Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
3/25/2024 2:13:41 PM
Filing ID 17548413

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Defendant/Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Plaintiff,

And

CLAYTON ECHARD,

Defendant.

In Re the Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052771
FC2023-052114

MOTION FOR JOINT HEARING PURSUANT TO RULE 5(A)(4)

(Assigned to the Honorable John Doody)
(Assigned to the Honorable Julie Mata)

Defendant/Respondent, **CLAYTON ECHARD**, by and through counsel undersigned, and pursuant to Rule 5(a)(4), *Arizona Rules of Family Law Procedure*, hereby files his Motion for a Joint Hearing. As and for his Motion, Defendant/Respondent, states as follows:

1. Contemporaneous with this filing, Defendant/Respondent has filed his *Motion for Relief from Judgment Based on Fraud* seeking redress in the underlying Order of Protection cause of action (FC2023-052771). (**Exhibit 1**).

2. An identical matter regarding similar concerns of fraudulent conduct involving fabricated pregnancies and doctored medical evidence by Petitioner/Plaintiff is currently pending adjudication before Judge Mata in FC2023-052114, with final trial set for June 10, 2024.

3. Rule 5(a)(4), *Arizona Rules of Family Law Procedure*, provides that, although the Court may not consolidate a case involving an order of protection with a family law case, it "may conduct a joint hearing."

4. Defendant/Respondent maintains the proper remedy is for Judge Doody to immediately dismiss the Order of Protection obtained by fraud, as set forth in the contemporaneous *Motion for Relief from Judgment Based on Fraud.*

5. In the interest of judicial economy, should the Order of Protection not be dismissed based on Defendant's *Motion for Relief from Judgment Based on Fraud*, Judge Mata's division should conduct a Joint Hearing.

WHEREFORE, Respondent/Defendant respectfully requests the Court:

A. Conduct a Joint Hearing, pursuant to Rule 5(a)(4) if the Protective order is not dismissed based on Fraud.

B. Order such further relief as the Court deems just.

//

RESPECTFULLY SUBMITTED this 25th day of March, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Defendant

ORIGINAL of the foregoing e-filed this 25th day of March, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable John Doody
Maricopa County Superior Court

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

Laura Owens
11440 N. 69th Street
Scottsdale, Arizona 85254
laura@lauramichelleowens.com

By: */s/ MB*

EXHIBIT “1”

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Plaintiff,

And

CLAYTON ECHARD,

Defendant.

Case No.: FC2023-052771

MOTION FOR RELIEF FROM JUDGEMENT BASED ON FRAUD

(Assigned to the Honorable John Doody)

Defendant, **CLAYTON ECHARD**, by and through counsel undersigned and pursuant to Rule 2, *Arizona Rules of Protective Order Procedure* (ARPOP), which invokes Rule 60(b)(3), *Arizona Rules of Civil Procedure* (ARCP), or, in the alternative, Rule 85(d)(3), *Arizona Rules of Family Law Procedure* (ARFLP), hereby files his Motion for Relief from Judgment.

On October 6, 2023 and October 25, 2023, Plaintiff committed fraud when she filed her underlying Petition for Order of Protection and then testified before Judge Doody under the fraudulent pretense that she was pregnant with Defendant's "twins" and that Defendant

was "cyberbullying her" by posting her "medical records" online. To be clear, **Plaintiff was never pregnant by Defendant** as they did not have penetrative sexual intercourse.

Specifically, during a deposition for the paternity/establishment matter currently pending before Judge Mata (FC2023-052114), Plaintiff **admitted to modifying** medical records and **claimed she had a miscarriage in September – predating the filing of the OOP.** In her own words: Plaintiff "*did change the top of that [sonogram] from Planned Parenthood to SMIL […] I added my name in the – in the facility name, correc*t." (**Exhibit 1, pages 81, 88).** Relevant here, Plaintiff tampered with the same sonogram this Court found to be part of the single act of Domestic Violence required to justify granting the Order of Protection. Meaning, she submitted to this court, and this court explicitly relied upon, a fraud.[1]

To date, in the contemporaneous Establishment matter, Plaintiff has provided no verifiable medical evidence to support her alleged twin pregnancy and has admitted that the ultrasound at the core of this Court's basis for granting the Protection Order was *de facto* fraudulent. Moreover, to date, every obstetrician and gynecologistsPlaintiff testified (court proceedings and deposition) to being seen for her (fake) pregnancy have indicated they have **no** records as she was **never** seen as a patient. *Startlingly*, the source of the sonogram that this Court relied on was allegedly from Southwest Medical Imaging (SMIL), which has

[1]Through the discovery process, a very disturbing hobby of Plaintiff modifying/creating documents she purports to be medical records (and legal correspondence) has been identified.

(independent of Plaintiff's admission to doctoring the image) confirmed there are no records of the alleged sonogram.)[2]

Further emphasizing the extreme fraud on this court, notwithstanding sharing *other* "sonograms" of the alleged "twin" pregnancy (that curiously match up with sonograms and YouTube videos posted from years ago *online*), Plaintiff has now denied the existence of all other sonograms. (**Exhibit 1, page 86).** When confronted with science and the opaque lack of evidentiary support at the deposition, Plaintiff admitted that she *never sought OBGYN or related care* for the pregnancy further demonstrating the fraud on this court (and in the collateral proceeding).

Plaintiff was never pregnant and all allegations stemming from the fictious pregnancy are fraudulent. As a result of Plaintiff's gross and consistent fraud, the entire matter is tainted as neither Defendant nor the Court had a full and fair opportunity to litigate and discharge their respective duties.

As and for his Motion, Defendant states as follows:

I. BACKGROUND

1. On October 6, 2023, Plaintiff obtained an *ex parte* Order of Protection against Defendant (**Exhibit 2)** and indicated that "*one party was pregnant by the other*." Her Order alleged, among other things, that Defendant was "*cyberbullying*" her on Reddit and posting

[2] For clarity, Plaintiff testified on March 1, 2024 that she obtained the sonogram on July 7, 2023, at Planned Parenthood in Mission Viejo, California and then edited medical records to add her name and falsely attribute it to Southwest Medical Imaging (SMIL). Regardless of the "source," *neither* SMIL *nor* Planned Parenthood have any records for any ultrasound appointment for Plaintiff.

"*private and confidential information, including* […] *medical history*" that he could only have access to because of their paternity case surrounding claim that she was "*pregnant with his twins*." The entirety of Plaintiff's allegations in her Order of Protection surrounds the existence of medical evidence to support her fictious pregnancy.

2. On October 25, 2023, a contested hearing was held before Judge Doody. Plaintiff testified to having attended various medical appointments to "confirm" her pregnancy, including the ultrasound appointment for the sonogram at issue and specifically relied on by this court. This was a lie as the sonogram was fabricated and medical providers have affirmed that Plaintiff never attended any pregnancy-related appointments.

3. The same date, the Court granted Plaintiff's Order of Protection solely based on the following image posted below, which Defendant allegedly posted anonymously on Reddit (which Defendant vehemently denies) and Plaintiff testified contained a sonogram that she "only" sent Defendant. FTR Oct. 25, 2023 at 10:01:17 a.m. (**Exhibit 3). This is *either* the same sonogram Plaintiff has admitted to changing and that the alleged source[3] of the sonogram has no records of *or* one of the other sonograms that Plaintiff has testified she did not obtain (*see* Exhibit 1).** (Parenthetically, Plaintiff (herself) *also* posted all the alleged sonograms on a public DropBox on Reddit *and* emailed the "records" to various journalists/media).

[3] Again, the source is either SMIL according to the insignia or Planned Parenthood, who, according to Plaintiff, was the original source.

II. RELEVANT LAW

Where not inconsistent with the *Arizona Rules of Protective Order Procedure* (ARPOP), Rule 2 invokes the *Arizona Rules of Family Law Procedure* (ARFLP) to "protective order matters heard in in conjunction with pending family law cases" and the *Arizona Rules of Civil Procedure* (ARCP) for "all other cases." Here, as the ARPOP does not include rules for requesting a new trial or setting aside a judgment, Rule 85(d)(3) ARFLP and Rule 60(d)(3) ARCP are invoked to the extent not inconsistent.[4]

Under both Rule 85(d)(3) ARFLP *or* Rule 60(d)(3) ARCP, the Court may relieve a party from a judgment based on "*fraud (whether previously called intrinsic or extrinsic, misrepresentation, [and] other misconduct.*" Additionally, both Rules permit a motion to be made on the basis of fraud "*within a reasonable time […] no more than 6 months after the entry of the judgment*."

Fraud, as defined by Rule 85(d)(3) ARFLP/Rule 60(b)(3) ARCP, can be either intrinsic or extrinsic; both justify relief from a judgment. Extrinsic fraud is "fraud upon the court," and concerns the procurement of a judgment. Extrinsic fraud has "*effect of which prevents a party from having a trial, or from presenting all of his case to the court, or which operates, not upon matters pertaining to the judgment itself, but to the manner in which it is procured* […]" *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965). Conversely, intrinsic fraud "pertains to matters of judgment itself" and therefore is concerned solely with fraudulent conduct that

[4] Although the hearing for Plaintiff's Order of Protection was arguably *not* heard in conjunction with the family court matter and the ARFLPs are likely *not* invoked, Defendant cites to Rule 85(d)(3) in the alternative to protect his right to relief.

occurs within the proceeding. *Robertson v. Teel*, 513 P.2d 977 (Ariz. App. 1973). Both forms of fraud constitute the "fraud" for the purposes of Rule 85(d)(3) ARFLP/Rule 60(b)(3) ARCP.

III. ARGUMENT

Plaintiff committed fraud in her October 6, 2023, Petition for Order of Protection. Plaintiff committed fraud (extrinsic) when she filed her Petition, which the Court relied on in order to grant the Order, and falsely claimed she was pregnant by Defendant. In her Petition, Plaintiff alleged that (1) Defendant had threatened her "since discovering [she] was pregnant," (2) Defendant had posted "personal and sensitive information" about her because of their paternity case; (3) Scottsdale PD had called Defendant; (4) Defendant was anonymously posting "private and confidential information, including facts about [her] medical history" and (5) Plaintiff feared for her safety. **All of these allegations are fraudulent**.

Plaintiff was never pregnant – the parties never had intercourse. Plaintiff has provided no verifiable medical records to confirm her pregnancy (because none exists) and *every* provider she testified to being seen by has confirmed they have no records for Plaintiff. There are no sonograms, no monthly follow up appointments – there is simply no evidence that Plaintiff was ever pregnant and certainly not within Defendant's "twins." To make matters worse, Plaintiff has since testified that she ***had a miscarriage*** **in September**, ***predating*** her filing this Order of Protection.

Because Plaintiff was never pregnant (and could not have been pregnant from fellatio) and/or she is now alleged she miscarried ***prior*** *to filing the Order of Protection*, the entirety of Plaintiff's underlying Order of Protection is fraud upon the Court. Plaintiff's representation of herself in an *ex parte* filing as pregnant with Defendant's "twins" and a victim of Defendant

maliciously claiming she was *not* pregnant and posting "medical" evidence online ostensibly led the Court into granting her Order of Protection.

Plaintiff deliberately withheld from the Court that she was *not* pregnant (and/or that she had *miscarried* the feigned pregnancy *(at the time of the hearing)* and that she altered the "medical" records she alleged Defendant was anonymously sharing online (which he vehemently denies) in order to procure a judgment against Defendant. Therefore, the Court's judgment granting Plaintiff's Order of Protection on October 6, 2023 must be set aside because "fraud was practiced in the very act of obtaining it." *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965). Without this critical material information, neither Defendant nor this Court had the full and fair opportunity to litigate and discharge their respective duties.

Plaintiff committed fraud (intrinsic and extrinsic) when she testified before Judge Doody regarding a sonogram on October 25, 2023, leading Judge Doody to uphold the Order of Protection. While arguably the entirety of Plaintiff's testimony regarding her alleged pregnancy was fraud, the Court explicitly indicated that it was granting the Order of Protection based on the *sonogram* depicted in the image inserted above. FTR Oct. 25, 2023 at 10:01:17 (Judge: "The way you published this photo […] it's unflattering […] that's my reason for making my decision").

Plaintiff committed fraud when she testified as to the existence of the sonogram, which she has since admitted she altered and that the "source" of the ultrasound (either Planned Parenthood *or* SMIL) has indicated they have no records of the ultrasound ever taking place because they are fake. Plaintiff committed fraud when:

a. Plaintiff testified she sent Defendant and a member of the media the sonogram depicted in the image at issue but *only* Defendant could have posted the image containing the sonogram. FTR Oct. 25, 2023 at 8:47:32.

b. Plaintiff testified that the main image – the one of her "pregnant" in a bra and yoga pants – had already been published online but that the sonogram was not. FTR Oct. 25, 2023 at 8:49:24. (In reality, both were published by Plaintiff on Reddit in a publicly accessible DropBox).

c. Plaintiff testified that she sent Defendant the ultrasound photo and ultrasound video and that she had an "ultrasound report" to accompany the July 7, 2023 sonogram. FTR Oct. 25, 2023 at 8:59:50 and 9:00:23 a.m. (Again, no ultrasound records exist – as there was never any ultrasound).

As the Court explicitly stated that the sole reason it was upholding the Order of Protection was because of the image containing the sonogram, Plaintiff committed fraud upon the Court (extrinsic). Plaintiff withheld to the Court that she had doctored the sonogram and that the alleged ultrasound where she obtained the sonogram had never taken place because it is a fake. Therefore, the Court's judgment upholding Plaintiff's Order of Protection on October 25, 2023 must be set aside because "fraud was practiced in the very act of obtaining it." *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965).

IV. **Defendant is entitled to his reasonable attorney's fees in costs incurred in this entire action, including filing this Motion for Relief from Judgment**. Defendant is entitled to his fees and costs incurred as a result of Plaintiff's lies and manipulations by making this malignant filing and then testifying before the Court alleging facts and

circumstances now known to Defendant to be false and/or fraudulent. To be clear, Plaintiff was fully aware of the true nature and circumstances underpinning her perjurious statements and when she admitted "medical evidence." On October 6 and October 25, 2023, she knew she was not pregnant, that she had not received an ultrasound for her alleged twin pregnancy, and that the sonogram she had proffered was created by her. Defendant had to incur significant costs and fees unraveling Plaintiff's web of lies, which included having to defend himself against her malignant filing of the underlying Order of Protection. Defendant is entitled to his reasonable attorney's fees and costs expended defending himself against Plaintiff and filing this Motion, pursuant to A.R.S. § 25-324.

To be clear, there is absolutely no suggestion, that Plaintiff's attorney for the Order of Protection had any knowledge that he was presenting fabricated medical records. Although Plaintiff has a history of fraud (the extent of which includes, but is not limited to, the three (3) know prior victims who have claimed they were subjected to similar false pregnancy), it was not yet fully exposed until well after this protective order proceeding.

WHEREFORE, Defendant respectfully requests the Court:

A. Dismiss the Order of Protection in its entirety, with prejudice on the basis of fraud;

B. Grant leave to Defendant to submit a *Child Doll Affidavit*;

C. Award Defendant his reasonable attorney's fees;

D. Order such further relief as the Court deems just including appending consequence to the current outstanding sanction request pending adjudication before Judge Mata on June 10, 2024.

RESPECTFULLY SUBMITTED this 25th day of March, 2024.

WOODNICK LAW, PLLC



Gregg R. Woodnick
Isabel Ranney
Attorneys for Defendant

ORIGINAL of the foregoing e-filed this 25th day of March, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable John Doody
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

Laura Owens
11440 N. 69th Street
Scottsdale, Arizona 85254
laura@lauramichelleowens.com

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Motion For Relief From Judgement Based On Fraud* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Mar 23, 2024 09:07 PDT)

CLAYTON ECHARD

03/23/2024

Date

EXHIBIT “1”

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:)
)
LAURA OWENS,) No. FC2023-052114
)
Petitioner,)
and)
)
CLAYTON ECHARD,)
)
Respondent.)

VIDEO DEPOSITION OF
LAURA OWENS

Friday, March 1, 2024

8:00 a.m.

Phoenix, Arizona

Rosanne P. Huebener
Certificate No. 50897

APPEARANCES OF COUNSEL

On behalf of the Petitioner:

THE VALLEY LAW GROUP, PLLC.
Cory Keith, Esq.
3101 N. Central Ave, Ste. 1470
Phoenix, AZ 85012
cory@thevalleylawgroup.com

On behalf of the Respondent:
WOODNICK LAW, PLLC.
Gregg R. Woodnick, Esq.
Isabel Ranney, Esq.
1747 E. Morton Avenue, Suite 205
Phoenix, AZ 85020
Office@WoodnickLaw.com

INDEX OF EXAMINATION

WITNESS: PAGE:
LAURA OWENS
EXAMINATION

By Mr. Woodnick 7

EXHIBITS

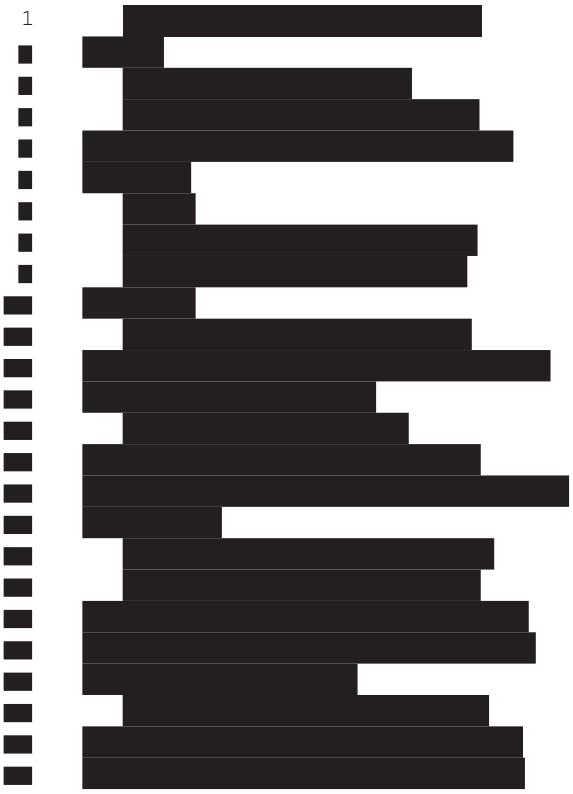
(Exhibits previously marked and supplied in a binder with exhibit tabs. Some exhibits not tabbed and therefore not defined in index.)

No. 1 Ultrasound GA=5w0d
No. 2 Text messages beginning 8/6/21
No. 3 Ultrasound GA=5w2d
No. 4 May 17, 2023 LinkedIn Message
No. 5 CE0013-CE0024
No. 6 Text messages beginning 7/15/23
No. 7 Text messages beginning 7/16/23
No. 8 CE0025-CE0026
No. 9 Sonogram Video SMIL 9/5/23
No. 10 Sonogram Still SMIL 9/5/23
No. 11 CE0032
No. 12 Twin Boy Gender Ultrasound
No. 13 CE0112
No. 14 CE0001-CE0011
No. 15 8/8/21 Text Messages

Exhibits (Continued)

No. 16 CE0042
No. 17 Text Message (No date)
No. 18 CE0027
No. 19 Text Message 7/25/23
No. 20 Scottsdale Police Department Report
No. 21 2/25/24 Reality Steve E-Mail
No. 22 --
No. 23 Video with Dad.mov
No. 24 Pregnant stomach video.mov
No. 25 Laura Owens E-mail to Reality Steve, et al. Friday 10/13/23
No. 26 --
No. 27 Laura Owens E-Mail to Reality Steve 10/6/23
No. 28 --
No. 29 --
No. 30 Owens E-Mail 10/26/23
No. 31 --
No. 32 --
No. 33 --
No. 34 Crying on Facebook.MP4
No. 35 Surprise Email and CE0116 photo
No. 36 E-Mail to Arizonaspc
No. 37 Colin Scanlon 2/28/24 E-Mail
No. 38 9/21/23 Owens E-Mail

Page 25



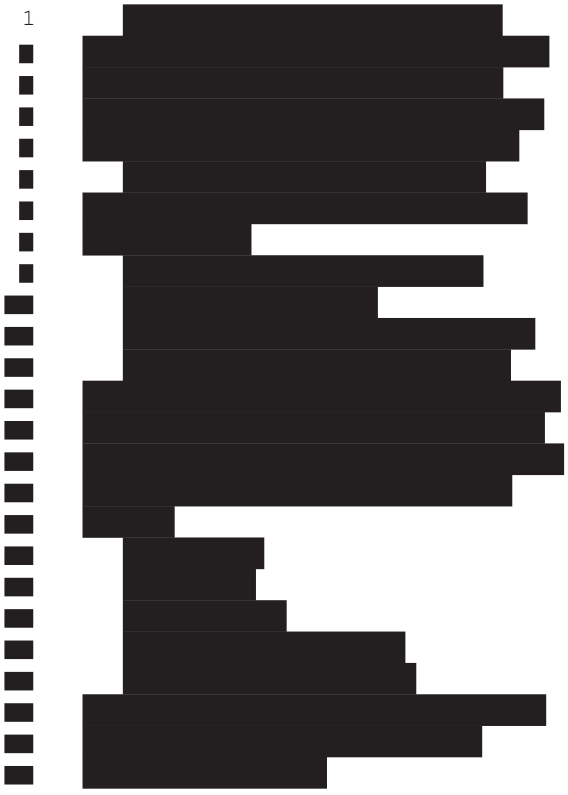
Page 26

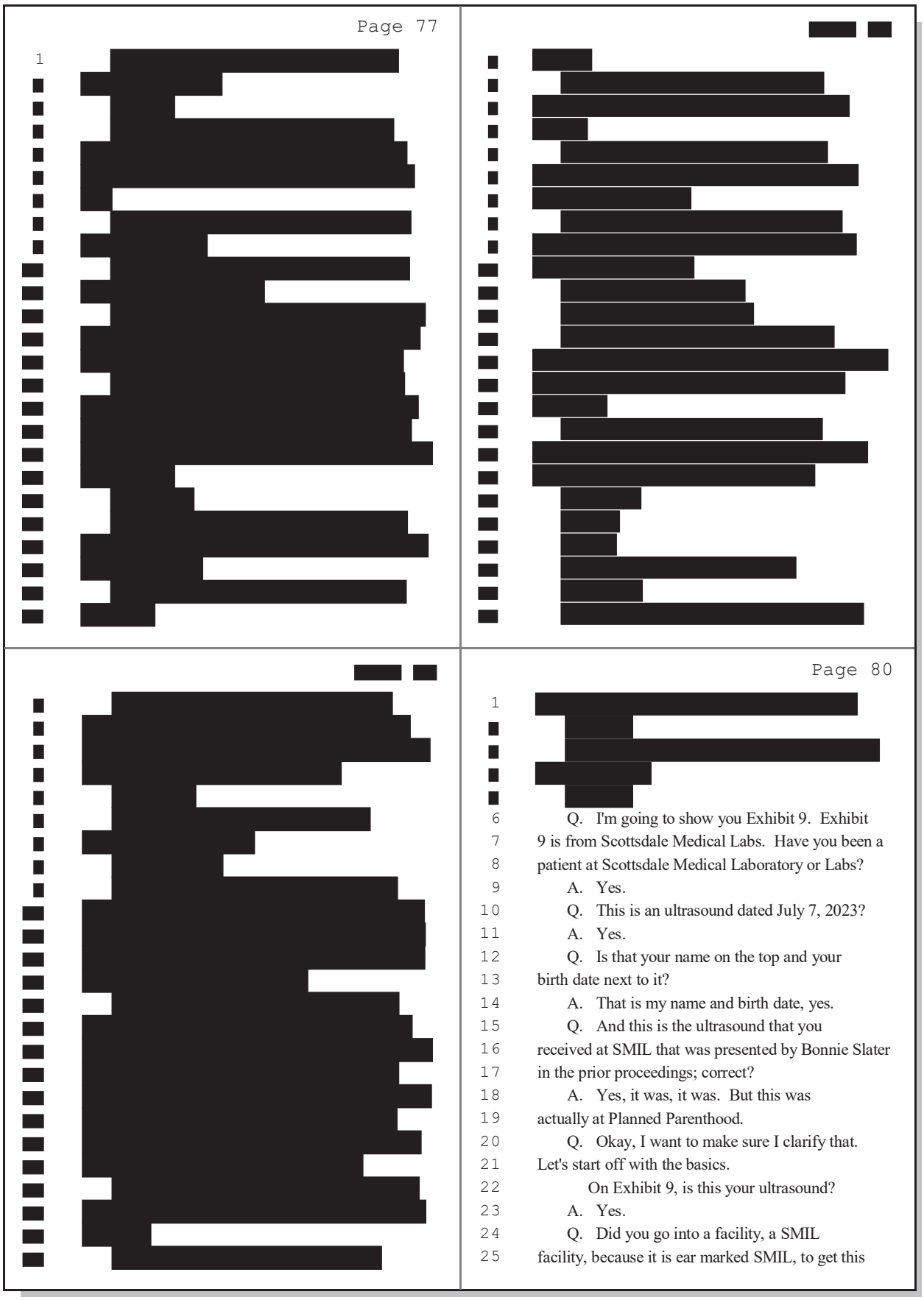
name begins with a Z but I just forgot --
A. .
Q. He --
A. She.
Q. Is your neurologist at Barrow?
A. Uh-huh.
Q. Yes?
A. Yes.
Q. So . You also told me you are seeing the on-line provider, correct?
A. Correct.
Q. When was the last time you saw the on-line provider?
A. I haven't had a video visit with that person in maybe a year-and-a-half or two years.
Q. What other providers have you seen, let's just look at 24 months, in the past 24 months?
A. I saw a doctor at Momdoc. I don't recall. I saw a provider at Banner Urgent Care, I think her name was Tamara, something with an L, and she, I think was a -- she may have been a nurse practitioner.
I saw a doctor at Planned Parenthood in Mission Viejo, and -- you said how long did you -- how long?

Page 27

Q. You are doing great. So one of the questions I had ahead of me was you have been to Planned Parenthood in the past 24 months?
A. Yes.
Q. And the Planned Parenthood you have been to is Planned Parenthood Mission Viejo or whatever the branch is there?
A. Yes.
Q. When was that?
A. That was in July of last year.
Q. July of '23?
A. '23, correct.
Q. You -- and you have no problems expanding the HIPAA release to include Planned Parenthood Mission Viejo July '23?
A. No.
Q. Have you seen any other providers at Planned Parenthood in Arizona?
A. No.
Q. Just the one visit in the summer of '23 to the location in Mission Viejo?
A. Yes.
Q. Any other medical providers?
A. In the last --
Q. 24 months?

Page 28





Page 77

Page 80

Q. I'm going to show you Exhibit 9. Exhibit 9 is from Scottsdale Medical Labs. Have you been a patient at Scottsdale Medical Laboratory or Labs?

A. Yes.

Q. This is an ultrasound dated July 7, 2023?

A. Yes.

Q. Is that your name on the top and your birth date next to it?

A. That is my name and birth date, yes.

Q. And this is the ultrasound that you received at SMIL that was presented by Bonnie Slater in the prior proceedings; correct?

A. Yes, it was, it was. But this was actually at Planned Parenthood.

Q. Okay, I want to make sure I clarify that. Let's start off with the basics.

On Exhibit 9, is this your ultrasound?

A. Yes.

Q. Did you go into a facility, a SMIL facility, because it is ear marked SMIL, to get this

Page 81

ultrasound?
A. I did not.
Q. Where did you get this ultrasound?
A. Planned Parenthood in Mission Viejo.
Q. So I don't know Mission Viejo well, but is what you are suggesting that Scottsdale Medical Imaging has a branch in Mission Viejo, California?
A. No.
Q. I'm totally confused here, I will give you a chance here to explain how there is a Scottsdale Medical Imaging ultrasound that you claim came from Mission Viejo.
A. There is not, this was the -- actually taken in Mission Viejo, this was not taken at SMIL.
Q. Why does it say SMIL on it?
A. I did change the top of that from Planned Parenthood to SMIL, because I didn't want him to contact the doctor.
Q. I'm showing you real clearly Bates stamp 0183, it's an ultrasound image that you are admitting to having changed information on, is that true?
A. Just the top left, yes, the location.
Q. I'm going to ask the question again.
A. Yes.
Q. Did you change data on the -- on what has

Page 82

been marked as Exhibit 9?
MR. KEITH: She answered the question, Gregg. Objection, form.
BY MR. WOODNICK:
Q. Other than changing the sword SMIL on that exhibit, did you change anything?
A. No.
Q. All right, Laura, I am going to give you an opportunity now because we are three years into this and a year into this case. Is this the only document you have altered?
A. Yes.
Q. So every exhibit in this entire history of feigned, of our position which is feigned pregnancies, this is only document that you are acknowledging having touched, via arts and crafts, is CE 0183, marked for today's deposition as Exhibit 9?
MR. KEITH: Objection, form, and, Gregg I'm going to ask you let's keep it professional in the questions.
THE WITNESS: Yes, this is the only -- this is the only one, and I would hope that the fact I'm admitting that would mean something.
BY MR. WOODNICK:
Q. Well, it means that you lied in an

Page 83

exhibit. You understand that. So this is where we go back to this issue of you being able to plead the Fifth. You acknowledge you had a medical document that you changed and you are telling me right now that's the only one I have to know about?
A. Yes.
Q. What software did you use to change it?
A. Um, Adobe Acrobat.
Q. Where were you when you changed it?
A. At my house.
Q. When did you change it?
A. Whenever this was, because I didn't want him to contact Planned Parenthood.
Q. At what point were you going to tell my office or your own attorney that you doctored a medical record?
A. I mean, as I said, it's my ultrasound. It is my ultrasound.
Q. Bonnie Plater subsequently withdrew from representing you?
A. No, Bonnie did not, I just didn't re-up the retainer because it was $5000 gone through in a week.
Q. You are aware that Ms. Plater used this exhibit in your proceedings, right?

Page 84

A. Correct, it was my ultrasound.
Q. I want to show you Exhibit 10. I think we have a little technology action here.
MS. RANNEY: There is actually no audio on this, but I'm going to show it to you.
(Video playing.)
BY MR. WOODNICK:
Q. Did you see Exhibit 10, Laura?
A. Yes.
Q. That's a video dated September 5, 2023?
A. Yes.
Q. Is that yours?
A. No, I never stated that was mine. I was asked that by Dave Neal.
Q. The Exhibit 10 which is a SMIL sonogram, what's the identifying information on there?
A. Laura Owens.
Q. What's the other identifying information on there?
A. GA=17w0d.
Q. So you admit that the sonogram in Exhibit 10 is not yours?
A. Exhibit -- okay, yes, that's not mine.
Q. Okay. If I were to look at a sonogram of this alleged pregnancy, the only place I would see

Page 85

that from its original source would be Mission Viejo Planned Parenthood?
A. Wait, are you talking about the -- are you talking about the video or -- I'm -- I'm confused.
Q. And that's fair.
Your testimony under Exhibit 10 is that ain't you?
A. Exhibit 10 is, is that -- yes, correct.
Q. How many sonograms have you had for this alleged pregnancy?
A. One.
Q. Where was it?
A. Planned Parenthood Mission Viejo.
Q. So I'm going to ask my question again. If I were to want the original source of the sonogram, the only sonogram that you took in a six or seven-month pregnancy, I could only get it from the source at Mission Viejo Planned Parenthood?
A. Yeah, and I did go anonymously.
Q. Oh. So if I issue a subpoena to them, because you are going to sign a consent when we bring this to Judge Mata's attention, they are not going to know it was you that was there?
A. I self-paid. I mean, I don't know.

Page 86

Q. Okay. So I'm going to give you an opportunity again, because you have got statements under oath that we are about to get to from the prior proceedings, you do not have to answer my questions, you can always plead the Fifth.
Your testimony now is that the sonograms that I just presented to you are not yours; correct?
A. The one sonogram was mine.
Q. And it came from Mission Viejo, but Mission Viejo is not going to have any idea it was you because you did it anonymously but then you went back and you added your name to it?
MR. KEITH: Objection, form.
THE WITNESS: No, I didn't add my name to it, my name was on it. I changed the SMIL thing.
BY MR. WOODNICK:
Q. Your name was on it?
A. And I changed SMIL.
Q. Hang on for a second. You just told me, Laura, that you were anonymous at Planned Parenthood.
A. But I changed SMIL on there. I think I'm confused as to what you are asking.
Q. No problem. We will slow it down a little.

Page 87

A. And can you -- are you talking about -- can you just tell me what exhibit?
Q. Just to the be clear for the record, I'm talking about Exhibit 9.
A. Exhibit 9.
Q. That's the one that you say that you changed and attributed to another medical provider located in Scottsdale Arizona, correct?
A. Correct.
Q. And that's SMIL, which is an acronym for Scottsdale Medical Imaging labs or something like that; correct?
A. Correct, I have gone there before.
Q. You are a patient of SMIL?
A. Correct.
Q. So when I get the subpoena for the records release from SMIL, this isn't going to be there because they didn't do this test?
A. Correct.
Q. Because you just put their name on the test?
A. Correct.
Q. This test, according to you, was originated in California?
A. Correct.

Page 88

Q. And you went in there anonymously?
A. Correct, and I -- yeah, I added my name in the -- in the facility name, correct.
Q. So we are changing your testimony, so it's not -- you originally said you just changed and added the word SMIL, but now under oath you are saying you added your name to it too; correct?
A. Correct.
Q. And your date of birth?
A. Yeah, I changed the top. My date of birth actually they -- I think they may have had my date of birth. They may have had my date of birth there. They may have had that. If you were to get the record, they may have my date of birth because they did ask my age.
Q. When you submit records to a court, you understand that you are signing a verification with them and that there's an expectation of honesty?
A. Yes, and I don't believe this was ever submitted to court.
Q. All right. I'm not done with Exhibit 9 yet.
Your testimony now that we have worked through it a little bit is the entire top section of Exhibit 9 is an ultrasound from Planned Parenthood in

Page 89

California where you appeared anonymously, you took that ultrasound and you added your name and a date and information to it?
A. The date is correct.
Q. Okay. Where is the original of this?
A. Um, I mean, I just have that. I mean, I'm sure I would have it on my computer.
Q. Okay, what would you have on your computer?
A. Like the image, my photos.
Q. How did Planned Parenthood California Mission Viejo give you this image?
A. I asked them to send it to me.
Q. Via?
A. Maybe I actually just took a screen grab of it. No, doesn't look like that. I don't recall.
Q. Do they do -- I'm not familiar with Mission Viejo Planned Parenthood, do they do like a medical records portal?
A. No, they did not.
Q. Did you walk out of Planned Parenthood with this?
A. With what?
Q. Whatever this image is that you doctored, did you walk out with it?

Page 90

A. Well, I didn't -- are you referring to doctoring in terms of the top?
Q. Yes.
A. Okay. Um, I mean, I didn't -- I didn't alter the ultrasound image, and this is even reviewed by another doctor independently.
Q. We can debate that. But this particular image, how did you get it?
A. I -- I -- I thought I had taken a picture with my phone, but it doesn't look like it was taken with my phone. So I don't recall.
Q. So you may have -- your position would be you were in Planned Parenthood, you took a screen shot with your cell phone and that, and then you came back to Phoenix and you used Photo Shop to change the caption?
A. I used Adobe Acrobat to change the caption, yes.
Q. How would you get me the original of what this was before you messed with it?
A. I can contact Planned Parenthood to see if, from the day I was there if there are records from there.
Q. So you would be willing to, for my office, sign not just a HIPAA release, but a special

Page 91

waiver that California may require because of their confidentiality laws with their Planned Parenthood and privacy, so that I could have that original information, right?
A. Um, I mean, I don't know what rights I would be waiving in California.
Q. Well, you want Judge Mata to have the original records in front of her, correct?
A. Judge Mata will see I was pregnant, I have other pregnancy records as well.
Q. This is not a debate. This, in particular Exhibit 9, you have provided and you have acknowledged --
A. To Clayton, yes.
Q. To Clayton. I have got it, too, it's right in front of me.
You acknowledge you made changes to this document, correct?
A. Correct.
Q. And you acknowledge that it's important that we know what the original was of this document to know what you changed?
A. Correct.
Q. Because right now I got to take your word that it's the original, right, because there's no

Page 92

verification.
A. Correct.
Q. So you are going to work with my office to contact Mission Viejo and get the original source material from their data base, whatever it is, so we can see what this image looked like before you -- whatever you did to it. Can we agree to that?
A. Like I said, I went anonymous, but I'm happy to help you guys however I can.
Q. Why did you go anonymous?
A. Because I didn't want people to know I'm pregnant at the time.
Q. But Planned Parenthood is privileged, you have been there before.
A. I had been there before, but I didn't want anyone to find out because I wasn't in a relationship or anything.
Q. You understand why people may think you may be lying about this Exhibit 9, right?
A. I do, yes.
Q. Okay, let's move on.
I'm going to move on and show you Exhibit 10.
A. Was 10 the video?
Q. Yeah. You saw the video, the September

EXHIBIT “2”

CLERK OF THE SUPERIOR COURT
FILED
10/6/2023 @ 10:43AM
, Deputy

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032
602-506-7353 Monday - Friday 8am - 5pm

Plaintiff ☐ Employer-Plaintiff if Workplace Injunction Laura Owens	**Defendant** Clayton Ray Echard	**Case No.** FC2023-052771
☐ **On behalf of minor/person in need of protection named:**	**Defendant's address** 6855 E Camelback Road 7002 Scottsdale, AZ 85254	**PETITION for:** ☒ **Order of Protection** ☐ **Injunction Against Harassment** ☐ **Workplace Injunction**
Agent's name (if Workplace Injunction)	**Defendant's birth date** 4/29/1993	
	Defendant's phone 314-956-6975	

This is NOT a court order.
This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

DIRECTIONS: Please read the Plaintiff's Guide Sheet before filling out this form.

1. **Defendant/Plaintiff Relationship** *(Choose the options that best describe your relationship to the defendant. *If you are applying on behalf of another person, choose the relationship between the other person and the defendant)*

☐ Married (past or present)
☐ Live/lived together as intimate partners
☐ Parent of a child in common
☒ One party is pregnant by the other
☒ Romantic or sexual relationship (past or present)
☐ Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step)
☐ Live/lived together but not as intimate partners
☐ Other (describe):

2. ☒ If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in Maricopa County Superior Court, Case # FC2023-052114.

3. Name of court, if any, in which any other protective order related to this conduct has been filed.
Court name Case #

4. Tell the judge what happened and why you need this order. PRINT both the dates and a brief description of what happened. If there is a contested hearing, a judge can consider only what you write here.
NOTE: Defendant will receive a copy of this petition when the order is served.

