

**From:** [Shawna Woner](#)  
**To:** ["Jack Wilenchik"](#)  
**Cc:** ["Eadie Rudder"](#); ["Nicholas Nogami"](#); ["Stephanie Gintert"](#)  
**Subject:** RE: Follow up on Call - RULE 408 Offer in Cao and Xia v. PFP Dorsey and Dorsey Condo Association  
**Date:** Monday, August 3, 2020 11:31:19 AM

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Jack,  
Stephanie just asked me about our upcoming deadline to respond to Complaint – mind agreeing to just give us one week from whenever you get back to us on settlement proposal given that intent of the offer was in large part to avoid costs?

Thanks,  
Shawna

*Please be advised that due to the ongoing COVID-19 pandemic, we will be sending all documents electronically; if you require a hard copy, please let me know. Thank you for your understanding and cooperation, and please remain safe and well as we face this challenge together.*

Shawna Murphy Woner  
Garrey, Woner, Hoffmaster & Peshek, P.C.  
6611 North Scottsdale Road  
The Gibraltar Building  
Scottsdale, Arizona 85250  
(480) 483-9700  
(480) 991-0334 fax

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**From:** Shawna Woner [mailto:[swoner@gwhplaw.com](mailto:swoner@gwhplaw.com)]  
**Sent:** Friday, July 31, 2020 3:55 PM  
**To:** 'Jack Wilenchik' <[JackW@wb-law.com](mailto:JackW@wb-law.com)>  
**Cc:** 'Eadie Rudder' <[eadie.rudder@carpenterhazlewood.com](mailto:eadie.rudder@carpenterhazlewood.com)>; 'Nicholas Nogami' <[Nicholas.Nogami@carpenterhazlewood.com](mailto:Nicholas.Nogami@carpenterhazlewood.com)>  
**Subject:** Follow up on Call - RULE 408 Offer in Cao and Xia v. PFP Dorsey and Dorsey Condo Association

Thanks, Jack, for taking the time on a crazy hot Friday afternoon to discuss. Just to confirm, the joint offer is to pay your clients the sum of [REDACTED] in exchange for a full release of all defendants (including the previously dismissed individual defendants) and a dismissal with prejudice. I am not a real estate attorney, but if there was anything that

needed to be done to effectuate or clear any issues on title arising by virtue of this suit, we would want to do that for the client as well. I understand that your clients stated at some point that they believed that the value of the unit was closer to [REDACTED] This offer of [REDACTED] in addition to the amount in escrow represents a good faith effort to meet them [REDACTED] so I do hope that they will take this seriously before expenses escalate.

Have a great weekend ~ cheers!

Shawna

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