

2026 APR 15 PM 1:36

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

9
10 SANDRA RODRIGUEZ,

11 **Plaintiff,**

12 vs.

13 GARDENS GILBERT COMMUNITY
14 ASSOCIATION an Arizona non profit
15 corporation; FOCUS HOA
16 MANAGEMENT, LLC, and Arizona
17 limited liability company; HARMIN
18 CADIS, BROOKE SORTOR, ANNA
19 SCHULTZ

20 **Defendants,**

21 **MARICOPA COUNTY**
22 **SUPERIOR COURT**
23 **Case No.: CV2024-005940**
24 *Judge David McDowell,*

25 **CERTIFICATE OF GOOD FAITH**
26 **CONSULTATION**
27 *(Ariz. R. Civ. P. 26(d))*

28 Dear Honorable Judge McDowell;

29 Rodriguez ("*Plaintiff*"), appearing pro se, certifies pursuant to Rule 26(d), Ariz. R. Civ.
30 P., that she made multiple good-faith efforts to resolve this discovery dispute without court
31 intervention and has satisfied all meet-and-confer requirements.

32 Plaintiff served discovery on December 1, 2025, supplemented on December 22, 2025,
33 and re-served on March 1, 2026 after Defendants failed to respond. Plaintiff also provided
34 written notice of deficiencies and requested compliance, including a production date, prior to
35 seeking Court relief.

1 On March 25, 2026, Plaintiff participated in a telephonic meet-and-confer with
2 Defendants' counsel, Augustus H. Shaw IV, specifically addressing Defendants' failure to
3 provide responses to Requests for Production, Interrogatories, Requests for Admission, and Rule
4 26.1 disclosures. Plaintiff clearly identified the outstanding discovery, the applicable deadlines
5 under Rules 33, 34, and 36, and the continuing obligation to disclose under Rule 26.1.

6 Defendants' counsel refused to provide substantive responses or a production timeline,
7 asserted that discovery was "not due," claimed deadlines were "reset" by the Amended
8 Complaint, and repeatedly stated he did not understand the requests despite Plaintiff's clear
9 explanations. Counsel did not propose any compromise, seek clarification in good faith, or agree
10 to cure deficiencies.

11 The conference concluded without resolution, and Defendants continue to withhold
12 responsive discovery despite notice and opportunity to comply. Their refusal to engage
13 meaningfully constitutes obstructionist conduct under Rule 26(h) and failure to comply with
14 disclosure and discovery obligations under Rules 26.1, 33, 34, and 36.

15 Accordingly, Plaintiff has satisfied Rule 26(d), and further meet-and-confer efforts
16 would be futile.

17
18 Respectfully submitted this 15th day of April 2026.

19 

20
21 Sandra Rodriguez
22
23
24
25
26
27
28

1 **VI. CERTIFICATE OF SERVICE**

2 I served copies of this **CERTIFICATE OF GOOD FAITH CONSULTATION** for on all
3 parties of record via U.S. Mail.
4

5 **OPPOSING PARTY INFORMATION**

6 **DEFENDANTS:**

- 7 o Gardens Gilbert Community Association
8 o Focus HOA Management, LLC
9 o Harmin Cadis
10 o Brooke Sortor
11 o Anna Schultz
12 • **Address:** 4135 E. Power Road, Suite 133, Mesa, Arizona 85212

13 **DEFENDANT'S LEGAL COUNSEL:**

- 14 • **Name:** Augustus H. Shaw IV
15 • **Firm:** Shaw & Lines, LLC
16 • **Address:** 1490 S. Price Road, Suite 318 Chandler, Arizona 85286

17
18 Respectfully submitted this 15th day of April 2026.

19 

20
21 Sandra Rodriguez