

Cover Letter ~ March 5th, 2026 "Refiling"

Cover Letter addressed to the Clerk of the Superior Court:

Edward Rawlinson
9620 Las Vegas Blvd S
Ste E4 #516
Las Vegas, NV 89123
Telephone: (702) 423-5208
Email: info@southsiderecordz.com
(Pro Se) Plaintiff

March 5, 2026

Clerk of the Superior Court
Pinal County
P.O. Box 2730
Florence, AZ 85132

Dear Clerk of the Superior Court: (Re: "Refiling" of Civil Complaint – Edward Rawlinson v. J & J Arizona, LLC)

I am "Refiling" this civil action as a pro se plaintiff (representing myself without an attorney) from out-of-state (North Carolina). This "Refiling" is submitted within a reasonable time after the return of my original package, which was delivered to your office on {February 9, 2026 at 9:45 AM MST} (USPS Mail Tracking No. 9405550105800020368412 – receipt and tracking confirmation attached as Exhibit A).

Enclosed is my "Refiled" (Civil Complaint Package), corrected per your February 17, 2026 return instructions:

- Filing fee payment of \$352.00 (Cashier's Check enclosed)
- **Exhibit A:** USPS Mail Receipt and Tracking Confirmation # 9405550105800020368412 (February 9, 2026 delivery)
- **Exhibit B:** Clerk's Return Letter dated February 17, 2026.
- **Exhibit C:** Disability Award Letter
- **Exhibit D:** March Social Security Benefit Verification Letter
- **Exhibit E:** Initial and Supplemental Police Report — Dismissed Criminal Case CR 202300611 — Authenticated by former Defense Counsel Ian Service
- **Exhibit F:** Rule 15.1 Notice of Disclosure by State Prosecutor — Dismissed Criminal Case CR 202300611 — Authenticated by former Defense Counsel Ian Service
- **Exhibit G:** Case Dismissal Order — Dismissed Criminal Case CR 202300611 — Authenticated by former Defense Counsel Ian Service
- **Exhibit H:** Video Conference of Officer Samuel Martinez (Google Meet) Audio File
- **Exhibit I:** 911 Audio Evidence Audio File
- **Exhibit J:** "Bates 1: 077 092" Photos by Cpl Samuel Martinez — (File Names): "14" of "16".jpg & "15" of "16".jpg - Evidence Associated With Master File: "Bates 1 - 077 092 Photos by Cpl Samuel Martinez"
- **Exhibit K:** "March 4, 2026 - Affidavit of Edward Rawlinson to Social Security Administration (SSA) Offices of Disability Adjudication and Review in Raleigh and Charlotte, North Carolina"

- Completed "Civil Cover Sheet"
- Completed "Summons" - (all fields filled per "Clerk" correspondence)
- "Refiled" Civil Complaint
- Self-addressed, stamped envelope
- "MOTION FOR ALTERNATIVE SERVICE"
- "MOTION FOR REASONABLE ACCOMMODATIONS PURSUANT TO THE ADA" -
(WITH ABOVE REFERENCED ATTACHMENTS OF EXHIBITS: A-K)
- Two extra copies of the "Refiled" Civil Complaint
- Two extra copies of the "Completed Summons"
- Two extra copies of "MOTION FOR ALTERNATIVE SERVICE"
- Two extra copies of "MOTION FOR REASONABLE ACCOMMODATIONS PURSUANT
TO THE ADA"
- Two extra copies of each (Exhibit A–K) "filing sheets" (with screenshots/printouts attached) /
"Dropbox" / "Google Drive" link printed) / containing download links for - "Audio Files" for
(Exhibit H/Exhibit I)
- USPS Mail Receipt and Tracking Confirmation of "Refiled" Civil Complaint (mailed on March
5, 2026)

This "Refiling" is submitted within a reasonable time after the return of my original package, which was delivered to your office on {February 9, 2026 at 9:45 AM MST} (USPS Mail Tracking No. 9405550105800020368412) – receipt and tracking confirmation attached as

(Exhibit A).

I respectfully request that the "Filing Date" of the complaint be recognized as {February 9, 2026}, or that the statute of limitations be equitably tolled due to my good-faith timely attempt. The original package was complete with the compliant except for the procedural items you identified.

A.R.S. § 12-501:

The Arizona statute that governs the effective filing date of the (Civil Complaint) — and thus dictates a February 9, 2026 filing date and should be recognized under the circumstances described — is A.R.S. § 12-501 (Commencement of actions; filing of complaint).

"A civil action is commenced by filing a complaint with the court. The filing of the complaint constitutes commencement of the action, and the date of filing is the date the action is commenced for purposes of any statute of limitations."

◦ The statute is clear: the action is commenced (and the filing date is established) the moment the complaint is filed with the court — i.e., received and accepted by the Clerk of the Superior Court.

◦ Your original package was delivered to the Clerk's P.O. Box on February 9, 2026 at 9:45 AM MST (proven by USPS mail tracking/receipt—**Exhibit A**).

◦ Even though the "Clerk" later returned it for procedural corrections (fee payment, summons completion), Arizona courts treat the date of initial receipt as the filing date when the "Refiling" corrects only ministerial/technical defects and is done promptly (within a reasonable time).

◦ Plaintiff is on (Social Security Disability) and gets paid on the 3rd of every month.

◦ Arizona case law supports treating the original receipt date as the effective filing date when the "Refiling" fixes only procedural issues and is diligent:

- **Estate of Page v. Litzenberg, 177 Ariz. 84 (App. 1993) — Filing date relates back to initial**

receipt when refiling corrects technical deficiencies (e.g., fee, summons form).

