opposition claim that proposed 18(d)(ii) (“a need to request
10 and obtain a reasonable accommodation under the Americans with Disabilities
11 Act”) and (iv) (“an obligation related to past or present military service”) are
12 unnecessary additions to the rule because they are already in existing federal law
13 and do not need to be restated in a state court rule.²⁶ But the intent of the proposed
14 changes is to make the rules easier to understand by the court and the parties,
15 particularly unrepresented parties. A self-represented landlord or tenant may not
16 be aware of all the obligations required of a court and may only look to the RPEA
17 when preparing for their hearings.²⁷ Given that most tenants facing eviction
18 hearings are unrepresented by counsel, the proposed examples, even if mandated
19 by federal law, help ensure that they are aware of their rights and a court’s duties.
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23 **V. The State Bar’s Suggested Revisions to the Proposed Rules Changes**
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25 The State Bar of Arizona supports the Petition but recommends several

26 _____
27 ²⁶ Comment from the Justice of the Peace Bench in Maricopa County at 7-8;
28 Comment from Hull, Holliday & Holliday, P.L.C. at 7-8.

²⁷ Comment from the State Bar of Arizona at 3.

1 modifications to the proposed rules changes.²⁸ Petitioners agree with the Bar’s
2 recommendations in part as follows:

3
4 1. The State Bar recommends the following version of Rule (11)(d):

5 Whenever possible, the trial should be held on the initial
6 return date. The court ~~may~~ shall order ~~the~~ a single
7 continuance of a trial date by up to three court days in
8 justice court or ten days in superior court on the request
9 of a party ~~for~~ if the court finds good cause by such
10 request. The court may also order a single continuance
11 of a trial date or to accommodate the demands of the
12 court’s calendar, ~~but~~ the court nevertheless shall give
13 priority to hearing and resolving alleged “immediate and
14 irreparable” evictions. No continuance of more than
15 three court days in justice court or ten days in superior
16 courts may be ordered unless both parties are in
17 agreement.

18
19 Petitioners do not agree to the recommended changes that limit a court to
20 granting a single continuance. There are many scenarios that would reasonably
21 require more than one continuance in a case. For example, if a party’s child has a
22 medical procedure and follow-up appointment, both constitute good cause for more
23 than one continuance. Or if a member of the National Guard is deployed on an
24 emergency basis, there may be cause to support multiple continuances. As
25 explained above, under Petitioners’ proposed rules changes, a court must exercise
26 its discretion in each instance when evaluating whether there is good cause. Thus,
27 if a court does not, in its discretion, find that a party has good cause to merit any
28 continuance – especially a second or third continuance – the court may not grant

28 ²⁸ Comment from the State Bar of Arizona at 12-14.

1 the continuance. Petitioners agree to all other recommended changes to Rule
2 11(d).

3
4 2. The State Bar recommends the following changes to Rule
5 18(d):

6 “Good cause” shall mean a stated, substantial reason, the
7 accommodation of which will serve the interests of
8 fairness and justice, without also causing a significant
9 delay or harm to another party. Good cause may include
10 relieving a ~~person~~ party from the consequences of
11 mistake, ~~or inadvertence, but not from simple neglect or~~
excusable neglect., including any circumstances beyond
the party’s reasonable control.

12 Petitioners proposed deleting the word “substantial” from the rule. The
13 current rules do not define “substantial” to provide sufficient direction to what type
14 of reason a party must assert. As such, leaving “substantial” in the rule could set a
15 high, and inconsistent, bar to merit the granting of a continuance. Petitioners do
16 not agree to the State Bar’s recommendation to keep the word “substantial” in the
17 rule. In the alternative, Petitioners propose defining “substantial reason” as
18 follows: “A reason that is more than marginal or minimal, from a reasonable
19 person’s point of view.”²⁹

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23 Petitioners agree to the State Bar’s other recommended changes to Rule 18(d).

24 3. The State Bar recommends that 18(d)(iv) expressly reference the Service
25 Members Civil Relief Act. Petitioners agree to this recommendation.
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²⁹ See <https://dictionary.justia.com/substantial-evidence>.

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Conclusion

The proposed rules changes would clarify the definition of “good cause” and provide clearer direction for parties and the court for when a continuance should be granted in eviction actions. The proposed rules changes are necessary to fulfill the purpose of the rules as they stand today.

For the above reasons, we respectfully request that the Court approve this Petition to amend Rule 11(d) and Rule 18(d) of the Rules of Procedure for Eviction Actions.

Respectfully submitted this 2nd day of June 2025.

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/s/ Alan R. Solot
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SOUTHERN ARIZONA LEGAL AID

Original electronically filed with the
Clerk of the Supreme Court of Arizona
this 2nd day of June 2025.

By: /s/ Andrew P. Schaffer