

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,**

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

**MOTION TO DECLARE  
DEFENDANTS AND THEIR LEGAL  
COUNSELS SHAW AND DENTE  
VEXATIOUS LITIGANTS  
AND REQUEST FOR SANCTIONS**

21 **TO THE HONORABLE JUDGE MCDOWELL:**

22  
23 This motion is a response to the *Defendants' filing titled Response to Plaintiff's Certificate*  
24 *of Good Faith Consultation and Objection* Thereto, in which Defendants, through counsel  
25 Augustus H. Shaw IV and Dominick Dente, represent to this Court that the March 25, 2026 meet-  
26 and-confer "*did not address any discovery dispute*" and was limited solely to deposition and  
27 anticipated motion practice. That representation is demonstrably false. The recorded transcript of  
28 the March 25, 2026 call (Exh. 1) establishes that discovery disputes were expressly raised,  
discussed, and disputed, and that Defendants' counsel acknowledged the call constituted a meet-  
and-confer regarding discovery and deposition. Defendants' filing is therefore not merely

1 inaccurate, but a material misrepresentation made to avoid discovery obligations and mislead the  
2 Court on a dispositive procedural issue. (*See Exh. 1 (Transcript); Exh. 2 (meet-and-confer request*  
3 *identifying discovery deficiencies); Exh. 3 (call scheduling); Exh. 4 (call confirmation)*)

#### 4 5 **I. FACTUAL RECORD DEMONSTRATES DEFENDANTS' MISREPRESENTATIONS**

6  
7 Defendants represent to the Court that the March 25, 2026 call "*did not involve any*  
8 *discussion of discovery disputes, disclosure deficiencies, or the categories of discovery Plaintiff*  
9 *now claims were addressed.*" The objective record directly contradicts this assertion. The  
10 transcript of the recorded call demonstrates that Plaintiff expressly raised discovery violations,  
11 including Defendants' failure to produce responses to Requests for Production, Interrogatories,  
12 Requests for Admission, and Rule 26.1 disclosures. During the call, Plaintiff identified that  
13 discovery had been served in December and remained outstanding well beyond applicable  
14 deadlines. Defendants' counsel responded with shifting positions—first asserting that deadlines  
15 had been "reset" and responses were not yet due, and later claiming a lack of understanding—  
16 thereby obstructing meaningful discussion and resolution of the discovery dispute. The transcript  
17 further reflects that deposition issues were discussed in the same exchange, with Defendants'  
18 counsel seeking to proceed with Plaintiff's deposition and Plaintiff objecting based on the  
19 outstanding discovery deficiencies. Most significantly, Defendants' counsel expressly  
20 acknowledged on the call that the discussion constituted a meet-and-confer regarding discovery  
21 disputes and stated that he would testify that the call satisfied Rule 26(d). These statements are  
22 irreconcilable with Defendants' later representation to the Court that no discovery issues were  
23 discussed.

24  
25 The contemporaneous written record further confirms this. Prior to the call, Plaintiff  
26 explicitly identified ongoing discovery noncompliance and requested a meet-and-confer to  
27 address those issues, providing specific availability for the discussion. Plaintiff reiterated that  
28 Defendants had failed to produce discovery for over 100 days and that compliance was required  
under the Rules. This establishes that the purpose and subject matter of the meet-and-confer  
included discovery disputes, as well as their direct impact on the scheduling and propriety of  
Plaintiff's deposition. Defendants' subsequent attempt to narrow the scope of the call after the  
fact is unsupported by the record and contradicted by both the transcript and the written  
communications. (*See Exh. 2 (meet-and-confer request identifying discovery deficiencies and*

1 availability); *Exh. 3 (Defendants' counsel scheduling the March 25, 2026 call); Exh. 4*  
2 *(screenshot confirming the call occurred)*

## 3 4 **II. DEFENDANTS' CONDUCT CONSTITUTES BAD FAITH MISREPRESENTATION**

5 Defendants' conduct constitutes a clear violation of their duty of candor to the tribunal.  
6 Under Arizona law, attorneys may not knowingly make false statements of fact to the Court or  
7 fail to correct false statements once made. As reflected in Arizona ethical authority, a lawyer  
8 "*shall not knowingly make a false statement of fact or law to a tribunal,*" and must avoid conduct  
9 that misleads the Court. Defendants' counsel had direct personal knowledge of the contents of the  
10 March 25, 2026 call and personally participated in that discussion. The transcript reflects that  
11 Plaintiff expressly raised discovery issues at the outset, stating, "*No, this is also regarding the*  
12 *violations with the discovery...*", to which counsel responded, "*Sure. We can talk about that as*  
13 *well... let's take every issue one step at a time.*" (*See Exh. 1; Transcript*)

14 Counsel then engaged in a substantive discussion regarding discovery obligations and  
15 timing, ultimately acknowledging the nature of the discussion by stating, "*I would consider this*  
16 *a meet and confer regarding your discovery dispute,*" and further confirming, "*I will... testify*  
17 *that this will satisfy as a meet and confer regarding your discovery dispute.*" These statements  
18 demonstrate that Defendants' counsel was fully aware that discovery disputes were discussed  
19 during the call, rendering any contrary representation to the Court inconsistent with the record.  
20 (*See Exh. 1; Transcript*)

21 Despite this, counsel represented to the Court that discovery disputes were not discussed  
22 when the transcript demonstrates the opposite. At minimum, this constitutes reckless disregard  
23 for the truth; at worst, it reflects a knowing misrepresentation of a material fact central to the  
24 Court's procedural analysis. *See Ariz. R. Sup. Ct. 42, ER 3.3(a)(1) (Candor Toward the Tribunal)*

25 Arizona courts possess inherent authority to sanction parties and counsel for litigation  
26 misconduct, including misrepresentations, bad faith conduct, and abuse of the judicial process.  
27 Courts have specifically recognized that sanctions are appropriate where counsel engages in  
28 "*blatant misrepresentations of both the facts and the law.*" Defendants' conduct falls squarely  
within this category. By attempting to create a false procedural narrative to defeat Plaintiff's  
compliance with Rule 26(d), Defendants have engaged in conduct that undermines the integrity  
of the adjudicative process.