Approx. Date	(Do not write on back or in the margin. Attach additional paper if necessary.)
6/1/2023	Clayton has sent threatening messages since discovering I was pregnant, such as: I legitimately hate you right now. my hatred will only grow if you decide to put me through all of this. My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever My hate is toward you and you only. if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.
9/21/2023	Clayton Echard was The Bachelor and has many diehard loyal fans. He and I are involved in a very public paternity case that is being covered by every major media outlet. Clayton posted to a story to his 270k followers to look me up, which they have, and I have been sent threatening and harassing messages by his followers. I explained this to him and asked him to take down the post, which he did not. By posting personal and sensitive information about me publicly (and without my consent), he has made me feel humiliated and embarrassed.

9/21/2023	Scottsdale PD Officer Vince Johnson called Clayton to explain that what he was doing was harassment in and of itself, coupled with the fact that he was inciting his followers to harass me as well. Despite this call, Clayton still did not take down the post.
10/5/2023	Between 9/22 and 10/5, Clayton has posed as several users on Reddit, including "sillygoosetits", "GossipGooseTits", "Sandbetweenhertoes", and others. He has posted private and confidential information, including facts about my medical history, that is known only to him because of our paternity case. This is why it is 100% traceable back to him. He has also been writing defamatory and very hurtful things about me, including comments about how I have gained weight (I am pregnant), how I am not attractive, how my photos are so poorly edited that it is laughable, how I am bad at my job (a self-help podcaster), and how my prior abusive relationship, which inspired a TEDx talk, never happened, despite mountains of evidence. He is doing everything in his power to ruin and hurt my reputation. As a result of what he has posted, I have gotten harassing messages that have told me to harm myself as a result of becoming pregnant with his twins. I am getting other threatening messages as well, and all of this attention from the general public that he has incited is very much unwanted. As a result of this public shaming, he has caused me extreme psychological harm and disrupted my peace. I have asked Clayton to stop the harassment on Reddit and social media so many times, but he won't. I have reported his accounts and posts to Reddit, but he continues to write unacceptable, cruel things about me. He has multiple accounts now and so even if one is blocked, he can create another one. As a result of him spreading false and damaging information under pseudonyms, I feel demeaned, humiliated, and like my deepest sense of privacy has been invaded. In addition, he has been in communication with my ex, who I have an order of protection against, and who he knows is dangerous. I have asked him to stop talking to him because it will put me in danger, but he continues to communicate with him.
10/6/2023	When combined, all of this has led me to feel extreme anxiety and fear for my safety. I have not left my house since September 28th because of this.

5. The following persons should also be on this order. They should be protected because Defendant is a danger to them:

6. Defendant should be ordered to stay away from these locations at all times, even when I am not present.
NOTE: Do not list confidential addresses here.

   ☒ Residence (confidential)
   ☒ Work/Business
   ☒ School/other

7. ☐ Defendant owns or carries a firearm or other weapons.
   ☐ Defendant should be ordered NOT to possess firearms while this order is in effect because of the risk of harm to me or other protected persons.

8. ☐ Defendant should be ordered to stay away from any animal that is owned, possessed, leased, kept or held by me, Defendant, or a minor child living in either my household or Defendant's household.

9. Other requests: No cyberharassment or cyberbullying under real name or pseudonyms.;

Under penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge, and I request an Order / Injunction granting relief as allowed by law.

/s/ Laura Owens
Plaintiff

Attest:
Judicial Officer/Clerk/Notary

10/6/2023.
Date

Clerk of the Superior Court
*** Electronically Filed ***
10/26/2023 8:00 AM

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052771

10/25/2023

HONORABLE JOHN R. DOODY

CLERK OF THE COURT
T. Sachse
Deputy

IN RE THE MATTER OF
LAURA OWENS

JOSHUA A LOPEZ

AND

CLAYTON RAY ECHARD

CLAYTON RAY ECHARD
6855 E CAMELBACK RD # 7002
SCOTTSDALE AZ 85254

COMM. DOODY

MINUTE ENTRY

There is a *LATER* at the end of this minute entry.

Prior to the commencement of today's proceedings, Plaintiff's Exhibits 1 through 18 and Defendant's Exhibits 19 through 51 are marked for identification.

Courtroom 101-NER

8:32 a.m. This is the time set for Hearing on Order of Protection issued on October 6, 2023. Plaintiff, Laura Owens, is present with the above-named counsel. Defendant, Clayton Ray Echard, is present on his own behalf.

A record of the proceedings is made digitally in lieu of a court reporter.

Laura Owens and Clayton Ray Echard are sworn.

The Court addresses previous motions filed by Plaintiff.

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052771 10/25/2023

IT IS ORDERED denying Plaintiff's Motion Requesting That the Hearing be Closed From the Public or That This Hearing Be Closed From Watching Online, filed October 25, 2023 and denying Plaintiff's Motion Requesting Laura Owens Attend Virtually or Telephonically for Hearing Scheduled October 25, 2023, filed on October 25, 2023.

Counsel for Plaintiff presents opening statements.

Laura Owens testifies.

Plaintiff's Exhibits 1 and 11 are received into evidence and Exhibit 52 is marked for identification and received into evidence.

Clayton Ray Echard testifies.

Defendant's Exhibits 34, 35, and 51 are received into evidence and Exhibit 53 is marked for identification and received into evidence.

Discussion is held.

Based on the testimony and matters presented,

THE COURT FINDS by a preponderance of the evidence that there is reasonable cause to believe that Defendant has committed an act of domestic violence within the last year.

THE COURT FURTHER FINDS that good cause exists to continue the Order of Protection in this case.

IT IS ORDERED that the Order of Protection issued at Superior Court on October 6, 2023 shall remain in full force and effect.

LET THE RECORD FURTHER REFLECT that the parties receive a copy of the aforementioned document in open court.

LET THE RECORD FURTHER REFLECT that Plaintiff's Exhibits 2 through 10, 12 through 18 and Defendant's Exhibits 19 through 33, and 36 through 50 are disposed.

Counsel for Plaintiff makes an Oral Motion to withdraw from these proceedings.

IT IS ORDERED granting Counsel's Motion to withdraw.

10:13 a.m. Hearing concludes.

FILED: Hearing Order

LATER:

LET THE RECORD REFLECT that the Court did not invoke the Brady Order due to the fact that it is still undetermined if Plaintiff is pregnant with Defendant's child.

All parties representing themselves must keep the Court updated with address changes. A form may be downloaded at:
http://www.superiorcourt.maricopa.gov/SuperiorCourt/LawLibraryResourceCenter/

EXHIBIT “3”

Posted by u/TheOneandOnlyJenn 12 hours ago

26

How to win the scariest costume contest

SHIT POST

Sorry, this post has been removed by the moderators of r/BachelorNation.

Moderators remove posts from feeds for a variety of reasons, including keeping communities safe, civil, and true to their purpose.



Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
4/3/2024 2:40:51 PM
Filing ID 17600739

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

MOTION TO WITHDRAW MOTION FOR SANCTIONS PURSUANT TO RULE 26

(Assigned to the Honorable Julie Mata)

Respondent, Clayton Echard, moves to withdraw only his *Motion for Sanctions Pursuant to Rule 26* dated January 3, 2024 based on the following:

Although Clayton believes he more than complied with Rule 26, ARFLP, and that the Court already overruled Laura's objection, it is clear she intends to pursue more toxic litigation predicated on threats as a rouse to avoid this Court reaching the heart of this matter (the overwhelming fraud). Clayton's claims for fees and sanctions exist independently of the Rule 26 Motion and have *already* been set for trial. Clayton would rather avoid the "$35,*000*" sideshow repeatedly threatened by Laura's new counsel and overt efforts to delay adjudication on the facts. Because the Rule 26 Motion is not the substantive pleading basis for his claims

against Laura, there is no reason to participate in the pointless litigation over this issue (and threats to appeal to further delay justice) notwithstanding Clayton's disagreement with Laura's legal positions on Rule 26. Moreover, Laura's threat to seek personal sanctions against Clayton's counsel based on her proffered Rule 26 violation, while frivolous, will only draw more attention and animus to this case. Subjecting the Court to this collateral circus, which is intended only to increase legal fees and prevent resolution on the merits, would be a waste of judicial (and other) resources.

Accordingly, Clayton hereby moves to withdraw the Rule 26 *Motion for Sanctions* filed January 3, 2024. He does not withdraw his counterclaims and other relief afforded and any other relief appropriate and available to him under A.R.S. §§ 25-324, 25-415, 25-809, etc.

He also, for completeness of record, provides the following:

Background and Procedural History

1. This matter is before the Court on Petitioner Laura Owens's *Petition to Establish* filed August 1, 2023 and Clayton's *Amended Response to Petition to Establish Paternity* filed December 12, 2023 (relating back to original filing date of August 21, 2023 under ARFLP 28(c)).

2. On December 12, 2023, Clayton moved for leave to amend his Response. In the Amended Response, Clayton cited Rule 26 and provided notice of intent to seek sanctions for statements made in Laura's Petition. *See* Amended Response, pp. 5-6, §§ 25-26. The Court granted leave to amend and accepted the Amended Response on January 25, 2024.

3. On December 28—more than 10 days after notice of Clayton's intent to seek Rule 26 sanctions via the motion for leave to amend—Laura moved to dismiss her Petition based on her assertion she was "no longer" pregnant. Her motion to dismiss sought to dismiss the entire action with prejudice. Clayton objected because, inter alia, he had alleged counterclaims seeking an affirmative finding of non-paternity, attorney fees, and sanctions for Laura bringing the action in bad faith, for improper purpose, etc. On January 25, the Court granted Laura's motion, in part, by dismissing her Petition, but the Court did not dismiss the action because Clayton is entitled to resolution of his claims for a finding of non-paternity, attorney fees, and sanctions. *See* Minute Entries dated January 25, 2024 ("While the Court will grant the *Motion* [to Dismiss], the issue of sanctions and attorney's fees remain. […] The Court will set an evidentiary hearing on the issues of sanctions and attorney fees by separate minute entry."); *see also* ARFLP 46(a)(1)(B) (prohibiting voluntary dismissal without court approval after an answer is filed and permitting the court to dismiss a petition on such terms and conditions the court deems proper, including the resolution of any claims by the responding party).

4. On January 3, 2024, Clayton filed a Motion for Sanctions Pursuant to Rule 26 (hereafter the "Motion for Sanctions"). The Motion for Sanctions came more than 10 days after the Motion for Leave to Amend—in which Clayton gave written notice of intent to seek Rule 26 sanctions from Laura's complaint—and after Laura moved to dismiss her Petition.

5. Laura responded to the Motion for Sanctions on January 23, 2024. In her response, she argued, inter alia, that the Motion was deficient because of lack of notice

required by Rule 26(c)(2)(B). The Court did not expressly rule on the Motion for Sanctions but set the matter for trial on attorney fees and sanctions.

Changes of Counsel and Rule 26 Dispute

6. At the time she filed her motion to dismiss, Laura was represented by Alexis Lindvall. At the time she responded to the Motion for Sanctions, she was represented by Cory Keith. Again, Laura brought this same argument relating to Rule 26's 10-day notice requirement in her response to the Motion for Sanctions, albeit with less force, and the Court still set the case for trial (ostensibly because even if she is correct and Clayton's Rule 26 Motion is denied, there remain other claims that must be resolved before the case concludes).

7. Her current attorney (as of the time of this filing), David S. Gingras, began aggressively asserting various claims, positions, and legal threats in emails to Clayton's counsel after entering appearance on or about March 25.

8. Several of these unpleasant emails pertain to the Motion for Sanctions under Rule 26. Laura asserts that the Motion was improperly brought because of lack of written notice required by Rule 26(c)(2)(B) (hereafter referenced as the "safe harbor" notice). This argument is partly articulated beginning on page 14 of her *Motion for Extension of Time to Respond to Respondent's Motion to Compel* filed April 1, 2024. (Properly denied by the Court on April 2, 2024).

9. According to her argument, Clayton did not provide sufficient written notice to comply with the rule. Laura interprets Rule 26(c)(2)(B) as providing the party against whom sanctions are sought a 10-day grace period in which to withdraw or appropriately correct the alleged violation. She interprets "withdraw or appropriately correct" as giving her an

"absolute right" to withdraw her pleading without consequence or further proceedings. *Response to Motion to Compel* at 16-17.

10. Further, Laura appears to believe she should have had the right to withdraw her entire Petition by virtue of Clayton moving for Rule 26 sanctions without the "safe harbor" notice[1] notwithstanding Rule 46.

11. She bases her renewed objection to complying with discovery orders and disclosure obligations on this notion: "The only current remaining issue in this case is Mr. Echard's Motion for Rule 26 Sanctions … which is presently set for evidentiary hearing on June 10, 2020. The pending Motion to Compel seeks evidence which is only, and could only, be relevant to the issue of sanctions (because there are no other pending issues for this Court to address). Thus, the only *fact of consequence* necessary to determine this matter is the question of whether Ms. Owens lied about ever being pregnant in the first place. […] Mr. Echard has no right to this discovery (or indeed, to any discovery) because none of the discovery is relevant to any of the remaining issues of consequence in the case." (Emphasis in original).

12. This untenable position completely ignores the Court's trial setting order and Clayton's Amended Response. Clayton has requested relief to which he is entitled under Title 25, including a finding of non-paternity and attorney fees and costs, that are entirely independent from the Rule 26 Motion. The applicable statutes, including A.R.S. §§ 25-324 (attorney fees and costs for filing in bad faith, filing without grounding in fact or law, filing

[1] As articulated more fully below, Clayton believes the Motion for Leave to Amend operates as sufficient written notice consistent with precedent Laura's counsel cited.

for improper purpose in legal decision-making and parenting time proceedings), -415 (sanctions for litigation misconduct related to claims made under § 25-403, -403.03, or -403.04) and -809(G) (attorney fees for unreasonableness in paternity proceedings), provide independent remedies that have no grounding in Rule 26. Based on the Court's comments on the record at the most recent status conference and the order setting trial, the Court intends to hear those claims for attorney fees and sanctions notwithstanding the Rule 26 Motion. That is why the Court did not dismiss the action in its entirety: the Court must first resolve Clayton's claims for relief.

13. Laura's current counsel's communications on this topic are tremendously aggressive and counsel has taken to Twitter, posting pleadings and medical documents contrary to the Court Order, all of which the Court will have to determine the propriety of reasonableness under A.R.S. § 25-324 come trial. These communications include declaring that Clayton refusing to withdraw the motion would itself be sanctionable under Rule 26, promising to litigate the issue to higher courts at great expense to both parties, threatening to seek personal sanctions against Clayton's attorneys, threatening new bar complaints (Laura having already filed two (2) against undersigned counsel and at least two (2) prior attorneys) and so on.

14. In one example, counsel estimates $35,000 in "risk" if Clayton does not withdraw his Motion for Sanctions: "*If I was in your position, I would seriously stop and think about that before telling me to GF myself. You can literally avoid about $35,000 in risk simply by admitting you made a mistake, then doing the right thing. If you decide NOT to take that safe harbor, it's your decision….but a pretty freaking bad one*." It is not clear whether the

$35,000 is a prediction of legal fees for both parties, a possible attorney fees award to Laura for acts not yet undertaken, an amount expected as a sanction, etc., but what is clear is that Laura's scorched Earth approach to this litigation remains the same as always: to threaten and drive up costs in an attempt to exhaust Clayton's remedies and willingness to defend himself and seek affirmative relief to which he is entitled under Title 25.

15. The emails also concede, however, that "There are *other* options available to you if you want to seek fees. But you have not made any other motions seeking fees under those other authorities. If you think you have a factual/legal basis to do so, GO FOR IT." (Emphasis in original). Clayton has already invoked those claims in his Response, Amended Response, and various other filings and positions in open court. Laura's position self-contradicts in that it simultaneously declares Clayton has no avenue for relief other than Rule 26 (and therefore should have no discovery) but also that he can bring claims for relief under other authorities.

Clayton's Positions

Interaction between Rule 26, Rule 46, and Title 25

16. As a threshold matter, the policy implications of Laura's position that Rule 26's 10-day notice and "safe harbor" language grant an "absolute right" to withdraw a petition and defeat the responding party's entire case are both severe and obvious. A party who has already filed a response and brought counterclaims for relief would never invoke Rule 26 if doing so would give the petitioner *carte blanche* to withdraw their pleading with no limitations.

17. Rule 46 expressly prohibits voluntary dismissal of a petition after a responsive pleading is filed or evidence is taken, particularly when the responding party alleges

affirmative claims for relief as Clayton did here. The suggestion that the Rule 26 10-day notice supersedes Rule 46 is illogical and would deter parties from seeking Rule 26 relief at all, *especially* in cases of the most egregious conduct Rule 26 is meant to prevent. Rule 46 "locks in" the party's petition once a response is filed and guarantees the respondent the opportunity to present their claims for relief even if the petitioner changes their mind and wants to opt out of the litigation.

18. Laura is correct that failure to comply with Rule 26 results in relief *for that motion* being denied, but to suggest that failure to comply with Rule 26 results in effective waiver of all claims in the litigation would interpret a procedural provision of one rule in a way that swallows the entirety of another. A harmonious reading of Rules 26 and 46 is simple: failure to comply with Rule 26 results in not receiving Rule 26 sanctions for that motion. It does not prohibit a subsequent Rule 26 filing with a new 10-day notice, nor does it afford a party who violated Rule 26 an opportunity to dismiss the entire litigation during the 10-day notice period. Laura's interpretation would render Rule 26 practically useless because no party with valid claims for relief would risk waiving their right to resolution of those claims—a right guaranteed by Rule 46.

19. Rule 26's procedural requirements do not supersede independent claims for relief given by law, including claims under A.R.S. §§ 25-324, -415, and -809. Nothing in Rule 26 indicates, nor could it given the supremacy of statutes over procedural rules, that a party waives their right to bring their statutory claims by invoking Rule 26. This would create an absurd result and exalt form over function in a most problematic way.

//

Differences between ARFLP 26 and ARCP/FRCP 11

20. Laura's position relies on case law interpreting Rule 11 of both the Arizona and Federal Rules of Civil Procedure. Although Rule 26 is based on Rule 11 and case law interpreting Rule 11 is instructive, it is not dispositive. Of relevance to this case, Rule 26 exists in the context of remedial statutes present in Title 25 that are not available in other civil proceedings at either the state or federal levels.

21. Laura herself believes—correctly—that attorney fees and sanctions are available under A.R.S. § 25-809(G) independent of Rule 26. Clayton has already identified this statute and at least two others in Title 25 that similarly require the Court to consider reasonableness of positions, bad faith, improper purpose, etc. as part of this action. None of these statutes apply to general civil matters in the state or federal courts. Put another way, Rule 11 precedent exists in a completely different legal context where awards of attorney fees are more limited, such as fees provisions in contracts under A.R.S. § 12-341.01, damages not to exceed $5,000 for frivolous claims, delay, or discovery abuses under A.R.S. § 12-349, liability for excessive costs under 28 U.S.C. § 1927 (relevant to the *Holgate* decision discussed below), etc.

22. Clayton denies that these cases, or indeed any Rule 11 case at the state or federal level, categorically disposes of analogous issues under Rule 26. That said, to the extent they provide persuasive authority, he will address the primary cases Laura cites on their merits.

23. In the *Holgate* matter Laura's counsel cites and argues in support of her position, the trial court could not award sanctions under 28 U.S.C. § 1927 because it did not find bad faith required under that statute. Accordingly, the movant's alternative claim for

sanctions under the court's statutory authority was unavailing, and they brought no substantive legal basis to request those sanctions except under their flawed Rule 11 motion. *Holgate v. Baldwin*, 425 F.3d 671, 680-81 (9th Cir. 2005). It should also be noted the *Holgate* decision **expressly declines to award sanctions for a Rule 11 notice error or for opposing a plaintiff's motion for voluntary dismissal**, stating the appropriate remedy is to denial the request for Rule 11 sanctions, not award "counter-sanctions" as Laura threatens to request. *Holgate* at 680. Clayton denies his Rule 26 Motion for Sanctions lacked proper notice, but even if it did, **Laura's threats are contrary to the very precedent on which she relies to make them**.

24. Of relevance here, there was no alternative basis for the claim for attorney fees and sanctions under applicable federal law in *Holgate*, so the court could not sanction on its own motion without finding bad faith. Rule 11 was an exclusive remedy in that context, but Rule 26 is not the exclusive remedy or basis for Clayton's requests for fees and sanctions under Title 25 of Arizona Revised Statutes. **Notably, under Rule 26, the Court can move for sanctions on its own motion, which is likely appropriate given the exorbitant amount of fraud perpetuated by Laura in this and the collateral matters.**

25. Similarly, Laura relies on *Gallagher v. Surrano Law Offices, P.C.*, a trial court decision summarizing applicable Rule 11 precedent. Although *Gallagher* is not precedential, Clayton finds the same problem with the analysis in that case: the party seeking sanctions cited A.R.S. §§ 12-349 and -250 as an alternative basis but did not prove the required factors, including bad faith, subjective intent, financial positions of the parties, etc. Critically, the court considered awarding fees and sanctions under authority unrelated to Rule 11

notwithstanding the movant's failure to comply with Rule 11's 10-day notice requirement. This case does not stand for the proposition that Rule 11 is the exclusive mechanism for seeking fees and sanctions. The court declined to award the statutory remedies, but the fact it considered them belies Laura's position that the 10-day notice in Rule 26 gives her an "absolute right" to withdraw her petition and thereby dismiss all Clayton's claims. Title 25 is far more remedial and contains numerous mechanisms for fees and sanctions that do not exist in the Rule 11 context, warranting a much broader interpretation of Rule 26 and the availability of other remedies.

26. Laura also cites *Barber v. Miller*, another Ninth Circuit case involving an appeal from FRCP 11 sanctions without the 10-day notice. 146 F.3d 707 (9th Cir. 1998). The primary issue in *Barber* is whether a party received sufficient notice and opportunity to withdraw or correct their offending filing when the movant moved for sanctions after the complaint had already been dismissed. 146 F.3d at 710. The movant also failed to serve a copy of the motion before filing (under a prior version of Rule 11 that required service of a motion for sanctions and a 21-day waiting period before filing). *Id*. The *Barber* court reversed the sanctions because a party cannot wait until after summary judgment to move for sanctions under Rule 11. *Id*.

27. In *Barber*, the court also devoted significant attention to the difference between Rule 11 sanctions imposed by motion of a party and imposed *sua sponte* by the court. *Barber* states that sanctions imposed upon motion of a party and those imposed by show-cause order on the court's initiative are substantively and procedurally different. Critically, the version of Rule 11 the *Barber* court interpreted only allowed an order for payment of attorney fees

directly to the movant **if imposed on motion**, not on the court's own initiative. *Barber* at 711. The *Barber* court could not interpret the sanctions award as "the equivalent of an election by the court to impose sanctions on its own motion" because the rule did not substantively allow that form of award except by motion of a party under the version of Rule 11 then-existing. *Id*. (contrast with Rule 26, allows "the court—**on motion or on its own**—[to impose] an appropriate sanction, which may include an order to pay the other party or parties the amount of the reasonable expenses incurred because of the filing of the document, including a reasonable attorney fee") (emphasis added).

28. Rule 26 does not distinguish between party motions and *sua sponte* sanctions in the same way Rule 11 did **when that case was decided in <u>1998</u>**. ARFLP did not even exist at the time, and it allows the same form of sanctions regardless of whether the sanctions are upon motion of a party or the court's own initiative. *Barber* tells nothing meaningful about Rule 26 in this context.

<u>Sufficiency of Clayton's Notice and Authority to Sanction</u>

29. Clayton asserts the notice he gave in his Motion for Leave to Amend and the Amended Response complied with Rule 26(c)(2)(B). The Amended Response specifically identifies the pleading and conduct that he believes violates Rule 26(b). Clayton filed his Motion for Sanctions separately several weeks later (i.e., long past the 10-day "safe harbor" period Laura claims she did not receive).

30. In *Holgate*, one of the parties, the Newells, has their sanctions award upheld on appeal despite **not sending separate notice** of their intention to seek Rule 11 sanctions. Instead, they filed a motion to join in the sanctions motion of another party and served their

joinder motion the same day they filed it. *Holgate*, 425 F.3d at 678. The joinder motion was the first notice the opposition had of their intention to seek sanctions against him. *Id*. They filed a second motion requesting sanctions months later. *Id*. The *Holgate* court found the safe harbor period commenced when the Newells filed their initial joinder motion and the second motion for sanctions supported an award of sanctions. *Id*. In summary, "because Levinson had prior notice of the frivolousness of the complaint (from the Baldwin motion), and notice of a second forthcoming motion for sanctions, we conclude the district court did not abuse its discretion by awarding sanctions to the Newell defendants"). *Id*.

31. Nothing in Rule 26 suggests the safe harbor notice is not satisfied by filing and serving an earlier motion that provides the opposition with notice of the conduct alleged to violate the rule. Rule 26 does not reference a form or provide specific language that must be included in the notice like many other rules and statutes do; rather, it requires the party to be sanctioned has actual notice of the allegedly offending conduct and an opportunity to withdraw or correct the filing.

32. In fact, Laura *did* try to withdraw her petition after Clayton's Motion for Leave to Amend, and the Court declined to award the complete dismissal she now asserts she had an "absolute right" to receive. (Recall *Holgate*, 425 F.3d at 680, in which the court declined to sanction a party for opposing a plaintiff's voluntary motion to dismiss, just as Clayton did here).

33. Laura's present-day assertion that she would have withdrawn her petition upon receiving Rule 26 notice is not persuasive of anything because her actions would not have changed whatsoever. She was not prejudiced. She asserts that she did not receive proper notice

and therefore had no opportunity to withdraw her petition, but the fact she **changed position in response to the Motion for Leave to Amend by moving to dismiss her petition**, albeit after the 10-day window before Clayton could file the Motion for Sanctions. Laura was not prejudiced because she would not have done anything differently had she received a separate notice in whatever form she believes would have been proper. She had actual written notice, changed position in response to that notice in an attempt to withdraw her petition, and the Court denied her that relief because it must resolve Clayton's claims before disposing of the action.

34. Even if the Court finds Clayton's notice insufficient, the remedy is to deny the request for sanctions based on his Rule 26 motion. *Holgate*, 425 F.3d at 680. Rule 26 sanctions for improper procedure in seeking Rule 26 sanctions would create an illogical cascade of motions and countermotions akin to two mirrors facing one another.

35. Nothing in Rule 26 would prevent: (1) Clayton issuing a new notice and filing for sanctions after the new 10-day "safe harbor" period; (2) the Court issuing sanctions on its own motion (which the Rule expressly allows); (3) Laura filing a motion for sanctions, if she believes one is appropriate, after following the procedures; or (4) the Court awarding attorney fees, costs, and other appropriate awards under any of the numerous statutes allowing (or requiring) such relief with no relationship to Rule 26. Indeed, the Court must resolve the statutory claims for relief notwithstanding whether Clayton or Laura ever filed anything pertaining to Rule 26, and the denial of Rule 26 sanctions has no impact on the substantive claims the parties have brought.

//

Withdrawal of Rule 26 Motion

36. Ultimately, although Clayton believes he complied with Rule 26 and that the Court already overruled Laura's objection, it is clear she intends to continue her established pattern of threatening her way through the litigation, refusing to comply with her discovery obligations, and seeking to avoid the merits of the case through any means necessary.

37. Clayton's claims for fees and sanctions exist independently of the Rule 26 Motion and have already been set for trial. With or without the Rule 26 Motion, those claims require resolution (as the Court already found when it preserved them while dismissing Laura's Petition).

38. Clayton would rather avoid the "$35,000" sideshow Laura intends to use to distract from and avoid the merits of the claims against her. Because the Rule 26 Motion is not the substantive pleading basis for his claims against Laura, there is no reason to participate in the pointless litigation of this issue notwithstanding Clayton's disagreement with Laura's positions on Rule 26.

39. Subjecting the Court to this collateral chaos, which is intended only to increase legal fees and prevent resolution on the merits, would be a waste of judicial resources. Moreover, Laura's threat to seek personal sanctions against Clayton's counsel based on her proffered Rule 26 violation, while considered frivolous, will only draw more attention and animus to this case.

40. Withdrawing the Rule 26 Motion will not affect the Court's duty to resolve the claims Clayton properly brought under Title 25. It will, however, prevent the wholesale wasting of judicial resources and attorney fees on this meaningless procedural issue.

Accordingly, he moves to withdraw the Rule 26 Motion for Sanctions filed January 3, 2024. He does not withdraw his counterclaims for a finding of non-paternity, attorney fees, costs, sanctions, and any other relief appropriate and available to him under A.R.S. §§ 25-324, 25-415, 25-809, etc.

WHEREFORE, Respondent respectfully requests the Court:

A. Withdraw Respondent's *Motion for Sanctions Pursuant to Rule 26* filed January 3, 2024.

B. Order such further relief as the Court deems just.

RESPECTFULLY SUBMITTED this 3rd day of April, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 3rd day of April, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gingras
Gringas Law Office, PLLC
David@GingrasLaw.com

Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Motion To Withdraw Motion For Sanctions Pursuant To Rule 26* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Apr 3, 2024 14:25 PDT)

CLAYTON ECHARD

04/03/2024

Date

Clerk of the Superior Court
*** Electronically Filed ***
M. Cain, Deputy
4/10/2024 4:50:43 PM
Filing ID 17639913

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, And **CLAYTON ECHARD**, Respondent.	Case No.: FC2023-052114 **RESPONSE/OBJECTION TO PETITIONER S MOTION TO COMPEL LUNCH AND FOR ALTERNATIVE RELIEF** (Assigned to the Honorable Julie Mata)

Respondent, CLAYTON ECHARD, by and through counsel undersigned, hereby objects and responds to Petitioner s Motion to Compel Lunch and for Alternative Relief filed April 8, 2024. As and for his Response, Respondent states as follows:

Maybe this was meant as a *joke*, but in the context of the other communications from Petitioner (bar complaints, more threats of bar complaints, threats of lawsuits, hinting at lawsuits against journalists, and allegations of rape), it is inappropriate. (Parenthetically, the case law cited by Petitioner is factually distinct from this matter, where Petitioner continues to evade compliance with basic disclosure).

To be clear, Respondent does not *object* to the notion of lunch with Petitioner s counsel. However, as repeatedly expressed to Petitioner (see below) Respondent will not engage in lunch without the **compelled** disclosure and, in light of the nature of Petitioner s communications, without a neutral third-party present.

As detailed in an email to Petitioner s counsel on April 1, 2024:

> As for lunch, I enjoy food. In my 24 years of practice, I have never said no to a lunch or beer invitation, but I am saying *not now*K Perhaps this will be nothing more than fodder for a future blog post, but I trust you are being sincere. Your statements in emails, over the phone, on your blog, on your Twitter, etc, may have been the product of passion but they were received as combative and unpleasant. Given your verbiage and your approach online and to my team, I think Judge Mata will side with me on any trepidation issues here. That said, I am quick to forgive, and if your email is meant to be an olive branch apology for the professional allegations and overzealous advocacy, I would certainly accept that apology.

As further provided to Petitioner s counsel on 4/4/24:

1. While I appreciate your right to speak on all issues, I am deeply uncomfortable with the tone you are using in emails to my office, on Twitter and in your blog.

2. Comments like ***I am the Connor McGregor of litigation*** and ***I look forward to reading their obituaries***I really invoke something extremely unpleasant. Using the term ***special ed*** in a derogatory way is also not something I am comfortable with either (as a lawyer and parent).

3. I have never tweeted in my life. There are certainly passionate followers of this case from Bachelor Nation (due to your client bringing the matter to the world s attention). That said, I was forwarded some of the postings over the past few days as well as your recent blog post and I am just not sure why you are engaging with them. We don t. I am also not certain why you are publishing court documents and your client s personal medical records contrary to court order.

1. Lunch does not fix the fact that the Petitioner has failed to provide disclosure notwithstanding the granted Motion to Compel. These antics have delayed the

work of both medical and forensic expert reports[1] as the experts are waiting for the alleged twin fetus pictures, records between Petitioner and Sarah Navarro on the date of the alleged miscarriage, and the alleged records from the telehealth doctor that allegedly treated Petitioner for her alleged miscarriage. These records were specifically confirmed to be in the possession of Petitioners counsel when he stated ***Gregg that is NOT going to be a problem. You are going to LOVE the image dates because the images are dated July 23, OMD*** *July*? Petitioner testified in two (2) related protective order proceedings, at her deposition in March

[1] As detailed in an email to Petitioner on 3/29/24:

> z Giving us the picture and timestamp for our forensic technology expert, Byran [*sic*] Neumeister, when there is already admissions of records fraud and a trial in 2 months is also not something that requires delay. And, as we said before, we will address the photo if it is complimented by the alleged verifiable meta data and medical record. Laura claimed she deleted the picture from her iPhone, claimed Sara [*sic*] deleted too, but also claimed she sent it to the tele-med provider. There should be a very clear digital footprint for Neumeister and a picture of a picture is not going to cut it in light of the history (and her testimony). We also are awaiting the original sonogram she claimed she got anonymously from PPH (which has affirmed it does not offer anonymous appointments and that is has an easily accessible patient portal). This was the sonogram she admitted she doctored and that is the core of our Motion for relief under the OOP cause number.
>
> OK x z When you speak with [redacted] and [redacted] they will confirm the fabricated documents and fake pregnancy allegations were happening back in 2014. And since you saw she blamed Greg Gillespie for the other ultrasounds (that came from her email address and phone number in emails and texts as will be verified by Neumeister) she should be reminded that she did not even know Greg existed back in 2014 when she first claimed to be fake pregnant by [redacted] and the records were faked.

and made statements before this Court that *grossly* differ on the timeline for the alleged miscarriage (also known as *perjury*).[2]

Perhaps, in addition to trying to cajole a trial continuance, the missing disclosure has not been provided because it contains more fabricated records. Instead of acknowledging that she lied to this court, Petitioner has ostensibly dialed up her photoshop skills. She insisted on deposing Echard in February (video recorded) and allowed her series of (since withdrawn) attorneys (Bonnie Platter, Alexis Lindvall, and Cory Keith) to (*unwittingly*) use a sonographic exhibit that she since has admitted to doctoring. This is the same fake sonogram she flaunted claiming she was pregnant with Echard s twins after showing up to Court before Judges Doody and Gialketsis with a (ostensibly fake) pregnant stomach claiming she was *NMMB* pregnant and due with twins on *February 14, 2024*K

This is *not* just a faked sonogram that was used in court proceedings, but Petitioner testified in the collateral protective order proceedings that her OBGYN s were *Dr. Makhoul* and that she was seen *last Friday* by *Dr. Higley*K There are no records that support these statements by Petitioner and the provider s absence of records confirm they never treated Petitioner for pregnancy. Now, contrary to the confounding responses to this court s direct questions at the last status conference and her own medical records, her public postings seem to range to claiming her alleged miscarriage either took place in July or even as late as November 2023 (*see* email from Petitioner s counsel dated 4/8/24 in **Exhibit 1).**

---

[2] Petitioner also presented evidence in these proceedings that including alleged videos of her pregnant stomach and statements by her neurologists that she looked 21 weeks pregnant. *If* Petitioner is now claiming she miscarried in July, she would not have a visibly growing pregnant stomach that looked ONweeks.

While Petitioner appears to have recently toned down her social media posts, her newest counsel has back-filled that void with persistent Twitter and Blog posts and outlines his theory of the case including his *anticipated* motions and more. (see *generally* postings by Petitioner's counsel **Exhibit 2).** A sample of these postings below[3][4]:



FUCK THESE SICK, SELFISH, LYING ASSHOLES. Should I clarify how I feel?

These vile scum, I mean people, are not helping anything. They are human cockroaches spreading feces on the floor and then spinning the facts to make them more dramatic than they really are in the hopes this will drive traffic and increase revenue for their sad, pathetic lives. One day, these trash humans will wake up and realize that lying for money is not a good way to live. Or maybe they will never see their sins. Either way, I look forward to reading their obituaries, briefly, before throwing them in the trash where they belong.

<u>This is not complicated – Petitioner claims she has the bulk of the requested disclosure in her possession.</u>

Contrary to her testimony and statements to this Court through her parade of prior attorneys, Petitioner has stated, several times, that she <u>has</u> the requested information and she

[3] *See* Petitioner's counsel's Twitter at Twitter.com/davidsgringas.
[4] Taken from Petitioner's counsel's blog at https://gingraslaw.com/blog/.

now ostensibly claims to have <u>miscarried in JULY</u>**.** Specifically, Petitioner, through counsel, stated in emails that he *had* the photos of the fetuses, the contact information for the telehealth provider, and the communications between Petitioner and her sister (all of which is requested in Respondent s *Motion to Compel*) (*see generally,* **Exhibit 1):**

- 3/27/24 at 9:53 a.m.: *Let me speak with Laura about the request for the photo of the sacs (hate that word).* ***She told me she had this photo available, and if she does, then I ll immediately provide it to you today. Same with the name of the telehealth provider.*** *x* (Emphasis added).
- 3/27/24 at 1:54 p.m.: *Having said all that, I just got off the phone with Laura, and* ***she is sending me the sac photo and the name of the telehealth person*** *E I* (Emphasis added).
- 3/28/24 at 5:20 p.m.: *As promised, I have talked to Laura about the fetal sac photos, and* ***she has produced copies of those photos to me (I have them in my possession right now). I am prepared to disclose these to you, along with some additional information (Laura found additional information showing a consult with a healthcare provider*** *at the time the fetal sacs were discharged (or whatever you call it).* (Emphasis added).
- 4/8/24 at 3:07 p.m.: *As I mentioned before, I have the photos you want to see. I understand you want to give them to your experts x* ***Gregg that is NOT going to be a problem. You are going to LOVE the image dates because the images are dated <u>July 23, 2023.</u>*** *x I also have the text messages between Laura and her sister dated July 23, 2023 x I do have some telehealth info showing Laura seeking medical advice on July 23, 2023. I don t think that is helpful to either party, but it is something I am willing to disclose.* (Underlines in original; Emphasis added).[5]

2. Instead of just simply complying with Rule 49 and disclosing the information he acknowledges having, counsel bombards Respondent s attorney and his attorney s office

[5] Notably, if the photos were from 7/23, as current counsel is now claiming (but not disclosing), then <u>EVERY</u> filing after that date is *per se* a violation of Rule 26 <u>and</u> the testimony at the deposition and the protective orders proceedings were all perjurious.

staff with communications, comments about personal sanctions against attorneys, and suggestions that the State Bar needs to be involved. (Petitioner having already filed two (2) complaints (dismissed) and at least two (2) others against her prior attorneys also dismissed), and so on (*see generally* **Exhibit 1).**

- 4/3/24 at 11:20 a.m.: *x Jesus man seriously? I mean seriously? Does Clayton mean THAT much to you* ***? So look I guess what is going to happen next is you can submit your proposed order on the MTC to the court. I will respond and object to the order, and I will probably have to file a motion asking for relief on the basis of fraud (by you).*** *This stuff is going to be MESSY. Like really messy.* ***x If you won t agree to do something remedial, I need to be clear about what happens next I am going to file something explaining this crap to the judge, and I am going to ask her to make a referral to the state bar and that applies to BOTH you and to Isabel****. Isabel now knows that you have lied to the court multiple times. She cannot sit back and allow this to continue. I don t care if she s new and I don t care if she hasn t signed any pleadings. That is irrelevant. Isabel cannot stick her head in the sand. She has an absolute duty under ER 8.3 to report professional misconduct (as do I). She also has an absolute duty under ER 8.4(a) NOT to help you violate the rules.* ***If Isabel sits back and lets this go further off the rails without taking appropriate remedial steps, she is putting her own license in peril****.*

- 4/4/24: *As a compromise, I offer this proposal:* ***Don t apply for fees right now*** *x* ***In return for you not seeking fees right now, I will agree not to bring a motion asking for relief from the MTC order on the basis of fraud****. Like I said, I am not happy about what I have recently learned, but if we can avoid fighting over that new issue now, it would be helpful for both sides.*

3. Petitioner s Motion is also misleading. The parties are communicating over email and Respondent is responding *where appropriate*. Undersigned has no ethical or legal obligation to expose himself to unnecessary criticism that is not conducive to resolution.

