

1 Without a proposed amended complaint, how could the Defendants or the Court
2 determine what counts the Plaintiff desires to add to the Complaint. Moreover, how can
3 the Court or the Defendants adequately evaluate the request to amend the Complaint
4 without a copy of the proposed amendment?
5

6 **II. PLAINTIFF’S MOTION TO EXTEND TIME, TEMPORARILY**
7 **PAUSE DISCOVERY SHOULD BE DENIED**

8 The Court, in its Ruling Addressing Several Motions and Filings dated November
9 10, 2025, stated:

10 The deadlines are set forth above and will NOT be amended or extended absent a
11 showing of good cause and diligence in getting this matter ready for a final hearing.
12

13 The Plaintiff has failed to articulate or show “good cause” to delay this matter
14 further and as such, the Defendants respectfully request that the Court deny any requests
15 to delay this matter further.

16 **III. CONCLUSION**

17 The Court, in its Ruling Addressing Several Motions and Filings dated November
18 10, 2025, placed the Plaintiff on notice of her requirement to abide by Rule 15(a)(4) Ariz.
19 R. Civ. P. and provide a proposed amended Complaint when the Court wrote:
20

21 Whether the amendment is granted is not determined at this time because there is
22 no motion or **proposed amended complaint before the Court.** (Emphasis Added)
23

24 The Court also warned the Plaintiff that a “self-represented party is held to the same
25 standards as an attorney and are to be afforded no additional latitude in abiding the rules.”
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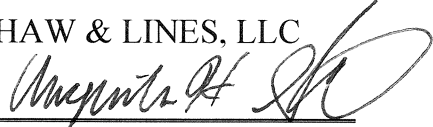
1 Here, the Plaintiff has clearly shown a patent disregard for the Arizona Rules of
2 Civil Procedure, which leaves the Defendants with no way to evaluate the request to the
3 amend the Complaint found in the Motion. Therefore, Plaintiff's Motion should be denied.
4

5 Moreover, the Plaintiff should be prohibited from filing another Motion to Amend
6 her Complaint. The Plaintiff has filed a number of requests to Amend her Complaint, each
7 one falling short of the requirements of Rule 15 Ariz. R. Civ. P. Because the Plaintiff
8 cannot abide by the Arizona Rules of Civil Procedure even when this Court makes her
9 aware of the Rules and requirement that they be followed, the Plaintiff should be
10 prohibited from making any more attempts to amend her Complaint in the future.
11

12 As such, the Defendants request that the Court deny the Plaintiff's Motion in its
13 entirety and order the Plaintiff to reimburse the Defendants their reasonable attorney's
14 fees and costs incurred by the Defendants to respond to the Motion.
15

16
17 DATED this 2nd day of December 2025.

18 SHAW & LINES, LLC

19 
20 Augustus H. Shaw IV, Esq.
21 4523 E. Broadway Rd.
22 Phoenix, Arizona 85040
23 Attorneys for Defendant

24 ORIGINAL submitted for filing this
25 2nd day of December 2025 to:

26 Clerk of the Court
27 Maricopa County Superior Court
(Via E-Filing online – Turbo Court)

28 COPY of the foregoing e-mailed and mailed this

1 2nd day of December 2025 to:

2 Sandra Rodriguez
3 4735 E. Besty Lane
4 Gilbert, Arizona 85296
5 Plaintiff
6 By: /s/ Diane Fincher

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