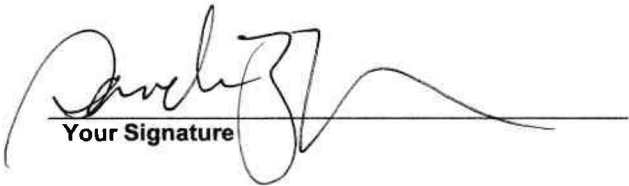


NIA

Today's Date: _____


Your Signature

This page must be completed and attached to the LAST page of your Motion/Request

I filed the ORIGINAL of the attached document(s) with the Clerk of the Superior Court in Maricopa County on: January 31, 2025.
Month Date Year

I mailed/delivered a COPY of the attached document(s) to the Judicial Officer assigned to my case, Judge (or Commissioner): Coffey, on January 31, 2025 (Judicial Officer assigned to your case)
Month Date Year

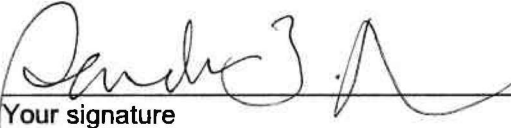
I mailed/delivered a COPY of the attached document(s) on this date: January 31, 2025 To: Gardens Gilbert Community Association et. al
Month Date Year

(You must mail a copy of all documents to the other side and his/her lawyer)

<u>Gardens Gilbert Community Association et. al.</u> Name of Other Side	<u>Shaw & Lines, LLC/Augustus H. Shaw IV</u> Name of Other Side's Lawyer
<u>4135 S. Power Road, Ste. 133</u> Address	<u>4523 E. Broadway Road</u> Lawyer's Address
<u>Mesa, Arizona 85212</u> City, State, Zip	<u>Phoenix, Arizona 85040</u> City, State, Zip

By signing below, I state to the Court, under penalty of law, that the information stated on these pages is true and correct to the best of my knowledge and belief.

I further state that I have filed/mailed the attached document(s) as shown above. I understand that if I do not file/mail the attached document(s) as shown above, the judge in my case will not read my request/motion.


Your signature

1 Sandra Rodriguez
2 4375 E. Betsy Lane
3 Gilbert, Arizona 85296
4 **Phone Number:** 602-688-9720
5 **Email Address:** sandra.rodriguez0339@gmail.com
6 **Representing:** Self Represented, without a Lawyer
7

8 **ADDENDUM A**

9 **IN THE SUPERIOR COURT IN THE STATE OF ARIZONA**
10 **IN AND FOR THE COUNTY OF MARICOPA**

11 SANDRA RODRIGUEZ,
12 Plaintiff,
13 vs.

14 GARDENTS GILBERT COMMUNITY
15 ASSOCIATION, FOCUS HOA
16 MANAGEMENT, LLC, HARMIN CADIS,
17 BROOKE SORTOR, AND ANNA
18 SCHULTZ
19 Defendants,

20 AUGUSTUS H. SHAW IV
21 Defendant's Legal Counsel,
22

Supreme Court:
Case No.: CV 24-0286-PR

Appellate Court
Case No.: 1 CA-CV 24-0803

Maricopa County Superior Court
Case No.: CV2024-005940

**PLAINTIFF'S SEPARATE
CASE MANAGEMENT REPORT**

23
24 **To the Honorable Superior Court:**

25 Comes now Sandra Rodriguez (Plaintiff), submitting this Separate Case Management
26 Statement as ordered by Judge Roderick Coffey on December 13, 2024, to outline critical
27 procedural violations, due process infringements, and systemic inequities experienced during this
28

1 litigation. This statement highlights significant instances of judicial bias, obstruction of justice,
2 and the Defendants' escalatory conduct during the proceedings.

3 **Plaintiff respectfully requests the Court to take the following actions:**

- 4 1. Grant a default judgment due to the Defendants' repeated procedural violations and
5 bad faith litigation tactics.
- 6 2. If a default judgment is not approved, restart the case under the authority of a new,
7 impartial judge to ensure procedural fairness and justice.
- 8 3. Permit Plaintiff to file a new civil complaint addressing all previously dismissed and
9 newly arising claims.
- 10 4. Investigate and address the documented pattern of legal and financial extortion
11 perpetuated by the Defendants and their legal counsel, Augustus H. Shaw IV, which
12 has compounded the harm inflicted upon the Plaintiff and her family.

