

JUN 15 2026 8:56 AM  
J. Maynard, Deputy

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,**

**NOTICE OF SUPPLEMENTAL  
FACTS AND MEMORANDUM  
IN SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY  
JUDGMENT**

20 **TO THE HONORABLE JUDGE COURY:**

21 Rodriguez ("*Plaintiff*"), pursuant to the Court's June 5, 2026 Order granting leave to file  
22 supplemental facts in support of Plaintiff's Motion for Summary Judgment, respectfully submits  
23 this Notice of Supplemental Facts and Supplemental Memorandum. This filing is based upon  
24 events occurring after Plaintiff filed her Motion for Summary Judgment and provides  
25 supplemental evidence directly relevant to Defendants' Rule 56(d) request, Defendants'  
26 representations concerning discovery and disclosure, the completeness of the evidentiary record,  
and the absence of genuine disputes of material fact.

27 Plaintiff incorporates by reference her Motion for Summary Judgment, Separate  
28 Statement of Facts, supporting exhibits, affidavits, declarations, recordings, photographs, videos,  
HOA records, Arizona Corporation Commission records, discovery materials, Motions to

1 Compel, Petition for Special Action, and all other evidence previously filed in support of  
2 summary judgment.

3  
4 The supplemental evidence submitted herewith includes:

- 5 1. **Exhibit 1:** Plaintiff's June 2, 2026 Final Notice of Outstanding Discovery  
6 Deficiencies and Demand for Complete Compliance.
- 7 2. **Exhibit 2:** Defendants' June 3, 2026 response asserting that all discovery and  
8 disclosure had been provided.
- 9 3. **Exhibit 3:** Correspondence documenting continuing disputes regarding discovery,  
10 disclosure, service, and Rule 56(d).

11 These materials demonstrate that Defendants continued to represent that discovery was  
12 complete while simultaneously seeking Rule 56(d) relief and while substantial discovery disputes  
13 remained unresolved.

## 14 I. SUPPLEMENTAL FACTS

### 15 A. DEFENDANTS CONTINUED TO ASSERT DISCOVERY WAS COMPLETE 16 DESPITE OUTSTANDING DISCOVERY DEFICIENCIES

17 On June 2, 2026, Plaintiff served Defendants with a Final Notice of Outstanding  
18 Discovery Deficiencies identifying numerous unresolved Requests for Production, Requests for  
19 Admission, Interrogatories, Rule 26.1 disclosure deficiencies, electronically stored information,  
20 and responsive records Plaintiff has repeatedly documented remain outstanding.

21 The Notice identified records concerning Gardens Gilbert Community Association, Focus  
22 HOA Management, LLC, GGCA HOA Board members, Anna Schulz, Harman Cadis, Brooke  
23 Sortor, HOA governance, Board communications, elections, financial operations, enforcement  
24 activities, complaints, management records, and other matters directly relevant to Plaintiff's  
25 claims and Defendants' defenses.

26 On June 3, 2026, defense counsel responded:

27 *"It is the position of the Defendants that all discovery and disclosure has been  
28 provided to you."*

1 Defense counsel further asserted that Plaintiff's discovery disputes had been resolved.  
2 Those representations are contradicted by the record. Plaintiff's March 13, 2026 Motion to  
3 Compel, including Exhibits 5 through 7, documents Requests for Production seeking records  
4 concerning HOA operations, governance, Board actions, communications, elections, enforcement  
5 matters, financial records, and management activities that have not been produced.

6 Plaintiff's April 27, 2026 Motion to Compel, together with Exhibits 4, 8, 14, 15, 16, and  
7 18 through 26, further documents continuing discovery deficiencies, incomplete productions,  
8 withheld records, and unresolved disclosure disputes despite repeated requests and meet-and-  
9 confer efforts. The record therefore demonstrates that substantial discovery disputes remain  
10 unresolved at the same time Defendants were representing that discovery was complete.

11 **B. DEFENDANTS RELIED UPON BROAD PRIVILEGE AND WORK**  
12 **PRODUCT DOCTRINE OBJECTIONS MAINTAINING DISCOVERY WAS**  
13 **COMPLETE**

14 Defendants continue to repeatedly relied upon attorney-client privilege and work-product  
15 objections to withhold categories of records directly relevant to HOA governance, Board  
16 decision-making, management activities, enforcement actions, communications, and conduct  
17 giving rise to this litigation.