1                   **III. DEFENDANTS’ ARGUMENTS FAIL AS A MATTER OF LAW AND FACT**

2  
3           Defendants’ argument that no discovery meet-and-confer occurred fails as a matter of fact  
4 because the transcript conclusively demonstrates that discovery issues were raised, discussed, and  
5 disputed. (*Exh. 1*) Their argument that the call was limited to deposition issues is likewise  
6 unsupported, as the transcript shows that Plaintiff raised discovery violations at the outset and  
7 that Defendants’ counsel agreed to address those issues during the call. Their assertion that  
8 Plaintiff failed to satisfy Rule 26(d) fails as a matter of law. Rule 26(d) requires (1)  
9 communication, (2) discussion of the dispute, and (3) a good faith effort to resolve it. It does not  
10 require agreement, resolution, or a particular outcome. Plaintiff identified the disputes,  
11 communicated them to opposing counsel, and engaged in a telephonic discussion regarding those  
12 disputes. (*Exh. 1-2*)

13           Even where a meet-and-confer is contentious or unsuccessful, Rule 26(d) is satisfied so  
14 long as the parties actually present and discuss the discovery dispute. The Rule establishes an  
15 expedited procedure for resolving discovery disputes and requires only that the parties confer and  
16 present the dispute to the Court—it does not require a successful resolution, agreement between  
17 the parties, or multiple attempts to meet and confer regarding the same issues. Here, the record  
18 reflects that the parties communicated, discussed the dispute, and reached an impasse. That  
19 satisfies Rule 26(d). Defendants’ attempt to impose additional requirements not found in the Rule  
20 is improper and contrary to its purpose of efficient dispute resolution. (*See Exh. 1-2*)

21                   **IV. DEFENDANTS’ CONDUCT SUPPORTS PROTECTIVE ORDER**  
22                                   **AND FURTHER RELIEF**

23           Defendants’ pattern of conduct—including misrepresentations to the Court, continued  
24 failure to provide discovery, and manipulation of procedural rules—demonstrates ongoing  
25 litigation abuse. (*See Exh. 1 (transcript reflecting discovery disputes and counsel’s admissions);*  
26 *Exh. 2 (documenting over 100 days of nonproduction and Plaintiff’s good-faith meet-and-confer*  
27 *request); Exh. 3 (confirming counsel’s coordination and scheduling of the meet-and-confer call)*)

28           This conduct supports relief under Rules 26(c), 26(g), and 37, Ariz. R. Civ. P., as it has  
unreasonably expanded proceedings, delayed resolution, and prejudiced Plaintiff’s ability to  
prepare her case. Critically, Defendants’ discovery violations and refusal to engage in good-faith  
settlement negotiations have rendered the parties not prepared for the April 30, 2026 settlement

1 conference, in violation of the Court’s ADR requirements. Under Administrative Order 2023-  
2 009, parties must certify that discovery necessary for meaningful settlement is complete and that  
3 no disputes remain, and that good-faith settlement discussions have occurred. Defendants have  
4 done neither. Their obstruction—including withholding discovery, falsely claiming no meet-and-  
5 confer occurred, and refusing to negotiate—prevents certification of readiness and undermines  
6 the purpose of the settlement conference. (*See* Defendant’s.’ Response. at pages 2–3, asserting  
7 the call “*did not involve any discussion of discovery disputes*” and citing Exh. B, where counsel  
8 states, “*We have not met and conferred regarding your current discovery dispute.*”) This conduct  
9 constitutes vexatious behavior, including delaying proceedings and abusing discovery, warranting  
10 Court intervention to restore fairness and enforce compliance.

### 11 **V. RELIEF REQUESTED**

12 WHEREFORE, Rodriguez respectfully requests that this Court:

- 13 1. **Find that Defendants’ Response contains material misrepresentations**  
14 regarding the March 25, 2026 meet-and-confer, including false statements that no  
15 discovery disputes were discussed;
- 16 2. **Reject and/or strike Defendants’ Response and Objection to Plaintiff’s**  
17 **Certificate of Good Faith Consultation** to the extent it relies on those  
18 misrepresentations;
- 19 3. **Find that Plaintiff fully satisfied Rule 26(d), Ariz. R. Civ. P., and permit**  
20 Plaintiff’s underlying motions to be considered on the merits;
- 21 4. **Impose sanctions pursuant to Rule 37, Rule 26(g), A.R.S. § 12-349, and the**  
22 **Court’s inherent authority against:**
  - 23 a. Defendants Gardens/Gilbert Community Association, Focus HOA  
24 Management, LLC, Harman Cadis, Brooke Sortor, and Anna Schultz; and
  - 25 b. Defendants’ counsel, Augustus H. Shaw IV and Dominick Dente of Shaw  
26 & Lines, LLC;
- 27 5. **Find that such sanctions are warranted based on bad faith conduct, material**  
28 **misrepresentations to the Court, and abuse of the discovery process;**
6. **Preclude Defendants from relying on any arguments or positions premised on**  
the false assertion that no discovery meet-and-confer occurred;



1 significant because it was advanced to defeat Plaintiff's procedural compliance and avoid  
2 substantive obligations—conduct that undermines the integrity of the adjudicative process.

3 In addition, the repeated and cumulative nature of Defendants' conduct—ongoing  
4 discovery noncompliance, shifting positions to avoid production, and advancing positions to the  
5 Court that are inconsistent with the record—constitutes a pattern of abusive litigation tactics. This  
6 pattern supports relief under A.R.S. § 12-3201, including designation of Defendants and their  
7 counsel, Augustus H. Shaw IV and Dominick Dente, and Shaw & Lines, LLC, as vexatious  
8 litigants, to prevent further misuse of judicial resources and to protect the integrity of these  
9 proceedings.

10 Accordingly, Plaintiff respectfully requests that the Court impose appropriate sanctions,  
11 including evidentiary preclusion and/or monetary sanctions, and enter such additional orders as  
12 necessary to curb further abuse—including vexatious-litigant restrictions tailored to prevent  
13 continued filing of positions that are unsupported by the record or interposed for delay.

