

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 SANDRA RODRIGUEZ,
10 **Plaintiff,**

11 vs.

**MARICOPA COUNTY
SUPERIOR COURT**
Case No.: CV2024-005940
Judge Christopher Coury,

12 GARDENS GILBERT COMMUNITY
13 ASSOCIATION an Arizona non-profit
14 corporation; FOCUS HOA
15 MANAGEMENT, LLC, and Arizona
16 limited liability company; HARMIN
17 CADIS, BROOKE SORTOR, ANNA
18 SCHULTZ

19 **Defendants,**

**MOTION FOR LEAVE TO FILE
SUPPLEMENTAL FACTS IN
SUPPORT OF PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT AND DEFENDANTS'
RULE 56(d) REQUEST**

20 **TO THE HONORABLE JUDGE COURY:**

21 Rodriguez ("*Plaintiff*") respectfully requests leave to file a Notice of Supplemental Facts
22 relevant to Plaintiff's pending Motion for Summary Judgment and Defendants' Rule 56(d)
23 Request. Plaintiff does not seek reconsideration of the Court's May 27, 2026 Order or any
24 discovery-related relief. Rather, Plaintiff seeks to preserve the record regarding events occurring
25 after the May 27, 2026 Order and Plaintiff's June 1, 2026 Notice of Appeal.

26 On June 2, 2026, at approximately 8:00 a.m., Plaintiff served Defendants' counsel via
27 email and U.S. Priority Mail with a Final Notice of Outstanding Discovery Deficiencies and
28 Demand for Complete Compliance. The Notice identified outstanding Requests for Production,
Requests for Admission, Interrogatories, Rule 26.1 disclosure deficiencies, electronically stored

1 information, and responsive records that continue to remain incomplete or unproduced despite
2 prior requests and motions. (See Exh 1)

3 On June 3, 2026, at approximately 7:49 a.m., Defendants' counsel responded:
4

5 *"Please note, as stated in the Court's attached order, your discovery and*
6 *disclosure disputes have been resolved. It is the position of the Defendants that all*
7 *discovery and disclosure has been provided to you." (See Exhibit 2)*

8 Plaintiff submits these post-Order communications because they are relevant to Plaintiff's
9 Motion for Summary Judgment and Defendants' Rule 56(d) Request. Plaintiff further notes that
10 the Court's May 27, 2026 Order did not find that discovery was complete or that Defendants had
11 complied with all discovery obligations and expressly recognized that remedies remain available
12 if non-disclosure is later established. Attached as Exhibit 3 is a June 2, 2026 email in which
13 Defendants' counsel characterized Plaintiff as *"uncooperative," "dishonest," and "completely*
14 *ignoring the Rules of Civil Procedure"* while asserting that Plaintiff refused to meet and confer
15 despite the record demonstrating Rodriguez's written responses reflect her agreement to
16 participate in a Rule 26(d) conference, provided multiple dates and times, and requested
17 clarification regarding Defendants' Rule 56(d) request. Plaintiff submits Exhibit 3 solely to
18 preserve the record regarding post-Order communications that Plaintiff contends are inconsistent
19 with the parties' written correspondence and Arizona attorneys' duties of professionalism and
20 civility. Plaintiff's previously filed Motions to Compel identify the discovery requested, the
21 materials produced, and the records Plaintiff contends remain outstanding. This request is made
22 solely to preserve a complete and accurate record of post-Order events for purposes of the pending
23 Motion for Summary Judgment, Defendants' Rule 56(d) Request, and any future appellate review.

24 WHEREFORE, Plaintiff respectfully requests leave to file the proposed Notice of
25 Supplemental Facts.

26 Respectfully submitted,

27 

28 Sandra Rodriguez

1 **II. CERTIFICATE OF SERVICE**

2 I served copies of this ***MOTION FOR LEAVE TO FILE SUPPLEMENTAL FACTS IN***
3 ***SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT AND***
4 ***DEFENDANTS' RULE 56(d) REQUEST*** for on all parties of record via U.S. Mail.

