

ARIZONA SUPERIOR COURT  
IN AND FOR THE COUNTY OF MARICOPA

CLERK OF THE  
SUPERIOR COURT  
FILED  
L. GROENEVELD, DEP

2020 JAN 14 PM 2:07

CV2019-055353

Jie Cao, Haining Xia, Stone Xia

Plaintiffs,

v.

Lorne Polger, Matt Quinn, Michael A Schern

Defendants.

MOTION TO COMPEL DEFENDANTS  
TO COMPLY WITH MAILING  
REQUIREMENTS

(Assigned to the Honorable

Theodore Campagnolo)

The undersigned, on behalf of Jie Cao, Haining Xia and Stone Xia, hereby inform the court that the Defendants have completely failed to comply with their obligations to send filed documents to us during the entire proceeding up to the date of this motion.

The specifics are as follows:

The Plaintiffs filed the Complaint with the Superior Court of Maricopa County on November 20, 2019. According to the court docket, we saw several filings made by Michael A. Schern (an attorney who is also a Defendant in this case): (i) on December 18, 2019, a MOTION FOR MORE DEFINITE STATEMENT, (ii) on December 18, 2019, a DEFENDANTS' NOTICE REQUESTING ASSIGNMENT TO COMMERCIAL COURT, (iii) on December 20, 2019, an Answer. No copies of any of the above court filings were mailed to us. No other forms of communication were ever mailed to us. The Defendant completely failed to follow the court rules and procedures regarding communication. Moreover, as an attorney, Schern has failed treat us with fairness and transparency.

PRAY


The Plaintiffs pray for the court to order the Defendants to comply with court rules and procedures regarding communication, and to compel them to litigate this case in compliance with the rules and procedures set by the court.

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**AFFIDAVIT**

I, Jie Cao, do hereby certify that the statements and allegations set forth herein are true and accurate to the best of my knowledge and belief.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Jie Cao', written over a horizontal line.

**JIE CAO**

On behalf of:

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