

1 **THE STAVRIS LAW FIRM, PLLC**  
2 **CHRISTOPHER STAVRIS, AZ Bar No.025096**  
3 11445 E. Via Linda, Suite #2-504  
4 Scottsdale, Arizona 85259  
5 (480) 471-8907  
6 (480) 365-0320 (fax)  
7 [christopherstavris@gmail.com](mailto:christopherstavris@gmail.com)  
8 Counsel for Defendant

9  
10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
11 **IN AND FOR THE COUNTY OF MARICOPA**

12 STATE OF ARIZONA,

13 Plaintiff,

14 v.

15 **JODI ARIAS,**

16 Defendant.

17 CR2008-031021-001

18 **DEFENDANT’S MOTION TO HOLD**  
19 **HEARING ON DEFENDANT’S**  
20 **REQUEST FOR RECORDS**

21 (Hon. Aryeh Schwartz)  
22 (Rule 32 Management Unit)

23 Defendant/Arias through undersigned counsel asks this court to schedule a  
24 hearing (possibly an oral argument), to take place within the next forty-five (45)  
days. The purpose of this hearing is so this court can enter orders on Arias’  
instant motion for business records from non-parties Folio Literary Management  
/”Folio” and Steve Troha.

As was explained by Arias in an earlier motion, less than a year from the  
date Arias was sentenced, Harper Collins published the book “Conviction: The

1 Untold Story of Putting Jodi Arias Behind Bars”. The author of this book was  
2 Juan Martinez, the attorney who prosecuted Arias.

3           Initially, Arias sort discoverable materials (in the form of business  
4 records) from Harper Collins, which Arias determined were necessary in order  
5 to fully investigate and develop PCR claims, specifically claims of ineffective  
6 assistance of counsel/”IAC” and prosecutorial misconduct. After conducting  
7 additional investigations into this issue, as it related to Harper Collins, Arias  
8 determined that Harper Collins does not possess the materials she is seeking.  
9 Based on further investigations, it now appears that Folio Literary Management  
10 and Steve Troha will possess the business records Arias is seeking.

11           Steve Troha is an employee of Folio Literary Management/”Folio”, a  
12 corporation based in New York and Virginia. Folio is a corporation that  
13 represents authors by placing their respective literary works with publishing  
14 companies. Folio is the corporation that placed Juan Martinez’s writings about  
15 Jodi Arias and her trial with Harper Collins, who later published these writings  
16 under the name “Conviction: The Untold Story of Putting Jodi Arias Behind  
17 Bars”. Steve Troha, employed by Folio as a literary agent, was Juan Martinez’s  
18 literary agent and represented both Juan Martinez and Folio in putting Juan  
19 Martinez’s writings (about Arias and her trial) before Harper Collins.  
20  
21  
22  
23  
24  
25

1 Due to the business relationship between Folio, Steve Troha, and Juan  
2 Martinez, Arias is now seeking the following discoverable business records from  
3 Folio and Steve Troha:

- 4 • Any and all communications and documented records of such  
5 communications (including emails, any types of written or recorded  
6 messages, verbal communications, U.S. Mail, faxes, etc.), between Folio  
7 and any and all of its agents, including Steve Troha, and Juan Martinez.  
8 These communications will include the date(s) from when Folio or any of  
9 its agents, including Steve Troha, initially engaged in any type of  
10 communication with Juan Martinez, to the date when Harper Collins  
11 published the book, “Conviction: The Untold Story of Putting Jodi Arias  
12 Behind Bars”, on February 16, 2016.

15 PCR counsel has a duty to his client to both investigate and raise all colorable  
16 claims in her PCR Petition. (Rule 32.6(a), Ariz. R. Crim. Pro.). In order to  
17 pursue additional investigations into post-conviction claims, including claims of  
18 prosecutorial misconduct and IAC, Arias through counsel requires business  
19 records from Folio and Steve Troha.  
20

21 In order to provide non-party Folio and Steve Troha with notification of  
22 the discovery being sought, as well an opportunity to be heard, Arias asks this  
23 court to set a hearing to address the propriety of the discovery which Arias now  
24  
25

1 seeks. Dependent on the rulings of this court, Arias may have a subpoena duces  
2 tecum issued, for Folio and Steve Troha, which mirrors things this court  
3 determines are discoverable by Arias.

4  
5  
6 **RESPECTFULLY SUBMITTED** this 27<sup>th</sup> day of June, 2025  
7 **THE STAVRIS LAW FIRM, PLLC**

8 By \_\_\_\_\_  
9 /s/ Christopher Stavris  
10 Counsel for Defendant

11 Original filed this 27<sup>th</sup> day of  
12 June, 2025 with:

13 Maricopa County Superior Court  
14 Rule 32 Management Unit  
15 175 West Madison Street  
16 Phoenix, Arizona 85003

17 Copy of the foregoing mailed/e-mailed/  
18 delivered, this 27<sup>th</sup> day of  
19 June, 2025 to:

20 Maricopa County Superior Court  
21 Honorable Aryeh Schwartz  
22 201 West Jefferson Street  
23 CCB-1103  
24 Phoenix, Arizona 85003

25 Maricopa County Attorney's Office  
Rule 32/Appeals Unit-Phillip Garrow, bureau chief  
225 West Madison Street  
Phoenix, Arizona 85003

1 Folio Literary Management, LLC  
2 630 9<sup>th</sup> Avenue, Suite 1101  
3 New York, New York 10036

4 630 9<sup>th</sup> Avenue, Suite 1009  
5 New York, New York 10036

6 11863 Ropp Lane  
7 Lovettsville, Virginia 20180

8 Steve Troha  
9 630 9<sup>th</sup> Avenue, Suite 1101  
10 New York, New York 10036

11 630 9<sup>th</sup> Avenue, Suite 1009  
12 New York, New York 10036

13 11863 Ropp Lane  
14 Lovettsville, Virginia 20180

15 steve@foliolitmanagement.com

16 By /s/ \_\_\_\_\_  
17 Christopher Stavris

18

19

20

21

22

23

24

25