4. While Petitioner s counsel did eventually apologize for his toxic comments, the online activity continues and the toothpaste is out of the tube.

5. Undersigned Counsel realizes that filing this objection and bringing the above-mentioned to the attention of the court will likely escalate Petitioner s tactics, but believes it is relevant for the Court to have all the information when considering Petitioner s Motion to Compel Lunch and Alternative Relief.

6. **This is not a complicated case, contrary to what Petitioner promotes.** Trial (already continued once due to the same lack of disclosure) is in June and Respondent is prepared to proceed and argue appropriate inferences consistent with the data set (and lack thereof) and the Court can enter relief as deemed appropriate.

7. **Respondent is entitled to his reasonable attorney s costs and fees in responding to this Motion pursuant to A.R.S. § 25-324.** Petitioner has been forced to incur significant fees due to Respondent s continued efforts to avoid resolving her perjurious statements in these proceedings (that have affected at least three cases in Arizona -- not including those involving other presumable victims in AZ (2) and CA (1)). Quite simply, there is nothing to be resolved without the disclosure Respondent has already spent significant time (since at least October 2023) attempting to gain access to (which have repeatedly been met with Petitioner s overt efforts to avoid the same). Likewise, intimidation does not resolve this. Attorneys fees and accountability do.

WHEREFORE, Respondent respectfully requests the Court:

A. Deny Petitioner s Motion for Lunch;

B. Grant Respondent leave to file a *China Doll Affidavit* for his reasonable attorney s fees and costs under A.R.S. § 25-324;

C. Enter appropriate sanctions and other relief as the Court deems proper.

RESPECTFULLY SUBMITTED this 10th day of April, 2024.

WOODNICK LAW, PLLC



Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 10th day of April, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gingras
Gringas Law Office, PLLC
David@GingrasLaw.com
Attorney for Petitioner

By: */s/ MB*

EXHIBIT N

Maribeth Burroughs

From: Gregg Woodnick
Sent: Friday, March 29, 2024 9:31 AM
To: David Gingras
Cc: Isabel Ranney; Maribeth Burroughs
Subject: RE: Owens v. Echard; FC2023-052114

David,

1. I did hear Lexi moved to Texas with her husband, also a lawyer (and great guy) who clerked for me moons ago. Billie T. will know what is going on at that office if you are getting a bounce back from the Lexi's email address. I can't imagine that she was not given her file given Laura filed a Bar complaint against her, it was investigated and dismissed. She also has recently filed for a protective order (I was endorsed by the Bar because I got a complaint at the same time as Lexi).

2. Cory went out on his own during his short tenure. He responds quickly but his paralegal is wonderful and super on top of things so you might want to copy her if you are emailing. Isabel Sissel paralegal@desertlegalgroup.com. I am glad you were able to get a hold of him.

3. We object to any extension. It is NOT you. You are just the umpteenth attorney and the umpteenth who thinks they can get this resolved only to be fired or need to withdraw for ethical reasons.

   I appreciate (and am really respecting) your cautious approach not to step in dogshit, but disclosing the date of the alleged miscarriage is not something that requires Laura getting a continuance and we will object to the same. Giving us the picture and timestamp for our forensic technology expert, Byran Neumeister, when there is already admissions of records fraud and a trial in 2 months is also not something that requires delay. And, as we said before, we will address the photo if it is complimented by the alleged verifiable meta data and medical record. Laura claimed she deleted the picture from her iPhone, claimed Sara deleted too, but also claimed she sent it to the tele-med provider. There should be a very clear digital footprint for Neumesiter and a picture of a picture is not going to cut it in light of the history (and her testimony). We also are awaiting the original sonogram she claimed she got anonymously from PPH (which has affirmed it does not offer anonymous appointments and that is has an easily accessible patient portal). This was the sonogram she admitted she doctored and that is the core of our Motion for relief under the OOP cause number.

4. There is already an order about the medical records. We have been through this with her failed motions and whatnot. We need that picture to give to Drs. Dean and Justicia-Line. Again, we are not interested in a picture of a picture. That is where the *arts and crafts* issue comes in and, notwithstanding, Laura invoked Rule 2. When you speak with and they will confirm the fabricated documents and fake pregnancy allegations were happening back in 2014. And…since you saw she blamed Greg Gillespie for the other ultrasounds (that came from her email address and phone number in emails and texts as will be verified by Neumeister) she should be reminded that she did not even know Greg existed back in 2014 when she first claimed to be fake pregnant by Matt and the records were faked.

5. Our paralegal, Maribeth, will be sending you the deposition exhibits under separate cover.

6. Again, this has nothing to do with you – we have been involved in litigation with Laura since 2021 and this case/collateral proceedings since October and her claims and delay tactics are exhausting.

GW

From: David Gingras <david@gingraslaw.com>
Sent: Thursday, March 28, 2024 5:20 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; GRW Office <Office@woodnicklaw.com>
Subject: RE: Owens v. Echard; FC2023-052114

Gregg & Isabel,

Quick follow up on a few things.

1. Per the attached email, I just learned that Laura's first attorney (Alexis Lindvall) is no longer with the Modern Law firm. Unfortunately, her AZ Bar record still shows her working there, but apparently her LinkedIn has been updated to show that she has left AZ and moved to TX (yuck). https://www.linkedin.com/in/lexiwood11/

   Based on this, it sounds like getting a copy of the file from Alexis may be a challenge. As you will note, her firm claims that a copy of the file *was* given to Laura, but Laura says this isn't true. In any case, that issue will need to be resolved one way or another.

2. After not hearing back from Cory, I gave him a call this afternoon and fortunately I was able to reach him (I didn't realize he had also changed firms, apparently in the middle of the case, per a notice he filed). Cory said he's going to need more time to finish gathering Laura's file, but he promised to get this to me ASAP.

3. Since I don't have the information I need (yet), I am going to file a motion asking the court for more time to respond to the motion to compel. If you want to let me know your position, I'm happy to include a line that says I've consulted with you and you do (or do not) oppose the request. It's so clearly appropriate to ask for more time, I know the court is going to grant the request whether it's opposed or not….but just let me know your position so I can include that in the motion.

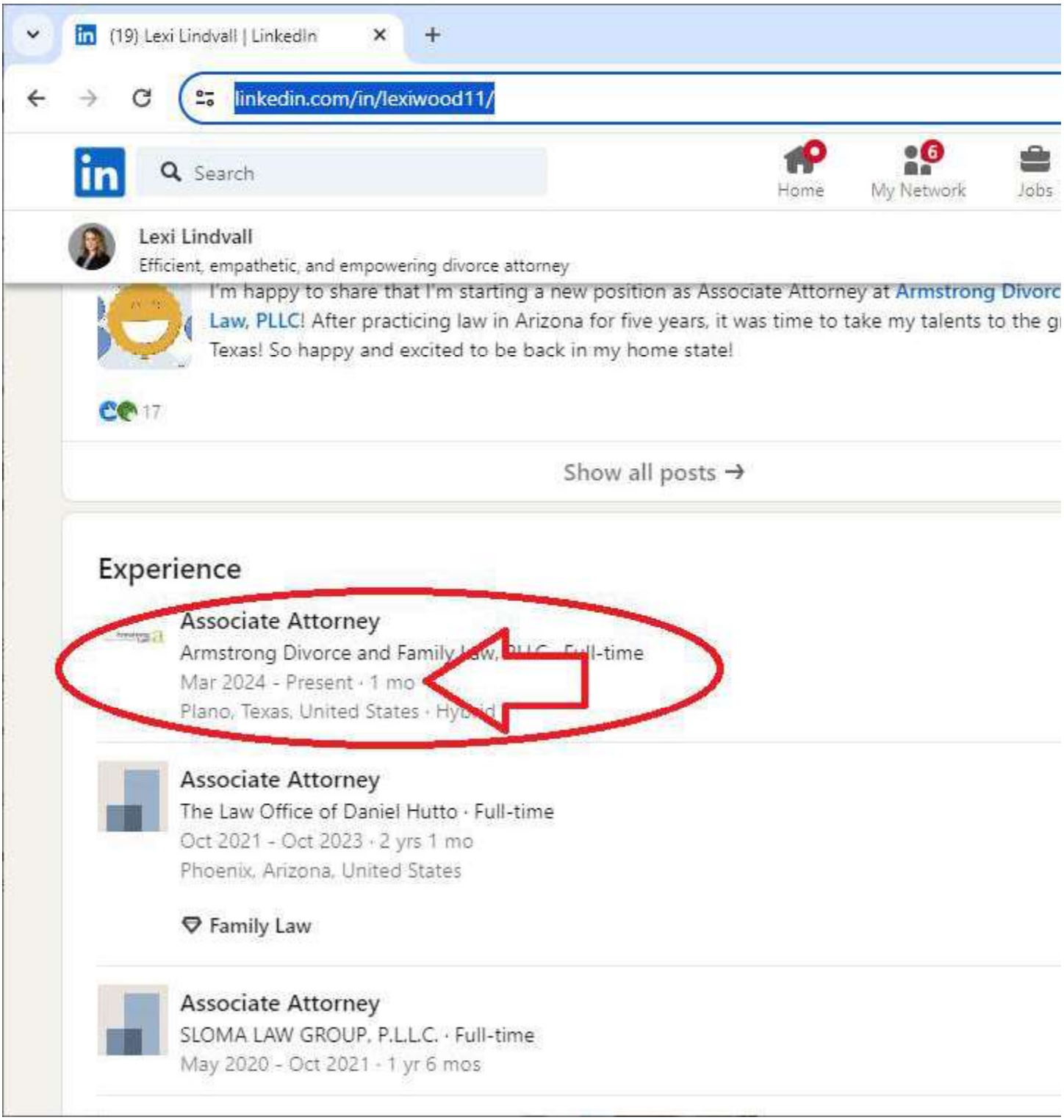
4. As promised, I have talked to Laura about the fetal sac photos, and she has produced copies of those photos to me (I have them in my possession right now). I am prepared to disclose these to you, along with some additional information (Laura found additional information showing a consult with a healthcare provider at the time the fetal sacs were discharged (or whatever you call it).

   BUT, Laura is concerned about these photos being publicly released, and she has asked me to request that you agree to a protective order as to them.

   NOTE – I have spent several hours today reading through all of the pleadings on the docket, and I see there was a prior motion for a protective order which you opposed and which the court denied. Obviously I wasn't involved with all that, but my guess is that the motion was denied because it was simply too broad or non-specific? Here, I am just asking for you to agree not to publicly disclose photos showing bloody tissue, at least until trial. This is a very narrow request, so I don't think there's a good reason to oppose it. Nevertheless, please let me know your position.

5. I've finished reading Laura's entire depo (which was extremely helpful), but the copy of the transcript provided by Isabel did not include any of the exhibits. I can see on the record that Cory ordered a complete transcript, so maybe I will get that once he hands over the file, but in the mean time, if you have a copy of the exhibits (hopefully numbered according to the transcript), that would be super helpful.

Thanks and more updates will follow shortly, I'm sure....



David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: David Gingras
Sent: Thursday, March 28, 2024 1:31 PM
To: cory@desertlegalgroup.com; alexis.lindvall@mymodernlaw.com
Cc: Gregg Woodnick <Gregg@woodnicklaw.com>; Isabel Ranney <isabel@woodnicklaw.com>; office@woodnicklaw.com
Subject: RE: Owens v. Echard; FC2023-052114

Cory & Alexis,

It's been over 24 hours, and I have not received a response from either of you to my message below.

I am sorry to be a pest, but as you may know, Mr. Echard's counsel has filed a Motion to Compel in which he argues that discovery was not previously provided by Petitioner. He also claims that he tried to meet and confer with "current counsel" (which I think was a reference to Cory), but that he did not receive any response to those efforts.

The response to the MTC is currently due Monday, April 1st, and in order to fully respond to the motion, I need to receive copies of Laura's files. Because I have not received them from you, I am probably going to file a request for an extension of time, but that still does not make this any less urgent.

Please respond to me by the close of business today to at least acknowledge receipt of this email, and please let me know when I can expect to receive the case files from you. I will also follow up by phone with both of you later today.

Thank you.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: David Gingras
Sent: Wednesday, March 27, 2024 12:24 PM
To: cory@desertlegalgroup.com; alexis.lindvall@mymodernlaw.com
Cc: Gregg Woodnick <Gregg@woodnicklaw.com>; Isabel Ranney <isabel@woodnicklaw.com>; office@woodnicklaw.com
Subject: Owens v. Echard; FC2023-052114

Cory & Alexis,

I have just been retained to represent Laura Owens in the paternity matter involving Clayton Echard. I am cc'ing Mr. Echard's counsel on this message just to keep Gregg and Isabel informed of my progress.

A conformed copy of my Notice of Appearance is attached.

Because I have only been involved in this matter for a few days, I am still getting caught up. As part of that effort, I need to request copies of Laura's file from both of your offices.

I have access to all of the pleadings on ECR, so please do NOT send any of those.

Instead, I am mainly looking for two things:

1.) Copies of all case-related correspondence; and
2.) Copies of any Rule 49 disclosures/documents (which, presumably, would have been sent to Mr. Echard's counsel, and thus may already be covered by the first part of my request).

Ideally, if you use Outlook, I'd prefer to just have case-related emails exported to a single PST file.

If you are not using Outlook, I'll just take the emails in whatever form is easiest for you to produce.

If you need me to send you a link to an online folder (because the files are too large to send), please let me know and I'll send you a link privately (obviously Gregg and Isabel shouldn't receive copies of any privileged communications).

Thanks and let me know if you have any questions or need anything else.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



Maribeth Burroughs

From: David Gingras <david@gingraslaw.com>
Sent: Wednesday, March 27, 2024 12:37 PM
To: Gregg Woodnick
Cc: Maribeth Burroughs; Isabel Ranney
Subject: RE: Echard/Owens

Gregg,

Let me speak to Laura about the request for the photo of the "sacs" (hate that word). She told me she had this photo available, and if she does, then I'll immediately provide it to you today. Same with the name of the telehealth provider.

And just to be clear – while I don't mind expediting these issues (it's obviously needed), I don't really intend to commit to a *quid pro quo* as far as getting you to agree to an extension of time to respond to the motion. I don't think that's appropriate at this stage.

If it was absolutely essential, I could easily respond to the motion by Monday....but that isn't the point. The point is that I don't want to file something that isn't helpful to the court because I haven't had enough time to gather information needed to provide a comprehensive explanation of our position.

Also, I don't think (based on what I've seen so far) that a sufficient good faith pre-filing effort was made to resolve the discovery "disputes" (which may not even be real disputes). That is *probably* the fault of Laura's prior counsel (assuming they didn't respond to you), but since I don't even have Laura's files yet, I am not in a position to know if that's the case.

As you saw via separate email a few minutes ago, I just reached out to Laura's prior counsel to ask for her file. Hopefully I will have this information later today. For now, as it relates to the motion to compel, I am just not in a position to even explain my side to the judge unless and until we go through the process of talking about these issues in detail (which is what I am trying to do right now).

So, here's my plan – I don't want to make a deal regarding the motion. Instead, I'm going to do everything I can over the next few days to dig into the issues raised by your motion, and either resolve them (by giving you what you're asking for), or by investigating the issues sufficiently so that I can explain our position to the judge. I don't accept half-assed/incomplete stories, so I have no intention of giving one to the judge.

Since the current response date is Monday, my plan is to either fully resolve the issues before then, or, if that isn't possible, at least I will be in a position to explain to the judge what's going on, and why the motion is either moot, without merit, or just ultimately premature (because there wasn't enough effort made to resolve the issues). I can't tell the judge what our side is until I complete my investigation into the issues.

In other words, let's just keep pushing forward for now, and then let's see where things stand on Monday.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Wednesday, March 27, 2024 11:28 AM
To: David Gingras <david@gingraslaw.com>
Cc: Maribeth Burroughs <maribeth@woodnicklaw.com>; Isabel Ranney <isabel@woodnicklaw.com>
Subject: Echard/Owens

David,

We really appreciate your willingness to take this case so far along into litigation. I also appreciate you wanting to focus on a resolution. Having spent Clatyon's legal fees having this exact conversation with a parade of prior attorneys with similar good intentions, please understand we are a bit jaded. Multiple prior lawyers unwittingly presented records to courts that were fabricated by Laura. Those records not only were medical but also included fake letters from law firms. It is really unbelievable.

Put bluntly, Laura has misused court processes in multiple states to perpetuate the most bizarre of cons for relationships. She is either seriously mentally ill or diabolical. Four (4) very established men have documented her faking pregnancies, demanding relationship contracts for abortions, and fabricating medical records. You might want to call ttorney in California. While the media seems to think my office orchestrated figuring out this pattern of fraud, it was actually who first dealt with Laura's fake pregnancies and suicide threats back in 2014.

We are looking for a finding that the filing (and subsequent filings) were malignant per Rule 26 etc. We get that Laura may be judgment proof as prior attorneys have discussed, but of course that is not the legal standard and Clayton's ability to collect a fees judgement is not really our focus. Clayton is entitled to the court findings that Judge Mata will make in the three (3) matters now in her lap (paternity, OOP, IAH). The value of that judgment may only be on paper, but TedX Laura, Medium Laura, and Reddit Laura need to be recategorized as FICTION because she will (the minute you are out of the case or sooner as she did with Cory) start spinning more yarn, emailing the media, and sabotaging more of Claytons' professional endorsements with her nonsense. (Note, there is currently an investigation regarding Laura pretending to be a black Howard University reporter (who does not exist) and distributing an article in the middle of this case attempting to cancel Clayton claiming he was involved with use of the "N" word.)

Contrary to Laura's beliefs, we do not control the media circus *she* started. But if Laura wants the reporters to run out of material, she needs to stop feeding it to them. She should go to whatever DBT inpatient program can help her stop living in a perpetual con. She needs to admit to the fraud, dismiss the protective orders against Clayton, Michael and Greg, and have you help her write a public apology. I am not a cast member, but she would also do herself a world of favor if she included in her apology the malignant rape allegation about both Greg Gillespie and myself that she made to Judge Bachus in her public apology.

That said, we know the Title 25 court only can do so much here and the paragraph above is *pie in the sky*. Still, Clayton is exhausted emotionally and financially but he is fully committed to this litigation until we get a judgment that he can show the world.

So....

Motion to Compel: We agree there is an obligation to avoid discovery issues. We did that long before you were on board and filing the MTC was already a last resort. Clayton is not willing to withdraw it at this time because we are 10 months in, Laura faked medical records, and we have a trial date. We also have our experts who need whatever other records Laura claims she has (but with proper verifiable chain of custody, given her propensity to cut and paste).

We would consider a *brief* extension for a response (as a professional courtesy to you as this is not your fault) but with some contingencies. Any extension would require Laura to immediately provide the picture she now suddenly claims she has of the fetuses that she testified she deleted and did not have her iphone anymore and that her sister deleted them. That information should be provided today from you. It will be time/date stamped and will put an end to the great mystery of WHEN the *alleged* miscarriage happened. Remember, she stated in court that she did not know. She stated in deposition the same. So how wonderful it will be to know by the date stamp on an image that will also be in her medical records from the telehealth doctor she sent the image to. We are eager to read the records from the doctor who told her not to worry about miscarrying 20 week twin fetuses (which would actually be a fetal death warranting a death certificate under law). She must also immediately provide the name of the telehealth provider so we can obtain the records directly from them, which should include the photo per her sworn testimony.

Laura knows there are no medical records that support her fake pregnancy narrative (as confirmed my the 7+ providers who have no records of ever seeing her notwithstanding her deposition and testimony in two protective order proceedings. I trust you have reviewed the records from Planned Parenthood, Dr. Makhoul's office, and Dr. Higley where they confirm that your client was never a patient there. We will issue another HIPAA records request for the Banner records, but expect them to similarly be lacking in evidentiary value.

We appreciate you have a lot to sift through and you getting a brief extension is reasonable, but we need the telemed provider and the picture that has now magically appeared (contrary to her testimony) today. Once we receive these, we can discuss what length of an extension is reasonable and further discuss resolution options.

Again, please do not take our instance here personally. You may withdraw or be fired before the ink dries here and we need to move this forward. If it resolves sooner, that would be wonderful and welcomed.

Gregg and Isabel

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: David Gingras <david@gingraslaw.com>
Sent: Wednesday, March 27, 2024 9:53 AM
To: Isabel Ranney <isabel@woodnicklaw.com>; Gregg Woodnick <Gregg@woodnicklaw.com>

Maribeth Burroughs

From: David Gingras <david@gingraslaw.com>
Sent: Thursday, March 28, 2024 5:20 PM
To: Gregg Woodnick
Cc: Isabel Ranney; GRW Office
Subject: RE: Owens v. Echard; FC2023-052114
Attachments: Re: Owens v. Echard; FC2023-052114

Gregg & Isabel,

Quick follow up on a few things.

1. Per the attached email, I just learned that Laura's first attorney (Alexis Lindvall) is no longer with the Modern Law firm. Unfortunately, her AZ Bar record still shows her working there, but apparently her LinkedIn has been updated to show that she has left AZ and moved to TX (yuck). https://www.linkedin.com/in/lexiwood11/

   Based on this, it sounds like getting a copy of the file from Alexis may be a challenge. As you will note, her firm claims that a copy of the file *was* given to Laura, but Laura says this isn't true. In any case, that issue will need to be resolved one way or another.

2. After not hearing back from Cory, I gave him a call this afternoon and fortunately I was able to reach him (I didn't realize he had also changed firms, apparently in the middle of the case, per a notice he filed). Cory said he's going to need more time to finish gathering Laura's file, but he promised to get this to me ASAP.

3. Since I don't have the information I need (yet), I am going to file a motion asking the court for more time to respond to the motion to compel. If you want to let me know your position, I'm happy to include a line that says I've consulted with you and you do (or do not) oppose the request. It's so clearly appropriate to ask for more time, I know the court is going to grant the request whether it's opposed or not....but just let me know your position so I can include that in the motion.

4. As promised, I have talked to Laura about the fetal sac photos, and she has produced copies of those photos to me (I have them in my possession right now). I am prepared to disclose these to you, along with some additional information (Laura found additional information showing a consult with a healthcare provider at the time the fetal sacs were discharged (or whatever you call it).

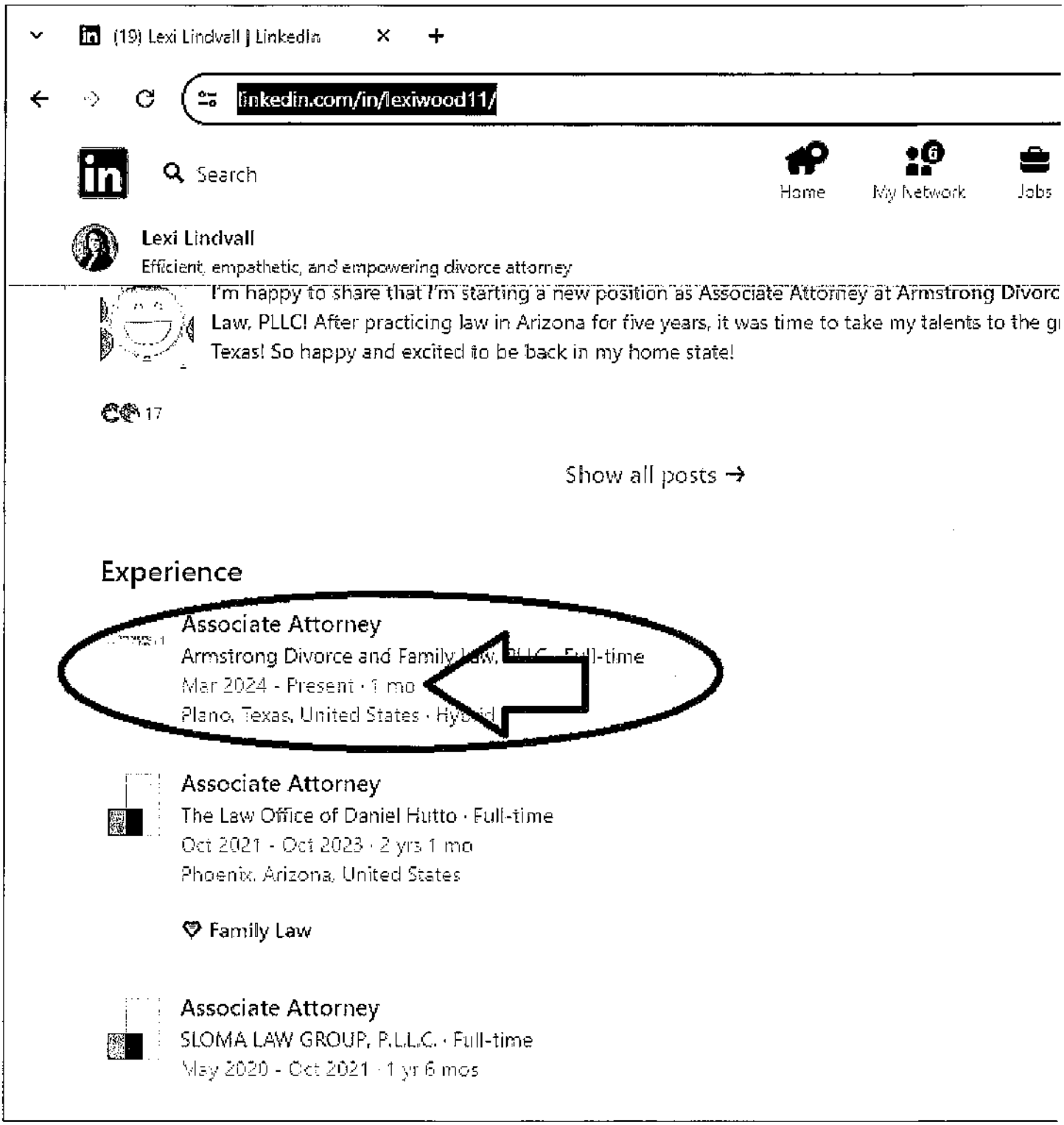
   BUT, Laura is concerned about these photos being publicly released, and she has asked me to request that you agree to a protective order as to them.

   NOTE – I have spent several hours today reading through all of the pleadings on the docket, and I see there was a prior motion for a protective order which you opposed and which the court denied. Obviously I wasn't involved with all that, but my guess is that the motion was denied because it was simply too broad or non-specific? Here, I am just asking for you to agree not to publicly disclose photos showing bloody tissue, at least until trial. This is a very narrow request, so I don't think there's a good reason to oppose it. Nevertheless, please let me know your position.

5. I've finished reading Laura's entire depo (which was extremely helpful), but the copy of the transcript provided by Isabel did not include any of the exhibits. I can see on the record that Cory ordered a complete

transcript, so maybe I will get that once he hands over the file, but in the mean time, if you have a copy of the exhibits (hopefully numbered according to the transcript), that would be super helpful.

Thanks and more updates will follow shortly, I'm sure....



David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com

David,

I appreciate that your effort to excise Laura from this mess she caused, but we strongly disagree with your analysis on Rule 26 (which is legally distinct from Rule 11 in several important ways). If Laura thinks this will stop her exposure to sanctions, then we welcome your Motion to Strike and will respond accordingly. That said, I am more than happy to coordinate a meet and confer with you but it will have to be tomorrow as I am in mediation with Jared Sandler today.

I sat on the Supreme Court Rules Committee appointed by Justice Bales and specifically was on a sub-committee that addressed Rule 26. I am confident that there are myriad legal and factual issues here and we will not be withdrawing any of our motions as sanctions are more than warranted.

Without diving too deep into the issue, here are a couple of quick comments:

- Laura had notice. If you only look at our Motion to Leave to amend, it contains detailed allegations about Rule 26 on pages 5-6 of the amended answer. The motion for sanctions was not filed until January 3, so she was given written notice of the specific Rule 26 allegations more than 10 days before filing via the motion for leave to amend. There is also several emails and communications with Laura's parade of prior attorneys that meet the same criterion.
- Laura would not have been able to withdraw her Petition. Dismissing the entire petition after a response has been filed requires either agreement of both parties or approval of the court after a motion to dismiss. She filed a motion to dismiss before the motion for sanctions, which the court denied and expressly preserved the claims for attorney fees and sanctions. This is consistent with Rule 46(a)(1)(B) (court may dismiss a petition on such terms and conditions as the court deems proper, *including the resolution of any claims by the responding party*).

We can talk more about this over the phone, but I will save the full legal analysis, including responding to the referenced Rule 11 case law which is neither directly on point nor analogous to Rule 26 (which is intertwined with Title 25 actions and legal distinguishable). I will also briefly point out that Rule 26 permits the Judge to move for sanctions on its own upon a finding of bad faith by Laura.

I am confident that Judge Mata has all the authority she needs to enter sanctions against Laura based on the numerous filings that she signed that were both woefully improper and predicated on fraud.

Laura's efforts would be better spend complying with the *un*controversial rules like Rule 49 disclosure. Our experts are waiting for the miscarriage photos and the simple name of the doctor that she sent the image to per her testimony. Bryan Neumeister is prepared to examine the images as well. You said you had the information, and they are *beyond* overdue per Rule 49. I trust you saw the discussion between Laura, Cory, and the Judge on the issue of the alleged miscarriage in our most recent status conference.

Again, this is not about you – you have been nothing but professional and we appreciate it, but we have had these conversations with her prior attorneys. We have been in front of the Judge. We now have all three proceedings before Judge Mata (or at least the third should be en route after our recent Motion).

I have also attached the unredacted email to Laura's prior attorney in the , which Cory was copied on.

If you'd still like to meet in confer, I can find time tomorrow.

Gregg

WOODNICK LAW, PLLC

1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: David Gingras
To: Isabel Ranney; Gregg Woodnick
Cc: Maribeth Burroughs
Subject: RE: Owens/Echard
Date: Monday, April 1, 2024 11:39:42 AM
Attachments: image002.png

Isabel (although most of these comments are for Gregg, except for the P.S. at the end),

Thanks for the response, and just to make sure my position is 100% clear, I'll give you a few response points:

1. In my view, it is an undisputed fact you never sent a written notice to Ms. Owens telling her that you intended to seek sanctions *unless* she "corrected or withdrew" her petition within 10 court days of the notice. That's the "safe harbor" notice required by the rule, and it was never given. Let's just concede that and move on.
2. Yes, you guys sent *other* types of notices (mostly framed as settlement offers and/or threats), but nothing that ever strictly complied with the 10-day notice and notice of the right to correct/withdraw requirement.
3. *Gallager* (which we all agree is instructive, but not binding) expressly rejected the idea that a settlement demand and/or threat are enough to strictly comply with the rule: "A demand for dismissal and a threat to seek sanctions does not transform a settlement demand into a Rule 11-compliant notice." DUH. That's obvious. The whole point is that you MUST tell the other party that they have the RIGHT to drop the case, and you have to give them 10 days to think about it and accept the safe harbor if they want it. The failure to give a clear notice of that is not harmless....which is why courts enforce this rule so strictly.
4. Yes, Rule 11 and Rule 26 are not identical, but only in ways unrelated to this issue. For the purposes of this discussion, the rules ARE identical. You know that, so stop wasting time by claiming otherwise.
5. As *Gallager* noted (and I'm sure you will not dispute): "Arizona courts look to federal case law construing and interpreting that rule's federal counterpart." See James, Cooke & Hobson, Inc. v. Lake Havasu Plumbing & Fire Protection, 177 Ariz. 316, 318-19, 868 P.2d 329, 331-32 (App. 1994); Smith v. Lucia, 173 Ariz. 290, 297, 842 P.2d 1303, 1310 (App. 1992). So the bazillion+ federal cases which are all unanimous on this point are going to be followed here.
6. Because you failed to give Ms. Owens the 10-day safe harbor notice, that's the end of the Rule 26 discussion. You cannot, as a matter of law, recover sanctions under Rule 26 *as that motion currently stands* (it's also worth noting you not only failed to give Ms. Owens notice of her absolute right to withdraw her petition, you actively opposed her request to dismiss this case which only needlessly increased fees for both sides).
7. Although your current Rule 26 motion cannot be granted (due to your failure to strictly comply with the rule), that does not mean the issue of sanctions is forever off the table.
8. You absolutely could bring a new motion, provided you strictly comply with the Rule; you just haven't done that yet. What that means is if you wanted to ask for *Rule 26* sanctions, you would have to meet and confer with me, and then you would have to give a 10-day written

safe harbor notice. If you did this, Ms. Owens would invoke her right to withdraw the petition, and the case would be terminated. You could not then proceed under Rule 26 (because the rule prohibits sanctions when a party accepts the safe harbor – that's the whole friggin' point here).

9. Assuming Ms. Owens withdrew her petition, you absolutely could still ask for sanctions under other authority (but not Rule 26, because the safe harbor prohibits this). For instance, you could ask for sanctions under ARS 12-349. You could also bring a motion under ARS 25-809(G). I guess you could even invoke the court's "inherent authority", but that doesn't add anything to what ARS 12-349 already says.

The point here is really simple – you didn't follow Rule 26, so you can't get sanctions under that rule. This is 1000000% clear. It is so clear, it is an issue I will absolutely, positively win on appeal if that becomes necessary.

At the same time, all hope is not lost for your side. There are *other* options available to you if you want to seek fees. But you have not made any other motions seeking fees under those other authorities. If you think you have a factual/legal basis to do so, GO FOR IT.

And just keep in mind – Ms. Owens will be bringing her own motion for fees under ARS 25-809(G) once we're done, and she will also bring a separate Rule 26 motion unless you withdraw your pending Rule 26 motion within 10 days.

While I feel like I already said this, it is worth saying again – if you withdraw your Rule 26 motion within the next 10 days, I cannot ask for sanctions in my own Rule 26 motion because you will have availed yourself of the safe harbor.

If I was in your position, I would *seriously* stop and think about that before telling me to GF myself. You can literally avoid about $35,000 in risk simply by admitting you made a mistake, and then doing the right thing. If you decide NOT to take that safe harbor, it's your decision....but a pretty freaking bad one.

P.S. One final comment that I think should be mentioned – Isabel, I know you're a new lawyer and none of my comments/hostility are directed at you. Getting familiar with the practice of law is hard, and it takes time, so please do not feel any concerns about me threatening sanctions towards you or whatever (because I'm not). If we have to go down that road, the dispute will be between myself and Gregg, not you. I will make it clear to the court that none of these arguments are directed at or towards you.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Isabel Ranney <isabel@woodnicklaw.com>
Sent: Monday, April 1, 2024 11:08 AM
To: David Gingras <david@gingraslaw.com>; Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens/Echard

David,

Gregg and I are both occupied but we will be able to call you later this afternoon once Gregg is out of mediation. He needs to be on the call as he is primary on this case. Also, your request to meet (reasonable) did come over the holiday weekend and I don't think the court expects us to drop other obligations to get on the phone the same day. Still, we will do our best to make it happen this afternoon as Gregg just messaged me that his mediation with Jared Sandler is moving along.

Here is a brief assessment of the case law you cited. Please note, this was gleaned in roughly 20 minutes of research and there is certainly more to follow as this is not comprehensive.