18 A.R.S. § 12-2234 protects confidential attorney-client communications. It does not shield  
19 underlying facts, corporate records, Board actions, business decisions, factual investigations, or  
20 otherwise discoverable information merely because counsel participated in communications.  
21 Likewise, *Samaritan Foundation v. Goodfarb*, 176 Ariz. 497 (1993), recognizes that attorney-  
22 client privilege and work-product protections are limited and do not authorize blanket  
23 withholding of factual information relevant to litigation.

24 Plaintiff repeatedly requested records concerning HOA Board members serving from  
25 2023 through the present, Focus HOA Management, LLC, Harman Cadis, Brooke Sortor, Anna  
26 Schulz, and other individuals involved in HOA operations, enforcement decisions, and actions  
27 affecting Plaintiff. Defendants repeatedly invoked broad privilege and work-product objections  
28 while failing to produce responsive records, factual information, or adequate privilege logs, yet  
simultaneously maintained that discovery obligations had been fully satisfied.

1           **C. DEFENDANTS SIMULTANEOUSLY CLAIMED DISCOVERY WAS**  
2 **COMPLETE AND REQUESTED RULE 56(d) RELIEF**

3           Despite repeatedly asserting that all discovery and disclosure had been completed,  
4 Defendants sought Rule 56(d) relief claiming additional discovery was necessary before  
5 responding to Plaintiff's Motion for Summary Judgment.

6           On June 5, 2026, the Court granted Defendants' Rule 56(d) request and extended  
7 Defendants' response deadline. Defendants cannot simultaneously maintain that discovery is  
8 complete while asserting that essential facts remain unavailable.

9           If Defendants had already produced all discovery and disclosure as repeatedly  
10 represented, Defendants should already possess the information necessary to respond to Plaintiff's  
11 Motion for Summary Judgment. These inconsistent positions are directly relevant to the  
12 credibility and sufficiency of Defendants' Rule 56(d) request.

13           **D. SUPPLEMENTAL EVIDENCE DEMONSTRATES DISCOVERY DISPUTES**

14           The supplemental exhibits further establish that Plaintiff continued to identify unresolved  
15 discovery deficiencies while Defendants maintained that no such deficiencies existed. Defendants  
16 did not provide supplemental disclosures, did not produce additional responsive records, did not  
17 provide complete privilege logs, and did not cure the deficiencies identified in Plaintiff's Motions  
18 to Compel and June 2, 2026 Final Notice.

19           Instead, Defendants maintained that all discovery and disclosure had already been  
20 provided. This evidence is directly relevant to Defendants' credibility, the completeness of  
21 discovery, the sufficiency of their Rule 56(d) request, and whether any genuine issue of material  
22 fact exists requiring trial.

23           **II. SUPPLEMENTAL MEMORANDUM**

24           **A. SUMMARY JUDGEMENT REMAINS APPROPRIATE:**

25           Summary judgment should be granted when no genuine dispute of material fact exists and  
26 the moving party is entitled to judgment as a matter of law. *Orme School v. Reeves*, 166 Ariz. 301  
27 (1990). Plaintiff's Motion for Summary Judgment is supported by extensive documentary  
28 evidence, including:

1. HOA governing documents;
2. HOA records;

3. Arizona Corporation Commission records;
4. written communications;
5. photographs;
6. audio recordings;
7. video recordings;
8. affidavits and declarations;
9. business records; and
10. Defendants' limited admissions and written representations.

Defendants have failed to identify competent admissible evidence creating a genuine dispute regarding the material facts established by Plaintiff's evidence.

**B. DEFENDANTS' DISCOVERY POSITIONS UNDERMINE THEIR RULE 56(d) REQUEST**

Rule 56(d) requires more than a generalized assertion that additional discovery is needed. A party seeking Rule 56(d) relief must identify specific unavailable facts, explain why those facts are unavailable, and demonstrate diligence in obtaining them.

