





1 pending before the Court is a Partial Motion to Dismiss; yet the Plaintiff files mountains  
2 of motions that have no bearing on the Partial Motion to Dismiss.

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4 The allegations contained in the Plaintiff's Motion to Strike are ludicrous. As such,  
5 the Defendants' hereby request that the Court deny the Plaintiff's Motion to Strike or, if  
6 the Court plans to entertain the Motion to Strike, scheduling a Hearing so that the  
7 Defendants and their counsel can be heard.

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9 **II. SANCTION SHOULD BE AWARDED AGAINST THE PLAINTIFF.**

10 Obviously, the Plaintiff will not cease the filing of frivolous Motions to Strike  
11 unless this Court awards the Defendants sanctions against the Plaintiff.

12 As such, pursuant to Court's Minute Entry dated August 27, 2024 and Rule 11,  
13 Arizona Rules of Civil Procedure, the Defendants ask the Court to award sanctions  
14 against the Plaintiff in the amount of the Defendants' attorney's fees and costs to respond  
15 to the Plaintiff's inappropriate motions.

16 **III. CONCLUSION.**

17 The Plaintiff has shown a clear pattern of filing repetitive and frivolous motions  
18 before the Court. The Defendant respectfully and strenuously requests that the Court  
19 intervene and stop the Plaintiff's abuse of the legal system. Sanctions must be assessed  
20 against the Plaintiff in order to protect the Defendants from inappropriate and  
21 unwarranted motions and pleadings. The Plaintiff's behavior must cease and the Court is  
22 the only bastion of relief.

23 As such, the Defendants request that the Court deny the Plaintiff's Motion to  
24 Strike and impose sanctions against the Plaintiff pursuant to the Court's Minute Entry  
25 dated August 27, 2024 and Rule 11, Arizona Rules of Civil Procedure to include the  
26 attorney's fees and costs incurred by the Defendants.

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DATED this 1<sup>st</sup> day of November, 2024.

**SHAW & LINES, LLC**

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ORIGINAL submitted for electronic filing

This 15<sup>th</sup> day of November 2024 with:

Clerk of the Court  
Maricopa County Superior Court

COPY electronically mailed

This 15<sup>th</sup> day of November 2024 to:

Sandra Rodriquez  
4735 E Besty Lane  
Gilbert, AZ 85296

By: /s/ D:U