1. Rule 26 differs from ARCP 11 and FRCP 11 because it pertains specifically to Title 25 actions where there are numerous legal authorities for awarding fees and sanctioning litigation misconduct that do not exist in other state civil or federal civil actions. The main cases cited in the emails are Rule 11 cases with limited distinguishing facts and circumstances. Assuming *arguendo* these cases apply analogously to Rule 26, which is not a fait accompli, here are some issues with them.
    a. *Holgate* is a federal case regarding FRCP 11. In *Holgate*, there were three parties seeking Rule 11 sanctions. The first party complied with the notice requirement rather uncontroversially and received a sanctions award. The second, the *Newell Defendants*, filed a motion to join the prior motion for sanctions and served the opposing attorney the day they filed the motion. The court found **the safe harbor period commenced when the Newell defendants simultaneously filed their motion and served the opposition, then filed another motion for sanctions later requesting sanctions against the same party.** The court found he received sufficient notice and affirmed the sanctions, and this posture is very similar to Clayton's

motion for leave to amend (in which he discusses, in writing, the intent to have Laura sanctioned under Rule 26) and the later motion for sanctions more than 10 days after serving the motion for leave to amend. If the motion for leave to amend serves as written notice as the initial motion did in *Holgate* for the Newell defendants, there is no error and Laura received adequate notice. Note that she also moved to dismiss her complaint during that time, so not only did she *know* a sanctions motion was forthcoming, she attempted to withdraw the complaint. The court denied the motion to withdraw the complaint and preserved the fees and sanctions claims as ARFLP 46 allows. Only the last claimant in *Holgate*, called Community Bank, had their sanctions award overturned for improper notice, and that claimant waited ten months after the other parties filed their sanctions motions to take action. By the time they filed, the attorney against whom they sought sanctions had been withdrawn from the case over five months. The court found this was too long because the attorney had no power to counsel his client to withdraw the offending complaint by the time sanctions were requested. The court also rejects the argument that there are alternative sources of authority for sanctions as a cure of the Rule 11 problems because that federal authority requires a finding of bad faith the court expressly did not make.

b. *Barber* is a Ninth Circuit case applying FRCP 11. In that case, the party seeking sanctions filed their motion after the complaint was already dismissed without complying with the notice requirement. The court found failing to comply with the safe harbor provision defeated the motion and declined to treat the award as one given by the court's own motion because the rule does not allow the court to take this action after judgment and there was no evidence in the record that the court would have made a sanction on its own as a "show cause" order because that would only occur in situations akin to contempt of court. The court's inherent authority and statutory authority under federal law also did not provide a basis for sua sponte sanctions because those would both require a finding of bad faith that the court expressly declined to make. Judge Mata has not yet made any findings regarding bad faith, but they are before the court and she has all of the information necessary to make a finding of bad faith.

c. *Gallagher* is a trial case and not binding precedent, but the analysis given therein is relevant. *Gallagher* says that the safe harbor provisions of ARCP 11 are construed strictly and failure to comply defeats the motion. It further says that a mere demand to dismiss a case and a threat to seek sanctions does not constitute a compliance Rule 11 notice because it does not give specific notice of the offending conduct or the 10 days in which to "withdraw or appropriately correct the alleged violations" like the rule requires. Laura did have specific notice and more than 10 days to correct after the motion for leave to amend, and she did in fact attempt to correct by moving to dismiss the petition. The court declined to dismiss the petition and specifically preserved the fees and

sanctions issues, which it has the authority to do under Rule 46. The court also rejected an independent allegation of entitlement to sanctions under A.R.S. § 12-350, but it did so mostly because the party seeking sanctions did not address the statutory factors or identify facts in the record supporting a finding of bad faith necessary under that statute. Clayton has articulated claims for fees under the appropriate Title 25 statutes and the relevant factors therein.

We will flesh this out further in the anticipated Response to the Motion. We will call you as soon as we are able to, which should be later this afternoon.

Regards,

Isabel Ranney

ISABEL RANNEY
Attorney
WL | WOODNICK LAW PLLC
1747 E. Morten Ave., #205
Phoenix, Arizona 85020
Phone: 602-449-7980
Fax: 602-396-5850
www.woodnicklaw.com
Email: isabel@woodnicklaw.com

CONFIDENTIAL/PRIVILEGED INFORMATION: **The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.**

From: David Gingras <david@gingraslaw.com>
Sent: Monday, April 1, 2024 9:58 AM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>
Subject: RE: Owens/Echard

Gregg,

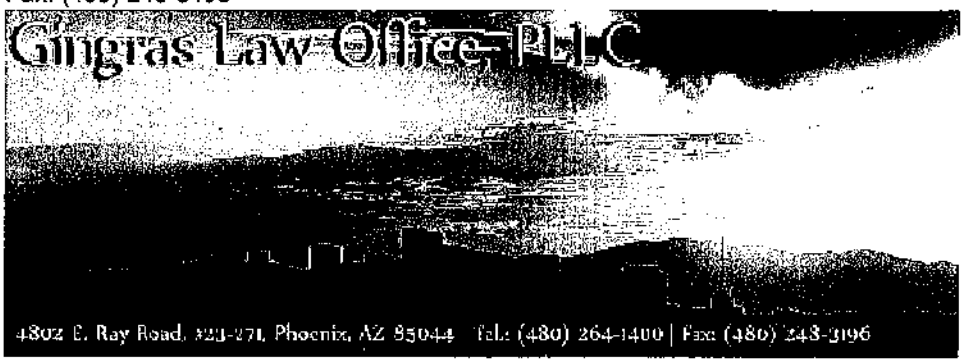
I know you are not going to concede the Rule 26 issue, so we're obviously going to have to litigate that point. I provided you with substantial caselaw that directly refutes your comments below, and your response cites nothing to contradict this. That's not surprising because we both know your position on this is wrong. It's not just wrong, it's sanctionable.

I'd like to get this issue in front of the judge immediately because it is going to be dispositive. It is also going to save a ton of time/fees for the parties (fees which we will be asking the court to hold you personally responsible for, so it's in your best interest not to drag this out longer than necessary).

In order to not delay this any further, we need to discuss this today. Since both of our positions are pretty firm, I think this should require about 30 seconds of time on the phone. There is no reason you can't step out of the mediation for one minute to speak with me during a break, so please let me know when you'd like to do this (assuming Isabel is not available). If you refuse to talk, that's fine – I'll explain that to the court in my certificate.

I've given you a clear explanation of my position, and I think you have made your position clear as well, so I don't think we have anything further to discuss, but in order to comply with Rule 9, I'd like to speak to either you or Isabel today.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Monday, April 1, 2024 9:34 AM
To: David Gingras <david@gingraslaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>
Subject: Owens/Echard

David,

I appreciate that your effort to excise Laura from this mess she caused, but we strongly disagree with

your analysis on Rule 26 (which is legally distinct from Rule 11 in several important ways). If Laura thinks this will stop her exposure to sanctions, then we welcome your Motion to Strike and will respond accordingly. That said, I am more than happy to coordinate a meet and confer with you but it will have to be tomorrow as I am in mediation with Jared Sandler today.

I sat on the Supreme Court Rules Committee appointed by Justice Bales and specifically was on a sub-committee that addressed Rule 26. I am confident that there are myriad legal and factual issues here and we will not be withdrawing any of our motions as sanctions are more than warranted.

Without diving too deep into the issue, here are a couple of quick comments:

- Laura had notice. If you only look at our Motion to Leave to amend, it contains detailed allegations about Rule 26 on pages 5-6 of the amended answer. The motion for sanctions was not filed until January 3, so she was given written notice of the specific Rule 26 allegations more than 10 days before filing via the motion for leave to amend. There is also several emails and communications with Laura's parade of prior attorneys that meet the same criterion.
- Laura would not have been able to withdraw her Petition. Dismissing the entire petition after a response has been filed requires either agreement of both parties or approval of the court after a motion to dismiss. She filed a motion to dismiss before the motion for sanctions, which the court denied and expressly preserved the claims for attorney fees and sanctions. This is consistent with Rule 46(a)(1)(B) (court may dismiss a petition on such terms and conditions as the court deems proper, *including the resolution of any claims by the responding party*).

We can talk more about this over the phone, but I will save the full legal analysis, including responding to the referenced Rule 11 case law which is neither directly on point nor analogous to Rule 26 (which is intertwined with Title 25 actions and legal distinguishable). I will also briefly point out that Rule 26 permits the Judge to move for sanctions on its own upon a finding of bad faith by Laura.

I am confident that Judge Mata has all the authority she needs to enter sanctions against Laura based on the numerous filings that she signed that were both woefully improper and predicated on fraud.

Laura's efforts would be better spend complying with the *un*controversial rules like Rule 49 disclosure. Our experts are waiting for the miscarriage photos and the simple name of the doctor that she sent the image to per her testimony. Bryan Neumeister is prepared to examine the images as well. You said you had the information, and they are *beyond* overdue per Rule 49. I trust you saw the discussion between Laura, Cory, and the Judge on the issue of the alleged miscarriage in our most recent status conference.

Again, this is not about you – you have been nothing but professional and we appreciate it, but we have had these conversations with her prior attorneys. We have been in front of the Judge. We now have all three proceedings before Judge Mata (or at least the third should be en route after our recent

Motion).

I have also attached the unredacted email to Laura's prior attorney in the which Cory was copied on.

If you'd still like to meet in confer, I can find time tomorrow.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

The alternative is that we litigate this. I am confident in our position but also am interested, as will the court, in focusing on the facts at issue.

Gregg

From: David Gingras <david@gingraslaw.com>
Sent: Monday, April 01, 2024 11:40 AM
To: Isabel Ranney <isabel@woodnicklaw.com>; Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens/Echard

Isabel (although most of these comments are for Gregg, except for the P.S. at the end),

Thanks for the response, and just to make sure my position is 100% clear, I'll give you a few response points:

1. In my view, it is an undisputed fact you never sent a written notice to Ms. Owens telling her that you intended to seek sanctions *unless* she "corrected or withdrew" her petition within 10 court days of the notice. That's the "safe harbor" notice required by the rule, and it was never given. Let's just concede that and move on.
2. Yes, you guys sent *other* types of notices (mostly framed as settlement offers and/or threats), but nothing that ever strictly complied with the 10-day notice and notice of the right to correct/withdraw requirement.
3. *Gallager* (which we all agree is instructive, but not binding) expressly rejected the idea that a settlement demand and/or threat are enough to strictly comply with the rule: "A demand for dismissal and a threat to seek sanctions does not transform a settlement demand into a Rule 11-compliant notice." DUH. That's obvious. The whole point is that you MUST tell the other party that they have the RIGHT to drop the case, and you have to give them 10 days to think about it and accept the safe harbor if they want it. The failure to give a clear notice of that is not harmless....which is why courts enforce this rule so strictly.
4. Yes, Rule 11 and Rule 26 are not identical, but only in ways unrelated to this issue. For the purposes of this discussion, the rules ARE identical. You know that, so stop wasting time by claiming otherwise.
5. As *Gallager* noted (and I'm sure you will not dispute): "Arizona courts look to federal case law construing and interpreting that rule's federal counterpart." See James, Cooke & Hobson, Inc. v. Lake Havasu Plumbing & Fire Protection, 177 Ariz. 316, 318-19, 868 P.2d 329, 331-32 (App. 1994); Smith v. Lucia, 173 Ariz. 290, 297, 842 P.2d 1303, 1310 (App. 1992). So the bazillion+ federal cases which are all unanimous on this point are going to be followed here.
6. Because you failed to give Ms. Owens the 10-day safe harbor notice, that's the end of the Rule 26 discussion. You cannot, as a matter of law, recover sanctions under Rule 26 *as that motion currently stands* (it's also worth noting you not only failed to give Ms. Owens notice of her absolute right to withdraw her petition, you actively opposed her request to dismiss this case which only needlessly increased fees for both sides).
7. Although your current Rule 26 motion cannot be granted (due to your failure to strictly comply with the rule), that does not mean the issue of sanctions is forever off the table.
8. You absolutely could bring a new motion, provided you strictly comply with the Rule; you just haven't done that yet. What that means is if you wanted to ask for *Rule 26* sanctions, you would have to meet and confer with me, and then you would have to give a 10-day written safe harbor notice. If you did this, Ms. Owens would invoke her right to withdraw the petition, and the case would be terminated. You could not then proceed under Rule 26 (because the rule prohibits sanctions when a party accepts the safe harbor – that's the whole friggin' point here).
9. Assuming Ms. Owens withdrew her petition, you absolutely could still ask for sanctions under other authority (but not Rule 26, because the safe harbor prohibits this). For instance, you could ask for sanctions under ARS 12-349. You could also bring a motion under ARS 25-809(G). I guess you could even invoke the court's "inherent authority", but that doesn't add anything to what ARS 12-349 already says.

The point here is really simple – you didn't follow Rule 26, so you can't get sanctions under that rule. This is 1000000% clear. It is so clear, it is an issue I will absolutely, positively win on appeal if that becomes necessary.

At the same time, all hope is not lost for your side. There are *other* options available to you if you want to seek fees. But you have not made any other motions seeking fees under those other authorities. If you think you have a factual/legal basis to do so, GO FOR IT.

And just keep in mind – Ms. Owens will be bringing her own motion for fees under ARS 25-809(G) once we're done, and she will also bring a separate Rule 26 motion unless you withdraw your pending Rule 26 motion within 10 days.

While I feel like I already said this, it is worth saying again – if you withdraw your Rule 26 motion within the next 10 days, I cannot ask for sanctions in my own Rule 26 motion because you will have availed yourself of the safe harbor.

If I was in your position, I would *seriously* stop and think about that before telling me to GF myself. You can literally avoid about $35,000 in risk simply by admitting you made a mistake, and then doing the right thing. If you decide NOT to take that safe harbor, it's your decision....but a pretty freaking bad one.

P.S. One final comment that I think should be mentioned – Isabel, I know you're a new lawyer and none of my comments/hostility are directed at you. Getting familiar with the practice of law is hard, and it takes time, so please do not feel any concerns about me threatening sanctions towards you or whatever (because I'm not). If we have to go down that road, the dispute will be between myself and Gregg, not you. I will make it clear to the court that none of these arguments are directed at or towards you.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Isabel Ranney <isabel@woodnicklaw.com>
Sent: Monday, April 1, 2024 11:08 AM
To: David Gingras <david@gingraslaw.com>; Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens/Echard

David,

Gregg and I are both occupied but we will be able to call you later this afternoon once Gregg is out of mediation. He needs to be on the call as he is primary on this case. Also, your request to meet (reasonable) did come over the holiday weekend and I don't think the court expects us to drop other obligations to get on the phone the same day. Still, we will do our best to make it happen this afternoon as Gregg just messaged me that his mediation with Jared Sandler is moving along.

Here is a brief assessment of the case law you cited. Please note, this was gleaned in roughly 20 minutes of research and there is certainly more to follow as this is not comprehensive.

1. Rule 26 differs from ARCP 11 and FRCP 11 because it pertains specifically to Title 25 actions where there are numerous legal authorities for awarding fees and sanctioning litigation misconduct that do not exist in other state civil or federal civil actions. The main cases cited in the emails are Rule 11 cases with limited distinguishing facts and circumstances. Assuming *arguendo* these cases apply analogously to Rule 26, which is not a fait accompli, here are some issues with them.
    a. *Holgate* is a federal case regarding FRCP 11. In *Holgate*, there were three parties seeking Rule 11 sanctions. The first party complied with the notice requirement rather uncontroversially and received a sanctions award. The second, the *Newell Defendants*, filed a motion to join the prior motion for sanctions and served the opposing attorney the day they filed the motion. The court found **the safe harbor period commenced when the Newell defendants simultaneously filed their motion and served the opposition, then filed another motion for sanctions later requesting sanctions against the same party**. The court found he received sufficient notice and affirmed the sanctions, and this posture is very similar to Clayton's motion for leave to amend (in which he discusses, in writing, the intent to have Laura sanctioned under Rule 26) and the later motion for sanctions more than 10 days after serving the motion for leave to amend. If the motion for leave to amend serves as written notice as the initial motion did in *Holgate* for the Newell defendants, there is no error and Laura received adequate notice. Note that she also moved to dismiss her complaint during that time, so not only did she *know* a sanctions motion was forthcoming, she attempted to withdraw the complaint. The court denied the motion to withdraw the complaint and preserved the fees and sanctions claims as ARFLP 46 allows. Only the last claimant in *Holgate*, called Community Bank, had their sanctions award overturned for improper notice, and that claimant waited ten months after the other parties filed their sanctions motions to take action. By the time they filed, the attorney against whom they sought sanctions had been withdrawn from the case over five months. The court found this was too long because the attorney had no power to counsel his client to withdraw the offending complaint by the time sanctions were requested. The court also rejects the argument that there are alternative sources of authority for sanctions as a cure of the Rule 11 problems because that federal authority requires a finding of bad faith the court expressly did not make.
    b. *Barber* is a Ninth Circuit case applying FRCP 11. In that case, the party seeking sanctions filed their motion after the complaint was already dismissed without complying with the notice requirement. The court found failing to comply with the safe harbor provision defeated the motion and declined to treat the award as one given by the court's own motion because the rule does not allow the court to take this action after judgment and there was no evidence in the record that the court would have made a sanction on its own as a "show cause" order because that would only occur in situations akin to contempt of court. The court's inherent authority and statutory authority under federal law also did not provide a basis for sua sponte sanctions because those would both require a finding of bad faith that the court expressly declined to make. Judge Mata has not yet made any findings regarding bad faith, but they are before the court and she has all of the information necessary to make a finding of bad faith.
    c. *Gallagher* is a trial case and not binding precedent, but the analysis given therein is relevant. *Gallagher* says that the safe harbor provisions of ARCP 11 are construed strictly and failure to comply defeats the motion. It further says that a mere demand to dismiss a case and a threat to seek sanctions does not constitute a compliance Rule 11 notice because it does not give specific notice of the offending conduct or the 10 days in which to "withdraw or appropriately correct the alleged violations" like the rule requires. Laura did have specific notice and more than 10 days to correct after the motion for leave to amend, and she did in fact attempt to correct by moving to dismiss the petition. The court declined to dismiss the petition and specifically preserved the fees and sanctions issues, which it has the authority to do under Rule 46. The court also rejected an independent allegation of entitlement to sanctions under A.R.S. § 12-350, but it did so mostly because the party seeking sanctions did not address the statutory factors or identify facts in the record supporting a finding of bad faith necessary under that statute. Clayton has articulated claims for fees under the appropriate Title 25 statutes and the relevant factors therein.

We will flesh this out further in the anticipated Response to the Motion. We will call you as soon as we are able to, which should be later this afternoon.

Regards,

Isabel Ranney

ISABEL RANNEY
Attorney
WL | WOODNICK LAW PLLC
1747 E. Morten Ave., #205
Phoenix, Arizona 85020
Phone: 602-449-7980
Fax: 602-396-5850
www.woodnicklaw.com
Email: isabel@woodnicklaw.com

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

From: David Gingras <david@gingraslaw.com>
Sent: Monday, April 1, 2024 9:58 AM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>
Subject: RE: Owens/Echard

Gregg,

I know you are not going to concede the Rule 26 issue, so we're obviously going to have to litigate that point. I provided you with substantial caselaw that directly refutes your comments below, and your response cites nothing to contradict this. That's not surprising because we both know your position on this is wrong. It's not just wrong, it's sanctionable.

I'd like to get this issue in front of the judge immediately because it is going to be dispositive. It is also going to save a ton of time/fees for the parties (fees which we will be asking the court to hold you personally responsible for, so it's in your best interest not to drag this out longer than necessary).

In order to not delay this any further, we need to discuss this today. Since both of our positions are pretty firm, I think this should require about 30 seconds of time on the phone. There is no reason you can't step out of the mediation for one minute to speak with me during a break, so please let me know when you'd like to do this (assuming Isabel is not available). If you refuse to talk, that's fine – I'll explain that to the court in my certificate.

I've given you a clear explanation of my position, and I think you have made your position clear as well, so I don't think we have anything further to discuss, but in order to comply with Rule 9, I'd like to speak to either you or Isabel today.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Monday, April 1, 2024 9:34 AM
To: David Gingras <david@gingraslaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>
Subject: Owens/Echard

David,

I appreciate that your effort to excise Laura from this mess she caused, but we strongly disagree with your analysis on Rule 26 (which is legally distinct from Rule 11 in several important ways). If Laura thinks this will stop her exposure to sanctions, then we welcome your Motion to Strike and will respond accordingly. That said, I am more than happy to coordinate a meet and confer with you but it will have to be tomorrow as I am in mediation with Jared Sandler today.

I sat on the Supreme Court Rules Committee appointed by Justice Bales and specifically was on a sub-committee that addressed Rule 26. I am confident that there are myriad legal and factual issues here and we will not be withdrawing any of our motions as sanctions are more than warranted.

Without diving too deep into the issue, here are a couple of quick comments:

- Laura had notice. If you only look at our Motion to Leave to amend, it contains detailed allegations about Rule 26 on pages 5-6 of the amended answer. The motion for sanctions was not filed until January 3, so she was given written notice of the specific Rule 26 allegations more than 10 days before filing via the motion for leave to amend. There is also several emails and communications with Laura's parade of prior attorneys that meet the same criterion.
- Laura would not have been able to withdraw her Petition. Dismissing the entire petition after a response has been filed requires either agreement of both parties or approval of the court after a motion to dismiss. She filed a motion to dismiss before the motion for sanctions, which the court denied and expressly preserved the claims for attorney fees and sanctions. This is consistent with Rule 46(a)(1)(B) (court may dismiss a petition on such terms and conditions as the court deems proper, *including the resolution of any claims by the responding party*).

We can talk more about this over the phone, but I will save the full legal analysis, including responding to the referenced Rule 11 case law which is neither directly on point nor analogous to Rule 26 (which is intertwined with Title 25 actions and legal distinguishable). I will also briefly point out that Rule 26 permits the Judge to move for sanctions on its own upon a finding of bad faith by Laura.

I am confident that Judge Mata has all the authority she needs to enter sanctions against Laura based on the numerous filings that she signed that were both woefully improper and predicated on fraud.

Laura's efforts would be better spend complying with the *un*controversial rules like Rule 49 disclosure. Our experts are waiting for the miscarriage photos and the simple name of the doctor that she sent the image to per her testimony. Bryan Neumeister is prepared to examine the images as well. You said you had the information, and they are *beyond* overdue per Rule 49. I trust you saw the discussion between Laura, Cory, and the Judge on the issue of the alleged miscarriage in our most recent status conference.

Again, this is not about you – you have been nothing but professional and we appreciate it, but we have had these conversations with her prior attorneys. We have been in front of the Judge. We now have all three proceedings before Judge Mata (or at least the third should be en route after our recent Motion).

In the response filed by Alexis, I see she raised this issue (properly, but only briefly), and in the reply, there is an argument that the requirement of *Rule 9* were "met and/or were impossible to meet". However, the reply is entirely silent about why the 10-day notice requirement of Rule 26(c)(2)(B) was completely ignored.

In light of this, I would like to schedule a time to meet and confer with you about this issue, per both Rule 9(c) and Rule 26(c)(2)(A). I am available any time on Monday, so please let me know what time I can call.

Here's the problem – under Rule 26, if the required 10-day notice had been given, Laura would have had an absolute right to "withdraw or appropriately correct the alleged violation"; i.e., she would have had an absolute right to withdraw her petition and dismiss the case, subject only to Clayton's right to seek fees under ARS 25-809(G) (which, as of Jan. 3, 2024 would have been minimal). That is the outcome required by the rules.

Obviously, if Clayton did not comply with the 10-day notice requirement of Rule 26, then he cannot seek or receive sanctions under that rule. That makes sense because by failing to comply with the rule, Clayton deprived Laura of exactly what the rule requires – a safe harbor which includes a right to withdraw a claim in order to avoid further litigation expenses.

Under these circumstances, I need to be clear about my plan – absent some other explanation, I intend to file a Motion to Strike your Rule 26 motion based on the apparent failure to comply with the rule. That motion, if filed, would also include a request for sanctions (under Rule 26) and fees (under ARS 25-809(G)) for all fees and costs that Laura has incurred from January 3, 2024 to the present, and all fees that Laura continues to incur while this matter remains pending.

While I am happy to give you a more detailed written explanation if you need one, you should construe this email as your 10-day pre-filing notice per Rule 26(c)(2)(B). Because the old version of Rule 11 used to require an actual draft brief be sent to the opposing party, I will probably also do that (just for redundancy) after we talk on Monday.

And yes -- I understand you may take the position that this issue is either already before the court (since Judge Mata set a hearing on the Motion for Sanctions notwithstanding Alexis's very brief remark), or that Judge Mata has somehow impliedly ruled on the issue by setting the hearing over Laura's objection. If that's your position, we can obviously agree to disagree.

I guess it is also possible that I am missing something – i.e., I know you had one or more hearings before Judge Mata since January, and it is possible this issue may have come up, and she may have made some sort of verbal ruling (not found in any minute entry that I have seen) in which she determined that Rule 26(c)(2)(B) did not apply for some reason. If that is what occurred, I would appreciate whatever details you have about the court's verbal ruling, as this would be subject to revision through alternative means (e.g., a motion under Rule 78(b)).

This is obviously a significant issue, given that by the time this matter reaches trial, the fees incurred by both sides will likely exceed $100K. It is also a clear error of law, which would be an easy matter to reverse on appeal, if the judge were to consider a Motion for Sanctions that was filed in complete disregard for the 10-day notice requirement. Because there is a substantial financial value in this issue, and because the law is so clear on this point, I obviously intend to litigate this specific issue as far as necessary, so we need to have a thorough discussion about it, and soon.

So, please let me know when we can meet and confer about this on Monday. Thanks.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: David Gingras
To: Gregg Woodnick
Cc: Isabel Ranney; Maribeth Burroughs
Subject: RE: Owens v. Echard; Request to Meet and Confer
Date: Thursday, April 4, 2024 1:30:39 PM

Gregg,

Thank you for the email, and your words are noted. I am obviously a passionate person, and my words sometimes reflect that. I do my best to remain professional with you (I am allowed to be upset when I see something that I think crosses the line).

I don't want to escalate the debate, but as much as you may have concerns about my *words*, I also have concerns about your *conduct*. Lying to me and/or lying to the court are much more serious problems than me tweeting comparisons to an MMA star.

But, you have asked to tone stuff down, and I agree with that view...so I'm not going to push the issue further at the moment, unless given no choice. So give me another choice.

As for the other points you mention, a few comments:

First, I am aware of no court order that would stop Laura from publishing her own medical records. Yes, I am aware there is a minute entry order dated 2/21/24 that says, among other things, "no party shall disclose outside of themselves [odd wording] any medical or other documentation ... *disclosed between the parties*."

I was obviously not present when that order was entered, so I may not have the full context, but my reading of this is if *Laura* discloses medical records to you, you can't share them publicly, and if Clayton shares records with us, we can't share them publicly. That's typical, and it is how I read the court's order. If my reading is correct, it does not prohibit Laura from posting her own medical records, which she did solely to rebut false claims from your side that no such records existed. There is nothing nefarious or improper about this.

If you interpret the order to mean that Laura is somehow *enjoined from publishing her own records* for the purpose of responding to false statements other people are making (including Dave Neal, who Clayton is clearly working directly with), you need to let me know that immediately so I can take the issue up with the judge.

There is clear case law on that issue – a court could *never* issue such an order, which is why I give the minute entry order a narrower reading. Any broader reading would make the order unconstitutional. In fact, the order would be *void ab initio* meaning it could simply be ignored. I know this because I've litigated the identical issue in other cases. *See, e.g., Phoenix Newspapers, Inc. v. Superior Court*, 101 Ariz. 257, 259 (1966) (holding order prohibiting disclosure of details of court hearing violated Arizona constitution and was void; Superior Court has no authority to "foreclose the right of the

people and the press from freely discussing and printing the proceedings held in open court.")

Laura's medical records were filed in a pleading submitted to the court and which is a public record. There is no protective order against this (nor would there be any basis for one), so anyone is free to share that information with the public, which is all I did.

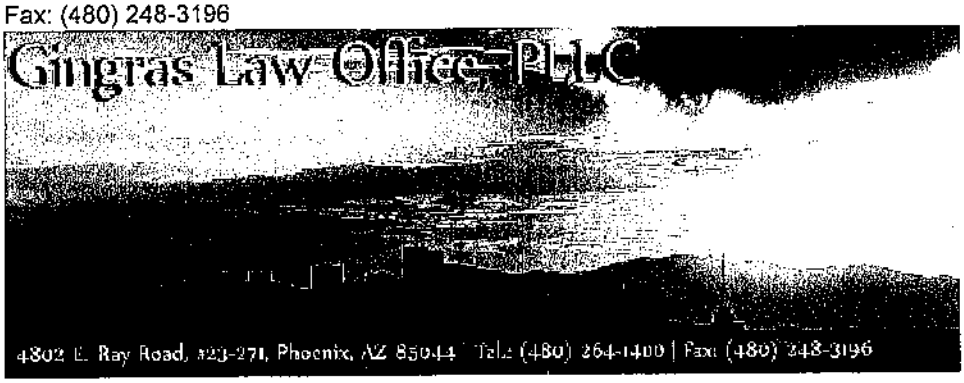
Second, you may not believe this but I want to make sure it's clearly explained – Laura does not want to fight this battle with you guys. She would strongly prefer to stop all the insanity immediately, today.

Now that I've had an entire 10 days to catch up, I can see why people like Dave Neal would not want this – because he is making money by exploiting the situation. It's a dream for him. This case has provided Dave with endless content, and when you are a social media guy like Dave, content is literally the same thing as money. It's too bad that he is likely going to lose a lot of money when Laura sues him, but that's a discussion I will have with him separately.

If Clayton wants the public fighting to stop, GREAT! Let's make that happen. Let's resolve this today. Laura is happy to do that, and if we resolve this, I will never post another word about it and neither will she.

The only thing holding us back right now is Clayton.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Thursday, April 4, 2024 12:56 PM
To: David Gingras <david@gingraslaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

David,

1. While I appreciate your right to speak on all issues, I am deeply uncomfortable with the tone you are using in emails to my office, on Twitter and in your blog.

2. Comments like ***"I am the Connor McGregor of litigation"*** and ***"I look forward to reading their obituaries,"*** really invoke something extremely unpleasant. Using the term "***special ed***" in a derogatory way is also not something I am comfortable with either (as a lawyer and parent).

3. I have never tweeted in my life. There are certainly passionate followers of this case from Bachelor Nation (due to your client bringing the matter to the world's attention). That said, I was forwarded some of the postings over the past few days as well as your recent blog post and I am just not sure why you are engaging with them. We don't. I am also not certain why you are publishing court documents and your client's personal medical records contrary to court order.

4. Laura needs to comply with the order and provide disclosure. The court will probably give us a few weeks to submit China Doll Affidavit or (I am guessing) it may just tell us fees abide trial. That will be up to Judge Mata.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: David Gingras <david@gingraslaw.com>
Sent: Thursday, April 04, 2024 9:22 AM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

Gregg,

Prepare to be surprised, but for once I am NOT going to be a jerk. I'm going to show you I can be reasonable (sometimes).

Here's the deal – you keep asking to tone things down. Honestly, I do share that view. Let's see if we

can do that.

Here's what I'm asking – you submitted your order to the court on the MTC, and obviously I'm guessing you plan to apply for fees. I don't want you to do that (right now) because it will cause additional unnecessary work for both sides that I think we can avoid...just through a very minimal compromise.

As a compromise, I offer this proposal:

- Don't apply for fees right now. If you win at trial, you can ask for all the fees you want, including the MTC fees. In fact, you can basically say the MTC ruling entitles you to that part of the fees, even without a finding of frivolous or whatever under 12-349. So basically, I am not asking you to give up anything other than the right to seek fees *now*. You can do that in 60ish days when the case is over.
- In return for you not seeking fees right now, I will agree not to bring a motion asking for relief from the MTC order on the basis of fraud. Like I said, I am not happy about what I have recently learned, but if we can avoid fighting over that new issue now, it would be helpful for both sides.
- Also, in return for you not seeking fees now (subject to your right to seek them later), Laura will go ahead and comply with MTC order today. To be fair, she says most of the stuff you are asking for does not exist, so this is not a huge concession on her part, but at least it is something.

BONUS POINT – in an effort to be *even more reasonable*, I will also throw out something else. Because you've already deposed Laura, and because some of what she discloses may raise new questions, what if we were to schedule a conference call with you, me, and Laura, and you could ask some follow-up questions about anything new that she gives you?

To be clear – Laura hasn't actually authorized me to make that part of the offer, but she has shown herself to be so completely open, honest, and reasonable at every stage. She appears to be an open book (at least since I've been involved). I am sure she would be willing to do a call....provided we limit it to some reasonable amount of time.

And yes, I know phone calls aren't as formal as a depo. So what? That really doesn't matter. Laura is an available witness, so you really don't need to admit her depo testimony at trial (except for impeachment). My point is that even if a phone call doesn't give you admissible testimony, it still gives you helpful information you can use to decide your next steps. If you have questions and Laura points you in the right direction to where you can confirm her answers, that would save you the time and money of a depo (plus I think court reporters are overpaid anyway, so I just don't want to waste those costs).

Think about this and let me know. Tone will remain down.

David Gingras, Esq.

From: David Ginoras
To: Gregg Woodnick
Cc: Isabel Ranney; Maribeth Burroughs
Subject: RE: Owens v. Echard; Request to Meet and Confer
Date: Monday, April 8, 2024 3:06:45 PM
Attachments: Image002.png
Image003.png
Image004.png

My comments back....in blue:

1. Disclosure: I should not have to keep asking for the missing information which was required pursuant to Rule 49 and the Motion to Compel. You have stated several times in emails that you have the photo your client testified to taking on the day of the miscarriage (which has yet to be provided and it appears you are now saying it occurred in November, contrary to your client's testimony at deposition and statements at the prior status conference). I assume you also have the telemed doctor records and contact information so we can obtain the records with the photo from the source directly. Again, I should not have to keep asking about this, as the Court granted the MTC.

DG Comments: there's obviously been a lot going on, and I don't have unlimited hours in the day. I'm not holding anything back; I'm just trying to prioritize things.

Has the judge actually signed the MTC order you submitted? If she did, I have not seen that. Assuming the order has been entered (or is entered soon), I am obviously going to comply with it, but I still feel we have other things to discuss that may relate to that order.

Among other things, when I first got involved, I did not know (but obviously now know) that Cory Keith gave you a detailed disclosure statement on February 23, 2024. In your MTC filed on March 11, 2024, you told the judge that Laura had given you NO disclosures at all for eight months, and that she had only recently provided "minimal" disclosures. Both things were totally and completely false.

In addition, because you refused to give me sufficient time to review this stuff, I did not know (but now understand) that when you filed the Motion to Compel on March 11, 2024, the ONLY basis you had for the motion was Laura's general disclosure duties under Rule 49 (in other words, this was NOT a situation where you served a specific request to produce or interrogatory that Laura failed to answer) – the only basis for your motion was Rule 49.

But on February 21, 2024, the court issued a minute entry order which provided as follows: "the parties shall complete initial disclosure no later than 45 days from today's date."

45 days from February 21 is *April 6*. Based on this, it is clear you filed a motion to compel on March 11 that sought information that Laura was under no obligation to produce until April 6th. I'm sorry but there is no other way to say this – that is ABSOLUTELY UNBELIEVEABLE MISCONDUCT. Never seen anything like it in all my years of practice.

So look – I don't want to expand the arguments here or make things more contentious, but this is one of the issues we need to talk about. I am very willing to be fair with you, but if you refuse to talk to me while simultaneously demanding that I comply with an order you obtained by lying to the court....well, that is not going to be a productive conversation.

The bottom line is that I am willing to work with you to try and de-escalate this conflict. If you are interested in that, we have plenty to discuss.

On the other hand, if you want to pound your chest and demand that I play by the rules when you have shown a total disregard for the rules, that is not going to be productive.

So, let's try to be productive here. That starts with talking, and, while I should not have to say this, it absolutely 1000% must involve complete and total candor – candor toward me and candor towards the court, in every communication without exception.

2. Lunch: I appreciate the lunch invitation and I would consider the free food AFTER your client complies with her obligation. She has admitted to forging medical records from SMIL and our experts need the original which she testified came from Planned Parenthood. As you have seen, Planned Parenthood indicated they have no records that show your client was there for an ultrasound on the day in question. Our experts (medical and Neumeister/tech) are waiting for the documents and the Motion to Compel was granted. I will eat with you (sushi?) after we have the information for the experts.

DG Comments: not a sushi fan, but I like Kona Grill, so if that's a fair compromise, let do it. I actually tend to not each much during the day (I am getting fat and old), so the whole "lunch" thing was really a metaphor. Would rather meet you for a beer and some nachos. Do you shoot pool? Happy to meet you somewhere for some friendly games of pool. I am not a good golfer, but Top Golf would be OK as well.

Your call on where/when/what.

3. Media: Any issues you have with Reality Steve Carbone or the others who have covered this story (after you client initiated this with the *Sun*), is your issue. It has no bearing on the litigation and it is not something Clayton should be spending legal fees on.

DG Comments: No clue what you're talking about. I have not reached out to Reality Steve (yet). Why is Clayton spending legal fees on media? I am not charging Laura for ANYTHING I'm posting online. That is just me expressing my views about stuff. I don't charge clients for that.

4. Experts: I understand Rule 702 and did not need the explanation. These very qualified experts are awaiting documents (that you ostensibly have) or confirmation that the photos and supplemental medical records Laura specifically testified to having do not exist. At this rate, you might not have their

reports before 60 days but that is only because your client has refused to provide the same. The disclosure you received provided a summary of their anticipated testimony pursuant to Rule 49(j). I will have more data for you as soon as Laura complies with her disclosure obligations which, again, we have been requesting for quite some time.

DG Comments: again, if you would simply speak to me, I think you would instantly realize there are ways to simplify this dispute. In fact, in the spirt of trying to show what can happen when we communicate, let me share some information with you.

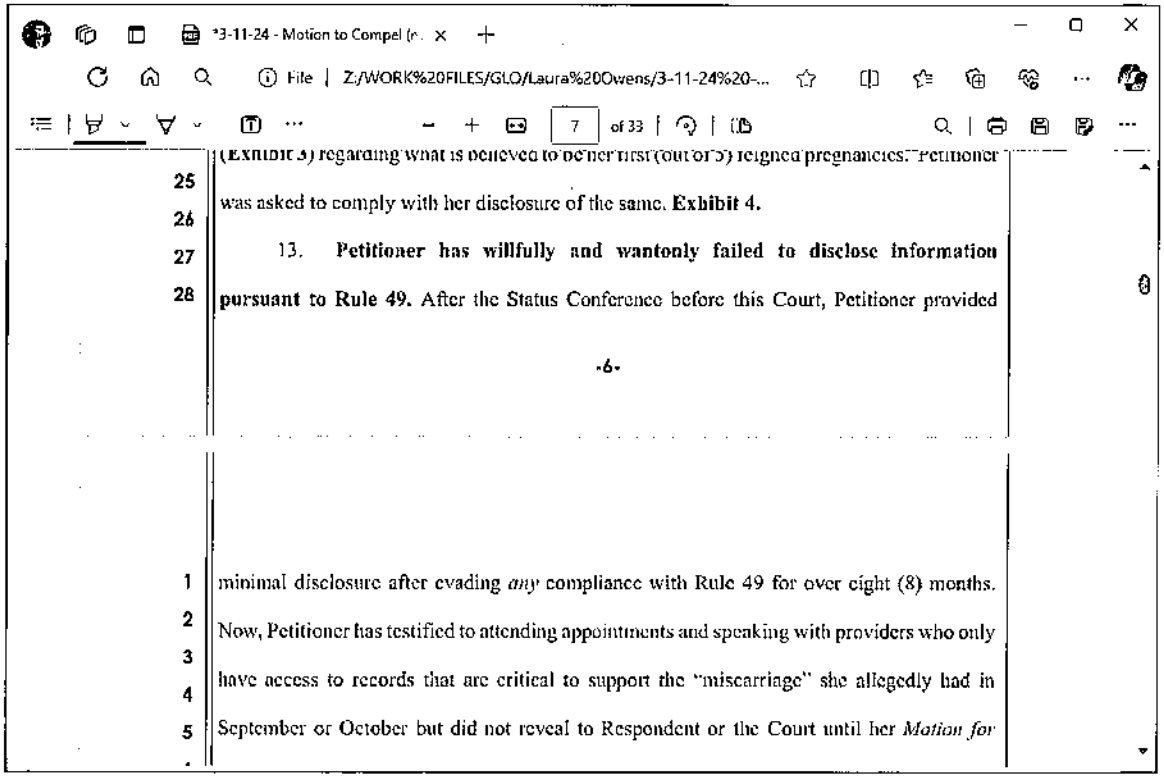
As I mentioned before, I have the photos you want to see. I understand you want to give them to your experts because you don't truth the image dates.

