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6 *Attorneys for Defendants*

7 **IN THE SUPERIOR COURT OF 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  
corporation, et al.; FOCUS HOA  
15 MANAGEMENT, LLC, and Arizona  
16 Limited Liability Company; HARMAN  
17 CADIS; ANNA SCHULTZ; AND  
BROOKE SORTOR,

18 Defendants.

No. CV2024-005940

**RESPONSE TO PLAINTIFF'S  
EMERGENCY MOTION TO STAY**

*Assigned to the Hon. David McDowell*

19 Defendants Gardens/Gilbert Community Association, Anna Schultz, Focus HOA  
20 Management, LLC, Harman Cadis, and Brooke Sortor (hereafter collectively referred to  
21 herein as “Defendants”) hereby responds to Plaintiff’s Emergency Motion to Stay  
22 (hereafter, the “Motion”).

23  
24 In requesting that the Motion be denied, Defendants, request that the Court consider  
25 the arguments made by the Defendants in their previously filed Defendants’ Response to  
26 Plaintiff’s Motion for Protective Order and Objection to Notice of Deposition;  
27 Defendants’ Response to Plaintiff’s Motion to Extend Deadlines and Temporarily Pause  
28

1 Discovery; Defendants' Response to Plaintiff's Amended Motion for Protective Order;  
2 and Defendants' Response to Plaintiff's Motion to Amend Civil Complaint, Extend Time,  
3 Temporarily Pause Discovery (hereafter, the "Responses"), as the arguments made in the  
4 Responses apply to the current Motion.  
5

6 The Defendants request that the Court deny the Plaintiff's Motion in its entirety,  
7 order the Plaintiff to reimburse the Defendants their reasonable attorney's fees and costs  
8 incurred by the Defendants to respond to the Motion and order the Plaintiff to cease filing  
9 inappropriate Motions that only serve to frustrate justice and elongate the litigation.  
10

11 DATED this 11<sup>th</sup> day of December 2025.

12  
13 SHAW & LINES, LLC

14 /s/ Augustus H. Shaw IV, Esq., CCAL  
15 Augustus H. Shaw IV, Esq.  
16 1490 S. Price Rd., Suite 318  
17 Chandler, Arizona 85286  
Attorneys for Defendant

18 ORIGINAL submitted for filing this  
19 11<sup>th</sup> day of December 2025 to:

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

22 COPY of the foregoing e-mailed and mailed this  
23 11<sup>th</sup> day of December 2025 to:

24 Sandra Rodriguez  
25 4735 E. Besty Lane  
26 Gilbert, Arizona 85296  
27 Plaintiff  
By: /s/ Diane Fincher .