

STATE OF NEW MEXICO COUNTY OF BERNALILLO SEC
COURT

Case Number: D-202-PB-201100653

IN THE MATTER OF THE ESTATE OF: ELIZABETH WILLIAMS NAYLOR, Deceased

NOTICE OF NO RESPONSE AND REQUEST FOR CONSIDERATION

COMES NOW, Petitioner Elizabeth Ann Naylor Owens, and respectfully submits this Notice of No Response and Request for Consideration of her Petition to Reopen Probate, Compel Distribution of Estate Assets, and Order Final Accounting. In support thereof, Petitioner states as follows:

1. On January 6, 2025, Petitioner initially filed a Petition to Reopen Probate, Demand for Fiduciary Accounting, and Request for Judicial Relief.
2. The Court, on February 6, 2025, issued an Order Denying Without Prejudice, requiring that Petitioner properly serve the interested parties pursuant to Rule 1-005(E) NMRA and submit a full briefing package after responses were received.
3. On February 19, 2025, Petitioner served the updated Petition and Certificate of Service upon all interested parties by Certified Mail, including:
 - **Guy Markley Naylor and Dr. Dale Gunn**
 - **Kurt A. Sommer, Esq.**
 - **F. Vaughn Thomas, Esq.**
4. To date, no response has been filed in response to the updated Petition filed and served on February 19, 2025.

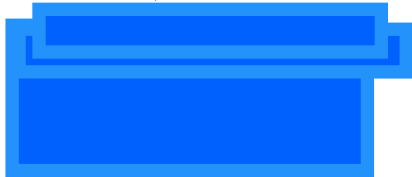
5. While a prior response was filed on February 10, 2025, it was in reference to the earlier petition and does not address the updated factual assertions or legal arguments made in the version now properly before the Court.

6. The statutory period for response—**20 days from date of receipt**—has elapsed, and no supplemental or responsive pleading has been submitted by the co-trustees or their attorneys.

Respectfully submitted this **24th day of March, 2025**.

Elizabeth Ann Naylor Owens

Petitioner, Pro Se



CERTIFICATE OF SERVICE

COMES NOW, Petitioner, Elizabeth Ann Naylor Owens, and hereby certifies that on this **24th day of March, 2025**, a true and correct copy of the **Notice of No Response and Request for Reconsideration** was served upon the following interested parties as required by **Rule 1-005(E) NMRA**:

Served Parties:

1. **Guy Markley Naylor & Dr. Dale Gunn**

[REDACTED]

Method of Service: Certified Mail

2. **Kurt A. Sommer, Esq.**
Sommer Udall Law Firm, P.A.

P.O. Box 1084
[REDACTED]

Method of Service: Certified Mail

3. **F. Vaughn Thomas**

P.O. Box 24588
[REDACTED]

Method of Service: Certified Mail

I declare under penalty of perjury under the laws of the State of New Mexico that the foregoing is true and correct.

Dated this **24th day of March, 2025**.

Respectfully submitted,

Elizabeth Ann Naylor Owens, Petitioner, Pro Se
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