14 Respectfully,

15 

16 Sandra Rodriguez  
17

18 **VII. EXHIBITS**

- 19
- 20 1. **EXHIBIT 1** – Transcript Summary and Sworn Affidavit (March 25, 2026)  
21 Shows a meet-and-confer occurred, with discovery and deposition discussed,  
22 including counsel's Rule 26(d) admission.
  - 23 2. **EXHIBIT 2** – March 23, 2026 Meet-and-Confer Request Email  
24 Demonstrates good-faith effort and identifies specific discovery deficiencies.
  - 25 3. **EXHIBIT 3** – March 24, 2026 Scheduling Email  
26 Shows Defendants' counsel scheduled the meet-and-confer.
  - 27 4. **EXHIBIT 4** – March 25, 2026 Call Screenshot  
28 Confirms the call occurred, refuting Defendants' claim no conference took place.

1 **VIII. CERTIFICATE OF SERVICE**

2 I served copies of this *MOTION TO DECLARE DEFENDANTS AND THEIR LEGAL*  
3 *COUSNELS SHAW AND DENTE VEXATIOUS LITIGANTS AND REQUEST FOR*  
4 *SANCTIONS* for on all parties 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

18 Respectfully submitted this 23rd day of April 2026.

19  
20   
21 Sandra Rodriguez

# EXHIBIT 1

# TRANSCRIPT SUMMARY AND SWORN AFFIDAVIT

## (TELEPHONIC MEET AND CONFER

## BETWEEN RODRIGUEZ AND DEFENSE LEGAL COUNSEL SHAW)

**Date of Call:** March 25, 2026

**Start Time:** 10:30 AM MST

End Time: 10:45 AM MST

**Participants:** Sandra Rodriguez (“*Plaintiff*”), Augustus H. Shaw IV, Shaw & Lines, LLP (“*Defendant’s Legal Counsel*”)

**Subject:** Transcript of March 25, 2026 Meet-and-Confer Regarding Defendants’ Discovery Noncompliance and Deposition (*Civil Case No. CV2024-009540*)

### I. SUMMARY OF MEET AND CONFER

The March 25, 2026 telephonic meet-and-confer was conducted as a direct follow-up to Plaintiff Rodriguez’s March 23, 2026 written request addressing Defendants’ ongoing discovery noncompliance and issues relating to Plaintiff’s deposition. In that correspondence, Plaintiff identified specific deficiencies, including Defendants’ failure to provide responses to Requests for Production, Interrogatories, Requests for Admission, and Rule 26.1 disclosures, and documented that more than 100 days had passed without production. Plaintiff expressly requested a telephonic conference to address these discovery issues and their impact on the scheduling of her deposition.

Defendants’ lead counsel, Augustus H. Shaw IV, accepted that request on March 24, 2026 and coordinated the call for March 25, 2026 at approximately 10:30 a.m., confirming both awareness of and agreement to confer regarding the identified discovery disputes and Plaintiff’s deposition.

Consistent with Plaintiff’s written request, the March 25, 2026 call addressed Defendants’ discovery obligations and Plaintiff’s outstanding discovery requests, as well as Defendants’ efforts to proceed with Plaintiff’s deposition. At the outset, Plaintiff clarified that the meet-and-confer

was “also regarding the violations with the discovery,” referencing the same issues raised in her March 23, 2026 email. Defendants’ counsel acknowledged and agreed to address those issues, stating, “Sure. We can talk about that as well... let’s take every issue one step at a time.”

During the call, the parties engaged in a substantive dispute regarding discovery compliance and deposition, including:

- 1) Whether discovery requests served in December 2025 were overdue;
- 2) Whether the Court’s prior stay and subsequent February 23, 2026 order lifting the stay required immediate production;
- 3) Defendants’ position that discovery deadlines were allegedly “reset” following the Amended Complaint; and
- 4) Defendants’ continued failure to produce any responsive materials. Plaintiff expressly stated, “They were provided to you on December 1st... it’s been passed the deadline,” and further asserted, “You’re withholding discovery... that is a violation,” while Defendants’ counsel disputed the timing and obligation to produce.
- 5) Plaintiff’s deposition, with Plaintiff stating, “The deposition is not going to happen until you guys have cured your discovery violations because I have not received [the requested materials],” explaining that proceeding without discovery would impair her ability to defend her case. Not to mention, other defects related to the deposition.

The transcript reflects that Defendants, through counsel, sought to advance Plaintiff’s deposition while simultaneously disputing and withholding discovery, despite Plaintiff’s clear position that discovery compliance must occur first. This sequence demonstrates that deposition and discovery were discussed together and that the deposition dispute arose directly from Defendants’ failure to produce discovery.

Importantly, Defendants’ counsel expressly acknowledged on the record that the discussion constituted a meet-and-confer regarding discovery disputes, stating, “I would consider this a meet and confer regarding your discovery dispute,” and further confirming, “I will... testify that this will satisfy as a meet and confer regarding your discovery dispute.” This directly contradicts Defendants’ assertion that no discovery issues were discussed during the March 25, 2026 call.

The call concluded without resolution of the discovery and deposition issues, with both parties acknowledging disagreement and the need for judicial intervention.

## II. KEY FACTUAL POINTS FOR THE COURT

The March 25, 2026 call establishes that a telephonic meet-and-confer occurred under Rule 26(d), including discussion of both discovery disputes and Plaintiff's deposition. Although Defendants' counsel framed the call as relating to "*a discovery dispute regarding an in-person deposition,*" Plaintiff clarified it was "*also regarding the violations with the discovery,*" and counsel agreed to address both.

The transcript reflects that deposition issues were in fact discussed. Defendants' counsel attempted to move forward with deposition, asking, "*Would you like... to move on to the deposition?*", while Plaintiff responded that deposition could not proceed due to outstanding discovery and lack of materials necessary to defend the case.

The record further shows that Plaintiff attempted to raise additional issues concerning the deposition, but the discussion was impeded by repeated interruptions and overlapping speech, limiting Plaintiff's ability to fully articulate her position during the call.

Following the call, Defendants' counsel maintained his position to proceed with deposition despite the unresolved discovery disputes and Plaintiff's stated objections regarding prejudice.

The transcript also reflects discussion of a Rule 26(d) joint filing. Plaintiff stated she was willing to complete her portion and file the joint statement after receiving Defendants' position, while Defendants' counsel suggested Plaintiff was "refusing," despite her clarification to the contrary.