Throughout this litigation, Defendants repeatedly represented that *"all discovery and disclosure has been provided"* and that Plaintiff's discovery disputes had been resolved. At the same time, Defendants sought Rule 56(d) relief claiming additional discovery was necessary before they could respond to Plaintiff's Motion for Summary Judgment. These positions are fundamentally inconsistent. (See Exh 2)

The record demonstrates that Plaintiff repeatedly sought records concerning HOA governance, Board actions, communications, elections, enforcement activities, management operations, financial matters, and decision-making involving Gardens Gilbert Community Association, Focus HOA Management, LLC, Anna Schulz, Harman Cadis, Brooke Sortor, and other individuals involved in matters giving rise to this litigation. See Plaintiff's March 13, 2026 and April 27, 2026 Motions to Compel and supporting exhibits. Plaintiff repeatedly identified outstanding Requests for Production, incomplete disclosures, missing records, and deficiencies that remained unresolved despite repeated requests and meet-and-confer efforts.

Defendants frequently responded with attorney-client privilege and work-product objections. However, A.R.S. § 12-2234 protects confidential communications made for the purpose of obtaining legal advice; it does not automatically shield underlying facts, business

1 decisions, corporate actions, HOA governance records, operational records, factual  
2 investigations, or other discoverable information. See *Samaritan Foundation v. Goodfarb*, 176  
3 Ariz. 497 (1993). Arizona courts have consistently recognized that privilege protects  
4 communications, not the underlying facts. Likewise, the work-product doctrine does not permit a  
5 party to withhold ordinary business records, Board actions, operational records, or factual  
6 information merely because counsel was involved in related communications.

7 Plaintiff respectfully submits that Defendants cannot establish compliance with their  
8 discovery obligations by broadly invoking privilege and work-product protections while  
9 withholding categories of factual information central to Plaintiff's claims and Defendants'  
10 defenses. Nor can Defendants simultaneously maintain that discovery is complete, withhold  
11 requested records through broad objections, and then seek Rule 56(d) relief claiming additional  
12 discovery is necessary to oppose summary judgment.

13 The Court should therefore consider Defendants' repeated representations regarding  
14 completed discovery, the unresolved discovery deficiencies documented throughout the record,  
15 and Defendants' inconsistent positions when evaluating the credibility, weight, and sufficiency of  
16 their Rule 56(d) request and whether any genuine dispute of material fact actually exists.

### 17 **C. ARIZONA LAW FAVORS RESOLUTION ON THE MERITS**

18 Arizona courts repeatedly emphasize that discovery and disclosure rules are intended to  
19 facilitate resolution of disputes on their merits rather than procedural maneuvering. In *Bryan v.*  
20 *Riddel*, 178 Ariz. 472 (1994), the Arizona Supreme Court cautioned against elevating form over  
21 substance and rejected the use of disclosure rules as procedural gamesmanship. Likewise, *Allstate*  
22 *Ins. Co. v. O'Toole*, 182 Ariz. 284 (1995), and *Zimmerman v. Shakman*, 204 Ariz. 231 (App.  
23 2003), reaffirm Arizona's preference for resolving disputes on their merits whenever reasonably  
24 possible. Defendants' reliance upon procedural positions while continuing to withhold requested  
25 information is inconsistent with these principles.

### 26 **D. NO GENUINE ISSUES OF MATERIAL FACTS EXISTS**

27 The supplemental evidence further establishes:

- 28 • Defendants repeatedly represented that discovery was complete.
- Plaintiff repeatedly documented outstanding discovery deficiencies.
- Defendants refuse to cure those deficiencies.
- Defendants simultaneously sought Rule 56(d) relief.



6. Consider Defendants' reliance upon broad privilege and work-product objections in light of A.R.S. § 12-2234 and Samaritan Foundation v. Goodfarb;
7. Find that Defendants have failed to identify admissible evidence creating a genuine dispute of material fact;
8. Deny any further Rule 56(d) relief;
9. Find that no genuine issue of material fact exists regarding Plaintiff's remaining claims;
10. Grant Plaintiff's Motion for Summary Judgment on all claims currently pending before this Court;
11. Preserve the evidentiary and legal record concerning Counts 5, 6, 7, and 11 for purposes of ongoing appellate review; and
12. Grant such further relief as the Court deems just and proper.

