



1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. PLAINTIFF DOES NOT OPPOSE CONSOLIDATION OF THE CASES.**

3 Plaintiff, at Line 5 of Page 1 of her Response Defendant’s Request for  
4 Consolidation (sic) (hereafter, the “Response”) states “Plaintiff does not oppose  
5 consolidation.” Line 1 of Page 7 requests that the Court “Grant consolidation of Case Nos.  
6 CV2024-005940 and CV2024-013806.” As such, the Plaintiff has agreed to the  
7 consolidation of Case Nos. CV2024-005940 and CV2024-013806.  
8

9  
10 Therefore, the consolidation of Case Nos. CV2024-005940 and CV2024-013806  
11 should be granted as both parties agree to the consolidation. Also, Defendants request that  
12 all other requests and prayers for relief asserted by the Plaintiff in the Response be  
13 summarily denied by the court.  
14

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16 **II. SANCTION AGAINST THE COUNSEL FOR THE DEFENDANTS IS**  
17 **NOT APPROPRIATE AND SANCTIONS SHOULD BE AWARDED**  
18 **AGAINST THE PLAINTIFF.**

19 As is the *modus operandi* of the Plaintiff, the Plaintiff makes unwarranted,  
20 inappropriate and false statements about counsel for the Defendants and makes an  
21 inappropriate request for sanctions against the counsel for the Defendants.  
22

23 Sanctions against the counsel for the Defendants are not proper. The Defendants,  
24 through their Motion to Consolidate, simply attempted to respect judicial efficiency  
25 regarding litigation of two cases that allege the same causes of action and request the same  
26 damages. How can sanctions be appropriate when the Plaintiff herself agrees that the  
27 consolidation of the cases is appropriate?  
28

1 This pattern of harassment by the Plaintiff must be addressed by the Court through  
2 sanctions being imposed against the Plaintiff for constantly making inappropriate and  
3 false allegations and requesting sanctions against the Defendants counsel for no legitimate  
4 or legal reason.  
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7 **III. DEFENDANTS OBJECT TO THE PLAINTIFF'S PROPOSED FORM**  
8 **OF ORDER GRANTING MOTION TO CONSOLIDATE.**

9 Finally, Defendants object to the Plaintiff's Proposed Form of Order Granting  
10 Motion to Consolidate (hereafter, the "Proposed Order"). The Proposed Order contains  
11 inaccurate findings from the Arizona Court of Appeals and contains baseless findings that  
12 Defendants' counsel violated Rule 11 Ariz. R. Civ. P.  
13

14 As such, the Proposed Order should be wholly disregarded.

15 **IV. CONCLUSION.**  
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17 For the foregoing reasons, Defendants respectfully request that the Court enter an  
18 Order permitting the consolidation of this matter, numbered and captioned above, with the  
19 latter-filed Case No. CV2024-013806 and deny all other prayers of relief by the Plaintiff.  
20

21 DATED this 22nd day of August, 2025.

22 **SHAW & LINES, LLC**

23 /s/ Augustus H. Shaw, IV  
24 Augustus H. Shaw IV, Esq., CCAL  
25 4523 E. Broadway Road  
26 Phoenix, Arizona 85040  
27 *Counsel for Defendants*  
28

1 ORIGINAL submitted for electronic filing  
2 This 22nd day of August, 2025 with:

3 Clerk of the Court  
4 Maricopa County Superior Court

5 COPY mailed this 22nd day of August, 2025 to:

6 Sandra Rodriguez  
7 4735 E Besty Lane  
8 Gilbert, AZ 85296

9 By: /s/ Diane Fincher

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