Throughout the call, Defendants' counsel repeatedly asserted a lack of understanding of Plaintiff's discovery dispute and restated Plaintiff's positions in a manner inconsistent with her responses, while ultimately acknowledging, "*We have had our meet and confer regarding your discovery requests.*"

### III. TRANSCRIPT

**Speaker 1** – 0:00 (Rodriguez)

This is Sandra Rodriguez on March 25, 2026, at about 10:30 a.m., I am waiting for the call from Augustus H. Shaw IV Defendants' lawyer to talk about the discovery issues and the requests.

**Speaker 1** – 0:26 (Rodriguez)

Hello.

**Speaker 2** – 0:29 (Shaw)

May I please speak to Sandra Rodriguez.

**Speaker 1** – 0:31 (Rodriguez)

Yes, this is she.

**Speaker 2** – 0:34 (Shaw)

Hello. This is Augustus Shaw from Shaw and Lines

**Speaker 1** – 0:38 (Rodriguez)

Yes.

**Speaker 2** – 0:39 (Shaw)

Calling in regard to the request meet and confer concerning the discovery dispute regarding an in-person deposition.

**Speaker 1** – 0:52 (Rodriguez)

No, this is also regarding the violations with the discovery so.... *(Note: I'd referenced prior in my emails)*

**Speaker 2** – 1:00 (Shaw interjects)

Sure. We can talk about that as well. We can talk about that as well, but let's take every issues, each issue one issue one step at a time.

**Speaker 1** – 1:06 (Rodriguez)

Ok. Yeah. We can start with the discovery issues because that came first. That was due first.

**Speaker 2** – 1:12 (Shaw)

Ok. Sure.

**Speaker 1** – 1:13 (Rodriguez)

Uh huh. *(Note: Rodriguez agreeing)* Thank you.

**Speaker 2** – 1:14 (Shaw)

Pursuant to the Rules of Civil Procedure your discovery requests are not due yet.

**Speaker 1** – 1:22 (Rodriguez)

Yes, they are.

**Speaker 2** – 1:25 (Shaw Interrupts Rodriguez)

So...

**Speaker 1** – 1:25 (Rodriguez)

They were provided to you on December 1<sup>st</sup>. It's been passed the 60-day deadline per Rule 26 and so they are due.

**Speaker 2** – 1:32 (Shaw Attempts to Interject before Rodriguez is done speaking)

If you remember... If you remember the court per minute entry umm stayed all discovery and disclosure at that time.

**Speaker 1** – 1:43 (Rodriguez)

Right, but they lifted it on February 23<sup>rd</sup> so at that point you should have provided.

**Speaker 2** – 1:45 (Shaw)

That's correct.

**Speaker 1** – 1:46 (Rodriguez)

At that point, you should have provided the documents.

**Speaker 2** – 1:49 (Shaw)

That is not. The.. That's not what the Rules of Civil Procedure say.

**Speaker 1** – 1:54 (Rodriguez)

That's not what?

**Speaker 2** – 1:54 (Shaw)

The Rules of Civil Procedure. The Rules of Civil Procedure.

**Speaker 1** – 1:54 (Rodriguez)

Uh huh. *(Note: Rodriguez guiding Shaw to continue speaking, cuing Rodriguez was listening to what he was explaining.)*

**Speaker 2** – 1:57 (Shaw)

The Rules of Civil Procedure say that uh that the deadlines are reset after the filing of the Amended Complaint.

**Speaker 1** – 2:09 (Rodriguez)

That's not true. Where does it say that?

**Speaker 2** – 2:12 (Shaw)

Ok. So.. Again, the Amended Complaint... I can not answer discovery requests from a Complaint that is no longer valid. So, the discovery request that you provided in December was based on your original complaint.

**Speaker 1** – 2:28 (Rodriguez)

No, that is the same. It's the same. And I re-sent it to you as a follow up. It is the same. You are withholding discovery. It's the same and I explicitly said that in my follow up email. So, you're withholding discovery and that is a violation of the court order. The judge lifted the stay so at that point just like I provided all my initial disclosures, all my interrogatories and admissions like you guys requested, and I provided over 2,000 exhibits. I complied. You did not. So.. you and the defendants did not. There's no where in the rules that it says that it resets. That's not true because I read the rules.

**Speaker 2** – 3:13 (Shaw)

Ok. Well, I guess we're going to have to agree to disagree. I do disagree with your analysis regarding when discovery is due; therefore, I would consider this a meet and confer regarding your discovery dispute.

**Speaker 1** – 3:27 (Rodriguez)

Ok.

**Speaker 2** – 3:32 (Shaw Interrupts Rodriguez)

And if you would uh if you would like to ask the court set in its most recent order to you. If you'd like to draft up a Rule 26(d) discovery dispute Joint Motion for Discovery Dispute. If you would like to draft that up with your discovery dispute in it. I'll be happy to fill out my portion of that Rule 26(d) and then you'll be able to file that with the court. But yes, this will.. I will uh testify that this will satisfy as a meet and confer regarding your discovery dispute concerning discovery that you provided in December 2025. Do you agree?

**Speaker 1** – 3:27 (Rodriguez)

Do I agree that we just met and conferred with regards the discovery disputes? Is that what you're saying?

**Speaker 2** – 4:20 (Shaw)

Yes, you had a discovery dispute regarding discovery and disclosures that you sought in December 2025. Is that correct?

**Speaker 1** – 4:41 (Rodriguez)

All of the discovery that I requested. I sent you a few emails. December 1<sup>st</sup>, I sent you another one on December 22, 2026, and sent you another one the most recent one (*referencing March 2026 discovery request*), but I know that's ones not due. But that one is one additional request that I'd made.

**Speaker 2** – 5:03 (Shaw)

Ok. So again, the request that we are meeting and conferring on where discovery requests pursuant to the Original Complaint.

**Speaker 1** – 5:14 (Rodriguez)

No, it is not pursuant to the Original. It's still a part of the case whether it's not the original.. it's still relevant to Amended Civil Complaint. So, no it is not.

**Speaker 2** – 5:22 (Shaw interjects)

That is not what I am saying.