#### **V. CONCLUSION**

The supplemental evidence shows that, after Plaintiff filed her Motion for Summary Judgment, Defendants continued to assert that discovery and disclosure were complete while simultaneously seeking Rule 56(d) relief and withholding categories of records repeatedly requested through discovery and Plaintiff's Motions to Compel. The record reflects ongoing disputes concerning HOA records, Board communications, operational records, privilege assertions, and disclosure deficiencies directly relevant to the claims and defenses at issue.

Plaintiff respectfully submits that Defendants cannot claim discovery is complete while asserting that essential facts remain unavailable to oppose summary judgment. When considered with Plaintiff's Motion for Summary Judgment, Separate Statement of Facts, affidavits, declarations, recordings, photographs, videos, HOA records, Arizona Corporation Commission records, discovery materials, Motions to Compel, Petition for Special Action, and the supplemental evidence submitted herewith, the record demonstrates the absence of any genuine dispute of material fact and supports judgment as a matter of law under Rule 56.

Plaintiff acknowledges that a Notice of Appeal was filed on June 1, 2026. This Supplemental Memorandum is submitted to preserve and supplement the record and to ensure these post-motion developments are properly before the Court should it determine that it retains authority to consider Plaintiff's Motion for Summary Judgment. Accordingly, Plaintiff respectfully requests that the Court accept and consider the supplemental evidence, take judicial

1 notice of the related filings and exhibits referenced herein, preserve the record regarding these  
2 matters, and grant such further relief as the Court deems just and proper.

3  
4 Respectfully submitted,

5 

6 Sandra Rodriguez  
7

8 **VI. EXHIBIT LIST**

- 9  
10 1. **Exhibit 1** - Plaintiff's Final Notice of Outstanding Discovery Deficiencies and  
Demand for Complete Compliance (June 2, 2026)

11 Notice identifying outstanding Requests for Production, Requests for Admission,  
12 Interrogatories, Rule 26.1 disclosure deficiencies, ESI, and related discovery  
13 obligations.

- 14 2. **Exhibit 2** - Defense Counsel's June 3, 2026 Response Regarding Discovery and  
15 Disclosure

16 Email from Augustus H. Shaw IV stating:

17 *"It is the position of the Defendants that all discovery and disclosure has been*  
18 *provided to you"* and asserting that Plaintiff's discovery and disclosure disputes  
had been resolved refusing to comply with discovery multiple court orders.

- 19 3. **Exhibit 3** - Correspondence Concerning Rule 56(d), Discovery Disputes, Service  
20 Objections, and Meet-and-Confer Efforts

21 Email correspondence reflecting defense counsel's accusations regarding Plaintiff's  
22 litigation conduct, Plaintiff's response disputing those accusations, objections  
23 concerning service and Rule 56(d), unresolved discovery and disclosure disputes, and  
24 communications Plaintiff contends demonstrate escalating litigation conduct, personal  
25 attacks, discovery-related disputes, and continuing disagreements regarding  
26 compliance with discovery, disclosure, and procedural obligations.

1 **VII. CERTIFICATE OF SERVICE**

2 I served copies of this **NOTICE OF SUPPLEMENTAL FACTS AND MEMORANDUM**  
3 **IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT** for on all parties  
4 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 ○ Harmin Cadis
  - 12 ○ Brooke Sortor
  - 13 ○ Anna Schultz
  - 14 ○ Anna Schultz

- 15 • **Address:** 4135 E. Power Road, Suite 133, Mesa, Arizona 85212

16 **DEFENDANT'S LEGAL COUNSEL:**

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

21  
22 Respectfully submitted this 15th day of June 2026.

23 

24  
25 Sandra Rodriguez

# EXHIBIT 1



Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

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## Final Notice of Outstanding Discovery Deficiencies and Demand for Complete Compliance

1 message

---

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

Tue, Jun 2, 2026 at 8:00 AM

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

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### 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>

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**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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**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

# EXHIBIT 3



Sandra Rodriguez <sandra.rodriguez0339@gmail.com>

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## Rodriguez Second Response: Continued Litigation Abuse by Shaw

1 message

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

Tue, Jun 2, 2026 at 6:22 PM

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

†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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**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](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

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