



1 Civ. P. and as strongly suggested by the Court in its Minute Entry dated November 11,  
2 2025. When Defendants' Counsel attempted to reach out and schedule a telephone  
3 conference to discuss the Motion, Plaintiff refused. (See **Exhibit A** attached hereto)  
4

5 Since the Plaintiff refuses to meet and confer with Defendants' Counsel  
6 concerning the Motion, the Defendants are forced to respond to the Plaintiff's Motion.  
7

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **I. PLAINTIFF'S MOTION SHOULD BE DENIED.**

10 Plaintiff's Motion requests that all discovery and disclosure deadlines be  
11 suspended and requests other forms of relief already discussed in the Court's Ruling  
12 Addressing Several Motions and Filings dated November 11, 2025, specifically,  
13 Plaintiff's request to amend her Complaint.

14 Plaintiff, as she has previously requested, desires the Court suspend discovery and  
15 disclosure so she can file an amended Complaint. In its Ruling Addressing Several  
16 Motions and Filings dated November 11, 2025, the Court held:

17 The deadlines are set forth above and will NOT be amended or  
18 extended absent a showing of good cause and diligence in getting  
19 this matter ready for a final hearing. The Court denies Ms.  
20 Rodriguez's request to extend the scheduling order to begin after the  
amended complaint is filed.

21 The Court has made it very clear that the parties were to meet and confer regarding  
22 discovery concerns and that the discovery deadlines would not be amended.

23 Plaintiff not only refuses to meet and confer regarding discovery and disclosure  
24 issues, Plaintiff has not clearly articulated "good cause" to delay the Court's discovery  
25 and disclosure deadlines; especially since the impetus of her request is based on an  
26 amended Complaint not approved by the Court.  
27  
28

1                   **II.     CONCLUSION**

2                   As such, the Defendants request that the Court deny the Plaintiff’s Motion in its  
3 entirety and order the Plaintiff to reimburse the Defendants their reasonable attorney’s  
4 fees and costs incurred by the Defendants to respond to the Motion.

5                                   DATED this 14<sup>th</sup> day of November 2025.

6   SHAW & LINES, LLC

7   /s/ Augustus H. Shaw IV, Esq., CCAL

8   Augustus H. Shaw IV, Esq.

9   4523 E. Broadway Rd.

10   Phoenix, Arizona 85040

   Attorneys for Defendant

11 ORIGINAL submitted for filing this  
12 14<sup>th</sup> day of November 2025 to:

13 Clerk of the Court  
14 Maricopa County Superior Court  
15 (Via E-Filing online – Turbo Court)

16 COPY of the foregoing e-mailed and mailed this  
17 14<sup>th</sup> day of November 2025 to:

18 Sandra Rodriguez  
19 4735 E. Besty Lane  
20 Gilbert, Arizona 85296  
21 Plaintiff

22 By: /s/ Diane Fincher .

# Exhibit “A”

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## Augustus Shaw

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**From:** Sandra Rodriguez <sandra.rodriguez0339@gmail.com>  
**Sent:** Thursday, November 13, 2025 7:21 PM  
**To:** Dominick D tente  
**Cc:** Augustus Shaw  
**Subject:** Re: Rodriguez v. Gardens Gilbert - Request to Meet and Confer Regarding Recent Filings

Dear Mr. Dentente,

Thank you for your email.

For the record, this request to meet and confer was sent only after I filed my Objection to Notice of Deposition, Motion for Protective Order, and Motion to Extend Deadlines and Temporarily Pause Discovery. Under the **Arizona Rules of Civil Procedure**, the issues raised in these filings—particularly those involving **Rule 26.1** violations, **Rule 26(f)** conferral deficiencies, safety concerns, harassment under **A.R.S.   12-1809**, and constitutional issues—are not the type of matters that can be resolved informally and therefore are not subject to **Rule 7.1(h)**'s conferral requirement.

Additionally, Defendants did not confer with me before noticing a deposition, as required by **Rule 26(f)** and **Rule 37(a)(1)**. I am noting this only to preserve the procedural history accurately.

To avoid any misunderstanding and to comply with **Rule 408** of the **Arizona Rules of Evidence**, I request that all future communications regarding these motions be provided in writing only. This ensures a clear and complete record and avoids any inadvertent implication of settlement discussions or waiver of rights. Any written communication you choose to provide will be reviewed and addressed through the proper procedural channels.