**Speaker 1** – 5:23 (Rodriguez)

You guys.. uh huh *(Note: Rodriguez stops and listens to allow Shaw to explain)*

**Speaker 2** – 5:23 (Shaw interjects)

That is not what I am saying... That's not what I'm saying... Maam That's not what I'm saying...  
Did you file... Did you the court accept your Amended Complaint in December 2025? Yes or no?

**Speaker 1** – 5:35 (Rodriguez)

Yes, they did, but you are non-compliant.

**Speaker 2** – 5:40 *(Shaw threatening Rodriguez)*

So, hold on..so..so.. and again. This is testimony that will be used against you in a court of law.

**Speaker 1** – 5:47 *(Rodriguez)*

No well yeah. This is testimony that you are withholding.

*(Note: Rodriguez Attempts to Speak and Shaw is Attempting to Shut her Down by Tell Interrupting her.)*

**Speaker 2** – 5:51 (Shaw become aggressive over the phone with Rodriguez)

HO... HO... HOLD ON!

**Speaker 1** – 5:50 (Rodriguez Attempts to Speak and Shaw continues to shout.)

You are withholding. No, you know what.. you are bad faith. You are not. I am recording this as well so I am going to use this against you too. I will be sharing and I am filing a special action against you personally because this is litigation abuse. You're withholding evidence.

**Speaker 2** – 6:07 (Shaw)

I don't. I don't understand. *(in the background)* Maam. If you're not going to allow me to speak.

*(Note: claims Rodriguez is not letting him speak after he threatens, raises voice at her verbally)*

**Speaker 1** – 6:12 (Rodriguez)

No, you are threatening me because you're telling me.. you're going to use this... and you're trying to claim perjury.

**Speaker 2** – 6:21 (Shaw)

K. You know what? Again. It is my understanding. My understanding.

**Speaker 1** – 6:27 (Rodriguez)

Right?

**Speaker 2** – 6:28 (Shaw)

That the court. That the court did not....

**Speaker 1** – 6:32 (Rodriguez)

Ok. So, you're withholding evidence. You don't want to provide it you want to depose me without evidence which is a constitutional violation.

**Speaker 2** – 6:40 (Shaw)

I'm not going to argue with you. I'm trying to tell you what I understand.

**Speaker 1** – 6:44 (Rodriguez)

Yeah. You're trying to give me excuses for withholding evidence. Unfortunately.

**Speaker 2** – 6:50 (Shaw)

We can not have a meet and confer if I do not understand what you are asking...

**Speaker 1** – 6:58 (Rodriguez)

Ok. I am asking something very simple. I am asking for them to hand over the evidence that I've already requested. That I sent you... a follow up.. How do you not understand that?

**Speaker 2** – 7:09 (Shaw)

Because I don't....

*(Note: Shaw attempts to speaking in the background while Rodriguez is speaking)*

**Speaker 1** – 7:10 (Rodriguez)

How do you not understand that? This is a due process violation, this is a constitutional violation, you're impeding my ability to defend my case because a lot of the information may implicate you which a conflict of interest. So, they're withholding evidence whether this was for the Original Complaint or the Amended Complaint it doesn't matter. That is not in the rules.

**Speaker 2** – 7:30 (Shaw)

I'm confused... I'm confused. So, if you will allow me to speak so we can handle my confusion that would be great. If you do not want to allow me to handle my confusion so I can understand what you are saying then that's fine. We can out conversation now.

*(Note: While Rodriguez is speaking Shaw is speaking in the background)*

**Speaker 1** – 7:44 (Rodriguez)

Ok. So.. What is your confusion?

**Speaker 2** – 7:52 (Shaw)

Ok.... Will you let me speak?

**Speaker 1** – 7:55 (Rodriguez)

Sure.

**Speaker 2** – 7:56 (Shaw)

Without interrupting me? *(Note: Making the inference and alleging Rodriguez is interrupting him after he'd continually dogged questions and threatened Rodriguez)*

**Speaker 1** – 7:55 (Rodriguez)

So what exactly do you need clarity on?

**Speaker 2** – 7:58 (Shaw)

Without interrupting me?

**Speaker 2** – 7:59 (Shaw)

Ok so, what exactly do you need clarity on?

**Speaker 1** – 7:58 (Rodriguez)

So what exactly do you need clarity on?

**Speaker 2** – 8:03 (Shaw)

Ok this is what I need clarity on. When did the court allow you to file your Amended Complaint?

**Speaker 1** – 8:20 (Rodriguez)

That has nothing to do with the evidence that's being requested. That was requested as of December 1<sup>st</sup>.

**Speaker 2** – 8:22 (Shaw becomes combative)

Are you.... Are you refusing... refusing to answer my question?

**Speaker 1** – 8:28 (Rodriguez)

Are you refusing? You're refusing to answer my question. Why are you withholding evidence that is required?

**Speaker 2** – 8:31 (Shaw)

I thought.. I thought we had an agreement. The agreement was you were going to address my confusion.

**Speaker 1** – 8:42 (Rodriguez)

Ok. I'm addressing your confusion. You're confusion...

**Speaker 2** – 8:45 (Shaw continues to be combative and interrupts Rodriguez from speaking)

By... by not interrupting me. And answer the question.

**Speaker 1** – 8:48 (Rodriguez)

No, because you're trying to... *(as Shaw continues to interrupt Rodriguez in the background)* you're use... and you're trying to put words in my mouth.

**Speaker 2** – 8:52 *(Shaw continues to be combative and interrupts Rodriguez from speaking)*

MAAM...

**Speaker 1** – 8:54 (Rodriguez)

Sir...you are not. (Rodriguez interrupted by Shaw)

**Speaker 2** – 9:05 (Shaw)

Thank you for the conversation.

**Speaker 1** – 9:05 (Rodriguez)

We will let the judge decide. *(Note: While Shaw continues to talk over her, extremely combative and toxic/hostile environment)*

**Speaker 2** – 8:59 (Shaw)

We are going to have to agree to disagree.

**Speaker 1** – 9:03 (Rodriguez)

Ok.

**Speaker 2** – 9:04 (Shaw)

I do not understand what you are requesting.

