

1 Lisa Marx  
2 13610 N. 111<sup>th</sup> Ave.  
3 Sun City, AZ 85351  
4 602-748-7781  
5 aimtodogood@gmail.com  
6 Representing self

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
8 **IN AND FOR THE COUNTY OF MARICOPA**

9  
10 Lisa Marx  
11 Plaintiff,

Case No. CV 2025-012980

12 vs.

13 Tara Condominiums Association, Inc.,

**PLAINTIFF'S FIRST REQUESTS  
FOR PRODUCTION OF  
DOCUMENTS OR THINGS  
(PURSUANT TO RULES 26, 26.2,  
AND 34, ARIZ. R. CIV. P.)**

Honorable Adele Ponce

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16  
17 Pursuant to Rules 26, 26.2, and 34 of the Arizona Rules of Civil Procedure, Plaintiff Lisa  
18 Marx, hereby serves these Requests for Production on Defendant Tara Condominiums  
19 Association, Inc., in this Tier 2 action (as designated under Rule 26.2(c)(2)). These  
20 requests comply with the presumptive discovery limits for Tier 2 cases under Rule  
21 26.2(d)(2), including no more than 10 requests per side (with discrete subparts counted  
22 separately only if they constitute independent inquiries). Defendant is required to  
23 produce for inspection, copying, testing, or sampling the following documents,  
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1 electronically stored information (ESI), and tangible things within thirty (30) days of  
2 service of these requests (pursuant to Rule 34(b)(2)(A)), to Plaintiff's email address  
3 aimtodogood@gmail.com or as otherwise agreed by the parties or ordered by the court.  
4 These requests are continuing in nature and require supplementation if additional  
5 responsive material is obtained, pursuant to Rule 26(e).

6 **Definitions (Pursuant to Rule 34(a)):**

- 7 • "Document" or "Documents" means any writing, recording, or photograph as  
8 defined in Rule 34(a), including but not limited to originals, duplicates, drafts,  
9 handwritten notes, emails, text messages, electronic files, spreadsheets,  
10 databases, calendars, memoranda, correspondence, reports, records, charts,  
11 graphs, drawings, photographs, videos, audio recordings, and any other data  
12 compilations from which information can be obtained.
- 13 • "Electronically Stored Information" or "ESI" includes all electronic data in its  
14 native format, including metadata, as defined in Rule 34(a).
- 15 • "Communication" or "Communications" means any oral, written, or electronic  
16 exchange of information, including but not limited to emails, text messages,  
17 letters, phone calls (e.g., logs, recordings, or notes), meetings, or other  
18 interactions.
- 19 • "Tara" refers to the Tara Homeowners Association or any related entity,  
20 including the Tara Condominium Association.
- 21 • "Board" refers to the Tara Board of Directors.
- 22 • "Colby" refers to Colby Management or any related entity.
- 23 • "Master Policy" refers to the Tara master insurance policy or any related  
24 condominium association insurance policies.

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- "You" or "Your" refers to the Defendant(s) and any agents, employees, representatives, or persons acting on their behalf.
  - "Relating to" or "Regarding" means concerning, referring to, reflecting, pertaining to, or in any way logically or factually connected with the matter discussed.

5 **Instructions (Pursuant to Rules 26(b), 26(e), and 34(b)):**

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1. Produce all responsive documents in their entirety, without redaction unless required by privilege or protection (in which case, provide a privilege log pursuant to Rule 26(b)(5)) or as specifically noted in a request (e.g., for PII redaction). Production must be made as documents are kept in the usual course of business or organized and labeled to correspond to the categories in these requests, pursuant to Rule 34(b)(2)(E).
  2. For ESI, produce in native format or a reasonably usable form (e.g., searchable PDF for emails), pursuant to Rule 34(b)(2)(E)(ii).
  3. If any document is withheld on grounds of privilege, work product, or other protection, state the basis for withholding and provide a privilege log describing the nature of the documents withheld in sufficient detail to enable assessment of the claim, pursuant to Rule 26(b)(5).
  4. Organize and label documents to correspond to each request, pursuant to Rule 34(b)(2)(E)(i).
  5. These requests are not limited by any prior disclosures and include all documents in Your possession, custody, or control, as defined in Rule 34(a)(1). If a document cannot be produced, describe it in detail, state its current location, and identify its custodian, pursuant to Rule 34(b)(2)(B)-(C). Objections must be
- 24

1 stated with specificity, pursuant to Rule 34(b)(2)(B)-(C), and any ground not  
2 stated is waived.