Thank you,

Sandra Rodriguez

On Thu, Nov 13, 2025, 5:15 PM Dominick D tente <[Dominick@shawlines.com](mailto:Dominick@shawlines.com)> wrote:  
Dear Ms. Rodriguez,

We are in receipt of your three recent filings, including the Objection to Notice of Deposition, Motion to Extend Deadlines and Temporarily Pause Discovery, and Motion for Protective Order.

Pursuant to Rule 7.1(h), we would like to consult with you regarding these matters, as we believe that all of the issues raised can be resolved without court intervention. We are available at your convenience for a phone call to respectfully discuss each of these items and work toward a mutually agreeable resolution.

Please let me know a date and time that works for you, and we will make ourselves available. We look forward to speaking with you.

Have a wonderful day,

Dominick Detente, Esq.

**SHAW & LINES, LLC**

4523 E. Broadway Rd.

Phoenix, Arizona 85040

480.456.1500

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*Relocating!*

Effective December 1, 2025, our new office location will be:

1490 S. Price Rd., Suite 318

Chandler, Arizona 85286

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**Confidentiality Statement:** This email and any accompanying files transmitted are confidential and intended solely for the receipt and use of the individual to whom it is addressed. This confidentiality includes the privilege of attorney/client protections. This message and files transmitted herewith are not to be forwarded, copied, distributed or disseminated to any person to whom said privileges do not apply. If you have received this message without being addressed by this sender, please disregard and delete the same, and notify this sender.



# Exhibit “B”

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1           **SHAW & LINES, LLC**

2           4523 E. Broadway Road

3           Phoenix, AZ 85040

4           Phone (480) 456-1500

5           [www.shawlines.com](http://www.shawlines.com)

6           Augustus H. Shaw IV, SBN 021593

7           Dominick D. Detente, SBN 040350

8           *Attorney for Defendants*

9                           **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

10                           **IN AND FOR THE COUNTY OF MARICOPA**

11           SANDRA RODRIGUEZ,

12                           Plaintiff,

13           vs.

14           GARDENS/GILBERT       COMMUNITY  
15           ASSOCIATION, an Arizona non-profit  
16           corporation, et al.

17                           Defendants.

18                           Case No. CV2024-005940

19                           *Consolidated with Case No. CV2024-*  
20   *013806*

21                           **NOTICE OF DEPOSITION**

22                           (Sandra Rodriguez)

23                           *Assigned to the Hon. David McDowell*

24           **YOU ARE HEREBY NOTIFIED** that, pursuant to Rules 26, 30(a) and 45,  
25           Arizona Rules of Civil Procedure, the deposition will be taken upon oral examination of  
26           the person whose name is stated below at the time and place stated below before an officer  
27           authorized by law to administer oaths. The deposition will be LIVE – IN PERSON – and  
28           will be recorded by stenographic and videotaped means.

29           Please note, pursuant to Rules 30 and 37(a), Ariz. R. Civ. P., the deponent is  
30           required to appear for deposition as noticed. Failure to attend or to cooperate in the  
31           scheduling or completion of the deposition may result in a motion to compel and an order  
32           of the Court requiring attendance and compliance, along with potential sanctions as  
33           permitted under the Rules.

34           ///

1 **PERSON TO BE EXAMINED:** Sandra Rodriguez  
2 **DATE/TIME OF DEPOSITION:** December 12, 2025 (Friday)  
3 1:30 p.m.  
4 **PLACE OF DEPOSITION:** Shaw & Lines, LLC  
5 1490 S. Price Rd., Suite 318  
6 Chandler, AZ 85286

7 DATED this 13<sup>th</sup> day of November 2025.

8 **SHAW & LINES, LLC**

9  
10 /s/ Dominick D. Detente, Esq.  
11 Augustus H. Shaw IV, Esq.  
12 Dominick D. Detente, Esq.  
13 4523 E. Broadway Rd.  
Phoenix, Arizona 85040  
*Attorneys for Defendant*

14 ORIGINAL e-mailed and mailed this  
15 13<sup>th</sup> day of November 2025 to:

16 Sandra Rodriguez  
17 4735 E. Besty Lane  
18 Gilbert, Arizona 85296  
*Plaintiff*

19 Seymore Reporting Services  
20 137 E. Elliot Rd., # 2473  
21 Gilbert, Arizona 85299  
office@srsreporting.com  
22 *Court Reporters*

23  
24 By: /s/ Diane Fincher  
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