

1 of Plaintiff shall be scheduled to occur at the office of the Court Reporter or at the State
2 Bar Association office.”

3
4 Defendants noticed the deposition of the Plaintiff Sandra Rodriguez for April 16,
5 2026 at Office of the Court Reporter, Legal Video Specialists, LLC, 3111 N. Central Ave.
6 Suite A225 Phoenix, AZ 85012. Notice of the Deposition was provided via mail to the
7 Plaintiff’s address of record on March 20, 2026. A Notice of Deposition was also served
8 via Turbo Court as part of the Defendants’ Rule 26(D)(2) Statement of Discovery Dispute
9 Regarding Plaintiff’s Refusal to Attend Deposition on March 25, 2026. A Notice of
10 Deposition was also e-mailed to the Plaintiff on March 20, 2026.

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12
13 Based on the Court’s Order and the proper providing of notice, Defendants’ assert
14 that Plaintiff must comply with the Court’s Order and attend an in-person deposition as
15 required by Rule 30, Ariz. R. Civ. P. Defendants desire that the Court resolve this dispute
16 by ordering the Plaintiff to attend the properly noticed deposition and to impose sanctions.
17

18 **III. DEFENDANTS’ POSITION - FROM PLAINTIFF’S STATEMENT –**
19 **DEFENDANTS’ DISCOVERY DEFICIENCIES (NOTE THERE**
20 **WAS NOT A SECTION II IN PLAINTIFF’S STATEMENT).**

21 On April 30, 2026, the parties engaged in a meet and confer regarding the Plaintiff’s
22 discovery and disclosure disputes. It is the position of the Defendants that the Defendants
23 have properly responded to all requests for discovery and disclosure.

24 The Defendants provided their Responses To Plaintiff’s First Set of (I) Requests
25 For Production Of Documents, (II) Requests For Admissions, and (III) Non-Uniform
26 Interrogatories to the Plaintiff concerning the original Complaint, subject to the then
27 effective Tier I designation and subject to applicable objections, on December 23, 2025.
28

1 The Defendants also provided their Post-Amendment Responses To Plaintiff's (I)
2 Requests For Production of Documents, (II) Requests For Admissions, and (III) Non-
3 Uniform Interrogatories to the Plaintiff concerning the Amended Complaint, subject to
4 the applicable Tier III designation and subject to applicable objections, on April 13, 2026.

6 It is important to note that many of the discovery and disclosure requests for the
7 Amended Complaint overlapped with the Original Complaint.
8

9 Plaintiff asserts that the "Defendants have produced no meaningful documents in
10 response to Requests for Production, relying instead on a previously produced insurance
11 policy, duplicate CC&Rs/bylaws," but does not provide clear guidance regarding the
12 documents she believes are being withheld.
13

14 Plaintiff states that the Defendants provide "affidavits in place of underlying
15 records," without providing any explanation or example of her rationale or what she means
16 by "affidavits." Plaintiff states that the Defendants' "responses consist of boilerplate
17 objections and unsupported claims that documents do not exist, while maintaining they
18 have "produced all discovery." Plaintiff asserts "Defendants continue to avoid production
19 through shifting positions and have failed to produce HOA records within their control,
20 including the requested HOA addendum." Again, the Plaintiff does not list what
21 documents she believes are being withheld nor does she explain the "HOA addendum"
22 she is seeking.
23
24

25 The Plaintiff does not contest any of the individual objections provided by the
26 Defendants and instead makes broad and unsupported allegations. The record clearly
27 shows that the Defendants have properly responded to the Plaintiff's discovery and
28

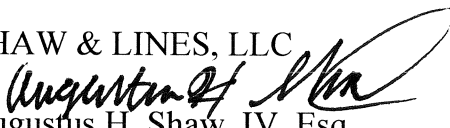
1 disclosure requests. The record also shows that the Plaintiff makes grand, sweeping
2 accusations without providing substantive legal arguments as to specific objections
3 provided by the Defendants or the specific documents she believes may exist and have not
4 been disclosed. Plaintiff simply states she is not being provided with adequate discovery
5 and disclosure, which the Defendants' deny.
6

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8 **IV. DEFENDANTS' POSITION - FROM PLAINTIFF'S STATEMENT –**
9 **STATUS/NATURE OF DISPUTE.**

10 It is the position of the Defendants that the Defendants have properly responded to
11 all requests for discovery and disclosure and the Plaintiff has a fundamental
12 misunderstanding of the Rules of Civil procedure concerning discovery and disclosure;
13 which is the basis of the Plaintiff's discovery and disclosure concerns.
14

15 DATED this 4th day of May 2026.

16 SHAW & LINES, LLC

17 
18 Augustus H. Shaw, IV, Esq.

19 1490 South Price Road, Suite 318

20 Chandler, Arizona 85286

21 *Attorney for Defendants*

22 ORIGINAL submitted for filing this
23 4th day of May 2026 to:

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

27 COPY of the foregoing e-mailed and mailed this
28 4th day of May 2026 to:

Sandra Rodriguez
4375 E. Besty Lane
Gilbert, Arizona 85296
Plaintiff

By: /s/ Diane Fincher _____