**Speaker 1** – 9:06 (Rodriguez)

Ok. And I do not understand why you are claiming that you don't understand the fact that this is a Due Process violation and you very well know that you are in violation of Rule 37. (While Rodriguez is speaking Shaw interrupts Rodriguez)

**Speaker 2** – 9:20 (Shaw shouts in the background speaking over Rodriguez)

I do not understand. I do not understand. (continually repeats "I do not understand.") Because you refuse to help me understand.

**Speaker 1** – 9:26 (Rodriguez)

No. No, you are trying to put words in my mouth. You're trying to twist my words around. *(As Shaw continues to talk over Rodriguez)* And then you're threatening me. That you're going to use this, and that I'm under oath and that's testimony.

**Speaker 2** – 9:37 (Shaw)

We have had our meet and confer regarding your discovery requests. My response to is I do not understand your discovery requests.

**Speaker 1** – 9:44 (Rodriguez)

Your response is you are denying my constitutional right, my right to access the evidence.

**Speaker 2** – 9:53 (Shaw)

Here is my statement. My statement is that I do not understand your discovery dispute because you do not allow me to ask questions.

**Speaker 1** – 10:06 (Rodriguez)

No, that is wrong. No, that is wrong. No, the recording will show... *(Note: During this portion of the call, Mr. Shaw repeatedly interrupted and spoke over Ms. Rodriguez, preventing her from completing her responses.)* the recording will show that, that you are threatening.

**Speaker 2** – 10:09 (Shaw speaks over Rodriguez again)

Would you like... Would you like to move on to the deposition?

**Speaker 1** – 10:15 (Rodriguez)

The deposition is not going to happen until you guys have cured your discovery violations because I have not received. The fact that you're even requesting a disposition when I don't have my

discovery is a Due Process violation. On the simple fact that I can't defend myself that's my 14<sup>th</sup> Amendment Due Process Right. So, you're impeding on my Constitutional Rights.

**Speaker 2** – 10:47 (Shaw)

Ok so. We're going to have to agree to disagree. Under the Rules as the court explained to you under the Court's Minute Entry.

**Speaker 1** – 10:56 (Rodriguez)

No, you're using an old minute entry. You are not using the most recent minute entry which was the February 23. *(Note: Ms. Rodriguez referencing February 23, 2026 Court Order issued by Judge McDowell.)* Where he lift.. *(Note: Ms. Rodriguez was interrupted again by Mr. Shaw.)*

**Speaker 2** – 11:04 (Shaw)

No. So I'm using... I'm using the Minute Entry and this minute entry. Repeatedly asking. Will you allow me to speak? Will you allow me to speak?

*(Note: During the call, Mr. Shaw paused mid-sentence and asked whether he would be permitted to "speak," despite no audible interruption by Ms. Rodriguez at that time.)*

**Speaker 1** – 11:12 (Rodriguez)

You're speaking.

**Speaker 2**– 11:14 (Shaw)

Ok so. The minute entry that I am referring to is a minute entry dated... it is dated March 3, 2026, and it reads as follows.

**Speaker 1** – 11:26 (Rodriguez)

Ok so that's not.

**Speaker 2** – 11:30 (Shaw)

The Court is in receipt of the plaintiffs. Will you allow me to speak? Will you allow me to speak?

*(Note: (Note: Mr. Shaw repeatedly stated “will you allow me to speak,” causing the discussion to become repetitive and obstructing efforts to address and resolve the issues raised during the meet-and-confer.)*

**Speaker 1** – 11:33 (Rodriguez)

We are not going to agree on any of this.. and this is another reason why I don't want to have an in-person deposition because the interactions with you and the defendants have been incredibly hostile. *(Note: Mr. Shaw again spoke over and interrupted Ms. Rodriguez while she was attempting to respond.)*

**Speaker 2** – 11:49 (Shaw speaks over Rodriguez)

Ok very good.

**Speaker 1** – 11:50 (Rodriguez)

On top of the fact, that I have reason to believe you and the defendants are stalking my social media pages.

**Speaker 2** – 11:56 (Shaw states in the background)

I... I understand so...

**Speaker 1** – 11:59 (Rodriguez)

I... I would like for you to honor your original commitment and umm keep ...*(Note: Mr. Shaw continues to repeatedly interrupted Ms. Rodriguez, preventing her from completing her statement.)*

**Speaker 2** – 12:03 (Shaw states in the background)

I understand. Maam.

**Speaker 1** – 12:03 (Rodriguez)

The original virtual deposition when that time does come, but I would like to judge to make a decision on all of this.

**Speaker 2** – 12:12 (Shaw)

Ok very good. So you'd like the judge to make a decision on all of this?

**Speaker 1** – 12:14 (Rodriguez)

Right.

**Speaker 2** – 12:14 (Shaw)

So Under the Rules I will send you the Rule 26(d) Joint Statement to fill out your portion of that Joint Statement.

**Speaker 1** – 12:29 (Rodriguez)

You can fill yours out. And I can fill out my portion. I can file it.

*(Note: Mr. Shaw's portion of the Joint Statement previously referenced, which Ms. Rodriguez has requested he complete; Ms. Rodriguez stands ready to complete her portion and volunteers to file the Joint Statement upon his compliance.)*

**Speaker 2** – 12:36 (Shaw)

So, you're refusing to. I want to make sure I understand. You're refusing... You're refusing... to fill out your portion.

*(Note: Mr. Shaw repeatedly restated Ms. Rodriguez's statements in a manner inconsistent with her original wording, altering the substance of her responses.)*

**Speaker 1** – 12:44 (Rodriguez)

No. I am not refusing. You again are putting words in my mouth.

*(Note: Mr. Shaw repeatedly interrupted Ms. Rodriguez while she was speaking, resulting in overlapping speech.)*

**Speaker 2** – 12:48 (Shaw)

Okay. Okay. Maam! Let me finish my conversation. If you won't let me finish my conversation.

**Speaker 1** – 12:51 (Rodriguez)

Well, you're saying I'm refusing. I'm correcting you because you're putting...

*(Note: Mr. Shaw repeatedly interrupted Ms. Rodriguez while she was speaking, resulting in overlapping speech.)*

**Speaker 2** – 13:00 (Shaw)

Ok. Here is my question to you. Will. Will you be filing your own 26.b motion?

