

EXHIBIT A

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

11 WENDY KNIGHT, an individual,

12 Plaintiff; and

13 STATE OF ARIZONA, *ex rel.* KRISTIN K.
14 MAYES, Attorney General,

15 Plaintiff-Intervenor,

16 v.

17 SUNWEST CHOICE HEALTH AND REHAB, an
18 Arizona Corporation; APACHE TRAIL
HEALTHCARE, INC., an Arizona Corporation;
19 BANDERA HEALTHCARE, LLC, a Foreign
20 Corporation; THE ENSIGN GROUP, INC., a
Foreign Corporation; JOHN and JANE DOES I-X;
21 BLACK and WHITE PARTNERSHIPS I-X; and
ABC CORPORATIONS I-X,

22 Defendants.
23

Case No.: CV2024-007103

**CERTIFICATION OF SPECIAL
PUBLIC IMPORTANCE**

24 WHEREAS the above-numbered action involves allegations of abuse and neglect of a
25 vulnerable adult pursuant to the Adult Protective Services Act; and
26

1 WHEREAS the Defendants in the above-numbered action moved to compel arbitration
2 pursuant to an arbitration agreement containing a secrecy clause that violates Arizona law and
3 public policy; and

4 WHEREAS the Adult Protective Services Act gives the Attorney General the absolute right
5 to intervene in cases alleging violations of the Act; and

6 WHEREAS it appears to me that the illegal secrecy clause at issue in this action may be
7 present in arbitration agreements executed by dozens of other facilities located in Arizona and
8 controlled by one or more of the Defendants in this action;

9 I HEREBY CERTIFY that the above-numbered action is of special public importance to
10 the citizens of Arizona, and I direct the Office of the Attorney General to seek the Court's leave
11 to intervene in the action and present to the Court all relevant materials and arguments relating to
12 the illegality of the arbitration agreement at issue.

13
14 DATED this 15th of May, 2024.



KRISTIN K. MAYES
ATTORNEY GENERAL