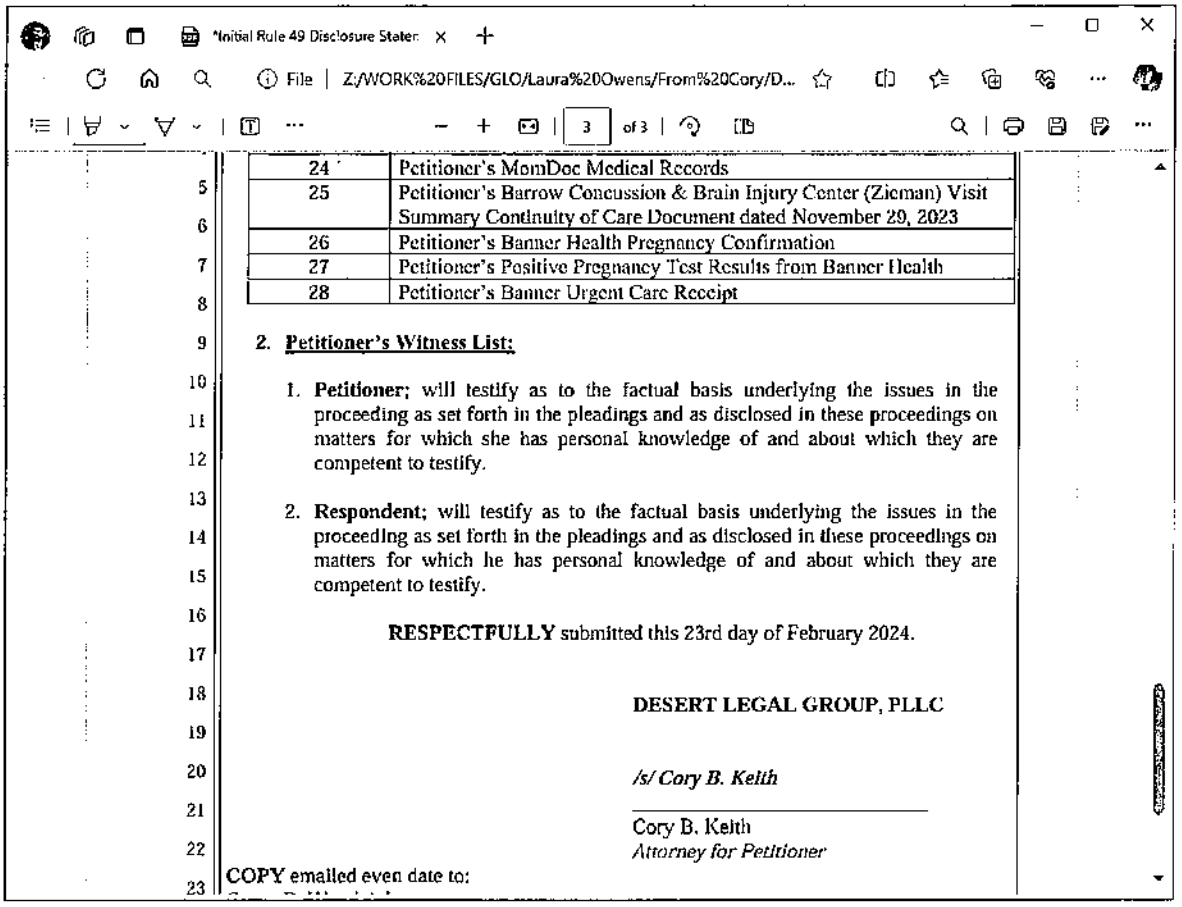
Gregg – that is NOT going to be a problem. You are going to LOVE the image dates – because the images are dated July 23, 2023. Still think you need an expert to debunk the dates? I would expect not.

Not that this matters, but I also have text messages between Laura and her sister dated July 23, 2023 – again, arguably helpful for you, but certainly not dispositive of anything. Also, I do have some telehealth info showing Laura seeking medical advice on July 23, 2023. I don't think this is helpful to either party, but it is something I am willing to disclose.

But here's the thing – I am still on the fence about giving you the photos themselves unless you agree to not publicly disclose them prior to trial (if there is a trial). Given the incredibly inappropriate circumstances which resulted in the MTC order being granted, I have still not decided if I want to fight that order further. It really just depends on how reasonable you are.

If you are reasonable with me, I will be reasonable back. But it's hard to reach a conclusion about which side you're on when you won't speak to me.





24	Petitioner's MomDoc Medical Records
25	Petitioner's Barrow Concussion & Brain Injury Center (Zieman) Visit Summary Continuity of Care Document dated November 29, 2023
26	Petitioner's Banner Health Pregnancy Confirmation
27	Petitioner's Positive Pregnancy Test Results from Banner Health
28	Petitioner's Banner Urgent Care Receipt

2. **Petitioner's Witness List:**

1. **Petitioner;** will testify as to the factual basis underlying the issues in the proceeding as set forth in the pleadings and as disclosed in these proceedings on matters for which she has personal knowledge of and about which they are competent to testify.

2. **Respondent;** will testify as to the factual basis underlying the issues in the proceeding as set forth in the pleadings and as disclosed in these proceedings on matters for which he has personal knowledge of and about which they are competent to testify.

RESPECTFULLY submitted this 23rd day of February 2024.

DESERT LEGAL GROUP, PLLC

/s/ Cory B. Keith

Cory B. Keith
Attorney for Petitioner

COPY emailed even date to:

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Monday, April 8, 2024 1:57 PM
To: David Gingras <david@gingraslaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

David,

1. Disclosure: I should not have to keep asking for the missing information which was required pursuant to Rule 49 and the Motion to Compel. You have stated several times in emails that you have the photo your client testified to taking on the day of the miscarriage (which has yet to be provided and it appears you are now saying it occurred in November, contrary to your client's testimony at deposition and statements at the prior status conference). I assume you also have the telemed doctor records and contact information so we can obtain the records with the photo from the source directly. Again, I should not have to keep asking about this, as the Court granted the MTC.

2. Lunch: I appreciate the lunch invitation and I would consider the free food AFTER your client complies with her obligation. She has admitted to forging medical records from SMIL and our experts need the original which she testified came from Planned Parenthood. As you have seen, Planned Parenthood indicated they have no records that show your client was there for an ultrasound on the day in question. Our experts (medical and Neumeister/tech) are

waiting for the documents and the Motion to Compel was granted. I will eat with you (sushi?) after we have the information for the experts.

3. Media: Any issues you have with Reality Steve Carbone or the others who have covered this story (after you client initiated this with the *Sun*), is your issue. It has no bearing on the litigation and it is not something Clayton should be spending legal fees on.

4. Experts: I understand Rule 702 and did not need the explanation. These very qualified experts are awaiting documents (that you ostensibly have) or confirmation that the photos and supplemental medical records Laura specifically testified to having do not exist. At this rate, you might not have their reports before 60 days but that is only because your client has refused to provide the same. The disclosure you received provided a summary of their anticipated testimony pursuant to Rule 49(j). I will have more data for you as soon as Laura complies with her disclosure obligations which, again, we have been requesting for quite some time.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: David Gingras <david@gingraslaw.com>
Sent: Friday, April 05, 2024 3:15 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

Greg,

One other quick follow up....which I'd prefer to do in a call, but happy to leave this in email for now...

I just talked to Laura about the expert disclosure thing. I've said this before, but I am *usually* very robotic (and pretty strict) when it comes to following procedural rules. That means if everyone follows the rules strictly, I'm happy, and if people don't, I'm not.

With respect to your experts, I'm guessing you really aren't planning to call them. There just isn't enough time and if there is any value in their testimony (which I can't tell due to lack of detail in the disclosure), that value seems like it would be minimal at best. Plus the *Daubert* problem, etc.

BUT, Laura and I are such reasonable people, we actually think *maybe* it would be OK if you really want to put one OB/GYN on the stand. Obviously I would need (and am entitled to) a lot more disclosure about what this person plans to say, and what their backgrounds are (I obviously need to know if the doc is married to Clayton's brother or whatever).

But assuming no other red flags, I may actually be willing to agree that you can call an OB/GYN...because I'm guessing if that person is truly neutral and knowledgeable, they can offer some valuable information for us.

So that is one of the issues I'd like to discuss, and this really shouldn't be too controversial.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: David Gingras
Sent: Friday, April 5, 2024 2:15 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

Gregg,

I appreciate the response. To focus on matters at hand, we need to speak about the status of disclosures (this is one of the items on the list).

I understand that a few days ago, you disclosed the names of some experts, but basically nothing else. Obviously, the incredibly scant details of these disclosures do not come close to what is required under Rule 49(j), and separately from that, I don't need to remind you that if you want to call an expert, you also have to *separately* meet the Rule 702 admissibility standards AND the other requirements of *Daubert*.

If you're not familiar with those requirements, attached is a brief where I explain them in some detail.

I mean, at the end of the day, since you have a total of one hour of trial time, I'm not really sure that I even care about this. When you deduct time for a little opening/closing, and the main witnesses, if you really want to call an expert and use your remaining time (maybe 1-2 minutes per person?) to ask a few questions...I guess you can do that.

But that's only if you disclose everything that's required (which you haven't done) and only if you show compliance with *Daubert* and 702 (also not yet done).

Again, this is why we need to talk. I'll leave you alone for the rest of today, but we need to talk on Monday. If I don't hear from you, I'm going to ask the court to order you to speak with me, so let's try to just work together collaboratively on this.

And one last this re: this comment: "I would certainly accept that apology"

Two things:

1. Yes, I absolutely do apologize if I was unprofessional or unpleasant. That was NOT my intent.
2. You need to respect the fact that Laura has *SEVERE* (and I mean extreme) concerns about your honesty and integrity. At first, I did not share those concerns, but since I've learned about the case, I am starting to see that Laura's concerns may have merit.

If you don't fully appreciate my concerns, I will say one last thing – I am about to send a LONG email to Dave Neat. I assume he's working closely with you, but if not, you should reach out to him and ask him for a copy of the message. Since you don't know me that well, the email may provide some helpful context. That's the main reason I'm sending to him.

And I will tell you the same thing I told Dave – there was good reason to make some public comments to explain Laura's position, but that is now done. I don't plan on speaking much more about the case in public, unless it is necessary to respond to false information someone else has published.

Hope that makes sense.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Friday, April 5, 2024 1:40 PM
To: David Gingras <david@gingraslaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

David,

I have two disclosed medical experts who would like to see the photographs, Planned Parenthood and the tele-med records about the alleged miscarriage, as it may impact their efforts. Bryan Neumeister is prepared to review the data as well. Please provide the disclosure and *then* we can discuss resolution options.

I appreciate that you say you will tone things down, but that is contrary to your recent blog posts and continued activity on Twitter. I respectfully disagree with you legally but that is what the court is for – not for the zoo-like atmosphere online. With regard to the YouTube and Podcast crowd, remember that was actually created last year when Laura was posting and arguing with Redditor's and sending (ostensibly altered) data to Steve Carbone and others.

As for lunch, I enjoy food. In my 24 years of practice, I have never said no to a lunch or beer invitation, but I am saying "*not now*." Perhaps this will be nothing more than fodder for a future blog post, but I trust you are being sincere. Your statements in emails, over the phone, on your blog, on your Twitter, etc, may have been

the product of passion but they were received as combative and unpleasant. Given your verbiage and your approach online and to my team, I think Judge Mata will side with me on any trepidation issues here. That said, I am quick to forgive, and if your email is meant to be an olive branch apology for the professional allegations and overzealous advocacy, I would certainly accept that apology.

I want to avoid Clayton incurring fees discussing anything further without the disclosure, which I trust you agree is reasonable. We need the experts input and Clayton will make informed decisions with data your client provides.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: David Gingras <david@gingraslaw.com>
Sent: Friday, April 05, 2024 11:09 AM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

Gregg,

I just tried calling your office but got no answer. I think it's been over a week since we have spoken by phone.

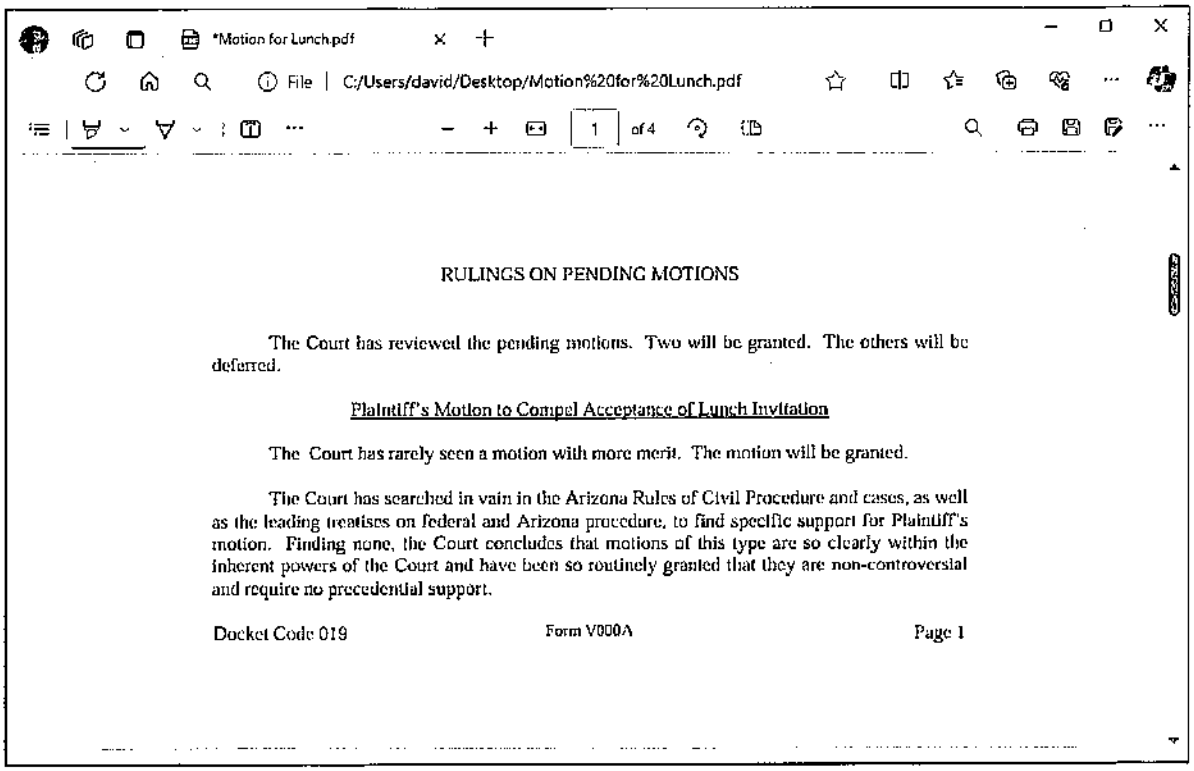
There are TONS of issues that we need to talk about, and email just isn't cutting it. We need to talk. Soon.

Since you and I are about the same age, maybe you saw this back when it happened, but if you didn't see this, I politely ask you to read Judge Gaines' famous order granting "Plaintiff's Motion to Compel *Acceptance of Lunch Invitation*" (attached).

Right now, we don't need to meet for lunch, although I am happy to do that.

Right now, all I am asking is for you to have the courtesy of accepting my calls so we can talk about the case. Tone will be calm, friendly, and professional.

If you won't agree to talk, I guess I will ask Judge Mata to order you to accept an invitation to lunch.



*Motion for Lunch.pdf

File | C:/Users/david/Desktop/Motion%20for%20Lunch.pdf

1 of 4

RULINGS ON PENDING MOTIONS

The Court has reviewed the pending motions. Two will be granted. The others will be deferred.

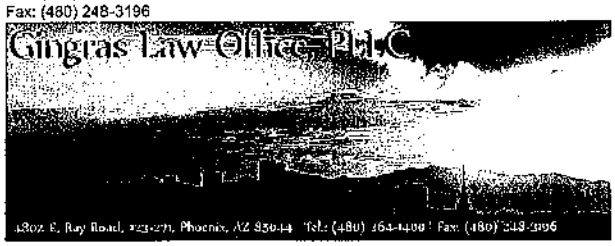
Plaintiff's Motion to Compel Acceptance of Lunch Invitation

The Court has rarely seen a motion with more merit. The motion will be granted.

The Court has searched in vain in the Arizona Rules of Civil Procedure and cases, as well as the leading treatises on federal and Arizona procedure, to find specific support for Plaintiff's motion. Finding none, the Court concludes that motions of this type are so clearly within the inherent powers of the Court and have been so routinely granted that they are non-controversial and require no precedential support.

Docket Code 019 Form V000A Page 1

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Thursday, April 4, 2024 12:56 PM
To: David Gingras <david@gingraslaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard; Request to Meet and Confer

David,

1. While I appreciate your right to speak on all issues, I am deeply uncomfortable with the tone you are using in emails to my office, on Twitter and in your blog.

2. Comments like "***I am the Connor McGregor of litigation***" and "***I look forward to reading their obituaries***," really invoke something extremely unpleasant. Using the term "***special ed***" in a derogatory way is also not something I am comfortable with either (as a lawyer and parent).

3. I have never tweeted in my life. There are certainly passionate followers of this case from Bachelor Nation (due to your client bringing the matter to the world's attention). That said, I was forwarded some of the postings over the past few days as well as your recent blog post and I am just not sure why you are engaging with them. We don't. I am also not certain why you are publishing court documents and your client's personal medical records contrary to court order.

4. Laura needs to comply with the order and provide disclosure. The court will probably give us a few weeks to submit China Doll Affidavit or (I am guessing) it may just tell us fees abide trial. That will be up to Judge Mata.

Gregg

EXHIBIT O

← Post



David S. Gingras
@DavidSGingras

Follow

New motion filed yesterday (4.8.24) in Owens v. Echard.

I'll probably post a short blog update later this morning.

gingraslaw.com/Motion%20to%20...



David S. Gingras, #021097
Gingras Law Office, PLLC
4802 E Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

Attorney for Petitioner
Laura Owens

MARICOPA COUNTY SUPERIOR COURT

STATE OF ARIZONA

In Re Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No: FC2023-052114

MOTION TO COMPEL LUNCH AND FOR ALTERNATIVE RELIEF

(Assigned to Hon. Julie Mata)

Various procedural rules (e.g. Rule 9(c)) require lawyers to talk, in person or by phone, before they may file motions. Email discussions are not enough.

But what if a lawyer refuses to talk with you? How can counsel complete the mandatory pre-filing conference requirements of Rule 9(c) when opposing counsel won't accept your calls?

Post your reply

So for now, onward we march. Absent a last minute settlement (which is probably the most likely outcome), we will have a trial in June, and the judge will decide who is lying and who is telling the truth. The only issue NOT up for debate that day is the bullshit motion for sanctions that Clayton filed in January and which he has now withdrawn. And that is a good thing.

~DSG

P.S. As I get more up to speed with this case, I am really starting to lose patience with the small but vocal handful of people out there who are milking this case for personal financial gain (I am not one of them since I make $0 from writing this stuff). You, the guilty and the dirty, know who you are.

These people (not naming names) are generally blogging or hosting YouTube videos every day to talk about the

videos every day to talk about the case...but they are *not really talking about the case*. Not even close. They don't explain all the facts, and they don't give both sides of the story, like any real journalist would. At the end of the day, they don't give a shit about this case, and they don't give a shit about the people involved or the truth. They are nothing but mosquitoes, sucking their meager livings out of the First Amendment I've fought so hard to protect.

These human leeches are selling half-truths and twisting shit WAYYYY out of perspective in order to INCREASE THE DRAMA! SO MUCH DRAMA!, and thereby get a few more pennies of Google AdSense revenue and a few "super chat" bucks to pay for breadsticks.

It honestly makes me puke.

FUCK THESE SICK, SELFISH, LYING ASSHOLES. Should I clarify how I feel?

These vile scum, I mean people, are not helping anything. They are human cockroaches spreading feces on the floor and then spinning the facts to make them more dramatic than they really are in the hopes this will drive traffic and increase revenue for their sad, pathetic lives. One day, these trash humans will wake up and realize that lying for money is not a good way to live. Or maybe they will never see their sins. Either way, I look forward to reading their obituaries, briefly, before throwing them in the trash where they belong.



David S. Gingras @David... · 5m

Thanks for the $1. When I go the casino tonight, I'll put it on the roulette wheel and let fortune decide my fate.

Also, I don't plan to make further public comments for now. The process was helpful, but not very productive.

Moving on to other tasks.

1 35



David S. Gingras @DavidSGin... · 11m

Replying to @nutinliket and @acerbic_comic

I am commenting because there is a HUGE amount of misinformation being spread, unfairly, about Laura. The purveyors of these lies will likely be sued in the near future.

For now, I am trying to correct the record and help people understand the law. I'll blog about that ASAP.

1 29



David S. Gingras @DavidSGing... · 6m

Just look at Alex Jones. He spread lies about parents who lost their kids in a school shooting.

He was sued, couldn't prove his lies were true, and a jury ordered him to pay $1.5 BILLION.

Anyone who thinks it's funny to spread lies better own a tent and a sleeping bag.

15



David S. Gingras @DavidSGi... · 53m

Replying to @courtwatcher123

And what makes you so confident you know the truth? Were you there when Clayton and Laura hooked up? Have you seen all her medical records? I have, and trust me - the people who have accused Laura of lying are probably going to end up sued for defamation (not talking about you).

2 112



Kim #MedicareForAll 🏥😢 @... · 32m

Replying to @GayleWysock and @DavidSGingras

Nah they can refile anytime. This guy won't be around long anyway. Judge is going to chew him out and spit him out.

1 41



David S. Gingras @DavidSGi... · 26m

Here for the long haul. Don't believe me? Let's bet. I'll bet you $1k (my own money) that I will be here through the end of this case.

Want to take that bet? Message me and we will set up escrow for the wager. I won't hold my breath.

1 47



David S. Gingras
@DavidSGingras

Follow

Replying to @FlowersAreR3d and @GayleWysock

Is that a yes? Put your money where your mouth is.

We both know you won't. Enjoy troll life. #sad

10:28 PM · 03 Apr 24 · **52** Views



Kim #MedicareForAll 🏥😢 @... · 17m

Replying to @DavidSGingras and @GayleWysock

Don’t need to. I can watch you fail and laugh.

20



David S. Gingras
@DavidSGingras

Follow

Hang on -- several people posted "shame on you" for posting someone's name (I have NO CLUE who they are talking about).

Now you are saying you want NOTHING confidential? OK, which is it? All confidential or nothing?

Again, Laura asked for confidentiality, and Clayton said NO.

9:09 PM · 2024-04-02 From Earth · View

Replying to @MeganFoxWriter

And yes, of course I read my own emails. I have no idea who is. No idea why he would need to be shielded from public view. Clayton's lawyer could have told me that, but never did.

If this crazy talk continues, hard blocks will follow. Seriously. Stop.

35

David S. Gingras @Davi... · 12m

Replying to @MeganFoxWriter

For like the 99th millionth time - LAURA ASKED FOR A PROTECTIVE ORDER. She asked for the court to say that certain stuff should be kept private.

Clayton OPPOSED THIS. He wanted NOTHING to be private, and the court agreed.

If you don't like that, tell Clayton to change his view.

1 42



David S. Gingras @DavidSGingras · 3m

Don't like my bio? Ask for details. I am the Conor McGregor of litigation. Done TONS of family law cases. I don't list those, because they are boring.

FYI - Clayton's lawyer has handled TWO federal cases (high profile cases go to federal court).

Me? 79 federal cases & counting.

5



Court Watcher
@courtwatcher123

Follow

You've said yourself that you are trying to get up to speed with this case. There are people posting replies to you that know this case,inside out. Every court document, every televised court hearing, every article LO has written about this. Why do you assume they are lying?

12:24 AM · 4/3/24 From Earth · **18** Views



David S. Gingras @DavidSG... · 3m

And put all the noise aside - Laura had MULTIPLE positive pregnancy tests before she filed this case. Not one, not two, multiple positives, including one purchased by Clayton and taken directly in front of him (which was positive).

What else really matters?

2



David S. Gingras @DavidSGi... · 1m

The ONLY remaining issue in the case right now is this - did Laura lie about being pregnant?

Yes I'm still new to the case, but the evidence on that point appears to be 10000% clear. SHE TOOK A PREGNANCY TEST THAT CLAYTO BOUGHT, IN FRONT OF HIM.

How is that not conclusive?

3



David S. Gingras @DavidSG... · 5m

I'm not assuming they are lying. That isn't how this works.

Clayton has a duty to disclose admissible evidence to me through his lawyer. I get to look at that evidence and determine what it means.

Views of strangers on X is not admissible evidence.

10

B

KoldT @Koldlemonadetea · 4m

It's pretty simple. She has already admitted to doctoring ultrasounds. She never saw an obgyn who performed an ultrasound. That is the ONLY way to confirm twins. The WOMAN lawyer was the fastest to peace out, because any woman worth her salt can see right through this.

1 4



David S. Gingras @DavidSG... · 16s

The woman lawyer took a job in another state. Her leaving had NOTHING to do with Laura.

And Laura has testified she DID have an ultrasound. She admitted changing the name of the place where it was done (bad idea) but she stands by her story. So what if it was twins or not?



David S. Gingras @DavidSGingras · 20s

A woman can file a paternity case with ZERO positive tests.

She can file the case just because she missed a period.

She can file the case just because she thinks she might be pregnant.

Even if she ends up not pregnant, it's not illegal to ask courts to help verify paternity.



David S. Gingras @DavidSGingras · 3m

Replying to @courtwatcher123 and @HayleyBoyd14

And if you "feel" a positive lab test doesn't prove anything, that's fine. That is your opinion. I respect that.

But legally, you are wrong. Medical tests are admissible proof (bearing in mind, there is NO legal requirement that Laura EVER test positive before going to court).

5



David S. Gingras @DavidSGingras · 5m

Replying to @courtwatcher123 and @HayleyBoyd14

One step at a time. Laura went to an urgent care. She asked for a pregnancy test. They took a sample, sent it to a lab, the result: POSITIVE



David S. Gingras @DavidSGingras · 11m

Let me explain as clearly as I can - this case is NOT ABOUT Laura offering 1000% confirmed proof she was pregnant. That is NOT an issue here under the law.

The ONLY question is: did Laura have SOME reason to think she MIGHT be pregnant? That's it. THAT. IS. IT.

If so, we win.

1 39



David S. Gingras @DavidSGingras · 7m

Bottom line - Clayton's cult hates Laura because you do not understand what is going on here. That mistake is making you see the case incorrectly.

I am trying to explain and clarify so you understand, but people are not listening.

That's fine. I will keep moving forward.

31



David S. Gingras
@DavidSGingras

Follow

Replying to @skdkjsjssjsn1

Doesn't matter if she never had an ultrasound. Doesn't matter if she faked an ultrasound. Doesn't matter if she never sought OB care. Doesn't matter if it was twins. Doesn't matter if they weren't Claytons.

At some point, you'll catch on to how this works. You're not there yet.

1:53 PM · 03 Apr 24 · **363** Views

1 Quote

What other legal arguments are there? Genuine question. Can you the give the rules you'll be mentioning so I can look them up.

11:51 AM · 4/3/24 From Earth · **298** Views



David S. Gingras @DavidS... · 57m
Laura is also probably going to file one or more motions for sanctions under a BUNCH of different rules/laws. Don't ask for details. That will come when the motions are filed (if needed).

1 · 1 · 384



Court Watcher @courtwatc... · 41m
I'm intrigued by what sanctions LE will be requesting.

2 · 88



David S. Gingras @DavidS... · 17m
If he does not withdraw the motion (the rule gives him 10 biz days), then we will file a motion for sanctions



rebecca @rebecca_raines · 10m

Replying to @DavidSGingras and @happy_mom_life

I'd be interested to hear what peaked your interested in posting updates about this particular case versus other cases you take.

1 49



David S. Gingras @DavidSGing... · 8m

Replying to @rebecca_raines and @happy_mom_life

Main thing is because one party is AGGRESSIVELY making public statements about the case, and Laura feels her story is being drowned out by misinformation. That is a problem that needs addressing, so I've decided to post SOME info to try and clear the air. More to come soon.

1 51



Jes
@happy_mom_life

Follow

Replying to @DavidSGingras and @rebecca_raines

I'm sure you will, just as her revolving door of previous lawyers got there. Good luck.

5:24 PM · 03 Apr 24 · **47** Views



David S. Gingras @DavidSGing... · 8m

Replying to @happy_mom_life and @rebecca_raines

In this case, ONE lawyer left to take a new job, and the 2nd guy left after Clayton's lawyer threatened him (poor guy was young and not ready for battle).

I am ready for battle. I am not going anywhere.

38



Jody Knish @HowMuchUDeadlif · 7m

Replying to @DavidSGingras

Attempt to get someone to sign a "relationship contract" 2 weeks after they allegedly raped you is insane.

1 20



David S. Gingras @DavidSGingras · 4m

If that is what happened, you may have a point.

Or maybe you only know like 3% of the facts, and forming this strong of an opinion based on 3% of the facts is honestly fucking stupid.

1 21



David S. Gingras
@DavidSGingras

Follow

Replying to @YOuRmysunshine1 and @iGA5RDmpy6187

If you can show me how Laura lied, I would drop her as a client. Instantly.

If you mean what you say, you'd be open to helping me understand the truth. That is all I ask.

If you turn your back on my request, what does that say about your true motives?

10:41 PM · 04 Apr 24 · **60** Views



YOuaremysunshine @Y0uRmy... · 5h

Replying to @DavidSGingras and @iGA5RDmpy6187

She had the DNA test done more than once and all results said “little to no fetal DNA”. Doesn’t matter when she “miscarried”, as fetal DNA lives in mom’s blood for months and sometimes years after miscarriage/delivery. This is definitive proof there was never a pregnancy.

2 3 329



David S. Gingras @DavidSGing... · 2h

Great analysis. Just one thing - do you have a pic of the time machine Laura used on 8.1.23 to go forward in time to 10.15.23, see these test numbers, then travel back to 8.1.23 where she proceeded to maliciously file for paternity knowing what the future held? Plz send pics. 🙏

5 254

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
4/26/2024 10:25:18 AM
Filing ID 17722516

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Plaintiff,

And

CLAYTON ECHARD,

Defendant.

Case No.: FC2023-052114

AMENDED MOTION FOR RELIEF FROM JUDGEMENT BASED ON FRAUD

(Assigned to the Honorable Julie Mata)

Defendant, **CLAYTON ECHARD**, by and through counsel undersigned and pursuant to Rule 2, *Arizona Rules of Protective Order Procedure* (ARPOP), which invokes Rule 60(b)(3), *Arizona Rules of Civil Procedure* (ARCP), or, in the alternative, Rule 85(d)(3), *Arizona Rules of Family Law Procedure* (ARFLP), hereby files his **Amended** Motion for Relief from Judgment.

[This Motion is Amended solely in an effort to streamline litigation and focus on the upcoming trial. While, as addressed in Exhibit 4, this amendment is legally unnecessary, it is being provided to avoid further distraction from the core issues. *See*

attached Exhibit 1. The sole amendment, other than changes to the Judge and Petitioner's counsel, can be found on page three and notes that Petitioner was seen on November 14, 2023 for non-pregnancy related care at MomDoc months after she claims she miscarried.]

On October 6, 2023 and October 25, 2023, Plaintiff committed fraud when she filed her underlying Petition for Order of Protection and then testified before Judge Doody under the fraudulent pretense that she was pregnant with Defendant's "twins" and that Defendant was "cyberbullying her" by posting her "medical records" online. To be clear, **Plaintiff was never pregnant by Defendant** as they did not have penetrative sexual intercourse.

Specifically, during a deposition for the paternity/establishment matter currently pending before Judge Mata (FC2023-052114), Plaintiff **admitted to modifying** medical records and **claimed she had a miscarriage in September – predating the filing of the OOP.** In her own words: Plaintiff "*did change the top of that [sonogram] from Planned Parenthood to SMIL […] I added my name in the – in the facility name, correc*t." (**Exhibit 1, pages 81, 88).** Relevant here, Plaintiff tampered with the same sonogram this Court found to be part of the single act of Domestic Violence required to justify granting the Order of Protection. Meaning, she submitted to this court, and this court explicitly relied upon, a fraud.[1]

To date, in the contemporaneous Establishment matter, Plaintiff has provided no verifiable medical evidence to support her alleged twin pregnancy and has admitted that the

[1]Through the discovery process, a very disturbing hobby of Plaintiff modifying/creating documents she purports to be medical records (and legal correspondence) has been identified.

ultrasound at the core of this Court's basis for granting the Protection Order was *de facto* fraudulent. **Months after Petitioner claims she miscarried, in November of 2023, Petitioner was seen at MomDoc who provided non-pregnancy related gynecological care and who confirmed that Petitioner was not pregnant.** Moreover, to date, every obstetrician and gynecologists Plaintiff testified (court proceedings and deposition) to being seen for her (fake) pregnancy have indicated they have **no** records as she was **never** seen as a patient. *Startlingly*, the source of the sonogram that this Court relied on was allegedly from Southwest Medical Imaging (SMIL), which has (independent of Plaintiff's admission to doctoring the image) confirmed there are no records of the alleged sonogram.)[2]

Further emphasizing the extreme fraud on this court, notwithstanding sharing *other* "sonograms" of the alleged "twin" pregnancy (that curiously match up with sonograms and YouTube videos posted from years ago *online*), Plaintiff has now denied the existence of all other sonograms. (**Exhibit 1, page 86).** When confronted with science and the opaque lack of evidentiary support at the deposition, Plaintiff admitted that she *never sought OBGYN or related care* for the pregnancy further demonstrating the fraud on this court (and in the collateral proceeding).

Plaintiff was never pregnant and all allegations stemming from the fictious pregnancy are fraudulent. As a result of Plaintiff's gross and consistent fraud, the entire matter is tainted

[2] For clarity, Plaintiff testified on March 1, 2024 that she obtained the sonogram on July 7, 2023, at Planned Parenthood in Mission Viejo, California and then edited medical records to add her name and falsely attribute it to Southwest Medical Imaging (SMIL). Regardless of the "source," *neither* SMIL *nor* Planned Parenthood have any records for any ultrasound appointment for Plaintiff.

as neither Defendant nor the Court had a full and fair opportunity to litigate and discharge their respective duties.

As and for his Motion, Defendant states as follows:

I. BACKGROUND

1. On October 6, 2023, Plaintiff obtained an *ex parte* Order of Protection against Defendant (**Exhibit 2)** and indicated that "*one party was pregnant by the other*." Her Order alleged, among other things, that Defendant was "*cyberbullying*" her on Reddit and posting "*private and confidential information, including* […] *medical history*" that he could only have access to because of their paternity case surrounding claim that she was "*pregnant with his twins*." The entirety of Plaintiff's allegations in her Order of Protection surrounds the existence of medical evidence to support her fictious pregnancy.

2. On October 25, 2023, a contested hearing was held before Judge Doody. Plaintiff testified to having attended various medical appointments to "confirm" her pregnancy, including the ultrasound appointment for the sonogram at issue and specifically relied on by this court. This was a lie as the sonogram was fabricated and medical providers have affirmed that Plaintiff never attended any pregnancy-related appointments.

3. The same date, the Court granted Plaintiff's Order of Protection solely based on the following image posted below, which Defendant allegedly posted anonymously on Reddit (which Defendant vehemently denies) and Plaintiff testified contained a sonogram that she "only" sent Defendant. FTR Oct. 25, 2023 at 10:01:17 a.m. (**Exhibit 3). This is *either* the**

same sonogram Plaintiff has admitted to changing and that the alleged source[3] of the sonogram has no records of *or* one of the other sonograms that Plaintiff has testified she did not obtain (*see* Exhibit 1). (Parenthetically, Plaintiff (herself) *also* posted all the alleged sonograms on a public DropBox on Reddit *and* emailed the "records" to various journalists/media).

II. RELEVANT LAW

Where not inconsistent with the *Arizona Rules of Protective Order Procedure* (ARPOP), Rule 2 invokes the *Arizona Rules of Family Law Procedure* (ARFLP) to "protective order matters heard in in conjunction with pending family law cases" and the *Arizona Rules of Civil Procedure* (ARCP) for "all other cases." Here, as the ARPOP does not include rules for requesting a new trial or setting aside a judgment, Rule 85(d)(3) ARFLP and Rule 60(d)(3) ARCP are invoked to the extent not inconsistent.[4]

Under both Rule 85(d)(3) ARFLP *or* Rule 60(d)(3) ARCP, the Court may relieve a party from a judgment based on "*fraud (whether previously called intrinsic or extrinsic, misrepresentation, [and] other misconduct.*" Additionally, both Rules permit a motion to be made on the basis of fraud "*within a reasonable time […] no more than 6 months after the entry of the judgment*."

---

[3] Again, the source is either SMIL according to the insignia or Planned Parenthood, who, according to Plaintiff, was the original source.

[4] Although the hearing for Plaintiff's Order of Protection was arguably *not* heard in conjunction with the family court matter and the ARFLPs are likely *not* invoked, Defendant cites to Rule 85(d)(3) in the alternative to protect his right to relief.

Fraud, as defined by Rule 85(d)(3) ARFLP/Rule 60(b)(3) ARCP, can be either intrinsic or extrinsic; both justify relief from a judgment. Extrinsic fraud is "fraud upon the court," and concerns the procurement of a judgment. Extrinsic fraud has "*effect of which prevents a party from having a trial, or from presenting all of his case to the court, or which operates, not upon matters pertaining to the judgment itself, but to the manner in which it is procured* […]" *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965). Conversely, intrinsic fraud "pertains to matters of judgment itself" and therefore is concerned solely with fraudulent conduct that occurs within the proceeding. *Robertson v. Teel*, 513 P.2d 977 (Ariz. App. 1973). Both forms of fraud constitute the "fraud" for the purposes of Rule 85(d)(3) ARFLP/Rule 60(b)(3) ARCP.

