

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 REQUEST FOR  
ANSWERS TO  
INTERROGATORIES PURSUANT  
TO RULE 33 DIRECTED TO Tara  
Condominium Board**

Honorable Randall H. Warner

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18 Plaintiff, pursuant to Rule 33, Arizona Rules of Civil Procedure, requests that The  
19 Tara Condominium Board, answer, under oath and in writing within thirty (30) days  
20 after service, the following Interrogatories:  
21

22 UNIFORM INTERROGATORIES FROM RULE 84 FORM 6  
23  
24

1 1. **Interrogatory No. 7:** Do you have liability insurance, or are you aware of any other  
2 form of indemnity or bond, through which you were or might be insured in any  
3 manner for the damages, claims, or actions that are the subject of the pleadings?  
4

5 \_\_\_ If you answered "Yes", please provide the following information for each  
6 policy:  
7

8 A. The kind of insurance, indemnity or bond;

9 B. The name of the company or companies, including any excess or umbrella carriers,  
10 which you claim provide coverage;  
11

12 C. The policy number or policies numbers of any applicable policy;

13 D. The limit or limits of liability of each policy.  
14

15 E. The named insured of each policy.

16 F. Whether the insurance carrier has accepted or denied coverage.  
17

18 G. Whether you are being defended by the insurance carrier under a reservation or  
19 rights.  
20

21 2. **Interrogatory No. 9:** Please identify all persons responsible for furnishing any  
22 materials or information used to complete the disclosure statement required by Rule  
23 26.1, Ariz.R.Civ.P.  
24

1           3.       **Interrogatory No. 10:** Please state the name, address and telephone number of  
2 all persons who you believe may have knowledge or relevant information  
3 concerning each claim or defense disclosed pursuant to Rule 26.1, Ariz.R.Civ.P. If  
4 you have disclosed multiple claims or multiple defenses, state the claim(s) or  
5 defense(s) about which you believe the person has information or knowledge.  
6

7           4.       **Interrogatory No. 11:** Identify and list each document you believe may be  
8 relevant to each separate claim or defense disclosed pursuant to Rule 26.1,  
9 Ariz.R.Civ.P. If you disclosed multiple claims or multiple defenses, state which  
10 claim(s) or defense(s) about which you believe the document bears relevance. As to  
11 each of the documents identified, please provide the following:  
12

13           A. The location of the documents.  
14

15           B. The name, address, and telephone number of the individual with the custody or  
16 control over the documents.  
17

18           NONUNIFORM INTERROGATORIES  
19

20           5.       Did any board member personally perform any work, repairs, or  
21 maintenance, including plumbing or other systems, inside of the unit located 13601  
22  
23  
24

1 N. Newcastle, Sun City, AZ 85351 at any time before water damage occurred on or  
2 about January 2, 2024?

3  
4 6. If your answer to Interrogatory No. [5] is affirmative, provide a detailed  
5 description of all work, repairs, or maintenance performed inside the unit at 13601 N.  
6 Newcastle, Sun City, AZ 85351 before January 2, 2024, including in your narrative  
7 the specific dates the work was performed, the nature and specific location of the  
8 work within the unit, whether the work involved plumbing, pipes, water lines, or  
9 related systems, the materials or parts used (including brand names and  
10 specifications), and whether any permits or approvals were obtained for the work.  
11  
12

13  
14 7. Provide a detailed description of any and all work performed at 13601 N.  
15 Newcastle, Sun City, AZ 85351 from January 3, 2024, to the present, including in  
16 your narrative the specific dates the work was performed, the nature and specific  
17 location of the work within the unit, any materials or parts used (including brand  
18 names and specifications), and whether any permits or approvals were obtained for  
19 the work.  
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22 8. Provide a detailed description of all payments received for any work  
23 performed at 13601 N. Newcastle, Sun City, AZ 85351, including in your narrative  
24

1 the specific dates of each payment, the form of each payment (e.g., cash, check,  
2 electronic transfer), and the identity of the person or entity who made each payment.

3  
4 9. Provide a detailed description of the reading capacity and any limitations any  
5 member has experienced in reading and understanding documents, including  
6 governing documents, laws, contracts, or other materials relevant to your service on  
7 the Board and how any such limitations have affected your ability to perform your  
8 duties as a Board member, including reviewing or understanding HOA governing  
9 documents, laws, contracts, or approvals related to property modifications or  
10 maintenance in the Tara Condominium Association in Sun City, AZ 85351.

11  
12  
13 10. As a Director/Officer of the Tara Condominium Association, Inc., provide a  
14 detailed description of your involvement in any board decisions or actions taken in  
15 2024 to the present without an open meeting, vote, or approval as required by  
16 Declaration § 9.E., including but not limited to the election of the Chairperson on or  
17 about February 1, 2024 (¶ 26 of the Complaint), removal of Plaintiff from the  
18 Landscaping Committee and dissolution of that committee on or about February 1,  
19 2024 (¶ 27), announcement of a new board member on or about February 5, 2024 (¶  
20 28), transfer of \$5,198.69 from the Homeowners Equity line to the Major Maintenance  
21 Reserve Account in February 2024 (¶ 29), approval of roof repairs at 13609 N.  
22  
23  
24

1 Newcastle in early 2024 (¶ 33), sprinkler line repairs in early 2024 (¶ 34),  
2 appointment of a board member on or about June 21, 2024 (¶ 36), and any related  
3 expenditures or policy announcements (¶¶ 31, 32, 38-42), including in your narrative  
4 the specific communications you had with other board members or Association  
5 representatives about these actions, the factual basis for proceeding without open  
6 meeting approval, and any documents or records you reviewed or relied upon in  
7 participating in or approving these decisions.  
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10  
11 The foregoing constitutes all Interrogatories served upon you at this time. You are  
12 required to answer each Interrogatory fully and in writing under oath, pursuant to  
13 Rule 33(b)(2) of the Arizona Rules of Civil Procedure, and to serve your responses on  
14 the undersigned Plaintiff within 30 days of service of these Interrogatories. For  
15 purposes of these Interrogatories, "the Association" refers to the Tara Condominium  
16 Association, Inc.  
17  
18

19 Respectfully submitted,  
20

21 DATED: November 24, 2025.  
22

23 /s/ Lisa Marx  
24

1 CERTIFICATE OF SERVICE

2  
3 I hereby certify that on November 24, 2025., I served the foregoing Requests for  
4 Answers to Interrogatories on the following party by emailing to counsel's agreed  
5 email address with consent.

6 COPY of the foregoing emailed

7 This 24th day of November, 2025, to:

8 Charles H. Oldham, Esq.

9 [Chuck.Oldham@chdblawn.com](mailto:Chuck.Oldham@chdblawn.com)

10  
11 Ari A. Bowhay

12 [Ari.Bowhay@chdblawn.com](mailto:Ari.Bowhay@chdblawn.com)

13  
14 /s/ Lisa Marx

15 Lisa Marx

16 13610 N. 111th Ave.

17 Sun City, AZ 85351

18 602-748-7781

19 aimtodogood@gmail.com

20 Pro Per

21 Date: November 24, 2025.  
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23  
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