13 Plaintiff remains committed to seeking a fair and equitable resolution of her claims while
14 advocating for transparency and justice under both the Arizona Constitution and the Fourteenth
15 Amendment to the U.S. Constitution.

16 **1. Status of the Case**

- 17 1. Defendant has filed an Answer to the Complaint on December 17, 2024, which was filed
18 beyond the deadline required by Rule 12(a) of the Arizona Rules of Civil Procedure.
- 19 2. Plaintiff reserves the right to challenge the sufficiency and timeliness of Defendant's
20 Answer and to address procedural deficiencies as necessary.

21 **2. Previously Filed Request for Recusal of Judge Roderick Coffey**

- 22 1. On December 23, 2024, Plaintiff filed a formal motion for the recusal of Judge Roderick
23 Coffey, citing procedural bias, ethical concerns, and conflicts of interest.
- 24 2. Plaintiff requests that the Court take action on the pending motion before proceeding
25 further with this case, as the impartiality of the presiding judge is essential to ensuring due
26 process and constitutional protections for all parties.
- 27 3. Proceeding with case management activities under the current circumstances risks further
28 undermining the integrity of these proceedings.

3. Efforts to Settle Outside of Court and Defendants' Bad Faith Conduct

- 1 1. Despite repeated attempts by Plaintiff to settle this matter outside of court, Defendants
2 and their legal counsel, Augustus H. Shaw IV, have refused to cooperate, demonstrating
3 a consistent pattern of bad faith conduct.

4 **3.1 Plaintiff's Settlement Attempts**

- 5 • Plaintiff sent settlement proposals and communications to the Defendants and their legal
6 counsel, Augustus H. Shaw IV on the following dates:
 - 7 ○ **January 4, 2024, September 25, 2024, November 20, 2024 and December 27,**
8 **2024:** Defendants were either ignored entirely and dismissed without meaningful
9 engagement, demonstrating a clear refusal to respond or participate in good faith
10 settlement discussions.
 - 11 ○ **October 2, 2024, and September 25, 2024:** Plaintiff attempted to negotiate
12 directly with Focus HOA Management, LLC, Harmin Cadis, and Brooke Sortor,
13 and legal counsel Shaw but these efforts were met with outright refusals to act in
14 good faith.

15 **3.2 Escalation of Bad Faith Efforts by Defendants**

- 16 • Rather than engaging in settlement discussions, Defendants escalated their actions in bad
17 faith by:
 - 18 • Engaging in improper service of at least twelve motions, deliberately attempting to
19 undermine Plaintiff's civil due process rights by creating procedural barriers and denying
20 fair notice.
 - 21 • Abusing procedural rules to obstruct the Plaintiff's claims by submitting an untimely
22 Answer far beyond the deadlines mandated under the Arizona Rules of Civil Procedure,
23 thereby intentionally causing delays and engaging in procedural manipulation.
24 Furthermore, failing to ensure proper service for 12 motions demonstrates a clear
25 disregard for procedural fairness, judicial efficiency, and the Plaintiff's right to a timely
26 resolution.
 - 27 • Exploiting procedural delays and employing bad faith tactics to impose excessive legal
28 and financial burdens on Plaintiff, culminating in actions tantamount to legal and financial
extortion.

3.3 Pattern of Bad Faith Conduct

- 1 • Defendants, including Gardens Gilbert Community Association (GGCA), Focus HOA
2 Management, LLC (Focus HOA), GGCA Board of Directors President Anna Schultz, and
3 Focus HOA representatives Harmin Cadis and Brooke Sortor, have acted in concert to
4 obstruct justice and escalate attacks against Plaintiff, causing punitive damages and
5 significant harm.

