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CNA.DORSEY.01

7 *Attorneys for Defendant Dorsey Place Condominium*
8 *Association*

9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

10 **IN AND FOR THE COUNTY OF MARICOPA**

11
12 **JIE CAO and HAINING “FRAZER”**
13 **XIA, a married couple; STONE XIA, an**
14 **individual,**

15 **Plaintiffs,**

16 **v.**

17 **PFP DORSEY INVESTMENTS, LLC,**
18 **a Delaware limited liability company;**
19 **DORSEY PLACE CONDOMINIUM**
20 **ASSOCIATION, an Arizona nonprofit**
21 **corporation**

22 **Defendants.**

Case No. CV2019-055353

DEFENDANT DORSEY PLACE
CONDOMINIUM ASSOCIATION’S
GOOD FAITH CONSULTATION
CERTIFICATE

(Assigned to the Honorable
Daniel Martin)

23
24
25 Defendant Dorsey Place Condominium Association (the “Association”), through
26 counsel undersigned, hereby submits this Good Faith Consultation Certificate in order to
27 establish compliance with the requirements of Ariz. R. Civ. P. 8.1(e)(4) which requires
28 submission of such certificate in compliance with Ariz. R. Civ. P. 7.1(h). This certificate is

1 filed contemporaneously with the Association's Motion to Dismiss or in the Alternative
2 Motion for More Definite Statement pursuant to Ariz.R.Civ.P. 12(b)(6) and (e).
3

4 The following efforts have been made to resolve this matter before resorting to the
5 Court for relief:

- 6 • The Parties met and conferred by telephone conversation on August 13, 2020
7 and discussed whether the Plaintiffs' Complaint is curable by a permissible
8 amendment. The Parties agreed that no such amendment was feasible.
9

10 Based on the foregoing, undersigned counsel for the Association hereby certifies that,
11 after personal consultation and good faith efforts to do so, counsel for the parties have been
12 unable to agree that the Plaintiffs' Complaint is curable by a permissible amendment.
13 Undersigned counsel for the Association further certifies that, as required by Ariz.R.Civ.P.
14 7.1(h), such consultation was by telephone and not merely by letter or email.
15

16 RESPECTFULLY SUBMITTED this 13th day of August, 2020.
17

18 **CARPENTER, HAZLEWOOD, DELGADO & BOLEN, LLP**

19
20 By: 

21 Edith I. Rudder, Esq.
22 Nicholas C. Nogami, Esq.
23 1400 E. Southern Ave., Suite 400
24 Tempe, AZ 85282
25 *Attorneys for Defendants*
26
27
28

1 THE FOREGOING of the foregoing electronically
2 filed this 13th day of August, 2020, with:

3 Clerk of the Court
4 Maricopa County Superior Court
5 www.AZTurboCourt.gov

6 COPY of the foregoing mailed and delivered
7 via TurboCourt E-Service Notification
8 this 13th day of August, 2020, to:

9 Dennis Wilenchik, Esq.
10 Jack D. Wilenchik, Esq.
11 Ross Meyer, Esq.
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27
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By: 