

1 Plaintiff, in her Motion to Dismiss, requests that the Court “dismiss Defendants’
2 Response filed on November 4, 2024 (which was a responsive motion),” “enforce
3 compliance with Arizona filing and ethical standards” and “grant additional relief.”

4 The only legal rational the Plaintiff cites for her Motion to Dismiss is Arizona Code
5 of Judicial Administration §1-506, Rule ER 3.3(a) of the Arizona Rules of Professional
6 Conduct, Rule 4.1 Ariz. R. Civ. P., and several cases, not of which would provide the
7 Plaintiff the relief she is requesting.

8 In other words, the Plaintiff does not provide any legal justification for her request
9 to dismiss or other requests made in the Motion to Dismiss. Therefore, the Motion to
10 Dismiss should be denied.

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

12 The Court, in its Minute Entry dated August 27, 2024, stated:

13 Plaintiff must refrain from filing repetitive motions that ask for essentially
14 the same relief when the Court has already denied similar requests....
15 Restating the same or virtually identical arguments over and over again in
16 serial filings is not going to change the Court’s disposition. And, doing so,
may very well lead to the imposition of monetary sanctions against Plaintiff.

17 The Plaintiff’s Motion to Dismiss continues her practice of repeating arguments.
18 The arguments regarding TurboCourt, e-mail service of documents, retaliation,
19 harassment, non-compliance with filing requirements, and procedural abuses have been
20 the topics of the Plaintiff’s previous 15+ Motions and Pleadings. Obviously, the Plaintiff
21 will not cease her behavior unless this Court awards the Defendant sanctions against the
22 Plaintiff.

23 As such, pursuant to Court’s Minute Entry dated August 27, 2024 and Rule 11,
24 Arizona Rules of Civil Procedure, the Defendant asks the Court to award sanctions against
25 the Plaintiff in the amount of the Defendant’s attorney’s fees and costs to respond to the
26 Plaintiff’s inappropriate motions.

27 **III. CONCLUSION.**

28 Defendants request that the Court deny the Plaintiff’s Motion to Dismiss in its
29 entirety and impose sanctions against the Plaintiff pursuant to the Court’s Minute Entry
30 dated August 27, 2024 and Rule 11, Arizona Rules of Civil Procedure to include the

1 attorney's fees and costs incurred by the Plaintiff to respond to the original request and
2 this Motion.

3 DATED this 26th day of November, 2024.

4 **SHAW & LINES, LLC**

5 /s/ Augustus H. Shaw, IV
6 Augustus H. Shaw IV, Esq., CCAL
7 4523 E. Broadway Road
8 Phoenix, Arizona 85040
9 *Counsel for Defendant*

10 ORIGINAL submitted for electronic filing
11 This 26th day of November, 2024 with:

12 Clerk of the Court
13 Maricopa County Superior Court

14 COPY of the foregoing mailed
15 This 26th day of November, 2024 to:

16 Sandra Rodriquez
17 4735 E Besty Lane
18 Gilbert, AZ 85296

19 By: /s/ Diane Fincher
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