3 **REQUEST NO. 1:** All Documents and ESI Relating to the 2024 insurance claim on the  
4 Tara Master Policy for the property located at 13601 N. Newcastle Drive, including but  
5 not limited to: all Communications (e.g., emails, letters, phone calls with logs or notes)  
6 among the insurance company, Tara, and any involved parties (e.g., insurers, adjusters,  
7 claimants, Board members, Tara members, contractors); investigation records; signed  
8 documents (e.g., claim forms, releases, or settlements); Board approval letters or  
9 resolutions; financial records, including claim payouts, payment information, invoices,  
10 checks, wire transfers, accounting entries, and records of all associated transactions;  
11 and receipts for work completed, including dates and by whom.

12 **REQUEST NO. 2:** All signed minutes from Tara Board meetings held from January 1,  
13 2024, through April 30, 2025, including any attachments, agendas, exhibits, or related  
14 Documents.

15 **REQUEST NO. 3:** All signed minutes from Tara Executive Session meetings held from  
16 January 1, 2024, through April 30, 2025, including any attachments, agendas, exhibits,  
17 or related Documents (subject to any applicable privileges, with a privilege log if  
18 withheld).

19 **REQUEST NO. 4:** PDF copies (or native electronic copies if available) of all insurance  
20 policies covering Tara properties or operations in effect from August 1, 2024, through  
21 December 31, 2025, including but not limited to Master Policies, endorsements, riders,  
22 certificates of insurance, and any related correspondence or amendments; and all  
23 Master Policy Documents Relating to the requirement of Tara to be charged for a  
24 Special Form "Walls-In" including Betterments and Improvements policy, including

1 but not limited to: all wording from the Declaration that supports this type of insurance  
2 being required; all American Family company requirements for this type of insurance;  
3 and any existing Documents reflecting why the Walls-In including Betterments and  
4 Improvements is necessary when homeowners are required to carry HO6 policies that  
5 include betterments and improvements.

6 **REQUEST NO. 5:** PDF copies (or native electronic copies if available) of all emails and  
7 other ESI exchanged between Mark Gottmann (using his personal email address(es) or  
8 any Tara-associated email address(es)) and any persons at Colby Relating to changes in  
9 financial reporting from cash basis to any new forms or methods, from May 1, 2024,  
10 through August 31, 2025, including but not limited to attachments, drafts, and  
11 metadata.

12 **REQUEST NO. 6:** PDF copies (or native electronic copies if available) of all records,  
13 including but not limited to emails, phone records (e.g., call logs or transcripts), text  
14 messages, or any other forms of Communication, between the Board and any Tara  
15 members Relating to members volunteering to participate in projects or committees on  
16 Tara property, from January 1, 2024 through April 30, 2025.

17 **REQUEST NO. 7:** PDF copies (or native electronic copies if available) of all  
18 Architectural Change Forms submitted to or processed by Tara from January 1, 2024,  
19 through April 30, 2025, including any approvals, denials, correspondence, or related  
20 Documents.

21 **REQUEST NO. 8:** PDF copies (or native electronic copies if available) of all violation  
22 letters or notices issued by Tara from January 1, 2024, through April 30, 2025, including  
23 any related correspondence, responses, appeals, or enforcement records.  
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1 **REQUEST NO. 9:** All Documents and ESI Relating to the 400+% rate increase in the  
2 Master Policy from August 1, 2024, through July 31, 2025, including but not limited to:  
3 any existing Documents reflecting a breakdown of what caused the particular increases  
4 in each portion of the insurance; any Documents showing when the Board was  
5 informed of the increase; and Documents showing the amount of the increase in the  
6 Master Policy due to multiple claims.

7 **REQUEST NO. 10:** All Documents and ESI Relating to the issuing of the “Workers  
8 Comp.- If Any” policy that was issued in March of 2024, including but not limited to:  
9 emails, phone call documentation, written correspondences, and Documents showing  
10 by whom the policy was paid for and how.

11  
12 DATED this 6th day of February, 2026.

13 /s/Lisa Marx

14 Lisa Marx Plaintiff, Pro Se  
15 13610 N. 111th Ave.  
16 Sun City, AZ 85351  
17 602-748-7781  
[aimtodogood@gmail.com](mailto:aimtodogood@gmail.com)

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on this 6th day of February, 2026, a true and correct copy of the  
20 foregoing PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS OR  
21 THINGS

22 COPY of the foregoing emailed This 6th day of February, 2026, to:  
23 Charles H. Oldham, Esq.,  
24 Chuck.Oldham@chdbl.com

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Ari A. Bowhay  
[Ari.Bowhay@chdblawn.com](mailto:Ari.Bowhay@chdblawn.com)  
By /s/ Lisa Marx