6 **4. Legal and Financial Extortion by Defendants and Their Counsel**

- 7 1. The actions of Defendants and their counsel, Augustus H. Shaw IV, demonstrate a
8 concerted effort to use the legal process as a weapon to financially and procedurally harm
9 Plaintiff, including:
- 10 ○ Filing baseless or untimely motions to obstruct Plaintiff's ability to seek justice.
 - 11 ○ Exploiting procedural deficiencies and raising improper objections to unjustly
12 dismiss legitimate claims, thereby influencing the court's perception of the
13 Plaintiff and creating an unfair bias against her case.
 - 14 ○ Imposing excessive legal burdens on Plaintiff, causing undue financial hardship.
- 15 2. These actions constitute legal and financial extortion and require closer scrutiny by this
16 Court to ensure procedural integrity and adherence to ethical standards.

17 **5. Request for Default Judgment or, Alternatively, to Restart the Case**

18 To address the substantial procedural violations and ensure a fair resolution of this matter,

19 **Plaintiff respectfully requests the following relief:**

- 20 1. **Default Judgment:** Plaintiff requests that the Court grant default judgment against the
21 Defendants due to their repeated failures to adhere to procedural requirements, including
22 untimely filings and improper service, which have infringed upon Plaintiff's rights and
23 obstructed justice.
- 24 2. **Alternatively, Restart the Case:** If default judgment is not granted, Plaintiff requests the
25 Court restart the case under the authority of a new judge, allowing Plaintiff to file a revised
26 civil complaint to address the procedural and substantive issues that have been improperly
27 dismissed or obstructed. Ensuring the defendants and their legal counsel are responsible
28 for paying their own attorney fees and costs due to plaintiff's civil rights violations and
constitutional rights infringement.

This request is necessary to restore fairness, procedural integrity, and Plaintiff's ability to
seek justice in a fair and impartial forum.

1
2 **5.1 Restart the Case with a New Judge**

- 3 • Grant request filed on December 23, 2024 assigning a new judge to preside over this case
4 to restore judicial impartiality and protect Plaintiff's constitutional rights.

5 **5.2 Allow Plaintiff to File a New Civil Complaint**

- 6 • Permit Plaintiff to submit a new civil complaint that includes:
7 ○ Recently discovered violations of Plaintiff's civil rights by Defendant's and their
8 legal counsel, Shaw.
9 ○ Personal liability claims were improperly dismissed due to service and procedural
10 deficiencies exploited by the Defendants, resulting in prejudicial actions against
11 the Plaintiff by the court, the Defendants, and their legal counsel.
12 ○ Additional procedural and substantive claims that were not previously addressed
due to judicial bias and procedural irregularities.

13 **5.3 Restore Procedural Integrity and Fairness**

- 14 • Enforce strict compliance with the Arizona Rules of Civil Procedure for all parties.
15 • Require opposing counsel to address and resolve procedural deficiencies in good faith
16 moving forward by granting default judgement to plaintiff and sanctions due to continued
17 litigation abuse.

18 **6. TRIAL READINESS, JURY, AND LENGTH OF TRIAL**

19 **1. Readiness:** At this time, this case is not ready for trial due to unresolved procedural
20 deficiencies and pending motions. Additionally, the matter falls outside the jurisdiction of
21 the Maricopa County Superior Court while under review by both the Arizona Appeals
22 Court and the Arizona Supreme Court. Judicial resolution of these appellate issues is
23 required before trial readiness can be determined.

24 **2. Jury:**

- 25 ○ **There is a right to a trial by jury: Yes X No**
26 ○ **If there is such a right, it has been waived by the parties: Yes No X**

27 **3. Length of Trial:** The estimated length of trial is to be determined days, given the ongoing
28 complexities of this case. These complexities stem from unresolved procedural issues, the
involvement of the Maricopa County Superior Court, and the Defendants' continued civil

1 rights and constitutional violations against the Plaintiff, which require further examination
2 and resolution before trial proceedings can commence.

