

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

CLERK OF THE
SUPERIOR COURT
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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,**

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

**CERTIFICATE OF GOOD FAITH
CONSULTATION**

(Second Attempt in Support of Motion to
Compel filed April 23, 2026)

(Ariz. R. Civ. P. 26(d))

21 Dear Honorable Judge McDowell;

22
23 Rodriguez ("*Plaintiff*"), appearing pro se, certifies pursuant to Rule 26(d), Arizona Rules
24 of Civil Procedure, that she made good faith efforts to resolve the discovery dispute without
25 court intervention.

26 On April 30, 2026, at approximately 1:00 p.m., Plaintiff participated in a telephonic meet-
27 and-confer with Defendants' counsel, Augustus H. Shaw IV (Shaw & Lines, LLC). This
28 conference was a second meet-and-confer, following the March 25, 2026 conference, and was
conducted to address ongoing discovery deficiencies and related issues.

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3 Prior to the conference, Plaintiff provided written notice identifying the specific issues
4 to be discussed, including those outlined in Plaintiff's April 22, 2026 correspondence. The
5 purpose of the conference was to obtain Defendants' compliance with their discovery and
6 disclosure obligations without Court intervention.

7 During the April 30, 2026 meet-and-confer, Plaintiff identified and discussed the
8 following:

- 9 1. Defendants' failure to provide complete, verified responses to Requests for
10 Admission;
- 11 2. Defendants' failure to provide complete, verified responses to Uniform and Non-
12 Uniform Interrogatories for each Defendant;
- 13 3. Defendants' failure to produce responsive documents to Plaintiff's Requests for
14 Production (First and Second Sets);
- 15 4. Defendants' failure to provide complete Rule 26.1 disclosures;
- 16 5. Defendants' continued reliance on incomplete, evasive, or conditional responses;
- 17 6. The impropriety of proceeding with deposition prior to curing discovery
18 deficiencies;
- 19 7. Defendants' attempt to proceed with settlement certification despite incomplete
20 discovery and lack of good-faith settlement engagement; and
- 21 8. Plaintiff's request that Gardens Gilbert Community Association, Focus HOA
22 Management, LLC, and the individually named Defendants provide the
23 information reflected in the HOA Addendum (Sections 1-29).

24 Plaintiff further explained that the discovery requests were originally served on
25 December 1, 2025, supplemented on December 22, 2025, and followed up thereafter, and that
26 all applicable deadlines had expired. Plaintiff also explained that the Court's February 23, 2026
27 Order lifting the stay reinstated Defendants' discovery obligations.

28 During the conference, Plaintiff made multiple good faith efforts to clarify the scope of
the requests, confirm the categories of outstanding discovery, and obtain a commitment to

1 provide full and complete responses, including a firm production timeline. Defendants' counsel
2 maintained that Defendants had already provided all required discovery and disclosures, despite
3 Plaintiff identifying ongoing deficiencies, and did not agree to supplement responses, provide
4 additional documents, or commit to a timeline for curing the deficiencies. Counsel further
5 suggested that Plaintiff pursue depositions in lieu of curing written discovery deficiencies and
6 maintained positions based on objections and procedural arguments rather than agreeing to
7 produce responsive materials.

8 The April 30, 2026 meet-and-confer was unsuccessful, as the parties were unable to reach
9 agreement on any material issues, including the adequacy of discovery responses, production of
10 documents, Rule 26.1 disclosures, settlement readiness, and the HOA addendum. With respect
11 to the HOA addendum, Defendants' counsel acknowledged receipt of Plaintiff's request but
12 declined to treat it as a discovery request and did not agree to produce the requested information
13 through discovery.

14 Defendants did not agree to cure the identified deficiencies, provide production timelines,
15 or otherwise resolve the disputes. The meet-and-confer concluded without resolution, and the
16 parties reached an impasse. Defendants continue to withhold responsive discovery and have not
17 cured the deficiencies identified.

18 Defendants' failure to meaningfully engage in resolving the discovery disputes warrant
19 relief under Rule 37, Ariz. R. Civ. P., including appropriate sanctions for failure to participate in
20 good faith in discovery and pretrial procedures.

21 Plaintiff has therefore satisfied the good faith consultation requirement under Rule 26(d),
22 Ariz. R. Civ. P., and further attempts to resolve the dispute without Court intervention would be
23 futile. Accordingly, for these reasons, Plaintiff respectfully requests that the Court accept and
24 grant Plaintiff's Motion to Compel filed on April 23, 2026.

25 Respectfully submitted this 4th day of May 2026.

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28 Sandra Rodriguez

1 **VI. CERTIFICATE OF SERVICE**

2 I served copies of this **CERTIFICATE OF GOOD FAITH CONSULTATION**
3 (Second Attempt in support of Motion to Compel filed April 23, 2026) *for* on all parties
4 of record via U.S. Mail.
5

6 **OPPOSING PARTY INFORMATION**

7 **DEFENDANTS:**

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

14 **DEFENDANT'S LEGAL COUNSEL:**

- 15 ● **Name:** Augustus H. Shaw IV
16 ● **Firm:** Shaw & Lines, LLC
17 ● **Address:** 1490 S. Price Road, Suite 318 Chandler, Arizona 85286
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19 Respectfully submitted this 4th day of May 2026.

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