III. ARGUMENT

Plaintiff committed fraud in her October 6, 2023, Petition for Order of Protection. Plaintiff committed fraud (extrinsic) when she filed her Petition, which the Court relied on in order to grant the Order, and falsely claimed she was pregnant by Defendant. In her Petition, Plaintiff alleged that (1) Defendant had threatened her "since discovering [she] was pregnant," (2) Defendant had posted "personal and sensitive information" about her because of their paternity case; (3) Scottsdale PD had called Defendant; (4) Defendant was anonymously posting "private and confidential information, including facts about [her] medical history" and (5) Plaintiff feared for her safety. **All of these allegations are fraudulent**.

Plaintiff was never pregnant – the parties never had intercourse. Plaintiff has provided no verifiable medical records to confirm her pregnancy (because none exists) and *every* provider she testified to being seen by has confirmed they have no records for Plaintiff. There are no sonograms, no monthly follow up appointments – there is simply no evidence that

Plaintiff was ever pregnant and certainly not within Defendant's "twins." To make matters worse, Plaintiff has since testified that she ***had a miscarriage*** **in September**, ***predating*** her filing this Order of Protection.

Because Plaintiff was never pregnant (and could not have been pregnant from fellatio) and/or she is now alleged she miscarried ***prior*** *to filing the Order of Protection*, the entirety of Plaintiff's underlying Order of Protection is fraud upon the Court. Plaintiff's representation of herself in an *ex parte* filing as pregnant with Defendant's "twins" and a victim of Defendant maliciously claiming she was *not* pregnant and posting "medical" evidence online ostensibly led the Court into granting her Order of Protection.

Plaintiff deliberately withheld from the Court that she was *not* pregnant (and/or that she had *miscarried* the feigned pregnancy *(at the time of the hearing)* and that she altered the "medical" records she alleged Defendant was anonymously sharing online (which he vehemently denies) in order to procure a judgment against Defendant. Therefore, the Court's judgment granting Plaintiff's Order of Protection on October 6, 2023 must be set aside because "fraud was practiced in the very act of obtaining it." *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965). Without this critical material information, neither Defendant nor this Court had the full and fair opportunity to litigate and discharge their respective duties.

Plaintiff committed fraud (intrinsic and extrinsic) when she testified before Judge Doody regarding a sonogram on October 25, 2023, leading Judge Doody to uphold the Order of Protection. While arguably the entirety of Plaintiff's testimony regarding her alleged pregnancy was fraud, the Court explicitly indicated that it was granting the Order of Protection based on the *sonogram* depicted in the image inserted above. FTR Oct. 25, 2023

at 10:01:17 (Judge: "The way you published this photo […] it's unflattering […] that's my reason for making my decision").

Plaintiff committed fraud when she testified as to the existence of the sonogram, which she has since admitted she altered and that the "source" of the ultrasound (either Planned Parenthood *or* SMIL) has indicated they have no records of the ultrasound ever taking place because they are fake. Plaintiff committed fraud when:

a. Plaintiff testified she sent Defendant and a member of the media the sonogram depicted in the image at issue but *only* Defendant could have posted the image containing the sonogram. FTR Oct. 25, 2023 at 8:47:32.

b. Plaintiff testified that the main image – the one of her "pregnant" in a bra and yoga pants – had already been published online but that the sonogram was not. FTR Oct. 25, 2023 at 8:49:24. (In reality, both were published by Plaintiff on Reddit in a publicly accessible DropBox).

c. Plaintiff testified that she sent Defendant the ultrasound photo and ultrasound video and that she had an "ultrasound report" to accompany the July 7, 2023 sonogram. FTR Oct. 25, 2023 at 8:59:50 and 9:00:23 a.m. (Again, no ultrasound records exist – as there was never any ultrasound).

As the Court explicitly stated that the sole reason it was upholding the Order of Protection was because of the image containing the sonogram, Plaintiff committed fraud upon the Court (extrinsic). Plaintiff withheld to the Court that she had doctored the sonogram and that the alleged ultrasound where she obtained the sonogram had never taken place because it is a fake. Therefore, the Court's judgment upholding Plaintiff's Order of Protection on

October 25, 2023 must be set aside because "fraud was practiced in the very act of obtaining it." *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965).

IV. **Defendant is entitled to his reasonable attorney's fees in costs incurred in this entire action, including filing this Motion for Relief from Judgment**. Defendant is entitled to his fees and costs incurred as a result of Plaintiff's lies and manipulations by making this malignant filing and then testifying before the Court alleging facts and circumstances now known to Defendant to be false and/or fraudulent. To be clear, Plaintiff was fully aware of the true nature and circumstances underpinning her perjurious statements and when she admitted "medical evidence." On October 6 and October 25, 2023, she knew she was not pregnant, that she had not received an ultrasound for her alleged twin pregnancy, and that the sonogram she had proffered was created by her. Defendant had to incur significant costs and fees unraveling Plaintiff's web of lies, which included having to defend himself against her malignant filing of the underlying Order of Protection. Defendant is entitled to his reasonable attorney's fees and costs expended defending himself against Plaintiff and filing this Motion, pursuant to A.R.S. § 25-324.

To be clear, there is absolutely no suggestion, that Plaintiff's attorney for the Order of Protection had any knowledge that he was presenting fabricated medical records. Although Plaintiff has a history of fraud (the extent of which includes, but is not limited to, the three (3) know prior victims who have claimed they were subjected to similar false pregnancy), it was not yet fully exposed until well after this protective order proceeding.

WHEREFORE, Defendant respectfully requests the Court:

A. Dismiss the Order of Protection in its entirety, with prejudice on the basis of

fraud;

B. Grant leave to Defendant to submit a *Child Doll Affidavit*;

C. Award Defendant his reasonable attorney's fees;

D. Order such further relief as the Court deems just including appending consequence to the current outstanding sanction request pending adjudication before Judge Mata on June 10, 2024.

RESPECTFULLY SUBMITTED this 26th day of April, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Defendant

ORIGINAL of the foregoing e-filed this 26th day of April, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gringas
Gringas Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GringasLaw.com

By: */s/ MB*

EXHIBIT “1”

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:)
)
LAURA OWENS,) No. FC2023-052114
)
Petitioner,)
and)
)
CLAYTON ECHARD,)
)
Respondent.)

VIDEO DEPOSITION OF
LAURA OWENS

Friday, March 1, 2024

8:00 a.m.

Phoenix, Arizona

Rosanne P. Huebener
Certificate No. 50897

APPEARANCES OF COUNSEL

On behalf of the Petitioner:

THE VALLEY LAW GROUP, PLLC.
Cory Keith, Esq.
3101 N. Central Ave, Ste. 1470
Phoenix, AZ 85012
cory@thevalleylawgroup.com

On behalf of the Respondent:
WOODNICK LAW, PLLC.
Gregg R. Woodnick, Esq.
Isabel Ranney, Esq.
1747 E. Morton Avenue, Suite 205
Phoenix, AZ 85020
Office@WoodnickLaw.com

INDEX OF EXAMINATION

WITNESS: PAGE:
LAURA OWENS
EXAMINATION

By Mr. Woodnick 7

EXHIBITS

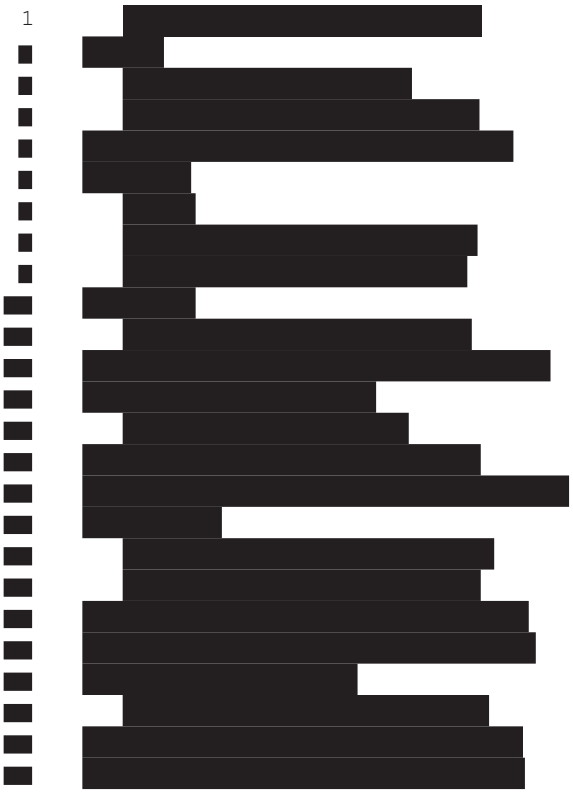
(Exhibits previously marked and supplied in a binder with exhibit tabs. Some exhibits not tabbed and therefore not defined in index.)

No. 1 Ultrasound GA=5w0d
No. 2 Text messages beginning 8/6/21
No. 3 Ultrasound GA=5w2d
No. 4 May 17, 2023 LinkedIn Message
No. 5 CE0013-CE0024
No. 6 Text messages beginning 7/15/23
No. 7 Text messages beginning 7/16/23
No. 8 CE0025-CE0026
No. 9 Sonogram Video SMIL 9/5/23
No. 10 Sonogram Still SMIL 9/5/23
No. 11 CE0032
No. 12 Twin Boy Gender Ultrasound
No. 13 CE0112
No. 14 CE0001-CE0011
No. 15 8/8/21 Text Messages

Exhibits (Continued)

No. 16 CE0042
No. 17 Text Message (No date)
No. 18 CE0027
No. 19 Text Message 7/25/23
No. 20 Scottsdale Police Department Report
No. 21 2/25/24 Reality Steve E-Mail
No. 22 --
No. 23 Video with Dad.mov
No. 24 Pregnant stomach video.mov
No. 25 Laura Owens E-mail to Reality Steve, et al. Friday 10/13/23
No. 26 --
No. 27 Laura Owens E-Mail to Reality Steve 10/6/23
No. 28 --
No. 29 --
No. 30 Owens E-Mail 10/26/23
No. 31 --
No. 32 --
No. 33 --
No. 34 Crying on Facebook.MP4
No. 35 Surprise Email and CE0116 photo
No. 36 E-Mail to Arizonaspc
No. 37 Colin Scanlon 2/28/24 E-Mail
No. 38 9/21/23 Owens E-Mail

Page 25



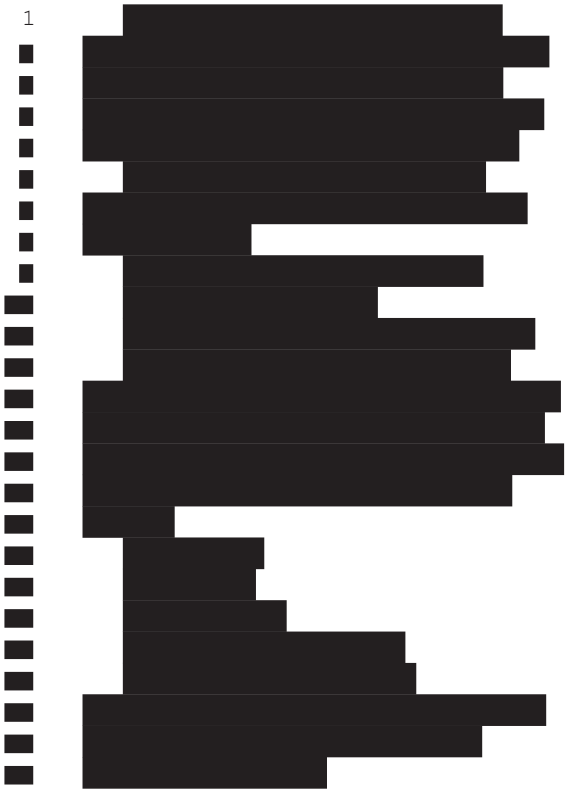
Page 26

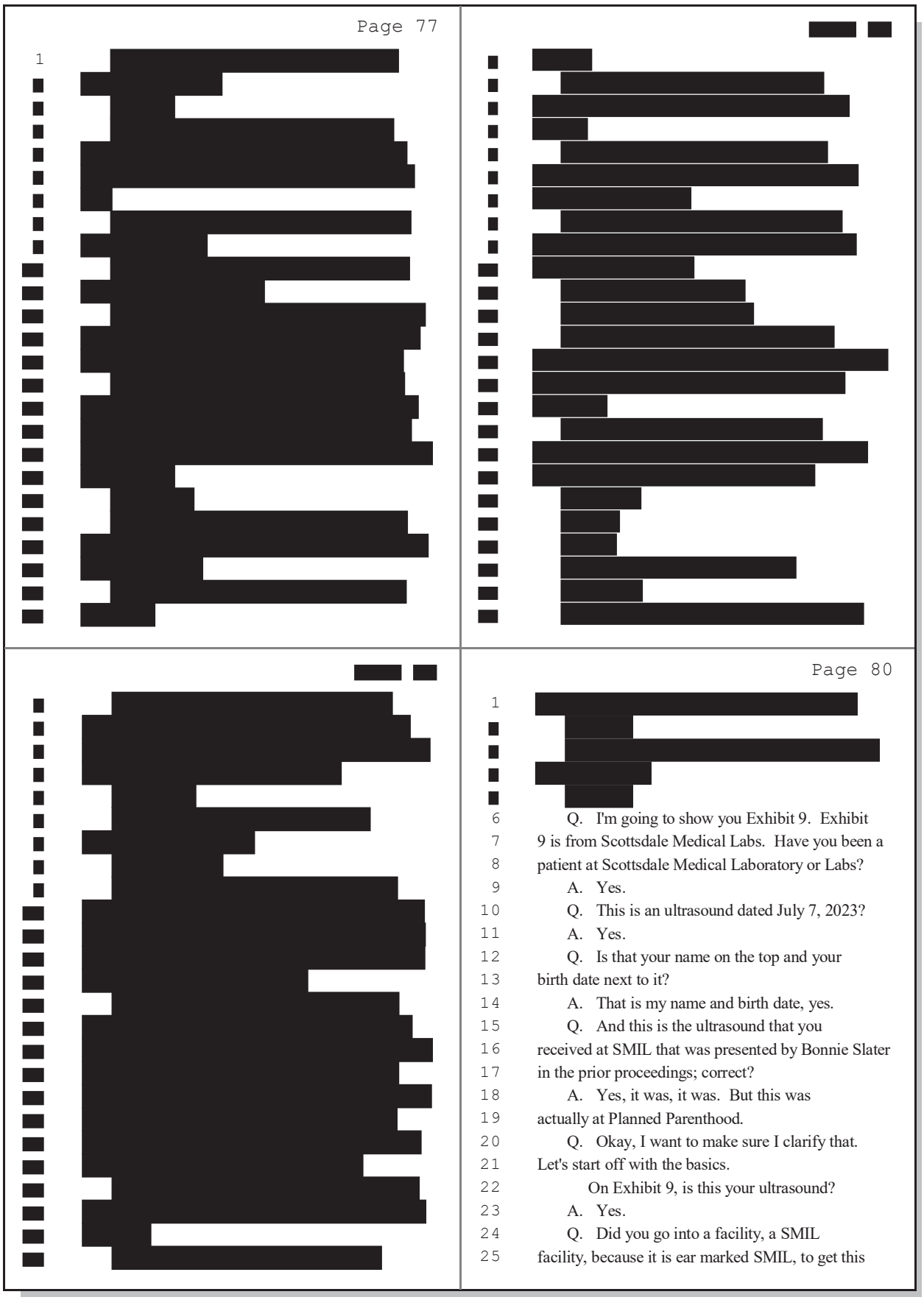
name begins with a Z but I just forgot --
A. .
Q. He --
A. She.
Q. Is your neurologist at Barrow?
A. Uh-huh.
Q. Yes?
A. Yes.
Q. So . You also told me you are seeing the on-line provider, correct?
A. Correct.
Q. When was the last time you saw the on-line provider?
A. I haven't had a video visit with that person in maybe a year-and-a-half or two years.
Q. What other providers have you seen, let's just look at 24 months, in the past 24 months?
A. I saw a doctor at Momdoc. I don't recall. I saw a provider at Banner Urgent Care, I think her name was Tamara, something with an L, and she, I think was a -- she may have been a nurse practitioner.
I saw a doctor at Planned Parenthood in Mission Viejo, and -- you said how long did you -- how long?

Page 27

Q. You are doing great. So one of the questions I had ahead of me was you have been to Planned Parenthood in the past 24 months?
A. Yes.
Q. And the Planned Parenthood you have been to is Planned Parenthood Mission Viejo or whatever the branch is there?
A. Yes.
Q. When was that?
A. That was in July of last year.
Q. July of '23?
A. '23, correct.
Q. You -- and you have no problems expanding the HIPAA release to include Planned Parenthood Mission Viejo July '23?
A. No.
Q. Have you seen any other providers at Planned Parenthood in Arizona?
A. No.
Q. Just the one visit in the summer of '23 to the location in Mission Viejo?
A. Yes.
Q. Any other medical providers?
A. In the last --
Q. 24 months?

Page 28





Page 77

Page 80

Q. I'm going to show you Exhibit 9. Exhibit 9 is from Scottsdale Medical Labs. Have you been a patient at Scottsdale Medical Laboratory or Labs?

A. Yes.

Q. This is an ultrasound dated July 7, 2023?

A. Yes.

Q. Is that your name on the top and your birth date next to it?

A. That is my name and birth date, yes.

Q. And this is the ultrasound that you received at SMIL that was presented by Bonnie Slater in the prior proceedings; correct?

A. Yes, it was, it was. But this was actually at Planned Parenthood.

Q. Okay, I want to make sure I clarify that. Let's start off with the basics.

On Exhibit 9, is this your ultrasound?

A. Yes.

Q. Did you go into a facility, a SMIL facility, because it is ear marked SMIL, to get this

Page 81

ultrasound?
A. I did not.
Q. Where did you get this ultrasound?
A. Planned Parenthood in Mission Viejo.
Q. So I don't know Mission Viejo well, but is what you are suggesting that Scottsdale Medical Imaging has a branch in Mission Viejo, California?
A. No.
Q. I'm totally confused here, I will give you a chance here to explain how there is a Scottsdale Medical Imaging ultrasound that you claim came from Mission Viejo.
A. There is not, this was the -- actually taken in Mission Viejo, this was not taken at SMIL.
Q. Why does it say SMIL on it?
A. I did change the top of that from Planned Parenthood to SMIL, because I didn't want him to contact the doctor.
Q. I'm showing you real clearly Bates stamp 0183, it's an ultrasound image that you are admitting to having changed information on, is that true?
A. Just the top left, yes, the location.
Q. I'm going to ask the question again.
A. Yes.
Q. Did you change data on the -- on what has

Page 82

been marked as Exhibit 9?
MR. KEITH: She answered the question, Gregg. Objection, form.
BY MR. WOODNICK:
Q. Other than changing the sword SMIL on that exhibit, did you change anything?
A. No.
Q. All right, Laura, I am going to give you an opportunity now because we are three years into this and a year into this case. Is this the only document you have altered?
A. Yes.
Q. So every exhibit in this entire history of feigned, of our position which is feigned pregnancies, this is only document that you are acknowledging having touched, via arts and crafts, is CE 0183, marked for today's deposition as Exhibit 9?
MR. KEITH: Objection, form, and, Gregg I'm going to ask you let's keep it professional in the questions.
THE WITNESS: Yes, this is the only -- this is the only one, and I would hope that the fact I'm admitting that would mean something.
BY MR. WOODNICK:
Q. Well, it means that you lied in an

Page 83

exhibit. You understand that. So this is where we go back to this issue of you being able to plead the Fifth. You acknowledge you had a medical document that you changed and you are telling me right now that's the only one I have to know about?
A. Yes.
Q. What software did you use to change it?
A. Um, Adobe Acrobat.
Q. Where were you when you changed it?
A. At my house.
Q. When did you change it?
A. Whenever this was, because I didn't want him to contact Planned Parenthood.
Q. At what point were you going to tell my office or your own attorney that you doctored a medical record?
A. I mean, as I said, it's my ultrasound. It is my ultrasound.
Q. Bonnie Plater subsequently withdrew from representing you?
A. No, Bonnie did not, I just didn't re-up the retainer because it was $5000 gone through in a week.
Q. You are aware that Ms. Plater used this exhibit in your proceedings, right?

Page 84

A. Correct, it was my ultrasound.
Q. I want to show you Exhibit 10. I think we have a little technology action here.
MS. RANNEY: There is actually no audio on this, but I'm going to show it to you.
(Video playing.)
BY MR. WOODNICK:
Q. Did you see Exhibit 10, Laura?
A. Yes.
Q. That's a video dated September 5, 2023?
A. Yes.
Q. Is that yours?
A. No, I never stated that was mine. I was asked that by Dave Neal.
Q. The Exhibit 10 which is a SMIL sonogram, what's the identifying information on there?
A. Laura Owens.
Q. What's the other identifying information on there?
A. GA=17w0d.
Q. So you admit that the sonogram in Exhibit 10 is not yours?
A. Exhibit -- okay, yes, that's not mine.
Q. Okay. If I were to look at a sonogram of this alleged pregnancy, the only place I would see

Page 85

that from its original source would be Mission Viejo Planned Parenthood?
A. Wait, are you talking about the -- are you talking about the video or -- I'm -- I'm confused.
Q. And that's fair.
Your testimony under Exhibit 10 is that ain't you?
A. Exhibit 10 is, is that -- yes, correct.
Q. How many sonograms have you had for this alleged pregnancy?
A. One.
Q. Where was it?
A. Planned Parenthood Mission Viejo.
Q. So I'm going to ask my question again. If I were to want the original source of the sonogram, the only sonogram that you took in a six or seven-month pregnancy, I could only get it from the source at Mission Viejo Planned Parenthood?
A. Yeah, and I did go anonymously.
Q. Oh. So if I issue a subpoena to them, because you are going to sign a consent when we bring this to Judge Mata's attention, they are not going to know it was you that was there?
A. I self-paid. I mean, I don't know.

Page 86

Q. Okay. So I'm going to give you an opportunity again, because you have got statements under oath that we are about to get to from the prior proceedings, you do not have to answer my questions, you can always plead the Fifth.
Your testimony now is that the sonograms that I just presented to you are not yours; correct?
A. The one sonogram was mine.
Q. And it came from Mission Viejo, but Mission Viejo is not going to have any idea it was you because you did it anonymously but then you went back and you added your name to it?
MR. KEITH: Objection, form.
THE WITNESS: No, I didn't add my name to it, my name was on it. I changed the SMIL thing.
BY MR. WOODNICK:
Q. Your name was on it?
A. And I changed SMIL.
Q. Hang on for a second. You just told me, Laura, that you were anonymous at Planned Parenthood.
A. But I changed SMIL on there. I think I'm confused as to what you are asking.
Q. No problem. We will slow it down a little.

Page 87

A. And can you -- are you talking about -- can you just tell me what exhibit?
Q. Just to the be clear for the record, I'm talking about Exhibit 9.
A. Exhibit 9.
Q. That's the one that you say that you changed and attributed to another medical provider located in Scottsdale Arizona, correct?
A. Correct.
Q. And that's SMIL, which is an acronym for Scottsdale Medical Imaging labs or something like that; correct?
A. Correct, I have gone there before.
Q. You are a patient of SMIL?
A. Correct.
Q. So when I get the subpoena for the records release from SMIL, this isn't going to be there because they didn't do this test?
A. Correct.
Q. Because you just put their name on the test?
A. Correct.
Q. This test, according to you, was originated in California?
A. Correct.

Page 88

Q. And you went in there anonymously?
A. Correct, and I -- yeah, I added my name in the -- in the facility name, correct.
Q. So we are changing your testimony, so it's not -- you originally said you just changed and added the word SMIL, but now under oath you are saying you added your name to it too; correct?
A. Correct.
Q. And your date of birth?
A. Yeah, I changed the top. My date of birth actually they -- I think they may have had my date of birth. They may have had my date of birth there. They may have had that. If you were to get the record, they may have my date of birth because they did ask my age.
Q. When you submit records to a court, you understand that you are signing a verification with them and that there's an expectation of honesty?
A. Yes, and I don't believe this was ever submitted to court.
Q. All right. I'm not done with Exhibit 9 yet.
Your testimony now that we have worked through it a little bit is the entire top section of Exhibit 9 is an ultrasound from Planned Parenthood in

Page 89

California where you appeared anonymously, you took that ultrasound and you added your name and a date and information to it?
A. The date is correct.
Q. Okay. Where is the original of this?
A. Um, I mean, I just have that. I mean, I'm sure I would have it on my computer.
Q. Okay, what would you have on your computer?
A. Like the image, my photos.
Q. How did Planned Parenthood California Mission Viejo give you this image?
A. I asked them to send it to me.
Q. Via?
A. Maybe I actually just took a screen grab of it. No, doesn't look like that. I don't recall.
Q. Do they do -- I'm not familiar with Mission Viejo Planned Parenthood, do they do like a medical records portal?
A. No, they did not.
Q. Did you walk out of Planned Parenthood with this?
A. With what?
Q. Whatever this image is that you doctored, did you walk out with it?

Page 90

A. Well, I didn't -- are you referring to doctoring in terms of the top?
Q. Yes.
A. Okay. Um, I mean, I didn't -- I didn't alter the ultrasound image, and this is even reviewed by another doctor independently.
Q. We can debate that. But this particular image, how did you get it?
A. I -- I -- I thought I had taken a picture with my phone, but it doesn't look like it was taken with my phone. So I don't recall.
Q. So you may have -- your position would be you were in Planned Parenthood, you took a screen shot with your cell phone and that, and then you came back to Phoenix and you used Photo Shop to change the caption?
A. I used Adobe Acrobat to change the caption, yes.
Q. How would you get me the original of what this was before you messed with it?
A. I can contact Planned Parenthood to see if, from the day I was there if there are records from there.
Q. So you would be willing to, for my office, sign not just a HIPAA release, but a special

Page 91

waiver that California may require because of their confidentiality laws with their Planned Parenthood and privacy, so that I could have that original information, right?
A. Um, I mean, I don't know what rights I would be waiving in California.
Q. Well, you want Judge Mata to have the original records in front of her, correct?
A. Judge Mata will see I was pregnant, I have other pregnancy records as well.
Q. This is not a debate. This, in particular Exhibit 9, you have provided and you have acknowledged --
A. To Clayton, yes.
Q. To Clayton. I have got it, too, it's right in front of me.
You acknowledge you made changes to this document, correct?
A. Correct.
Q. And you acknowledge that it's important that we know what the original was of this document to know what you changed?
A. Correct.
Q. Because right now I got to take your word that it's the original, right, because there's no

Page 92

verification.
A. Correct.
Q. So you are going to work with my office to contact Mission Viejo and get the original source material from their data base, whatever it is, so we can see what this image looked like before you -- whatever you did to it. Can we agree to that?
A. Like I said, I went anonymous, but I'm happy to help you guys however I can.
Q. Why did you go anonymous?
A. Because I didn't want people to know I'm pregnant at the time.
Q. But Planned Parenthood is privileged, you have been there before.
A. I had been there before, but I didn't want anyone to find out because I wasn't in a relationship or anything.
Q. You understand why people may think you may be lying about this Exhibit 9, right?
A. I do, yes.
Q. Okay, let's move on.
I'm going to move on and show you Exhibit 10.
A. Was 10 the video?
Q. Yeah. You saw the video, the September

EXHIBIT “2”

CLERK OF THE SUPERIOR COURT
FILED
10/6/2023 @ 10:43AM
, Deputy

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032
602-506-7353 Monday - Friday 8am - 5pm

Plaintiff ☐ Employer-Plaintiff if Workplace Injunction Laura Owens	**Defendant** Clayton Ray Echard	**Case No.** FC2023-052771
☐ **On behalf of minor/person in need of protection named:**	**Defendant's address** 6855 E Camelback Road 7002 Scottsdale, AZ 85254	**PETITION for:** ☒ **Order of Protection** ☐ **Injunction Against Harassment** ☐ **Workplace Injunction**
Agent's name (if Workplace Injunction)	**Defendant's birth date** 4/29/1993	
	Defendant's phone 314-956-6975	

This is NOT a court order.
This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

DIRECTIONS: Please read the Plaintiff's Guide Sheet before filling out this form.

1. **Defendant/Plaintiff Relationship** *(Choose the options that best describe your relationship to the defendant. *If you are applying on behalf of another person, choose the relationship between the other person and the defendant)*

☐ Married (past or present)
☐ Live/lived together as intimate partners
☐ Parent of a child in common
☒ One party is pregnant by the other
☒ Romantic or sexual relationship (past or present)
☐ Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step)
☐ Live/lived together but not as intimate partners
☐ Other (describe):

2. ☒ If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in Maricopa County Superior Court, Case # FC2023-052114.

3. Name of court, if any, in which any other protective order related to this conduct has been filed.
Court name Case #

4. Tell the judge what happened and why you need this order. PRINT both the dates and a brief description of what happened. If there is a contested hearing, a judge can consider only what you write here.
NOTE: Defendant will receive a copy of this petition when the order is served.

Approx. Date	(Do not write on back or in the margin. Attach additional paper if necessary.)
6/1/2023	Clayton has sent threatening messages since discovering I was pregnant, such as: I legitimately hate you right now. my hatred will only grow if you decide to put me through all of this. My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever My hate is toward you and you only. if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.
9/21/2023	Clayton Echard was The Bachelor and has many diehard loyal fans. He and I are involved in a very public paternity case that is being covered by every major media outlet. Clayton posted to a story to his 270k followers to look me up, which they have, and I have been sent threatening and harassing messages by his followers. I explained this to him and asked him to take down the post, which he did not. By posting personal and sensitive information about me publicly (and without my consent), he has made me feel humiliated and embarrassed.

9/21/2023	Scottsdale PD Officer Vince Johnson called Clayton to explain that what he was doing was harassment in and of itself, coupled with the fact that he was inciting his followers to harass me as well. Despite this call, Clayton still did not take down the post.
10/5/2023	Between 9/22 and 10/5, Clayton has posed as several users on Reddit, including "sillygoosetits", "GossipGooseTits", "Sandbetweenhertoes", and others. He has posted private and confidential information, including facts about my medical history, that is known only to him because of our paternity case. This is why it is 100% traceable back to him. He has also been writing defamatory and very hurtful things about me, including comments about how I have gained weight (I am pregnant), how I am not attractive, how my photos are so poorly edited that it is laughable, how I am bad at my job (a self-help podcaster), and how my prior abusive relationship, which inspired a TEDx talk, never happened, despite mountains of evidence. He is doing everything in his power to ruin and hurt my reputation. As a result of what he has posted, I have gotten harassing messages that have told me to harm myself as a result of becoming pregnant with his twins. I am getting other threatening messages as well, and all of this attention from the general public that he has incited is very much unwanted. As a result of this public shaming, he has caused me extreme psychological harm and disrupted my peace. I have asked Clayton to stop the harassment on Reddit and social media so many times, but he won't. I have reported his accounts and posts to Reddit, but he continues to write unacceptable, cruel things about me. He has multiple accounts now and so even if one is blocked, he can create another one. As a result of him spreading false and damaging information under pseudonyms, I feel demeaned, humiliated, and like my deepest sense of privacy has been invaded. In addition, he has been in communication with my ex, who I have an order of protection against, and who he knows is dangerous. I have asked him to stop talking to him because it will put me in danger, but he continues to communicate with him.
10/6/2023	When combined, all of this has led me to feel extreme anxiety and fear for my safety. I have not left my house since September 28th because of this.

5. The following persons should also be on this order. They should be protected because Defendant is a danger to them:

6. Defendant should be ordered to stay away from these locations at all times, even when I am not present.
NOTE: Do not list confidential addresses here.

   ☒ Residence (confidential)
   ☒ Work/Business
   ☒ School/other

7. ☐ Defendant owns or carries a firearm or other weapons.
   ☐ Defendant should be ordered NOT to possess firearms while this order is in effect because of the risk of harm to me or other protected persons.

8. ☐ Defendant should be ordered to stay away from any animal that is owned, possessed, leased, kept or held by me, Defendant, or a minor child living in either my household or Defendant's household.

9. Other requests: No cyberharassment or cyberbullying under real name or pseudonyms.;

Under penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge, and I request an Order / Injunction granting relief as allowed by law.

/s/ Laura Owens
Plaintiff

Attest:
Judicial Officer/Clerk/Notary

10/6/2023.
Date

Clerk of the Superior Court
*** Electronically Filed ***
10/26/2023 8:00 AM

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052771

10/25/2023

HONORABLE JOHN R. DOODY

CLERK OF THE COURT
T. Sachse
Deputy

IN RE THE MATTER OF
LAURA OWENS

JOSHUA A LOPEZ

AND

CLAYTON RAY ECHARD

CLAYTON RAY ECHARD
6855 E CAMELBACK RD # 7002
SCOTTSDALE AZ 85254

COMM. DOODY

MINUTE ENTRY

There is a *LATER* at the end of this minute entry.

Prior to the commencement of today's proceedings, Plaintiff's Exhibits 1 through 18 and Defendant's Exhibits 19 through 51 are marked for identification.

Courtroom 101-NER

8:32 a.m. This is the time set for Hearing on Order of Protection issued on October 6, 2023. Plaintiff, Laura Owens, is present with the above-named counsel. Defendant, Clayton Ray Echard, is present on his own behalf.

A record of the proceedings is made digitally in lieu of a court reporter.

Laura Owens and Clayton Ray Echard are sworn.

The Court addresses previous motions filed by Plaintiff.

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052771 10/25/2023

IT IS ORDERED denying Plaintiff's Motion Requesting That the Hearing be Closed From the Public or That This Hearing Be Closed From Watching Online, filed October 25, 2023 and denying Plaintiff's Motion Requesting Laura Owens Attend Virtually or Telephonically for Hearing Scheduled October 25, 2023, filed on October 25, 2023.

Counsel for Plaintiff presents opening statements.

Laura Owens testifies.

Plaintiff's Exhibits 1 and 11 are received into evidence and Exhibit 52 is marked for identification and received into evidence.

Clayton Ray Echard testifies.

Defendant's Exhibits 34, 35, and 51 are received into evidence and Exhibit 53 is marked for identification and received into evidence.

Discussion is held.

Based on the testimony and matters presented,

THE COURT FINDS by a preponderance of the evidence that there is reasonable cause to believe that Defendant has committed an act of domestic violence within the last year.

THE COURT FURTHER FINDS that good cause exists to continue the Order of Protection in this case.

IT IS ORDERED that the Order of Protection issued at Superior Court on October 6, 2023 shall remain in full force and effect.

LET THE RECORD FURTHER REFLECT that the parties receive a copy of the aforementioned document in open court.

LET THE RECORD FURTHER REFLECT that Plaintiff's Exhibits 2 through 10, 12 through 18 and Defendant's Exhibits 19 through 33, and 36 through 50 are disposed.

Counsel for Plaintiff makes an Oral Motion to withdraw from these proceedings.

IT IS ORDERED granting Counsel's Motion to withdraw.

10:13 a.m. Hearing concludes.

FILED: Hearing Order

LATER:

LET THE RECORD REFLECT that the Court did not invoke the Brady Order due to the fact that it is still undetermined if Plaintiff is pregnant with Defendant's child.

All parties representing themselves must keep the Court updated with address changes. A form may be downloaded at:
http://www.superiorcourt.maricopa.gov/SuperiorCourt/LawLibraryResourceCenter/

EXHIBIT “3”

Posted by u/TheOneandOnlyJenn 12 hours ago

26

How to win the scariest costume contest

SHIT POST

Sorry, this post has been removed by the moderators of r/BachelorNation.

Moderators remove posts from feeds for a variety of reasons, including keeping communities safe, civil, and true to their purpose.



EXHIBIT “4”

GINGRAS LAW OFFICE, PLLC

4802 E. Ray Road #23-271, Phoenix, AZ 85044 ▪ Tel: (480) 264-1400

April 25, 2024

VIA EMAIL
& U.S. Mail

Mr. Gregg Woodnick, Esq.
1747 E. Morten Avenue, Suite 205
Phoenix, AZ 858020

Re: *Owens v. Echard, Case FC2023-052771 (OOP Matter)*

Dear Gregg,

This letter serves as written notice to you pursuant to Rule 26(c)(2)(B) that Laura intends to bring a motion under Rule 26(c)(3) asking the court to sanction you for the pleading you filed on March 25, 2024 entitled "Motion for Relief from Judgment Based on Fraud". As explained below, the motion you filed violates Rule 26(b) in multiple different ways.

SUMMARY OF SPECIFIC ISSUES

The most serious violation in your motion is the number of knowingly false statements of fact it contains. At this point in the case, you cannot claim that these statements are simple mistakes or that you did not have enough information to know the truth. In addition, the sheer number of factual misstatements make it appear you are intentionally trying to defraud the court by advancing a narrative that you know, or reasonably should know, is completely and totally false.

Below is a list of the specific false factual statements contained in the motion, and to be clear – I draw a distinction between an allegation that you *claim* is true but which you know is disputed and unproven, and a representation where you avow something has been factually established and is no longer disputed.

In other words, I have no problem with you saying "Clayton *claims* Laura was never pregnant". That is an accurate statement of the case, same as if I file a pleading which says: "Laura claims Clayton raped her." Accurate summaries of disputed allegations are always OK.

But I do have a serious problem with you making an unqualified representation to the court that "Laura was never pregnant" *as if that has actually been established as fact*. Accurate statements about the disputed claims are fair. False representations about the facts are not.

Having said that, I believe the following statements violate Rule 26(b)(3) because they constitute statements of fact which you present as being established facts when you know they are heavily contested and, in some aspects, have already been shown to be completely false:

1.) "Plaintiff was never pregnant by Defendant"; Mot. at 2:1–2

This statement violates the rule because it is presented as a statement of fact, but you know it has never been proven to be true. You also know the statement is directly contradicted by extensive evidence including no fewer than five (5) pregnancy tests taken before the case was filed, multiple pregnancy tests taken after the case was filed, and at least one pregnancy test taken in front of Mr. Echard using a test that he purchased and provided to Ms. Owens. You also know this statement is directly refuted by the expert opinion of Dr. Medchill.

2.) "Plaintiff has provided no verifiable medical evidence to support her alleged twin pregnancy"; Mot. at 2:14–15.

This statement violates the rule because you know it is factually false. Laura has provided *extensive* evidence, some of which is attached to Dr. Medchill's expert report. Laura has also testified under oath about these issues, and she has provided an affidavit (attached to Medchill's report) explaining and summarizing the extensive medical evidence supporting her claim. I understand you do not *accept* this evidence as conclusive, but that it entirely different than telling the court that no evidence exists, when you know it does.