5 **A. OPPOSING PARTY INFORMATION**

6 **DEFENDANTS:**

- 7
- 8 ○ Gardens Gilbert Community Association
 - 9 ○ Focus HOA Management, LLC
 - 10 ○ Harmin Cadis
 - 11 ○ Brooke Sortor
 - 12 ○ Anna Schultz

- 13
- 14 ○ **Address:** 4135 E. Power Road, Suite 133, Mesa, Arizona 85212

15

16 **DEFENDANT'S LEGAL COUNSEL:**

- 17
- 18 • **Name:** Augustus H. Shaw IV
 - 19 • **Firm:** Shaw & Lines, LLC
 - 20 • **Address:** 1490 S. Price Road, Suite 318 Chandler, Arizona 85286

21

22 Respectfully submitted this 1st day of June 2026.

23 

24 Sandra Rodriguez

EXHIBIT 1



Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Final Notice of Outstanding Discovery Deficiencies and Demand for Complete Compliance

1 message

Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Tue, Jun 2, 2026 at 8:00 AM

To: Augustus Shaw <ashaw@shawlines.com>

Bcc: Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Dear Mr. Shaw,

Please find attached Plaintiff's **Final Notice of Outstanding Discovery Deficiencies and Demand for Complete Compliance**, together with the supporting discovery requests identified therein and a copy of the Court's May 27, 2026 Order.

As noted in the attached Notice, the Court recognized that party discovery must be obtained through Rules 33, 34, and 36, Arizona Rules of Civil Procedure. Consistent with that ruling, Plaintiff renews her request for complete compliance with Defendants' outstanding discovery obligations.

The attached Notice identifies numerous discovery requests that remain unanswered, incomplete, deficient, evasive, or unsupported by responsive documents, including Requests for Production, Requests for Admission, Uniform and Non-Uniform Interrogatories, supplemental disclosures, electronically stored information, and supporting evidence concerning Defendants' claims, defenses, disclosures, motions, and factual contentions.

Plaintiff requests that Gardens Gilbert Community Association, Focus HOA Management, LLC, Anna Schultz, Harmin Cadis, and Brooke Sortor provide complete verified responses, responsive documents, electronically stored information, supplemental disclosures, and any required privilege logs no later than **June 30, 2026**.

A true and correct copy of the Notice and attached exhibits has also been sent via **United States Postal Service Priority Mail**.

This correspondence is intended as a final good-faith effort to obtain discovery compliance without further court intervention.

Thank you for your attention to this matter.

Respectfully,

Sandra Rodriguez

2 attachments

**GGCA Minute Entry 05.27.26.pdf**

391K

**Final Notice of Outstanding Discovery Deficiencies Demand 06_02_26.pdf**

7593K

EXHIBIT 2



Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

RE: Final Notice of Outstanding Discovery Deficiencies and Demand for Complete Compliance

Augustus Shaw <ashaw@shawlines.com>
To: Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Wed, Jun 3, 2026 at 7:49 AM

Ms. Rodriguez,

Please note, as stated in the Court's attached order, your discovery and disclosure disputes have been resolved. It is the position of the Defendants that all discovery and disclosure has been provided to you.

I see that you have filed a Notice of Appeal regarding the Court's recent Rulings. This would also have an effect on any discovery and disclosure matters.

If you would like to meet and confer regarding this matter, please let me know.

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

web site 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

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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.

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From: Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Sent: Tuesday, June 2, 2026 8:00 AM

To: Augustus Shaw <ashaw@shawlines.com>

Subject: Final Notice of Outstanding Discovery Deficiencies and Demand for Complete Compliance

Dear Mr. Shaw,

Please find attached Plaintiff's **Final Notice of Outstanding Discovery Deficiencies and Demand for Complete Compliance**, together with the supporting discovery requests identified therein and a copy of the Court's May 27, 2026 Order.

As noted in the attached Notice, the Court recognized that party discovery must be obtained through Rules 33, 34, and 36, Arizona Rules of Civil Procedure. Consistent with that ruling, Plaintiff renews her request for complete compliance with Defendants' outstanding discovery obligations.

The attached Notice identifies numerous discovery requests that remain unanswered, incomplete, deficient, evasive, or unsupported by responsive documents, including Requests for Production, Requests for Admission, Uniform and Non-Uniform Interrogatories, supplemental disclosures, electronically stored information, and supporting evidence concerning Defendants' claims, defenses, disclosures, motions, and factual contentions.

Plaintiff requests that Gardens Gilbert Community Association, Focus HOA Management, LLC, Anna Schultz, Harmin Cadis, and Brooke Sortor provide complete verified responses, responsive documents, electronically stored information, supplemental disclosures, and any required privilege logs no later than **June 30, 2026**.