**Speaker 1** – 13:11 (Rodriguez)

Ok. Just to clarify you said that I'm refusing... and to clarify I never said that.

*(Note: Mr. Shaw again interrupted Ms. Rodriguez.)*

**Speaker 2** – 13:13 (Shaw)

No. That is not what I said. I'm asking you a question. Will you be filing your own Rule 26(d) motion?

**Speaker 1** – 13:34 (Rodriguez)

I can we already met and conferred, but like I said I proposed that you fill out your position, and you can send it to me, and then I'm happy to file it.

**Speaker 2** – 13:45 (Shaw)

Ok. So what you're saying is that? You would like me to send you because the 26(d) motion should be filed by the person who is seeking it so I'm seeking the relief.

*(Note: During this portion of the call, Mr. Shaw made statements regarding Rule 26(d) and filing requirements that are not reflected in the Arizona Rules of Civil Procedure. He also continually suggested that Ms. Rodriguez was unwilling to complete the Joint Statement, which is inconsistent with her prior communications confirming her willingness to complete her portion and file it.)*

**Speaker 1** – 14:05 (Rodriguez)

Ok then I will file my own in that case.

**Speaker 2** – 14:06 (Shaw)

Ok. You're saying here today that you will file your own 26(d) motion concerning our discovery dispute regarding your deposition. Is that correct?

**Speaker 1** – 14:22 (Rodriguez)

At this point, what I am saying is that we are not in agreement on any of the topics. We have already completed an attempt for a meet and confer. We don't agree and then we can kind of leave it at that. We don't agree. Let's just leave it at that.

**Speaker 2** – 14:33 (Shaw)

Very good. Thank you for your time today.

**Speaker 1 – 14:37 (Rodriguez)**

Thank you. Have a nice day. Bye.

Call Ended at 10:45 am

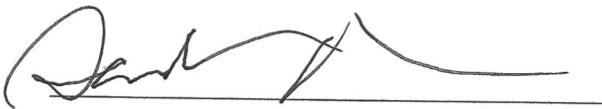
#### **IV. AFFIDAVIT OF SANDRA RODRIGUEZ**

I, Sandra Rodriguez, declare under penalty of perjury pursuant to the laws of the State of Arizona as follows:

- 1. I personally participated in the March 25, 2026 meet-and-confer call with Defendants' counsel, Augustus H. Shaw IV of Shaw & Lines, LLC, as reflected in the foregoing transcript titled "*Transcript Summary and Sworn Affidavit* (Telephonic Meet-and-Confer)**
- 2. The transcript summary provided herein is a true and accurate representation of the content of that phone call to the best of my knowledge, memory, and ability.**
- 3. The call was recorded contemporaneously, and I affirm that the contents of the summary are consistent with the recorded communication.**
- 4. I am willing and able to provide a copy of the audio recording to the Court, if so requested, for purposes of authentication, verification, or further evidentiary review.**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 2rd day of April, 2026, in Maricopa County, Arizona.



Sandra Rodriguez

# EXHIBIT 2

# EXHIBIT 2

## RELEVANCE

### **Plaintiff's March 23, 2026 Email Requesting Meet-and-Confer**

#### **SUMMARY:**

This exhibit is Plaintiff's contemporaneous email to Defendants' counsel documenting ongoing discovery noncompliance, including that more than 100 days had passed without production of requested discovery. Plaintiff identifies specific deficiencies, disputes Defendants' characterization of her position on deposition, and expressly requests a meet-and-confer, providing multiple dates and times for availability.

#### **RELEVANCE:**

This exhibit demonstrates Plaintiff's good-faith effort to resolve discovery disputes prior to Court intervention and establishes that the purpose of the March 25, 2026 call included discovery issues. It directly refutes Defendants' claim that no discovery meet-and-confer occurred and supports Plaintiff's compliance with Rule 26(d), Ariz. R. Civ. P.



Sandra Rodriguez &lt;sandra.rodriguez0339@gmail.com&gt;

---

**Plaintiff's Response to Deposition Notice and Defendants' Ongoing Discovery Noncompliance (Rodriguez v. Gardens Gilbert, CV2024-005940)**

---

Sandra Rodriguez &lt;sandra.rodriguez0339@gmail.com&gt;

Mon, Mar 23, 2026 at 4:52 PM

To: Augustus Shaw &lt;ashaw@shawlines.com&gt;

Bcc: Sandra Rodriguez &lt;sandra.rodriguez0339@gmail.com&gt;

Dear Mr. Shaw,

I write in response to Defendants' stated intent to seek dismissal under **Ariz. R. Civ. P. 12(j)** and **Rule 7.1(h)**. Any such request is improper in light of Defendants' ongoing failure to comply with their discovery obligations.

At the outset, I must correct a mischaracterization. At no time have I stated that I will not participate in a deposition. My position has consistently been that I will participate once Defendants comply with their disclosure obligations so the deposition may proceed fairly.

As of March 24, 2026, 113 days have passed since December 1, 2025, and Defendants have not provided the requested discovery. This continued noncompliance makes any attempt to proceed with deposition or dismissal improper. (See February 23, 2026 Court Order)

Defendants' characterization of this as a refusal is inaccurate. Notably, Defendants indicated an intent to seek dismissal just 11 days after Plaintiff produced substantial evidence—including photographs, video, and testimony—while continuing to withhold responsive materials.

Defendants' assertion of "good faith consultation" is not supported by the record. Communications have been limited to email, with no meaningful effort to confer or resolve the issues.

Defendants' continued refusal to provide discovery while invoking meet-and-confer requirements reflects obstruction rather than compliance. Nevertheless, in good faith and to eliminate any procedural dispute, I am available for a telephonic meet-and-confer at the following times:

- March 25, 2026 10:00 AM – 12:00 PM (AZ)
- March 26, 2026 1:00 PM – 3:00 PM (AZ)
- March 30, 2026 9:00 AM – 11:00 AM (AZ)

**RODRIGUEZ JOINT STATEMENT**

For clarity, Plaintiff is requesting ALL previously requested discovery—no more, no less—be produced in full compliance with the Rules.

Plaintiff requests that all outstanding discovery be produced in compliance with the Arizona Rules of Civil Procedure.