3.) "To date, <u>every</u> obstetrician and gynecologist … have indicated they have no records as she was <u>never</u> seen as a patient." Mot. at 2:18–21.

This statement violates the rule because you know it is factually false. It also violates the rule because you intentionally omit additional information in order to make the statement misleading.

In terms of falsity, as you know Laura has produced medical records from MomDoc (an OB/GYN facility) showing she was seen there as a patient on November 14, 2023. If you somehow missed this, those records (which I believe were previously disclosed before I got involved) are attached to Dr. Medchill's report as shown below.

INDEX OF EXHIBITS		
Exhibit	**Description**	**Date**
1	Pregnancy Test at Banner Health	June 1, 2023
2	Images of Tissue Discharged	July 23, 2023
3	Barrow (Zieman) Visit Summary	October 11, 2023
4	Barrow Epilepsy Pregnancy Specialist Appt.	October 17, 2023
5	HCG test – Sonora Quest	October 17, 2023
6	MomDoc Records	November 14, 2023

Your statement also violates the rule because it fails to explain you have received confirmation from other OB/GYNs (such as Dr. Makhoul) confirming that Laura made appointments to receive care, but she had to cancel for totally benign reasons such as testing positive for COVID. *See* CE0219–220. That omission clearly was intended to create a false impression that there was *zero* evidence that Laura ever sought any care from anyone, and that she had no valid explanation for why she did not keep various appointments. Those implications are completely and totally false.

4.) "Further emphasizing the extreme fraud on this court … other 'sonograms' of the alleged 'twin' pregnancy … curiously match up with sonograms and YouTube videos posted from years ago *online*." Mot. at 3:3–6.

This statement violates Rule 26 because it falsely implies there is *any* evidence to show Laura created a fake sonogram using an old YouTube video. You know that is 100% false.

As you know, the facts are as follows – Dave Neal previously disclosed an alleged "video" of a sonogram with Laura's name on it. My understanding is this was an exhibit at Laura's deposition (it was a file marked: Exhibit 9 - Sonogram Video SMIL (9.5.23).mov) and a screenshot is shown below. I believe this is the "YouTube" video you mentioned in your motion.



Laura's testimony about this point has never waivered – she says Dave Neal sent it to her after he *claimed* to have received it from an anonymous source. Laura asked Dave to disclose the source, and he never did. Based on this, Laura's belief is that Dave (or someone working with him) created the fake video in an effort to smear Laura and help Clayton. That will obviously part of the defamation lawsuit Laura plans to bring against both Clayton and Dave, and others, once this matter is over.

In any event, your statement to the court regarding the sonogram video clearly omits the full context of the video. In doing so, you falsely imply Laura had something to do with creating this fake video and/or that you have a good faith basis to believe evidence exists showing she created this. She has flatly denied creating it, and you have no evidence whatsoever to show that she did.

Taken as a whole, it is clear your assertions and representations in the motion go *far, far* beyond zealous advocacy. You are simply lying to the court about the facts and the evidence in an attempt to help your client. That is unacceptable.

In sum, I have no problem with you advocating zealously on behalf of Clayton just as I am trying to do with Laura. However, there are limits on such advocacy. You are not allowed to make knowingly false statements to the court, and you are not allowed to withhold information in an attempt to mislead the court.

The motion you filed clearly violates both of those standards, and it represents a clear violation of Rule 26. Accordingly, I demand that you withdraw or correct the motion within 10 court days from today. If you choose not to do so, I will seek sanctions and other relief from the court.

Very Truly Yours,



David S. Gingras, Esq.

1747 East Morten Avenue, Suite 205
Phoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

April 26, 2024

SENT VIA-EMAIL ONLY

David Gringas
Gingras Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, Arizona 85044
david@gingraslaw.com

RE: Laura Owens v. Clayton Echard
Maricopa County Superior Court
Case No. FC2023-052114

David,

The upcoming trial is very simple and the relentless emails and demands are only creating more legal work for naught and do not help. I am very uncomfortable with the aggressive way you are litigating this, sharing pleadings on your Blog, and the Twitter battles. I have expressed my concerns with some of the things you have said and am doing my level best to remain focused on what should be a simple evidence presentation to Judge Mata.

I strongly disagree with your Rule 26 analysis, and I regret withdrawing Clayton's Motion for Sanctions. My intention in withdrawing it was to keep the focus on the simple facts of the case. I thought it would encourage your camp to tone down the rhetoric and toxicity. Obviously, that did not happen.

As stated in the response to your sardonic "lunch" motion, I am willing to discuss issues pertaining to trial process with you but only with a neutral third-party present. I am not comfortable with how you communicate and had hoped that your prior apology after the *ad hominem* commentary would have changed that. It has not. This is Clayton and Laura's case, not ours.

As for your letter and 10-day demand, I am responding briefly to the four (4) salient issues. If you choose to file for Rule 26 Sanctions, we will respond and let the court adjudicate the matter. The underlying Motion at issue used limiting language that was perhaps *inartful* but certainly not malignant or violative of Rule 26. Although I do not

owe you an explanation, I am documenting our position and asking again that you to stop the hostile litigation.

1. **"Plaintiff was never pregnant by Defendant"** is a factual contention with evidentiary support based on belief formed after reasonable inquiry. *To wit:* Clayton's sincere and credible and unambiguous denial of vaginal intercourse or conduct that could have caused pregnancy. Only Laura has ever mentioned there being any sort of penetrative conduct and her narrative has widely shifted (from his "fluids" being "down there" after she performed oral sex to him being too high to remember penetration to now an absurd claim of rape). Clayton's assertion that Laura could never have been pregnant by him remains the same.

2. **"Plaintiff has provided no verifiable medical evidence to support her alleged twin pregnancy"** is a factual content with evidentiary support based on review of the disclosures she provided. "*Verifiable*" medical evidence is an important qualifier here because it limits the scope of the contention to evidence that can be proven accurate to a reasonable degree of scientific certainty and evidentiary scrutiny. Recall, we have still not received *any* confirmation that Laura had a sonogram done on 7/2 at Planned Parenthood and have, in fact, received records indicating all she had was a telehealth appointment at the end of June (which aligns with her various emails to Clayton and Clayton's father regarding the same). The MomDoc records support the absence of pregnancy and say nothing about whether a pregnancy ever existed.

3. **"To date, every obstetrician and gynecologist have indicated they have no records as she was never seen as a patient"** is a factual content based on the information she provided (and lack thereof). Making an appointment that was not kept with Dr. Makhoul or Dr. Higley does not constitute being "seen as a patient". For the MomDoc records, the statement also functions as a denial of factual contention "warranted on the evidence" per Rule 26(b)(4) (i.e., we denied her factual contention she was seen as a patient by an ob/gyn based on the totality of evidence and her being seen by MomDoc for a non-pregnancy related pap smear is not her being seen as a patient for pregnancy, including the fact she alleged before we filed the motion that she miscarried months earlier).

   To the extent this does not address her being seen at MomDoc for non-pregnancy related medical treatment, we will amend the motion to clarify that--months after Laura claimed she miscarried--she was seen on November 14, 2023 at MomDoc who confirmed she was not pregnant.

4. The fourth statement about the "**sonograms" "curiously matching up with sonograms and YouTube videos posted from years ago online**" is a factually accurate contention. They very much match up. Laura was presented with this

evidence during her deposition. See also the 5th supplemental disclosure statement, which includes the email your client sent to Steve Carbone (Reality Steve) from her email with the same sonogram attachment. She sent the same video to Clayton in October and said "…*here is my 100000000% real ultrasound VIDEO*." I appreciate that your client claims everything she said or sent to others that does not comport with her new narrative must be crafted by someone else or AI, but that is an argument she can make to the judge.

We will be filing the amended Motion in due course consistent with your request for the same.

Very truly yours,
WOODNICK LAW, PLLC



Gregg Woodnick

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
4/30/2024 2:16:38 PM
Filing ID 17740564

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Plaintiff,

And

CLAYTON ECHARD,

Defendant.

Case No.: FC2023-052114

REPLY TO PETITIONER'S RESPONSE TO RESPONDENT'S *AMENDED* MOTION FOR RELIEF BASED ON FRAUD

(Assigned to the Honorable Julie Mata)

Defendant/Respondent, **CLAYTON ECHARD**, by and through counsel undersigned, hereby files his Reply to Plaintiff/Petitioner, **LAURA OWENS**, Response to his Amended Motion for Relief Based on Fraud.

Tampering with evidence is more than just a "misstatement" and is appropriately addressed in A.R.S. § 13-2809. Here, Laura has committed significant levels of fraud in both the Order of Protection proceeding at issue and during the course of the paternity action also before this Court. Notably missing from Laura's *Response* is any acknowledgment that the sonogram at issue, which she finally admitted at deposition was falsely attributed to

Southwest Medical Imaging (SMIL), has *also* been confirmed not to have originated from Planned Parenthood.[1] (**Exhibit 1).**

Moreover, via medical records from 2016[2] (which are also dubious) Laura claims she had ovarian cancer and that she had an ovary removed – information that is patently missing from any of the "medical records" provided by Laura (including not being provided to her own expert) and which would have considerable impact on her ability to become pregnant (had there been intercourse). There is no mention of **John Chung Kail Chan, MD**'s records for Laura who reportedly diagnosed her with "'*real ovarian cancer, not something that just 'may' be there*" or **Rebecca Yee, MD's** records for Laura who said "*Yesterday (8/30/16) you received ovary removal surgery (oophorectomy) of your right ovary as well as a surgical abortion*."

As and for his Reply, Clayton states as follows:

1. **Laura's Response begs the question *why* this Court must set aside her protective order, which was procured based on fraud.** Fortunately, this Court ordered Petitioner to attend her deposition (she had previously failed to appear) and provide disclosure pursuant to Rule 49 (she had provided insufficient information prior to this Court's orders and then continued to not comply, prompting the eventual Order to Compel). Those discovery and disclosure processes revealed that Laura had *modified* medical records that were used in the

[1] Note, Laura already admitted at her deposition to doctoring the sonogram but avowed that she had obtained the original on July 2, 2024, at Planned Parenthood. Planned Parenthood has since confirmed that Laura was never seen there for an ultrasound appointment and had, in fact, cancelled the July 2nd appointment. Planned Parenthood also noted that the sonogram she claimed was from them was *not* consistent with the sonograms performed at Planned Parenthood. Laura also claimed that there might not be records of this appointment because she made it "anonymously" which Planned Parenthood has also confirmed is not possible as they do *not* offer anonymous appointments.

[2] Note, consistent with the Court's order that no medical records are to be publicly available these medical records have only been provided to Laura.

underlying paternity matter and in the collateral protective order matters. More shockingly, it exposed Laura's history of fabricating pregnancy claims and medical records extends to at least three (3) other men.

Laura's *Response to the Amended Motion to Set Aside* is a lesson in fallacies. It has all the classic trappings of *false authority*, *non-sequiturs*, *suppressed evidence*, and *red herrings.* As referenced, the dataset Laura's medical expert relied on is missing key foundational information (ostensibly because Laura failed to share the information with her own expert). Her medical expert and his report will appropriately be objected to at trial under Rule 702 and *Daubert*.

The *Response* uses fallacies in a distorted attempt to avoid the realities of A.R.S. § 13-2809, as by Laura's own admission (and as confirmed by SMIL *and* Planned Parenthood), Laura tampered with medical records and, despite this, used them as "evidence" in court proceedings. Laura refers to this civil and criminally punishable behavior as "*some misstatements*."

2. **This is not the first time Laura has tampered with medical evidence, which is relevant as a sonogram was the basis for Laura's OOP being upheld.** To be clear, Judge Doody clearly stated at the conclusion of the Order of Protection hearing that he was upholding the Order of Protection because of the sonogram in the image at issue. Laura appears to prefer to diminish the importance of the sonogram that she altered and presented as evidence. Had Laura relistened to the audio from the hearing, she would recall that when he made his decision, Judge Doody stated: "*The way you published this photo […] it's unflattering […] that's my reason for making my decision*." FTR Oct. 25, 2023 at 10:01:17.

Laura is prolific with her arts and crafts skills as, upon information and belief, the **same** tampering occurred in her *prior* pregnancy fraud matters. So much so that, in at least one instance, the actual patient whose records were falsely attributed to Laura in the CV2021-052893 matter (which this Court took judicial notice of) has stepped forward to share the trauma of seeing her medical records bearing Laura's name and the stolen valor of tragic pregnancy loss via a phenomenon known as vanishing twin syndrome (VTS).[3]

To be clear, there are three (3) ultrasounds that have been altered: one image used in the OOP/current proceeding, one video, and one 21 week sonogram. The first is the one that has been confirmed to have not come from Planned Parenthood nor Southwest Medical Imagining (SMIL). The second is an ultrasound video dated September 5, 2023 that Laura now claims was faked by one of her prior victims. The video was sent from Laura's email, contained her biographical information, and Laura sent it to Clayton and Steve Carbone ("Reality Steve"). **Exhibit 2.** Upon information and belief, once Laura realized the video she sent to Clayton and the media was identical to a publicly accessible video online from years ago (also falsely attributed to SMIL), she backpedaled and emailed Clayton, on October 14, 2023: "*This afternoon, I opened the file labeled "Sonogram 9-5-23.mov" […] I'm 100% sure you won't believe me, but I* ***had a different sonogram video with that title that I uploaded weeks ago.****"* (Emphasis added). **Exhibit 3.** To date, that "different" sonogram video has not been disclosed.

[3] Oddly enough, Laura's counsel blogged his theory that Laura has experienced this rare phenomenon. *See* "What the Hell is a 'Vanishing Twin'" at https://gingraslaw.com/what-the-hell-is-a-vanishing-twin/ (pub. Apr. 18, 2024).

The third is a sonogram of a fetus that appears to be twenty-one (21) weeks and three (3) days old. This sonogram was sent from Laura's email on October 12, 2023, bears the last name "Owens," and was sent to the media with commentary from Laura that "*The last imaging I had was troubling to me because I thought the boy's profile looked kind of weird (attached), but the sonographer didn't say anything.*" **Exhibit 4.** This sonogram has not been disclosed nor have any communications supporting Laura's repeated claim that she was pregnant with "boy and girl" "twins" (despite the Motion to Compel requiring the same). Upon information and belief, Laura opted not to disclose this sonogram (or provide it to her own expert) because it does not comport with her new July/August miscarriage timeline.

2. **Laura's appended expert report and her counsel sharing the same on Twitter are contrary to Court Order and Laura's repeated claims that she was in "need" of protection.** Not only did Laura's counsel (presumptively with her assent) post his 100+ page Response on his personal Twitter account (which included the same "medical records" Laura demanded be protected by this Court and **both** expert reports contrary to Court order), but they also provided commentary that the expert report prepared by two medical school obstetrics professors was "*a soft 2*" "*on a scale of 1-10 for Laura..10 being bad*." **Exhibit 5.**

Laura's counsel, ostensibly with direction from Laura, continues to espouse his theories on the case and publish Laura's private medical records online and on his law firm blog. This, contrary to Laura's repeated filings and assertions in her Order of Protection hearing and before this Court that she was entitled to this Court's protection in light of the negative public in reaction to her reaching out to the media, *The Sun*, and other tabloids. Moreover, her counsel not only shared her medical records on his personal Twitter but is also

engaging in discourse about elements of the case the parties were ordered not to disclose with a private individual, alongside his client. **Exhibit 6.** This flies in the face of this Court's order that "*no party shall disclose outside of themselves any medical or other documentation (exhibits, medical records, etc) disclosed between parties*)." *See* Court's Minute Entry dated February 21, 2024.

3. **Although expert reports have no bearing on the fraud Laura perpetrated on the Court in the Order of Protection at issue, Laura's expert report only shows Laura lied (*at minimum by omission*) to her own expert.** Laura has admitted to tampering with the sonogram relied on by Judge Doody when he granted her Order of Protection. That is fraud and evidence tampering. Her expert's report, which appears to rely on fabricated data and omitted medical records (which may also be fabricated) about having her ovary removed, has questionable value. Laura altered a sonogram and used that fake evidence to secure an Order of Protection. This is fraud upon the court.

To the extent that this Court believes the improperly published expert report is relevant, it should be noted that absent from Dr. Medchill's report is any review of Laura's medical records that show she had an oophorectomy (ovary removed) in 2016. There is no mention of **Dr. John Chung Kail Chan, MD**'s records for Laura who reportedly diagnosed her with "'*real ovarian cancer, not something that just 'may' be there*" or of **Dr. Rebecca Yee, MD's** records for Laura who said "*Yesterday (8/30/16) you received ovary removal surgery (oophorectomy) of your right ovary as well as a surgical abortion*." Additionally, all confirmed medical records for Laura fail to mention a missing ovary, which would be critical information Laura would need to inform her doctors about as, according to Dr. Yee, MD in a

letter to Laura "*At this point, having children on your own would, obviously, be impossible*." Upon information and belief, *either* Laura lied to her own expert, this court and the providers *or* Laura faked additional medical records going back to 2016 as part of her pregnancy for a relationship con.

4. **The evidence supports the conclusion Laura perpetrated fraud before Judge Doody and this Court.** The sonogram at issue and the sole reason Judge Doody granted Laura's Order of Protection did not come from SMIL despite its appearance. According to Laura's testimony, she changed "*the top of that [sonogram] from Planned Parenthood to SMIL." See* Exhibit 1, *Amended Motion for Relief from Judgement Based on Fraud*. It also, despite Laura's bizarre testimony at the deposition, did not come from Planned Parenthood, who noted "*Per our EMR team, the ultrasound image provided in your fax does not appear consistent with ultrasound images generated by our practice.*" This is because, upon information and belief and considering the existing information, it is not really Laura's sonogram and, instead, was *manufactured* by Laura with the intent to defraud the Court into believing that Laura was pregnant with Clayton's "twins" and that she was receiving obstetric care (which has also been confirmed to be false).

5. **Clayton is entitled to his reasonable attorney's fees and costs incurred in this entire action, including all filings related to this Motion for Relief from Judgment.** Laura was fully aware of the true nature and circumstances underpinning her perjurious statements and when she admitted "medical evidence." On October 6 and October 25, 2023, she knew she had not received an ultrasound for her alleged "twin" pregnancy, and that the sonogram she had proffered was (upon information and belief) created by her. She knew the

sonogram was fabricated when she deposed Clayton on February 2, 2024, yet she presented the sonogram to him and falsely attributed it to SMIL. When she was deposed by Clayton in March, she knew she was lying when she said the sonogram was *falsely* attributed to SMIL but originated at Planned Parenthood – a lie which was not confirmed until Clayton received confirmation from Planned Parenthood on April 26, 2024. Clayton has had to incur significant costs and fees unraveling Laura's ever-expanding web of lies, which include having to defend himself against her malignant filing of the underlying Order of Protection. Clayton is entitled to his reasonable attorney's fees and costs expended defending himself against Laura, pursuant to A.R.S. § 25-324.

WHEREFORE, Clayton respectfully requests the Court:

A. Dismiss the Order of Protection in its entirety on the basis of fraud;

B. Grant leave to Clayton to submit a *Child Doll Affidavit*;

C. Award Clayton his reasonable attorney's fees;

D. Order such further relief as the Court deems just including sanctions available to this Court.

RESPECTFULLY SUBMITTED this 30th day of April, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Defendant

ORIGINAL of the foregoing e-filed
This 30th day of April, 2024 with:

Clerk of the Court

Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gringas
Gringas Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GringasLaw.com

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Reply To Petitioner's Response To Respondent's Amended Motion For Relief Based On Fraud* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Apr 30, 2024 11:16 PDT)

CLAYTON ECHARD

04/30/2024

Date

EXHIBIT “1”

Planned Parenthood® Orange and San Bernardino Counties | MELODY℠ HEALTH

801 E. Katella Avenue Anaheim, CA 92805 | PH: 714.633.6373 | Fax: 714.532.2522

FAX COVER SHEET

TO: Woodnick Law, PLLC

FAX: 1-602-396-5850

FROM: PPOSBC Medical Records (714) 633-6373

DATE: 4/26/2024

PAGES:37**(incl. cover)**

COMMENTS:

Received attached follow up request on original auth form/request for records related to Owens v. Echard. See response attached.

The information contained in this facsimile message is intended only for the use of the individual named above and privilege of confidentiality is not waived by virtue of this having been sent by facsimile. If the person actually receiving this facsimile is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to Planned Parenthood of Orange and San Bernardino Counties 801 E. Katella Avenue Anaheim, CA 92805 via the US Postal Service.

Planned Parenthood® Orange and San Bernardino Counties | MELODY™ HEALTH

Woodnick Law, PLLC
1747 E. Morten Ave., #205
Phoenix, AZ 85020

April 26, 2024

VIA FAX

To Whom It May Concern:

We can confirm that the records we provided previously include all of the information we have on file for the patient identified in your request. This patient had scheduled an appointment for July 2, 2023, but our records show that the appointment was cancelled. The visit summary provided by the patient would be consistent with a summary generated for a cancelled visit. Per our EMR team, the ultrasound image provided in your fax does not appear consistent with ultrasound images generated by our practice. Although this patient was not seen by us (Planned Parenthood/Orange and San Bernardino Counties, Inc.) for an appointment, there are other Planned Parenthood providers/affiliates in our area, and it is possible the patient was seen by a different Planned Parenthood entity, which we would not be able to confirm or speak to.

If you have any questions, please do not hesitate to contact PPOSBC. Thank you.

Sincerely,

Veronica Mamisay
Paralegal
801 E. Katella Ave., Anaheim, CA 92805
Phone: 714.633.6373, Ext.358

Planned Parenthood
Orange and San Bernardino Counties

DECLARATION

Custodian of Records for: PLANNED PARENTHOOD/ORANGE AND SAN BERNARDINO COUNTIES, INC.

Records pertain to: Name: Laura Michelle Owens (who may also use the alias "Emily Laura Wilson") DOB: May 14, 1990

Reference/Case Number: Owens v. Echard (Case No. FC2023-052114)

I, the undersigned, being the duly authorized **Custodian of Records,** or other qualified witness with the authority to certify the records, hereby declare:

- **A comprehensive records search was conducted and the information already provided was comprehensive.**
- **No additional records matching Laura Michelle Owens with the date of birth of May 14, 1990 were identified.**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Veronica Mamisay
Signature of Custodian or Qualified Witness

Veronica Mamisay
Print Name

4/26/2024
Date

714.633.6373
Phone Number

FAX COVER SHEET

TO	
COMPANY	
FAX NUMBER	17145322522
FROM	Gregg Woodnick
DATE	2024-04-17 18:45:35 GMT
RE	Re: Laura Owens

COVER MESSAGE

Good morning,

Please see the attached from attorneys, Gregg R. Woodnick and Isabel Ranney. Please feel free to contact our office with any questions, thank you!

CANDY DRAKE
Director of Operations & Paralegal

WOODNICK LAW PLLC
1747 E. Morten Ave., #205
Phoenix, Arizona 85020
Phone: 602-449-7980
Fax: 602-396-5850
www.woodnicklaw.com
Email: candy@woodnicklaw.com

Phoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

April 17, 2024

Planned Parenthood Mission Viejo Health Center
26137 La Paz Rd., #200
Mission Viejo, CA 92691

Planned Parenthood Costa Mesa Health Center
1520 Nutmeg Place
Costa Mesa, CA 92626

Planned Parenthood Westminster Health Center
14372 Beach Blvd.
Westminster, CA 92683

VIA EMAIL & U.S. Mail

Re: **Owens v. Echard**
Maricopa County Superior Court Case No. FC2023-052114

Dear Provider,

This is a follow-up letter confirming that the information previously faxed to our office (attached) is all of the information you have on file for **Laura Michelle Owens** (DOB 04/15/1990). Her patient ID number is #2008546949.

Ms. Owens is claiming that an ultrasound was performed on July 2, 2023 and was administered by Dr. Mandeep Sidhu in your Costa Mesa location. She has provided screenshots of this alleged appointment as well as a "visit summary" that contains "no information" (attached).

She has also provided what she avers to be the ultrasound from that visit – please note she has testified to doctoring the heading of the image to attribute it to SMIL (Southwest Medical Imaging) but claims she obtained the actual ultrasound from your organization. The alleged ultrasound is also attached to this email.

If you can kindly re-check your records using the patient ID number provided to confirm or deny that Ms. Owens for July 2, 2023 was seen in person for an ultrasound that would be much appreciated. If any additional records come up during your search, please provide those as well.

hoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

The original letter to your organization that contains the Court Order for Ms. Owens' medical records as well as her signed HIPAA release is attached for your reference.

Please note this this cause does involve fraud allegations against one of the parties (including medical records doctoring/manipulation). As such, please assure your custodian of records not only provides the full file, but that if there are records that were not produced by your office (e.g. submitted by a party through an online portal) that they be clearly identified as such (including the submission date) so that they are not misconstrued as records prepared by your office.

Inversely, if your records search confirms no other records exist, please have your custodian of records provide a basic affidavit indicating:

1. They are the custodian of medical records for the facility.
2. A comprehensive records search was conducted and that information already provided is comprehensive.
3. No additional records matching Laura Michelle Owens with the date of birth of May 14, 1990 were identified.

Time is of the essence. As such, we are asking that you expedite production of the requisite data (or confirming the absence of information) and provide the same directly to our office via Fax (602-396-5850).

We appreciate your prompt attention to this matter. We will of course pay for copies upon presentation of invoices.

Very truly yours,
WOODNICK LAW, PLLC

Gregg R. Woodnick

Cc: D. Gringas, esq.

Planned Parenthood® Orange and San Bernardino Counties | MELODY℠ HEALTH

801 E. Katella Avenue Anaheim, CA 92805 | PH: 714.633.6373 | Fax: 714.532.2522

FAX COVER SHEET

TO: Gregg Woodnick of Woodnick Law, PLLC (ATTN: Medical Records)

FAX: 1-602-396-5850

FROM: PPOSBC Medical Records (714) 633-6373

DATE: 3/21/2024

PAGES: 27 (incl. cover)

COMMENTS:

Please see attached medical record. If you have any questions, please feel free to contact our office. Thank you!

The information contained in this facsimile message is intended only for the use of the individual named above and privilege of confidentiality is not waived by virtue of this having been sent by facsimile. If the person actually receiving this facsimile is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to Planned Parenthood of Orange and San Bernardino Counties 801 E. Katella Avenue Anaheim, CA 92805 via the US Postal Service.

49 East Moreland Avenue, Suite 203
Phoenix, AZ 85020
(502) 449-7980
(502) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

March 4, 2024

Planned Parenthood Mission Viejo Health Center
26137 La Paz Rd., #200
Mission Viejo, CA 92691
veronica.mamisav@PPOSCB.org

VIA EMAIL & U.S. Mail

Re: **Owens v. Echard**
Maricopa County Superior Court Case No. FC2023-052114

Dear Provider,

Attached please find an executed HIPAA release regarding a potential patient of yours, **Laura Michelle Owens** DOB 05/14/1990, who also may use the alias "**Emily Laura Wilson**", with the same DOB.

This HIPAA compliant release was executed by Ms. Owens at a recorded deposition on March 1, 2024 for use in cause number FC2023-052114. As evidenced by her signature, you have the authority to release Ms. Owen's records from **August 2020 to present date** directly to our office. The Court has also issued a Minute Entry (attached) confirming your authority to release records regarding the same.

Please promptly provide any and all records from that time period for any treatment services and communications provided to/with Ms. Owens. This is meant to be comprehensive.

Please note this this cause does involve fraud allegations against one of the parties (including medical records doctoring/manipulation). As such, please assure your custodian of records not only provides the full file, but that if there are records that were not produced by your office (e.g. submitted by a party through an online portal) that they be clearly identified as such (including the submission date) so that they are not misconstrued as records prepared by your office.

//
//

[redacted]
Phoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

Inversely, if your records search confirms no records exist, please have your custodian of records provide a basic affidavit indicating:

1. They are the custodian of medical records for the facility.
2. A comprehensive records search was conducted.
3. No records matching Laura Michelle Owens or Emily Laura Wilson with the date of birth of May 14, 1990 were identified.

We will be forwarding you the Minute Entry from the Court confirming your authority under separate cover. For now, and because time is of the essence, we are asking that you expedite production of the requisite data (or confirming the absence of information) and provide the same directly to our office.

We appreciate your prompt attention to this matter. We will of course pay for copies upon presentation of invoices.

Very truly yours,
WOODNICK LAW, PLLC

Gregg R. Woodnick

Cc: C. Keith, esq.

1747 East Morten Avenue, Suite 205
Phoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW

AUTHORIZATION AND RELEASE TO DISCLOSE MEDICAL RECORDS INCLUDING HIV & AIDS RELATED INFORMATION

Patient name: LAURA MICHELLE OWENS Date of Birth: 05/14/1990
Purpose for disclosure: Attorney/Family Law Litigation

I hereby authorize the disclosure of the above-named individual's health information as described below. The undersigned hereby authorizes Planned Parenthood Arizona Inc. to make the disclosure of information. and its affiliates

Company/Persons Authorized to Receive Information: Gregg Woodnick of Woodnick Law, PLLC, 1747 E Morten Avenue, Suite 205, Phoenix, AZ 85020, and his staff employed therein.

The specific information to be disclosed is: Any and all medical records and billing records of any kind and description, related to care or services provided to the patient named above for the following dates: 08/01/2020 through the present.

I understand that the information in my health record may include information relating to sexually transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV). It may also include information about behavioral or mental health services, and treatment for alcohol and drug abuse.

I understand that I have a right to revoke this authorization at any time. I understand that if I revoke this authorization, I must do so in writing and present my written revocation to the health information management department. I understand that the revocation will not apply to information that has already been released in response to this authorization.

This authorization will expire one-hundred-eighty days from the date on which it was signed. I understand that once the above information is disclosed, it may be re-disclosed by the recipient and the information may not be protected by federal privacy laws or regulations. I understand authorizing the use or disclosure of the information identified above is voluntary.

Laura M. Owens 3/1/24
Laura Michelle Owens Date

Clerk of the Superior Court
*** Electronically Filed ***
02/26/2024 8:00 AM

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052114 02/21/2024

HONORABLE JULIE ANN MATA

CLERK OF THE COURT
L. Overton
Deputy

IN RE THE MATTER OF
LAURA OWENS CORY B KEITH

AND

CLAYTON ECHARD GREGG R WOODNICK

JUDGE MATA

MINUTE ENTRY

NOTE: There is a Later at the end of this minute entry.

Courtroom 102 - NER

10:30 a.m. This is the time set for Status Conference regarding Respondent's Expedited Motion to Set in-person Status Conference. Petitioner, Laura Owens, is present with above-named counsel. Respondent, Clayton Echard, is present with above-named counsel.

A record of the proceedings is made digitally in lieu of a court reporter.

Discussion is held regarding the status of the case; and counsel for Respondent's Expedited Motion to Continue Trial and Motion for Additional Trial Time, filed February 6, 2024.

Counsel for Respondent addresses the Court regarding opposing counsel's failure to provide discovery & disclosure, and advises the Court of a forthcoming Deposition set for March 1, 2024, at 8:00 a.m., as the basis for his *Expedited Motion*.

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052114 02/21/2024

Counsel for Petitioner advises the Court that there is no objection to Respondent's *Expedited Motion to Continue Trial*, and addresses the Court regarding the ruling concerning Petitioner's Motion for Confidentiality and Preliminary Protective Order, filed January 17, 2024. Counsel further advises the Court that discovery regarding his client's pregnancy records is forthcoming by the end of the week.

Based on the matters discussed,

IT IS ORDERED granting the Expedited Motion to Continue Trial.

IT IS FURTHER ORDERED vacating the Trial/Evidentiary Hearing scheduled for February 27, 2024, at 4:00 p.m. and resetting same to **June 10, 2024, at 8:45 a.m.** (2 hours allotted). The parties, and counsel if represented, shall appear in person before:

Judge Julie Mata
Superior Court of Arizona
Northeast Regional Court Center
18380 North 40th Street
Courtroom 102
Phoenix, Arizona 85032
(602) 372-0825

Where to Find Additional Information & Forms

The Arizona Judicial Branch has a Family Law Information website, https://www.azcourts.gov/familylaw, with links to the Arizona Revised Statutes and the Arizona Rules of Family Law Procedure (ARFLP), which govern these proceedings (go to "Authorities" section). The Superior Court Law Library Resource Center (LLRC) also provides training classes and has detailed instruction packets available online at https://superiorcourt.maricopa.gov/llrc/family-court-forms/. Any party to a case can register and access the Clerk of Court's Electronic Court Record (ECR) for their particular case at https://ecr.clerkofcourt.maricopa.gov/login.aspx.

The parties are required to appear for the hearing. If only one party appears for the hearing, the Court may allow that party to present evidence and make arguments and the Court may enter rulings without the other party's participation. If neither party appears for the hearing, then the petition or motion may be denied and dismissed.

If, after completing discovery, the parties wish to request that the court set an alternative dispute resolution with a judge pro tem in accordance with ARFLP 67.4, the parties are required

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052114 02/21/2024

to submit a joint certification in the proper format to this court for consideration. A form for use in submitting such requests is available at https://superiorcourt.maricopa.gov/media/1stcmgxb/dradr41fz.pdf

Time for the hearing: Each party will have about 1/2 of the available time to present your case by asking questions, presenting documents, and presenting your position on the issue(s). The parties are expected to complete the trial in the allotted time. The time will not be extended unless a party files and the Court grants the motion at least 30 days before the hearing stating good cause to extend the time. That Motion must include a list of each and every witness who will testify and an estimate of time and subject matter of the expected testimony for each witness. Failure to timely file such a motion will be deemed a waiver of any argument that more trial time is needed.

IT IS ORDERED with regard to discovery and disclosure requirements:

1. In general, the Court will only set the matter for trial once all disclosure and discovery is complete. Both parties shall provide any additional disclosures as required under ARFLP 49(b)(2), and shall complete all discovery no later than 30 days prior to trial.

2. Any motions other than the Motion to Extend, shall be filed at least 15 days prior to trial.

3. Counsel and both parties (or both parties if there are no counsel, and assuming that the Court has made exceptions based on issues of domestic violence) shall personally meet, face to face, at least ten (10) days before trial to discuss the resolution and narrowing of all procedural and substantive issues in this case.

4. The parties shall promptly comply with all requests for relevant information in this case. That means that the parties shall sign all necessary consents and releases reasonably required to obtain relevant documents or records from any financial institution, company, business, medical or health care provider, or employer possessing any relevant information.

Pursuant to ARFLP 76.1, either party may request that the Court hold a scheduling conference to discuss the trial, including scheduling witnesses, the admission of evidence and the filing of a pretrial statements. At least one of the attorneys who will conduct the trial for each party, and any self-represented parties, must attend this conference and shall follow the rules for a pre-scheduling conference statement outlined in Rule 76.1.

IT IS ORDERED that the parties shall file and provide this Division and the opposing party with a copy of a Pretrial Statement pursuant to ARFLP 76.1 **no later than five (5) days**

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052114 02/21/2024

before trial. The Pretrial Statement must include the attachments listed in ARFLP 76.1(g), as applicable. Please see https://superiorcourt.maricopa.gov/media/e13dlsjl/drpts16fz.pdf for forms.

IT IS FURTHER ORDERED that the failure of counsel or any party to appear at the time of trial, or to timely present a completed Pretrial Statement with all attachments, may result in sanctions. (*See* ARFLP 76.2.) The sanctions may include the Court proceeding by default based on the evidence presented by the appearing party.

The parties may obtain the various forms and instructions from the Family Court Forms page, https://superiorcourt.maricopa.gov/llrc/family-court-forms/; use the drop down menu "Other Forms" to access a Pretrial Statement and an Affidavit of Financial Information.

EXHIBIT REQUIREMENTS

The Court will decide the issue(s) based on the testimony and evidence presented at the hearing. Accordingly, **IT IS ORDERED** that the parties submit any proposed hearing exhibits as follows:

1. **Submit Hearing Exhibits through Case Center.** This division is using Case Center (also known as Case Lines), a statewide electronic exhibit portal. Attorneys must submit exhibits through Case Center; self-represented litigants can request to opt-out of Case Center by contacting the judge's division (DRJ14@jbazmc.maricopa.gov or (602) 372-2928). Exhibits must be submitted at least 3 days before the hearing.

   Each party must make sure the Court has the party's valid current email address. If you do not have an email address, you can obtain a free one through accounts.google.com. Each party must register for Case Center at www.digitalevidence.azcourts.gov. The website has links to training resources that will guide you through uploading exhibits and navigating Case Center. The Clerk of Court will email each party (or their attorney of record) a case-specific Case Center link that the party will use to upload exhibits. Case Center accepts most digital formats (including photographs, PDFs, Word files, audio files, and video files). Case Center automatically numbers the exhibits. Petitioner's exhibits have an A- prefix (Exhibit A1, A2, etc.) and Respondent's exhibits have a B- prefix (Exhibit B1, B2, etc.). Third parties will have a C- or D- prefix. During the hearing, the parties must refer to exhibits using the Case Center exhibit numbers. For assistance with Case Center, contact AOC Support Services at (602) 452-3519 or pasupport@courts.az.gov, Monday – Friday 7 AM – 6 PM.

EXHIBIT “2”

Maribeth Burroughs

From: Gregg Woodnick
Sent: Wednesday, April 24, 2024 10:53 AM
To: steve@realitysteve.com
Cc: Isabel Ranney; Maribeth Burroughs
Subject: Owens/Echard

Steve,

As you may know, my office represents Clayton Echard in the residual portion of a paternity matter pending in Arizona. My understanding is that you had communication directly with Laura Owens in the Fall of 2023 regarding the alleged pregnancy. I do not know the extent of your communication and am assuming it is related to your role as a media reporter covering Clayton (former Bachelor) and Laura Owens (podcaster etc.)

Clayton has an ultrasound video that he says Laura sent him digitally on or about October 6th that was addressed through deposition. The ultrasound and email purport to be from Laura and have the subject line "*Ultrasound Video Proof*."

Laura appears to be denying that this is her ultrasound and that this was sent to Clayton.

Would you consider forwarding me whatever Laura sent you by email?

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

Maribeth Burroughs

From: Gregg Woodnick
Sent: Wednesday, April 24, 2024 11:08 AM
To: Isabel Ranney; Maribeth Burroughs
Subject: FW: Required 30 day notice prior to filing a defamation lawsuit
Attachments: 10-11-23 - proof of pregnancy from apt.mov; 10-9-23 - pregnant stomach.mov; Sonogram 9-5-23.mov

---

From: Steve <steve@realitysteve.com>
Sent: Wednesday, April 24, 2024 10:58 AM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Subject: Fw: Required 30 day notice prior to filing a defamation lawsuit

Here you go. One of many bizarre emails she sent me that in my mind proved nothing.

