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13 Attorneys for Defendant PFP Dorsey Investments, LLC

14 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

15 IN AND FOR THE COUNTY OF MARICOPA

16 JIE CAO and HAINING “FRAZER” XIA,  
17 a married couple; STONE XIA, an  
18 individual,

19 Plaintiffs,

20 v.

21 PFP DORSEY INVESTMENTS, LLC, a  
22 Delaware limited liability company;  
23 DORSEY PLACE CONDOMINIUM  
24 ASSOCIATION, an Arizona nonprofit  
25 corporation;

26 Defendants.

No. CV2019-055353

**DEFENDANT PFP DORSEY  
INVESTMENTS, LLC’S RULE 8.1(e)(4)  
GOOD FAITH CONSULTATION  
CERTIFICATE**

(Assigned to the Honorable Daniel Martin)

27 Undersigned counsel for Defendant PFP Dorsey Investments, LLC (“PFP”), hereby  
28 submits its Good Faith Consultation Certificate in order to establish compliance with the  
requirements of Ariz. R. Civ. P. 8.1(e)(4), which requires the submission of such certificate  
in compliance with Ariz. R. Civ. P. 7.1(h). This certificate is filed contemporaneously with  
PFP’s Motion to Dismiss Plaintiffs’ Second Amended Complaint.

Counsel for the Parties have worked together in good faith to address the issues in  
Plaintiffs’ pleadings, some of which have resulted in two amendments to their Complaint.

1 However, undersigned counsel, counsel for Plaintiffs, Ross Meyer, and counsel for Dorsey  
2 Place Condominium Association, Nicholas Nogami, had a telephone conference on August  
3 13, 2020, regarding the basis of Defendant PFP's Motion to Dismiss and it was concluded  
4 that the parties were unable to agree that the Second Amended Complaint is curable by a  
5 permissible amendment.

6 Based upon the foregoing, undersigned counsel for PFP hereby certifies that, after  
7 personal consultation and good faith efforts to do so, counsel for the parties have been  
8 unable to satisfactorily resolve this dispute which is the subject of the Motion to Dismiss  
9 filed by PFP.

10 Undersigned counsel for PFP further certifies that, as required by Ariz. R. Civ. P.  
11 7.1(h), such consultation was by phone, and not merely by letter or email.

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14 RESPECTFULLY submitted this 13<sup>th</sup> day of August, 2020.

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16 GARREY, WONER, HOFFMASTER & PESHEK, P.C.

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19 By /s/ Stephanie K. Gintert  
20 Shawna M. Woner  
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25 Attorneys for Defendant PFP Dorsey Investments, LLC

26 ORIGINAL of the foregoing  
27 e-filed this 13<sup>th</sup> day of  
28 August, 2020, with the  
Clerk of Maricopa County  
Superior Court.

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1 COPIES of the foregoing  
2 e-mailed this 13<sup>th</sup> day of  
3 August, 2020, to:

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By /s/ Ali Linton