A true and correct copy of the Notice and attached exhibits has also been sent via **United States Postal Service Priority Mail**.

This correspondence is intended as a final good-faith effort to obtain discovery compliance without further court intervention.

Thank you for your attention to this matter.

Respectfully,

Sandra Rodriguez



5.28.2026 Several Rulings Order-Ruling Minute Entry.pdf

372K

EXHIBIT 3



Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Rodriguez Second Response: Continued Litigation Abuse by Shaw

1 message

Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Tue, Jun 2, 2026 at 6:22 PM

To: Augustus Shaw <ashaw@shawlines.com>

Bcc: Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Dear Mr. Shaw,

I received your May 29, 2026 email on June 2, 2026. Your accusations that I am *"uncooperative," "dishonest,"* and *"completely ignoring the Rules of Civil Procedure"* are unsupported, inflammatory, and do not constitute a good-faith meet-and-confer effort. The record reflects that I agreed to confer, provided multiple dates and times, and requested reasonable clarification regarding the Rule 56(d) issues and relief sought. Those requests remain unanswered.

I also dispute your assertion that I have been properly noticed for deposition. An email attachment does not cure service deficiencies or establish proper service. I have not received proper service of any deposition notice, and my receipt of this email on June 2, 2026 at 6:20 pm does not establish compliance with the applicable rules. I reserve all objections regarding service, notice, and Defendants' continued failure to engage in a meaningful meet-and-confer process. This correspondence is being preserved for inclusion in the trial and appellate records.

Sincerely,

Sandra Rodriguez

On Fri, May 29, 2026 at 4:15 PM Augustus Shaw <ashaw@shawlines.com> wrote:

Ms. Rodriguez,

My attached correspondence was crystal clear. As usual, you are being uncooperative, dishonest and you are completely ignoring the Rules of Civil Procedure.

You have refused to meet and confer in good faith. As such, I will not withdraw my Rule 56(d) Motion and will await the Court's decision.

In the meantime, I'll see you, in person, at your deposition, hereby Noticed through the attached.

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

web site www.shawlines.com

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From: Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

Sent: Friday, May 29, 2026 3:25 PM

To: Augustus Shaw <ashaw@shawlines.com>

Subject: Rodriguez Second Response: Defendants' Request For Rule 56(D) Relief And For Expediated Hearing
Additional Request

Dear Counsel Shaw,

Your most recent email does not respond to the requests contained in my May 28, 2026 email. (See attached) Rather than addressing my requests for a written agenda, identification of the specific Rule 56(d) issues to be discussed, the relief sought, confirmation of the conference scope, and the dates and times I provided, you initiated a new email chain without acknowledging or responding to those requests.

To be clear, Plaintiff did not refuse to meet and confer. Plaintiff expressly agreed to participate, requested reasonable clarification necessary for a meaningful Rule 26(d) conference, and provided availability on June 2, 2026, at 1:00 p.m. or 3:00 p.m. Arizona time, and June 4, 2026, at 3:00 p.m. or 5:00 p.m. Arizona time.

Your subsequent communication did not address the requested information, identify the specific Rule 56(d) issues,

identify the relief sought, or respond to the proposed dates and times. As a result, Plaintiff renews her request for:

- A written agenda identifying the Rule 56(d) issues to be discussed;
- Identification of the relief sought;
- Confirmation of the expected duration of the conference; and
- Confirmation that the discussion will be limited to those identified Rule 56(d) issues.
- Upon receipt of this information, Plaintiff remains willing to reasonably comply with Rule 26(d) and participate in a good-faith meet-and-confer on the dates previously provided.

This is Plaintiff's second written response regarding Defendants' Rule 56(d) request. Plaintiff has provided availability and requested reasonable clarification necessary for a meaningful conference.

Any continued failure to respond to these requests will be documented and added to the record as evidence of Defendants' lack of cooperation and bad-faith meet-and-confer efforts. Plaintiff reserves all rights and remedies.

Sincerely,

Sandra Rodriguez

On Thu, May 28, 2026, 1:51 PM Augustus Shaw <ashaw@shawlines.com> wrote:

Ms. Rodriguez,

Attached please find the Defendants' Request For Rule 56(D) Relief And For Expediated Hearing concerning Plaintiff's Motion for Summary Judgment. We are required to meet and confer regarding filing the attached.

Are you free to chat about the attached today?

Please let me know and thanks!

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

web site www.shawlines.com

†Licensed in Arizona and Nebraska

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