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6 *Attorneys for Plaintiff*

7 IN THE SUPERIOR COURT OF ARIZONA
8 COUNTY OF MARICOPA

9 PATRICIA BOCCHINO,

Plaintiff,

11 vs.

12 FOUNTAIN SHADOWS HOMEOWNERS
ASSOCIATION,

Defendant.

Case No. CV2015-012434

Court of Appeals Case No: 1 CA-CV 16-0710

**REPLY IN SUPPORT OF MOTION TO
SUPPLEMENT RECORD**

15 Attached to its Statement of Facts in support of its Motion for Summary Judgment,
16 Defendant submitted redacted invoices, which the Court asked it to supplement with the
17 unredacted versions. The Court allowed Defendant to submit the supplemental documents by
18 email, rather than requiring the invoices to be filed with the clerk. It was not until Plaintiff
19 reviewed Defendant's Opening Brief that she realized those unredacted invoices had not been
20 transmitted to the Court of Appeals as part of the record. Plaintiff has asked the Court to
21 supplement the record to include the unredacted invoices, so that like this Court, the Court of
22 Appeals may have the opportunity to consider them.

23 Defendant contends that Plaintiff's motion should be denied because her request was not
24 made sooner, but Defendant cites no rule or law specifying a timeline within which such a
25 request must be made. Moreover, Defendant will not be prejudiced by the supplementation of
26 the unredacted documents, as Defendant contends the documents are not material to the issue on

1 appeal.¹ Accordingly, Plaintiff respectfully requests that this Court certify and forward the
2 corrected record that includes the omitted unredacted invoices submitted to it by Defendant on
3 May 25, 2016.

4 DATED this 3rd day of April 2017.

5 DESSAULES LAW GROUP

6
7 By: /s/ Ashley C. Hill
8 Jonathan A. Dessaules
9 Ashley C. Hill
Attorneys for Plaintiff

10 COPY of the foregoing mailed/emailed
11 this 3rd day of April 2017 to:

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13 Charlene Cruz
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21
22
23
24
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26 ¹ Rule 11(g)(1) expressly provides that “[i]f anything material to either party is omitted from or misstated in the record by error or accident, the omission or misstatement may be corrected and a supplemental record may be certified and forwarded...”