- *Gorney v. Meaney*, 214 Ariz. 226 (App. 2007) — Courts liberally construe filing rules for pro se litigants to avoid harsh SOL bars when good faith and diligence are shown.

- The cover letter explicitly requests recognition of February 9, 2026, and provides proof (tracking, "Refiling" within ~24 days) — this aligns with the statute and case law.

Additional Context for Timeliness and Equitable Tolling:

As further support for equitable tolling and relation-back, I note that the underlying facts giving rise to this action were not reasonably discoverable until June/July 2023 due to my limited access to evidence related to ineffective counsel during the "dismissed" {Criminal Case}: CR 202300611 involving representation by {Kate Milewski's resignation under Ethical Rule 1.9 on March 10, 2023; Brian Bohan's retirement-impacted appointment in late March 2023; Ian Service's limited evidence sharing starting June 1, 2023}, and detention abuses {ADA violations, March 12, 2023 assault, Pod G-500 threats/mattress removal by Bill Davis, "toothbrush core" disciplinary placement} — 3-month detention at the Pinal County Adult Detention Center from (February 23 through May 20, 2023), during which I had severely limited access to evidence, communications, or legal resources. This detention was caused by the very misconduct alleged in the complaint — ("Fraudulent Concealment" of (exculpatory) video, misleading statements to police, coordination with witness Milton Ayers), and was further exacerbated by detention abuses — {ADA violations, March 12, 2023 assault by {Detention Officers}, Pod G-500 threats/mattress removal by inmate Bill Davis, "toothbrush core" disciplinary placement}. These circumstances prevented reasonable discovery of the fraud until after my release on May 20, 2023 and subsequent investigation in June/July 2023; and further shows timeliness and precedent for equitable tolling.

In addition, key facts such as Milton F. Ayers III — (possibly having an arrest warrant on February 23, 2023) related to Traffic Case: No. J-1102-TR-2020000319 and being one of "many individuals" associated with Defendant: J & J Arizona, LLC that provided false/fraudulent

information to law enforcement — related to the Plaintiff's wrongful arrest/dismissed - Criminal Case: CR 202300611; were unknown indications of the "malicious fraud" to the Plaintiff, Edward Rawlinson at the time. The additional fact this evidence was not reasonably discoverable until June 1, 2023—(at the time of appointment of former criminal defense attorney: Ian Service); and due to the detention of the Plaintiff — (February 23, 2023 – May 20, 2023), coupled with the previously highlighted issue of limited access to evidence, and aforementioned ineffective counsel issues — {former attorney Kate Milewski's resignation under Ethical Rule 1.9 on March 10, 2023; former attorney Brian Bohan's retirement-impacted appointment in late March 2023; and former attorney Ian Service's limited evidence sharing starting June 1, 2023} — should be factored in and considered.

Plaintiff publicized the signed "original" complaint on February 7, 2026 on {news/business website}: (<https://www.southsiderecordz.com>) — This demonstrates diligence and good faith:

The fact that the Plaintiff, Edward Rawlinson publicized the filing on February 7, 2026 — (two days before it was received by the Clerk) — shows the Plaintiff was actively pursuing the case from the outset. This supports Plaintiff's "equitable tolling argument" — showing he was diligent even before the "Refiling". This creates a timestamped public record — and the website post (with dated complaint — February 7, 2026) — corroborates the Plaintiff's claim that the original package was timely filed/received on February 9, 2026. This is additional evidence of the Plaintiff's contemporaneous belief and action.

Equitable Tolling Applies:

Equitable tolling pauses the (Statutes Of Limitations) during the Clerk's return period (February 17, 2026) and remailing of "Refiled" complaint on (March 5, 2026) due to diligent, good-faith efforts and external factors {*McCloud v. State*, 217 Ariz. 82 (App. 2007)}. The original package was received February 9, 2026 — (USPS tracking attached as Exhibit A to prior filings). The return was due to procedural requirements — (fee, summons completion), not the Plaintiff's fault. The Plaintiff promptly mailed "Refiled" complaint on March 5, 2026. In closing; the Plaintiff's (February 23, 2023 through May 20, 2023 detention and counsel issues) — further support

tolling.

Request to enter this (Cover Letter) into the "File of Evidence" related to this case:

I respectfully request that this (Cover Letter) be entered into the official "File Of Evidence" related to this case as part of the record. This (Cover Letter) contains critical information supporting the timeliness of the filing, the good-faith nature of my original submission, and the basis for "equitable tolling" and "relation-back" of the filing date to February 9, 2026. The Plaintiff respectfully requests the "Court" to enter this (Cover Letter) into the official case file and believes this will preserve the record for any future motions, hearings, or appellate review regarding the statute of limitations or commencement of the action.

Thank you for your assistance. Please contact me via phone at: 702-423-5208 or email at: info@southsiderecordz.com if any further information is needed.

RESPECTFULLY SUBMITTED this 5th day of March, 2026.

Certificate of Service (if required by local rules)

I hereby certify that on March 5, 2026, a true and correct copy of the foregoing was mailed to the Clerk of the Superior Court, Pinal County, via (USPS) mail with tracking receipt.

By 

Edward Rawlinson
9620 Las Vegas Blvd S
Ste E4 #516
Las Vegas, NV 89123
Telephone: (702) 423-5208
Email: info@southsiderecordz.com
(Pro-Se) Plaintiff

Enclosures: As listed above (original package contents + motions + Exhibits A–K).