3 **4. Summary Jury Trial: The parties agree to a summary jury trial: Yes No**

4
5 **7. REQUEST FOR COURT ACTION**

6 Plaintiff respectfully requests that the Court:

- 7
1. **Accept this Separate Statement in lieu of a joint report.**
 2. **Grant the Plaintiff's request for Default Judgment.** If denied, allow the case to restart
8 under the authority of a new judge to ensure fairness, impartiality, and the integrity of the
9 judicial process.
 3. **Permit the Plaintiff to file an updated civil complaint to address newly arising claims,**
10 including recent violations and improperly dismissed allegations, incorporating events
11 that have occurred since the last amended complaint to the present date.
 4. **Enforce procedural fairness and ethical compliance for all parties,** particularly in
12 addressing deficiencies caused by opposing counsel's conduct.
 5. **Restore Plaintiff's civil due process and constitutional rights,** including her right to
13 present her case in a fair and impartial forum.
 6. **Take judicial notice of Defendants' bad faith conduct,** including their refusal to engage
14 in settlement discussions and their legal and financial extortion tactics.
 7. **Requesting Monetary Damages totaling \$6.5 Million Dollars:**

15 Reflecting the extensive harm caused by procedural violations, housing discrimination,
16 harassment, retaliation, and legal and financial coercion, the Plaintiff seeks the following
17 compensation:
18

- 19
- 20 ○ \$4.5 million for harassment, procedural violations, and discriminatory
21 practices.
 - 22 ○ \$2 million for obstruction of justice, due process and constitutional violations,
23 along with deliberate misconduct by the Defendants and their counsel,
24 Augustus Shaw IV.
25

26 **Non-Monetary Relief:**

- 27
- 28 1. **Vacating of Judgments:** Immediate removal and squashing of all judgments and
liens improperly imposed on the Plaintiff's property.

1 **2. Judicial Oversight:** Court-ordered investigation into the actions of Defendants
2 and Shaw for misconduct, including violations of ethical and procedural standards.

3 **3. Reassessment of Claims:** Remand of all dismissed claims for individualized
4 analysis under *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506 (2002), with a focus on
5 addressing constitutional violations and fair housing claims.

6 **8. CONCLUSION**

7 The Plaintiff reaffirms her unwavering commitment to achieving justice through
8 transparent and equitable proceedings. The documented examples of systemic misconduct,
9 procedural violations, and retaliatory actions by the Defendants underscore the necessity of the
10 comprehensive relief sought in this motion.

11 Given the Defendants' continued bad faith actions, including legal manipulation and
12 refusal to engage in meaningful resolution efforts, the Plaintiff submits this Separate Case
13 Management Statement in lieu of a joint report. This Statement highlights the Plaintiff's
14 dedication to securing a fair and impartial resolution of her claims while ensuring the protection
15 of her rights under both the Arizona Constitution and the Fourteenth Amendment to the U.S.
16 Constitution.

17 The Plaintiff respectfully urges the Court to carefully evaluate the systemic inequities,
18 procedural abuses, and deliberate misconduct outlined in this and prior motions. Granting the
19 requested relief is essential to upholding the principles of fairness, justice, and due process,
20 ensuring that the Plaintiff's rights are protected and the integrity of the judicial process is
21 preserved.

1 **CERTIFICATE OF SERVICE**

2 On the 3rd day of January 2025, I served copies of this *PLAINTIFF SEPARATE CASE*
3 *MANAGEMENT REPORT* for on all parties of record via U.S. Mail and electronically
4 and via Turbo Court. on 31st of December 2024.

5 **Defendants**

- 6
- 7 • Names: Gardens Gilbert Community Association (GGCA), Focus HOA Management,
8 LLC (Focus HOA); Harmin Cadis; Brooke Sortor, and Anna Shultz
 - 9 • Address: 4135 S. Power Road, Suite #133, Mesa, Arizona 85212
 - Role: Defendant's

10

11 **Defendant's Legal Counsel**

- 12
- 13 • Name: Augustus Shaw IV
 - Address: 4523 E. Broadway Road, Phoenix, Arizona 85040
 - 14 • Role: Defendant's Legal Counsel

15

16 Respectfully submitted this 31st day of December 2024.

17

18 

19 Sandra Rodriguez

20 Plaintiff, Pro Se

21

22

23

24

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