

1 26(i) and Rule 7.1(h) Ariz. R. Civ. P. and as strongly suggested by the Court in its Ruling
2 Addressing Several Motions and Filings dated November 11, 2025. When Defendants'
3 Counsel attempted to reach out and schedule a telephone conference to discuss the Motion,
4 Plaintiff refused and told the Defendants' counsel to stop attempting to call Plaintiff. (See
5 **Exhibit A** attached hereto)

7 Since the Plaintiff refuses to meet and confer with Defendants' Counsel concerning
8 the Motion, the Defendants are forced to respond to the Plaintiff's Motion.
9

10 **MEMORANDUM OF POINTS AND AUTHORITIES**

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

12 Plaintiff's Motion requests several forms of relief centered around her first Motion
13 for Protective Order and centered around the Defendants' appropriate discovery and
14 disclosure requests, which the Plaintiff attached to her Motion.
15

16 The Court in its Ruling Addressing Several Motions and Filings dated November
17 11, 2025, made it very clear that the Plaintiff was to engage in discovery and disclosure
18 and was to meet and confer with Defendants' counsel regarding any discovery or
19 disclosure disputes. Plaintiff, instead of complying with Rule 26(i) and Rule 7.1(h) Ariz.
20 R. Civ. P., insists on bringing her inappropriate discovery and disclosure disputes directly
21 to the Court, which is wholly inappropriate.

22 Plaintiff does not provide any applicable legal precedence regarding her Motion or
23 the discovery and disclosure issues discussed in her Motion. Plaintiff attempts to justify
24 her case by insulting and besmirching the Defendants' attorney, which is a common tactic
25 employed by the Plaintiff.

26 It is clear that the Plaintiff's Motion should be denied and the Defendants request
27 that the Court deny the Plaintiff's Motion.
28

1 ORIGINAL submitted for filing this
2 9th day of December 2025 to:

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

5 COPY of the foregoing e-mailed and mailed this
6 9th day of December 2025 to:

7 Sandra Rodriguez
8 4735 E. Besty Lane
9 Gilbert, Arizona 85296
Plaintiff

10 By: /s/ Diane Fincher .

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit “A”

From: [Sandra Rodriguez](#)
To: [Augustus Shaw](#)
Subject: Follow Quick Call after Pending Motion for Protective Order
Date: Tuesday, December 9, 2025 10:10:47 AM

Dear Mr. Shaw,

I received a missed call from your number today; the call rang only briefly and disconnected before I had an opportunity to answer. As stated in my pending Motions for Protective Order and related filings, all communications must be in writing to maintain an accurate record and ensure compliance with Rule 26(c). Please direct any necessary communication to me by email.

Thank you,

Sandra Rodriguez