

1 Plaintiff filed her original Complaint on March 21, 2024 and we still do not have a
2 Scheduling Order. This litigation continues to drag on. There is no valid legal or practical
3 reason to delay the Status Conference Hearing set for January 24, 2025 at 3:00pm.
4 Defendant is ready, willing, and able to attend the Status Conference Hearing. Therefore,
5 Defendant hereby opposes the Plaintiff's Motion and requests that the Status Conference
6 Hearing set for January 24, 2025 at 3:00pm occur as noticed.
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9 As such, the Defendant requests that the Court deny the Plaintiff's Motion in its
10 entirety and impose sanctions against the Plaintiff pursuant to the Court's Minute Entry
11 dated August 27, 2024 and Rule 11, Arizona Rules of Civil Procedure to include the
12 attorney's fees and costs incurred by the Defendant to respond to the Motion.

13 DATED this 20th day of January 2025.

14 **SHAW & LINES, LLC**

15 /s/ Augustus H. Shaw, IV
16 Augustus H. Shaw IV, Esq.
17 4523 E. Broadway Rd.
18 Phoenix, Arizona 85040
Attorneys for Defendants

19 ORIGINAL submitted for filing this
20 20th day of January 2025 to:

21 Clerk of the Court
22 Maricopa County Superior Court
23 (Via E-Filing online – Turbo Court)

24 COPY of the foregoing mailed this
25 20th day of January 2025 to:

26 Sandra Rodriguez
27 4735 E Besty Lane
28 Gilbert, Arizona 85296

Defendant
By: /s/ Elizabeth Mundall