With respect to the deposition, the parties through yourself previously agreed it would proceed virtually, and that agreement should be honored. I reiterate that, given the ongoing litigation abuse and harassment, I do not feel safe attending in person. I also have reason to believe Defendants Anna Schultz, GGCA Board Members, and counsel are monitoring my social media platforms, as further supported by video evidence of individuals circling my home at Defendants' direction. I will supplement the record with screenshots demonstrating continued monitoring and request that all Defendants, including those identified in the requests for production, provide the responsive materials.

I remain available to meet and confer by telephone. Please confirm your availability and identify the issues to be addressed.

## **JUDICIAL INTERVENTION DUE TO LITIGATION ABUSE**

Plaintiff has filed a Request for Hearing and a Request for Leave to File a Motion to Compel yesterday, March 23, 2026 and a physical copy has been mailed to you directly and respectfully seeks Court intervention.

## **9. RESERVATION OF RIGHTS**

Plaintiff expressly reserves all rights, including the right to seek appellate or special action relief as necessary.

For these reasons, any motion seeking dismissal under Rule 12(j) or Rule 7.1(h) will be opposed. Absent compliance with discovery obligations, Plaintiff will proceed with seeking appropriate relief, including sanctions under Ariz. R. Civ. P. 37.

I remain willing to meet and confer in good faith and look forward to your response.

Sincerely,

Sandra Rodriguez

[Quoted text hidden]



**GGCA Minute Entries 02.23.26.pdf**

128K

# EXHIBIT 3

# EXHIBIT 3

## RELEVANCE

### **Email Evidence of Defense Counsel’s Coordination and Agreement Notice of Meet-and-Confer Call on March 25, 2026**

#### **SUMMARY:**

This exhibit consists of an email communication from Defendants’ counsel, Augustus H. Shaw IV, dated March 24, 2026, in which he instructs Plaintiff to “provide me with the number to call tomorrow at 10:30am.” The email confirms that Defendants’ counsel initiated and scheduled a telephonic meet-and-confer for March 25, 2026 at a specific time. The communication reflects that Augustus H. Shaw IV, as lead counsel, coordinated and scheduled the March 25, 2026 meet-and-confer call, while co-counsel Dominick Dente was included only via email correspondence, demonstrating his awareness of the scheduling but not participation in the call itself. The record further shows that Plaintiff subsequently informed Mr. Dente by email that the meet-and-confer had already occurred with Mr. Shaw, as confirmed by the transcript and related communications. *(See Exhs. 1–3.)*

#### **RELEVANCE:**

This exhibit provides contemporaneous evidence that Defendants’ counsel scheduled the March 25, 2026 meet-and-confer. Together with Exhibits 1 through 4, it establishes that Plaintiff requested the conference, counsel scheduled it, and it occurred. This refutes Defendants’ claim that no meet-and-confer took place and shows counsel had advance knowledge of its purpose. It supports Plaintiff’s compliance with Rule 26(d), Ariz. R. Civ. P., and demonstrates that Defendants’ contrary statements are inconsistent with the record.



Sandra Rodriguez &lt;sandra.rodriguez0339@gmail.com&gt;

---

**Re: Meet and Confer – Counsel of Record Required, CV2024-005940)**

---

**Augustus Shaw** <ashaw@shawlines.com>

Tue, Mar 24, 2026 at 3:52 PM

To: Sandra Rodriguez &lt;sandra.rodriguez0339@gmail.com&gt;

Cc: Dominick Détente &lt;Dominick@shawlines.com&gt;

Please provide me with the number to call tomorrow at 10:30am.

Augustus H. Shaw IV †\*

Shaw & Lines, LLC

1490 S. Price Rd., Suite 318

Chandler, Arizona 85286

Phone 480-456-1500

e-mail [ashaw@shawlines.com](mailto:ashaw@shawlines.com)

web site [www.shawlines.com](http://www.shawlines.com)

†Licensed in Arizona and Nebraska

\*President- College of Community Association Lawyers

\*Faculty Associate Professor - Arizona State University O'Connor College of Law

---

CONFIDENTIALITY STATEMENT: THIS E-MAIL MESSAGE AND ANY ACCOMPANYING DOCUMENTS CONTAIN INFORMATION WHICH IS ATTORNEY PRIVILEGED, CONFIDENTIAL AND INTENDED ONLY FOR THE USE OF THE ABOVE-NAMED RECIPIENT. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, PRINTING OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE OR RETURN THE E-MAIL MESSAGE TO US. THANK YOU.

**THIS FIRM MAY ACT AS A DEBT COLLECTOR. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

---

**From:** Sandra Rodriguez <[sandra.rodriguez0339@gmail.com](mailto:sandra.rodriguez0339@gmail.com)>

**Sent:** Tuesday, March 24, 2026 10:15 AM

**To:** Augustus Shaw <[ashaw@shawlines.com](mailto:ashaw@shawlines.com)>

**Cc:** Dominick Détente <[Dominick@shawlines.com](mailto:Dominick@shawlines.com)>

# EXHIBIT 4

## **SUMMARY AND RELEVANCE OF SCREENSHOT**

**Date:** March 25, 2026

The screenshot reflects a telephonic communication between Plaintiff Sandra Rodriguez and Defendants' counsel, Augustus H. Shaw IV, occurring on March 25, 2026. It demonstrates that Mr. Shaw initiated contact with Plaintiff in response to her request to meet and confer, thereby confirming that a meet-and-confer call did in fact take place on that date. (*See Exh. 2*)

### **RELEVANCE:**

This evidence directly contradicts Defendants' representation to the Court that no meet-and-confer regarding discovery disputes occurred. The call itself, combined with the transcript (Exhibit 1), establishes that the parties communicated regarding pending discovery violations raised by Plaintiff, as well as deposition-related issues. The screenshot corroborates the timing and occurrence of the call, supporting Plaintiff's position that she satisfied the meet-and-confer requirement under Rule 26(d), Ariz. R. Civ. P., and further demonstrates that Defendants' contrary statements are not supported by the record.



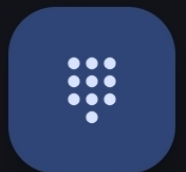
Search Google Voice

S



Shaw Law Firm

✓ Mar 25, 10:30 AM



Calls



Contacts



Messages



Voicemail