And no, she never followed up with any sort of defamation suit against me despite what her Subject Line says. And this I believe was AFTER I'd gone off on her in my podcast calling her a dumb ass and a liar.

Oh well.

Enjoy...

Sent from Yahoo Mail for iPhone

Begin forwarded message:

On Wednesday, October 11, 2023, 2:51 PM, Laura Owens <laura@lauramichelleowens.com> wrote:

> Steve,
>
> I am not a listener of your show normally, but I was told to check out yesterday's episode and I was stunned at what I heard on your 10+ minute rant about me. The message that you tried to get out to your listeners yesterday was clear: you don't believe I'm pregnant, because of that you think I have made up that I was abused in the past, that I shouldn't be doing anything publicly related to self-help, and that I am doing a disservice to women. All of these things are provably wrong. I am sending you this email not because I want to be pen pals, but because I am required to give you 30 days to retract your false statements before I sue for defamation since you have made every effort to attack my credibility and destroy my reputation. You've chosen to ignore evidence provided to you, including medical records and legal documents, that prove I am telling the truth, and instead have assassinated my character.
>
> I don't owe *anything* to you, but in order to give you reason to take back what you said, I am attaching a clip from this weekend of my pregnant belly, a sonogram from last month, and a video (so you know it's not "doctored") from my patient portal from a visit with my

neurologist TODAY which proves that I am by all accounts 21 weeks pregnant with twins. Clayton has seen all of this and I don't see why it is owed to the rest of the world, but apparently if I don't give it out, I will be treated viciously by the public.

Your allegations about me *not* being a victim of domestic violence *when abuse by both of my exes was witnessed by strangers who have given public statements in both situations* were uninformed and made maliciously. I know you have seen the witness statements, which is why I am so confused as to why you would question my history of domestic violence. I even have photos of the injuries I suffered at the hands of the the ex I was with for two years that are part of his DV file in San Francisco, and while the second ex didn't physically hurt me, he did tell me to "take the fucking [abortion] pills or I'll call the cops," *in writing*, which is by all means abusive. Your comments are hurtful and shame me because I have been a victim of abuse more than once.

As you know from listening to the audio on my calls with Ravgen, the results are not back yet. Clearly, I do have fetal DNA in me, and Clayton's mention of "little to no fetal DNA" was in the SAMPLE, as the lab said, which didn't mean I have "little to no fetal DNA" in my body. I hope I'm not forced to file a lawsuit for defamation as no desire for money from you or Clayton -- I just want a retraction/apology.

All the best,

Laura Owens

Nobody Told Me!" | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604

Email lauraowens@nobodytoldmeshow.com

EXHIBIT “3”

Gmail

Laura Owens <laura@lauramichelleowens.com>

Medical confirmation: diagnosis supports my pregnancy

Laura Owens <laura@lauramichelleowens.com> Sat, Oct 14, 2023 at 9:29 PM
To: Clayton Echard <claytonechard@gmail.com>

Clayton,

This afternoon, I opened the file labeled "Sonogram 9-5-23.mov" and it matches up with the still photo that Dave sent me, which I told him was NOT my ultrasound. I stand by that 100%. I'm 100% sure you won't believe me, but I had a different sonogram video with that title that I uploaded weeks ago. Greg went into the Dropbox/my computer and changed it. My Dropbox was open to everyone to "edit" rather than just "view", which I didn't know about for a week. He would benefit so much if he were able to throw this on me, which he won't be able to do. If neither you nor Dave posted the costume photo with me holding that specific sonogram image of our son, then Greg went into my computer and took it. No one else was sent it. I am sending you what I am sending to Detective Craig Reedy about all that connects Gillespie to this. I am filing harassment charges against him, which is a serious felony. I would hope that you might understand the "mix-up" with sonogram videos based on your friend Greg's history.

I am still very much pregnant and it's too much for me to read what has been written about me and what armchair psychologists think when the reality is that I am still pregnant, and that's it. I think you were very, very high that night and forgot that when I was on top of you on your couch, you were begging me to let you put it in for 30 seconds, then 25, 20, 15, 10....and I said no each time. Then, I thought you were just fingering me, but you stuck it in briefly. I told this story to family and my inner circle of friends the day after we hooked up and nothing about how I have told the story has changed since then. That's exactly what happened. I am not making this up at all and have been asked why I haven't said anything since this started. I know we technically had the same amount of weed (according to you), but I think you were a lot higher since you started a long time before me. Again, I don't expect you to believe me.

I realize that a neurologist is not an OB/GYN, but that is the most recent doctor who saw me and who clearly agreed with the fact that I looked 21 weeks pregnant. As you can see from the screenshot, she referred me to a different specialist and diagnosed me with "epilepsy during pregnancy". So believe it or not, I am still very much pregnant and you are welcome to go with me to the doctor if you would like. All of your celebratory videos are in poor taste when testing is by no means completed yet and when I fully expect the test results to come back with you as the confirmed father at the end of the week. As I've said before, I would have no reason to continue communication with you if I weren't pregnant since I want nothing from you at all. Therefore, I hope you believe what I told you in the first two paragraphs.

All the best,



Laura Owens
Nobody Told Me!' | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

2 attachments



Screenshot 2023-10-14 at 9.09.12 PM.png
203K

CE0032

Gmail Laura Owens <lauraowens@nobodytoldmeshow.com>

RE: Gregg Woodnick

Patrice Omalley <POmalley@cpmlegal.com> Thu, Sep 30, 2021 at 2:57 PM
To: Laura Owens <lauraowens@nobodytoldmeshow.com>
Cc: Ronn Owens <ronnowens@me.com>

SENT ON BEHALF OF JOSEPH W. COTCHETT

Dear Laura,

Thank you for the note – it is an extraordinary story with GILLESPIE. I am glad you are pursuing charges as they conduct is outrageous – if we can help in any way, do not hesitate to call.

Best regards,

Joe

Joseph W. Cotchett

COTCHETT PITRE & McCARTHY LLP
A LITIGATION LAW FIRM – SAN FRANCISCO, LOS ANGELES, NEW YORK

840 Malcolm Road, Suite 200 | Burlingame, CA 94010

Tel: (650) 697-6000 ex: 214 | Fax: (650) 697-0577

CONFIDENTIALITY NOTICE: This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. This email and any documents accompanying this email contain legally privileged and confidential information belonging to the sender. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this email communication is strictly prohibited. If you have received this email in error, please notify us immediately by telephone or email and permanently delete the email, any attachments, and all copies thereof from any networks, drives, cloud, or other storage media and please destroy any printed copies of the email or attachments. Neither this email nor the contents thereof are intended to nor shall create an attorney-client relationship between Cotchett, Pitre & McCarthy, LLP and the recipient(s), and no such attorney-client relationship shall be created unless established in a separate, written retainer agreement or by court order.

-----Original Message-----

From: Laura Owens <lauraowens@nobodytoldmeshow.com>

Sent: Wednesday, September 29, 2021 5:15 PM

To: Patrice Omalley <POmalley@cpmlegal.com>

Subject: Gregg Woodnick correspondence

Hi Patrice,

Hope all is well! I'm happy to report that default judgment was granted in my favor in the abortion coercion lawsuit I filed against my short term boyfriend, Greg Gillespie.

I am pursuing fraud charges as a result of the fraudulent emails that he concocted and were purported to have come from me. He has apparently doctored an ultrasound image from the internet and attributed it to me. I have seen no proof of it, however his attorney, in an attempt to intimidate me, claimed that he had sent it to Joe and that Joe had presumably informed me of a counterclaim against me for fraud.

As baffling as this is to you, it's equally baffling to me. I deeply apologize for their attempt to involve Joe and your firm in this and would really appreciate any information you can give me on this, as I have my doubts about whether he and Joe had this conversation.

All the best,

Laura Owens

Sent from my iPhone

Sent from my iPhone

CE0034

Clerk of the Superior Court
*** Electronically Filed ***
M. De La Cruz, Deputy
2/16/2023 10:43:07 AM
Filing ID 15553275

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Kaci Y. Bowman, #023542
Markus Risinger, #031524
Attorneys for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

LAURA OWENS,

Plaintiff,

And

GREGORY GILLESPIE,

Defendant.

Case No.: CV2021-052893

AMENDED MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR DEFENDANT WITHOUT CONSENT

(Assigned to: Honorable Alison Bachus)

In accordance with Rule 5.3(a)(2)(B)(ii) of the Arizona Rules of Civil Procedure, the undersigned respectfully moves the Court for an Order allowing Kaci Y. Bowman, Gregg R. Woodnick, Markus Risinger and the firm of WOODNICK LAW, PLLC to withdraw as attorneys of record for Defendant, GREGORY GILLESPIE.

The reason for this motion is that a breakdown in communication between attorney and client has occurred such that the attorney cannot proceed with client's representation, the clien has failed to substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw, and withdrawal can be

accomplished without material adverse effect on the client. Pursuant to E.R. 1.16, undersigned counsel's withdrawal in this matter is requested.

Counsel undersigned hereby certifies Defendant has previously been notified of the status of his case and is aware of his duty to communicate with the assigned arbitrator, Ms. Jackson (djackson1211@yahoo.com).

The last known mailing address and telephone number for **GREGORY GILLESPIE** is as follows:

Gregory Gillespie
3930 E. Shangri La Road
Phoenix, Arizona 85028
614-330-4471

WHEREFORE, the undersigned respectfully requests an Order granting the withdrawal from further representation of Defendant, GREGORY GILLESPIE, in this matter.

CERTIFICATE OF ATTORNEY

Gregg R. Woodnick, of Woodnick Law PLLC, does depose and say upon his oath the following:

I am the attorney of record for the Defendant, GREGORY GILLESPIE. I have informed the client of the status of his case in writing, including dates and times of any Court hearing or trial settings.

RESPECTFULLY SUBMITTED this 16th day of February, 2023.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Kaci Y. Bowman

ORIGINAL of the foregoing document filed this 16th day of February 2023 with:

Clerk of the Court
Maricopa County Superior Court

AND

COPY of the foregoing document emailed/delivered on this 16th day of February 2023, to:

Honorable Alison Bachus
Maricopa County Superior Court

Kyle O'Dwyer
3703 East Southern Avenue
Mesa, Arizona 85206
Kyle@FortifyLS.com
Attorney for Plaintiff

Gregory Gillespie
3930 E. Shangri La Road
Phoenix, Arizona 85028
gregsgillespie@gmail.com
Defendant/Counterclaimant

By: */s/Maribeth Burroughs*

EXHIBIT “4”

Maribeth Burroughs

From: Dave Neal <daveneal5@gmail.com>
Sent: Monday, April 29, 2024 6:29 PM
To: Isabel Ranney; Megan Fox
Subject: Fwd: HIPAA violation...
Attachments: IMG_094117_0.jpeg

Follow Up Flag: Follow up
Flag Status: Flagged

Dave Neal
c. 401.487.0581
Dave Neal Official Homepage
Dave Neal IMDb
Follow Me on Twitter

---------- Forwarded message ---------
From: **Laura Owens** <laura@lauramichelleowens.com>
Date: Thu, Oct 12, 2023 at 11:47 AM
Subject: Re: HIPAA violation...
To: Dave Neal <daveneal5@gmail.com>

OK, thanks, I would appreciate it. The last imaging I had was troubling to me because I thought the boy's profile looked kind of weird (attached), but the sonographer didn't say anything. I guess I just don't know how to read these things and am probably overanalyzing. The girl's looked fine.

All the best,

Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

On Thu, Oct 12, 2023 at 9:20 AM Dave Neal <daveneal5@gmail.com> wrote:
Working on locating the source, I'll let ya know when I find out!

On Thu, Oct 12, 2023 at 9:09 AM Laura Owens <laura@lauramichelleowens.com> wrote:
I didn't even see that it had my name on it. Did Greg send that to you I'm guessing?

All the best,

Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

On Thu, Oct 12, 2023 at 9:00 AM Laura Owens <laura@lauramichelleowens.com> wrote:
No, that's not mine...

All the best,

Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

On Thu, Oct 12, 2023 at 8:51 AM Dave Neal <daveneal5@gmail.com> wrote:
Hey Laura,
Please let me know, I just want to make sure someone isn't floating around doctored or false ultrasounds/sonograms of yours. Is this the sonogram you've referenced of yours that you don't want shared?
Cheers,
Dave



Redacted

On Wed, Oct 11, 2023 at 7:21 PM Dave Neal <daveneal5@gmail.com> wrote:

Hey, I was actually just gonna ask you if you wanted me to share that, I wasn't sure. I appreciate you letting me know in advance.
I'm actually gonna be in Scottsdale for a week for some separate business with my wife. Hope the weather isn't too hot this time of year.
Cheers,
Dave

On Wed, Oct 11, 2023 at 6:36 PM Laura Owens <laura@lauramichelleowens.com> wrote:

Dave,

I hate to throw the threat of a lawsuit in again, but I saw on Reddit that you are looking for an expert to review my sonogram. It's highly illegal/a HIPAA violation for you to be wanting to share ANYTHING related to my health without my permission, let alone trying to share it with strangers on the internet. I suggest that you delete that post and any "evidence" you are trying to gather, as my sonogram image and video are 100% real and verified. **You do not have my permission to be sharing phone calls, medical records, etc. with your public audience.** I have shared them with you simply so you can keep them in mind with your audience, not so you can analyze them.

All the best,

Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com


/2023
60 AM
C1-6-D
11.4cm
60°/2.1
Res./O8
0 - 4.60
Gn 0
C7/M7
FF2/E2


OWENS
GA=21w3d
TIs <0.1
TIb <0.1
MI 0.8

Redacted

EXHIBIT “5”

12:56 100

David S. Gingras
2.6K posts

Follow

Posts Replies Media Likes

David S. Gingras @DavidSGingras · 2d

Several people asked for copies, so I'll save you the trouble.

Here's everything filed yesterday in Owens v. Echard:
gingraslaw.com/FraudResponse....

I might blog this later (maybe/not), but it's Saturday after a long week, and my small brain needs a break.

23 6K

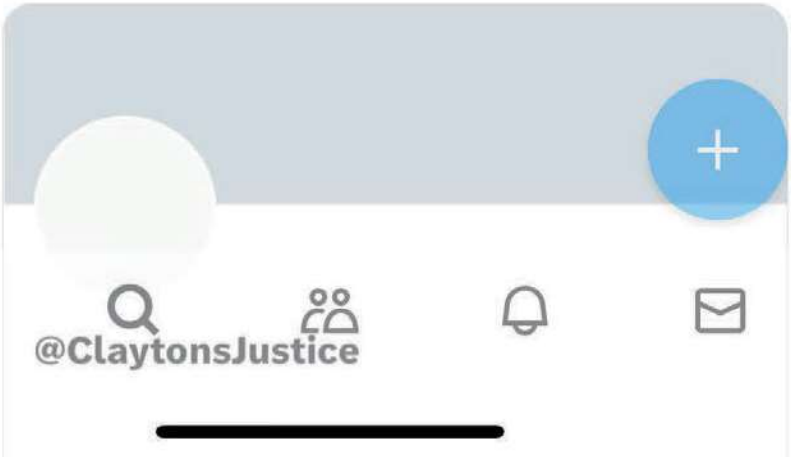
David S. Gingras @DavidSGingras · 2d

Big, if true.

But honestly, I don't want to suppress opposing views. Debate is the greatest tool in our search for truth. It's not much use if I'm just debating with myself.

Maybe this is a glitch, or a sign of something more ominous.

The search continues...
#JusticeForLaura



12:56 100

David S. Gingras
2.6K posts

Follow

Posts Replies Media Likes

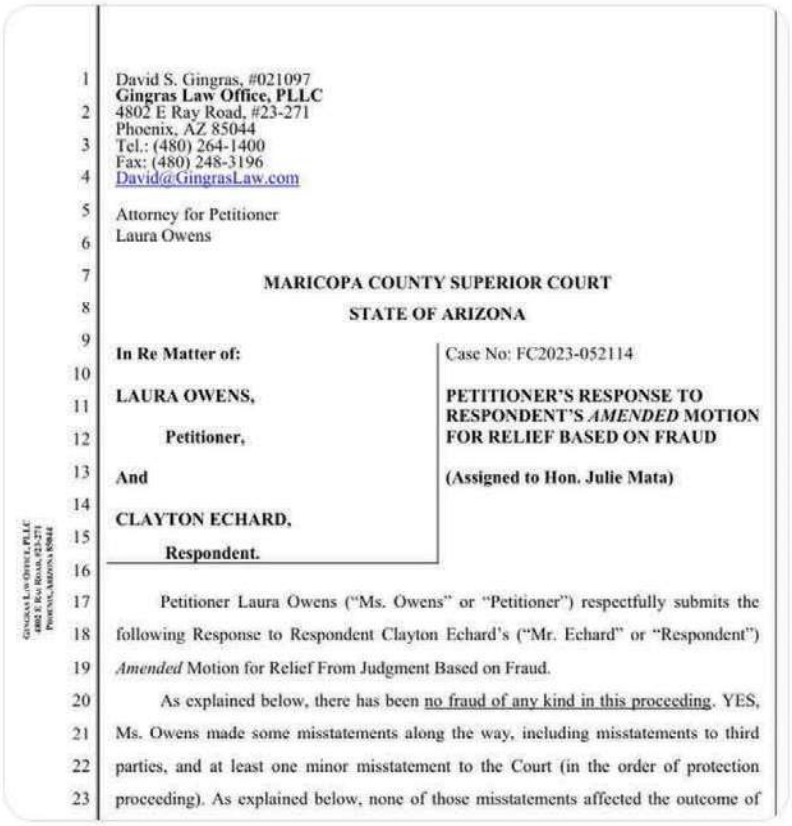
David S. Gingras @DavidSGingras · 2d

Just filed 5 minutes ago.

Expert reports from both sides are exhibits. Clayton's is 9 pages. Ours is 125 pages.

If anyone wants a link....go hug your dog and stop obsessing over this stuff. 🐕

Have a nice weekend, except for....never mind.



David S. Gingras, #021097
Gingras Law Office, PLLC
4802 E Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

Attorney for Petitioner
Laura Owens

MARICOPA COUNTY SUPERIOR COURT
STATE OF ARIZONA

In Re Matter of:	Case No: FC2023-052114
LAURA OWENS,	**PETITIONER'S RESPONSE TO RESPONDENT'S *AMENDED* MOTION FOR RELIEF BASED ON FRAUD**
Petitioner,	
And	**(Assigned to Hon. Julie Mata)**
CLAYTON ECHARD,	
Respondent.	

Petitioner Laura Owens ("Ms. Owens" or "Petitioner") respectfully submits the following Response to Respondent Clayton Echard's ("Mr. Echard" or "Respondent") *Amended* Motion for Relief From Judgment Based on Fraud.

As explained below, there has been no fraud of any kind in this proceeding. YES, Ms. Owens made some misstatements along the way, including misstatements to third parties, and at least one minor misstatement to the Court (in the order of protection proceeding). As explained below, none of those misstatements affected the outcome of

9 2 5 4.1K

David S. Gingras @DavidSGingras · 2d

In fairness - both expert reports are similar in length. The reason ours is so much longer is because we disclosed EVERYTHING the expert looked at (which the rule requires).

[redacted]

Clayton, on the other hand, did not include

CE0600



David S. Gingras @DavidSGingras · 5d

Small O v. E update - I'm off work the next two days for an important social function for a friend. No motions until I'm back.

But I received Clayton's expert report yesterday. On a scale of 1-10 for Laura...10 being bad, it's like a soft 2....barely.

More to come soon...

8 5.4K

David S. Gingras @DavidSGingras · 5d

Oh, and Clayton has our expert report, from the guy who probably has more OB/GYN experience than anyone in AZ.

His opinion is, on a scale of 1-10 (10 being good for Laura)....well, let's just say it is NOT a soft 2.

The report will be made public in due course.

6 5.1K

David S. Gingras @DavidSGing... · 4/22/24

Small update re Owens v. Echard - I'm not blogging any further about this case (for now). Reason: my investigation is now complete. I'm drafting two new motions that will be filed this week, hopefully Wednesday. I said the truth will come out in the end. That's coming this week.

10 1 4 7.8K

David S. [redacted] ...g... · 4/22/24

CE0601

EXHIBIT “6”

Maribeth Burroughs

From: Isabel Ranney
Sent: Tuesday, April 30, 2024 10:22 AM
To: Maribeth Burroughs
Subject: FW: The facts vs. your interview with Reality Steve

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Monday, April 29, 2024 11:32 AM
To: Isabel Ranney <isabel@woodnicklaw.com>
Subject: FW: The facts vs. your interview with Reality Steve

From: Steve <steve@realitysteve.com>
Sent: Monday, April 29, 2024 11:26 AM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Subject: Fw: The facts vs. your interview with Reality Steve

Gingras now bullying someone who came on my podcast a couple months ago..

----- Forwarded Message -----
From:
To: Steve <steve@realitysteve.com>
Sent: Monday, April 29, 2024 at 01:04:13 PM CDT
Subject: Fwd: FW: The facts vs. your interview with Reality Steve

FYI - don't want my name used but fyi …

Feel free to send to Dave.

---------- Forwarded message ---------
From: **David Gingras** <david@gingraslaw.com>
Date: Mon, Apr 29, 2024 at 1:53 PM
Subject: FW: The facts vs. your interview with Reality Steve
To:

I am Laura's attorney in the paternity matter involving Clayton Echard.

I have no idea who you are, and I have no idea what you know about this case. Laura did cc: on her email to you, and she forwarded your response below. That's all the information I have about you.

Based on what you've said here, it sounds like you are part of the Clayton Echard Cult. If that's not true, my apologies, but despite only being involved in this case for less than 30 days, I have never seen such a shocking level of cult-like mass hysteria in my life. Seriously, it's both shocking and disturbing. I've been practicing law for more than 20 years, and I've handled tons and tons of cases that involved *way* more animosity than this, but I have never seen such dishonest and delusional thinking from an opposing party. Never. Not even close. This one takes the cake.

It's like Clayton's followers have created this fake fantasy world in which Clayton is the hero, Laura is Satan, and they cannot accept *any* evidence to the contrary.

Again, I have no idea what you previously said about this case, and I don't know what your agenda is here, but your email below is a clear example of the broken cult-mind-mentality that is permeating this case. It's sad, and it's annoying that people actually live this way.

I'm talking about this line specifically: "It's very clear that the easiest way to prove a pregnancy is not to hire a retired doctor to review medical records you've provided, *with a clear request for him to support your case*."

No rational person would say this. This is cult-speak.

If you bothered to review the packet of information sent to Dr. Medchill, you'd see two things. First, Dr. Medchill is a 100% neutral, absolutely top-level expert. He was Chairman of the OB/GYN department at one of the largest hospitals in Phoenix. He has personally delivered more babies than any other doctor in Arizona. His credentials in this first are beyond question (whereas Clayton's experts have far less experience).

Second, at no point was Dr. Medchill ever asked to "support" Laura's case. Dr. Medchill has never met Laura and he has no reason to be anything but honest about what he thinks happened here. He's not doing Laura any favors. He is simply a life-long medical professional who is expressing an opinion about an area in which he is a subject-matter expert.

In fact, not only was there no pressure on Dr. Medchill to support one conclusion on the other, he was specifically asked if he believed Clayton's position was correct. He could have said whatever he wanted in response to that question. He is believed Clatyon was right (as you clearly do), he would have said so. But he didn't. Because Clayton is 100% wrong.

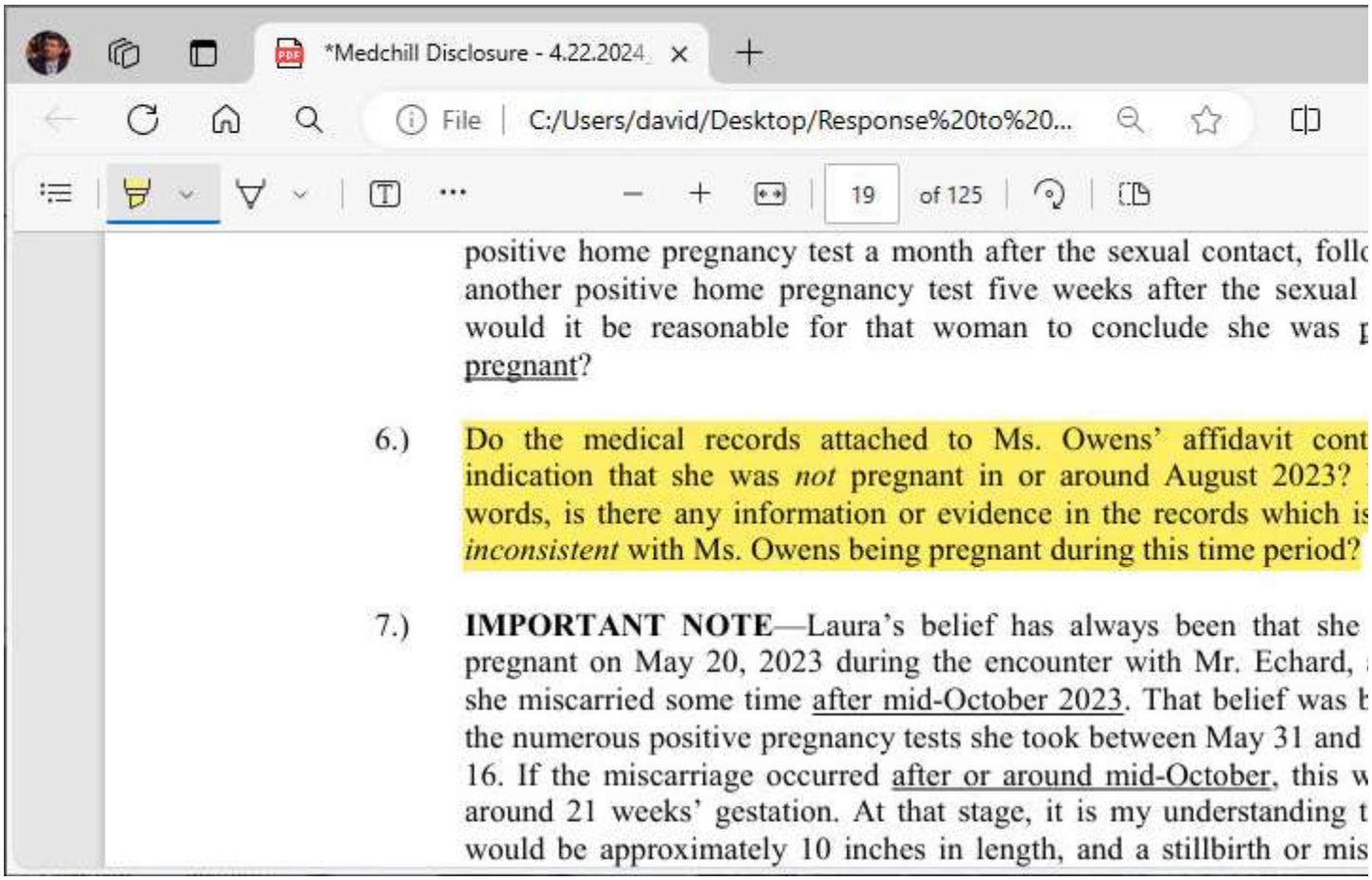
And it's worth nothing that Dr. Medchill was paid in advance for his work (he was paid before he ever rendered any opinion at all). Again, that simply shows he is a neutral professional who has nothing to gain from his opinions here.

One other response to your snide remark about how hiring experts isn't the best approach – we only hired an expert after Clayton disclosed that he had hired two experts.

Got that? Dr. Medchill is a rebuttal expert. We only hired him for the narrow purpose of responding to Clayton's experts (who, by the way, do NOT support Clayton's position *at all*).

So if you really think that calling experts is NOT the best way to address all this stuff, you should probably criticize Clayton for hiring two experts FIRST, thereby forcing us to respond in kind.

Anyway, having debated many members of Clayton's Cult, I realize that logic and sanity have no value for them. So please just ignore this message, and go back to believing whatever makes you happy.



David Gingras, Esq.

Gingras Law Office, PLLC

David@GingrasLaw.com

https://twitter.com/DavidSGingras

http://gingraslaw.com

Tel.: (480) 264-1400

Fax: (480) 248-3196



Begin forwarded message:

From:
Date: April 29, 2024 at 5:23:09 AM MST
To: Laura Owens <laura@lauramichelleowens.com>
Subject: Re: The facts vs. your interview with Reality Steve

As you may remember, my latest book examines moral courage - and the importance of speaking up in the face of wrongdoing, even when it is hard.

I'll repeat what I said on that podcast, which is that I really hope you are getting some help.

It's very clear that the easiest way to prove a pregnancy is not to hire a retired doctor to review medical records you've provided, with a clear request for him to support your case. I'm surprised that you want that point repeated publicly in a courtroom.

You have the option to do the right thing here, even if it is hard - and to take responsibility for your actions and express remorse.

Best,

On Sun, Apr 28, 2024 at 1:09 PM Laura Owens <laura@lauramichelleowens.com> wrote:

> Dear
>
> For months, I have been haunted by your comments on Reality Steve's podcast, grappling with the pain they deepened during what has been the worst period in my life. Dr. Medchill, a respected retired OB/GYN who delivered over 22,000 babies during his career, recently reviewed my medical history and

confirmed with 99% certainty that I was indeed pregnant. I'm only writing to you now to attach his report and prove that I was telling the truth all along.

During your conversation with Steve, you said I was fabricating both my pregnancy and my claims of feeling suicidal. The gleeful and giddy way you spoke about my mental health stripped away any semblance of the empathy I once admired in you. It seems the allure of a high-profile platform like his show blinded you to the most basic tenets of humanity. Comments like these, presented as professional insights, shattered me:

- "Is she actually having suicidal ideation, or is she understanding that by saying she's having suicidal ideation, there's gonna be a win?"
- "If she's really in crisis, why is she using it to manipulate situations instead of seeking help?"
- "Her claims are convenient excuses, aren't they? Designed to garner sympathy and manipulate emotions."

You remain the only well-respected professional who has publicly spoken about the situation, and with that came a responsibility that was not met with the gravity it warranted. Your words have not only been quoted by those looking to discredit and mock my experiences but have also given ammunition to conspiracy theorists who use your words as 'proof' of my alleged deceit. If you had doubts about the truth, you should have addressed them with me before you publicly discredited me. You knew how to reach me, having been a two-time guest on "Nobody Told Me". You could have verified the pregnancy yourself, as I would have simply given you the login information for my patient portal. You chose not to.

This letter isn't a request for an apology, as an apology can't reverse the effects of what has already been broadcast. Your conversation with Steve has reverberated in my mind for months, serving as a constant reminder of how my genuine pain has been callously dismissed and subjected to unfounded doubt. Your choice to speak about me in the manner you did neglected the very essence of psychological practice: to first do no harm. It wasn't just a professional failing, but a human one.

Please keep this email between us and don't share it with the people who have made my life a living hell for the past seven months. Attached is Dr. Medchill's report, which I hope serves as a stark reminder that I was telling the truth about my pregnancy all along, and that your flippant remarks on my mental health crisis were not only misguided but almost pushed me over the edge.

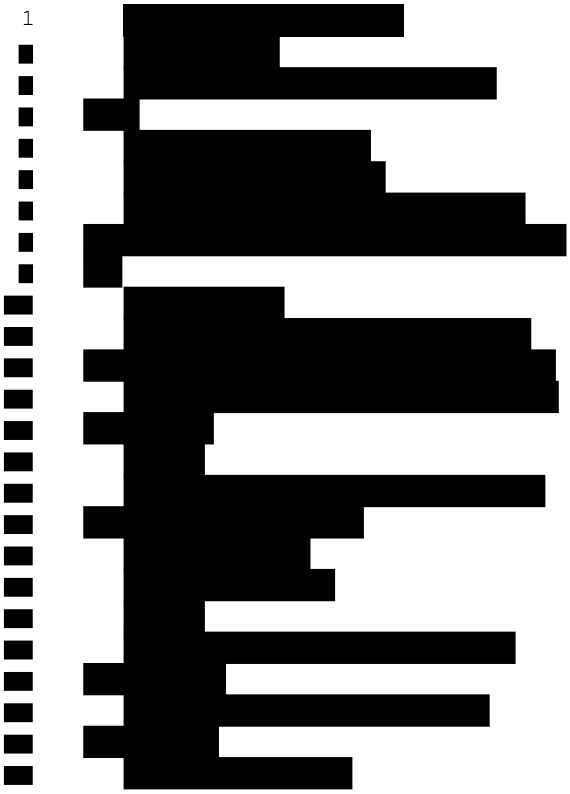
All the best,

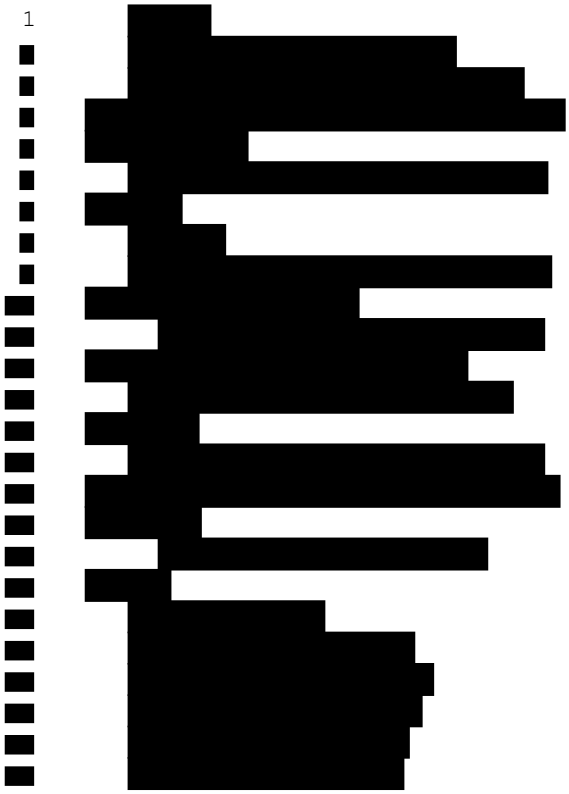
Laura Owens

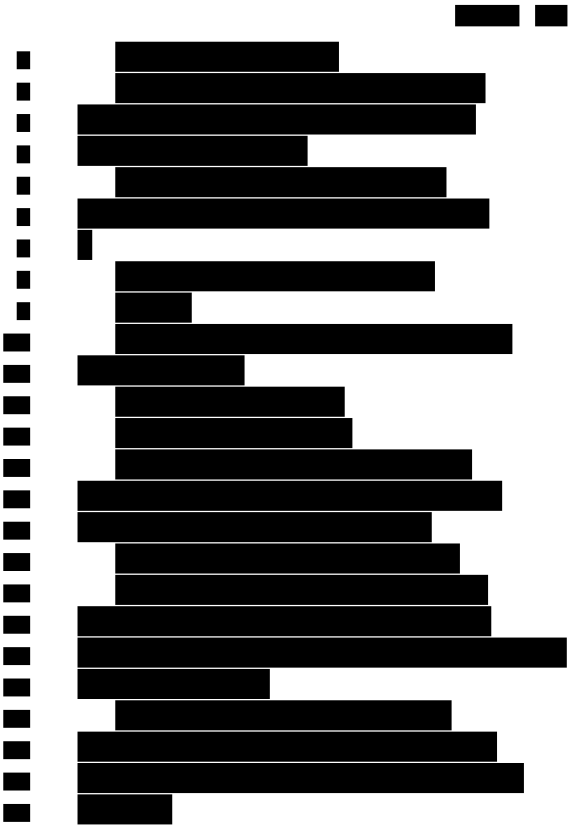
Nobody Told Me!' | *Quartet Farms* | *LizMax Investments* | *TEDx Talk*

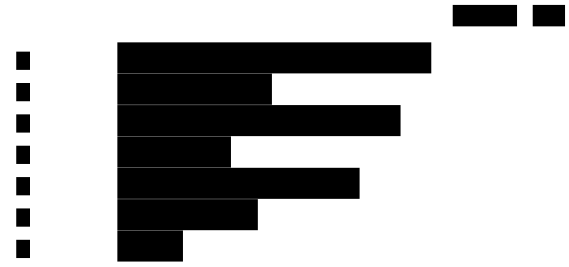
Phone 415-810-0604

Email laura@lauramichelleowens.com









Q. In your medical records, which we are going to talk about as we get to exhibits, you mention having -- I'm going to butcher this, I'm sorry. Polycystic ovary syndrome.

A. Correct.

Q. Who is your doctor that treats you for that?

A. That would be an OB/GYN, but I haven't established regular enough care with an OB/GYN. But I was treated for the PCOS in San Francisco by a provider.

Q. Who was the provider in San Francisco?

A. I was treated by Dr. Chan. He is a gynecologist for -- it's like a specialist, one for --

Q. Fertility.

A. No, he's not. He's for cancer.

Q. Okay.

A. Yea, for cancer, because they thought that I might have precancerous for ovarian -- I just can't --

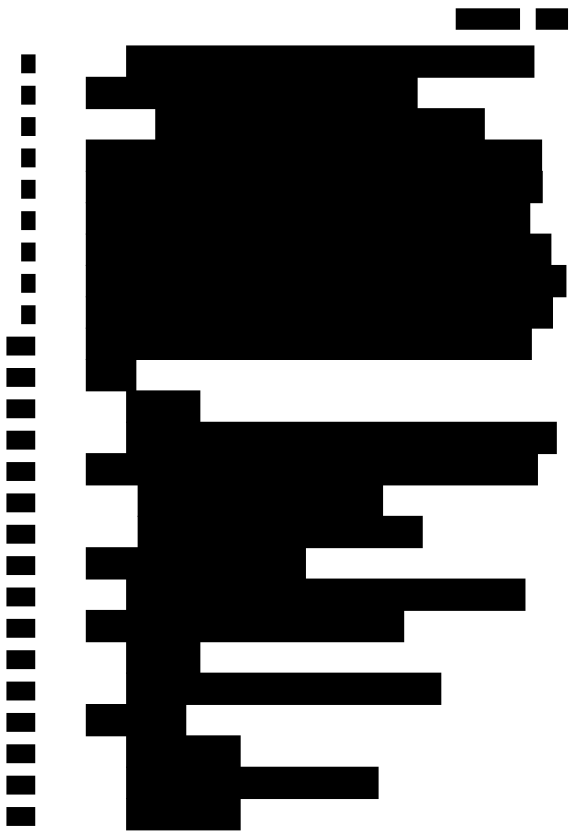
Q. Do you recall the last time you saw Dr. Chan?

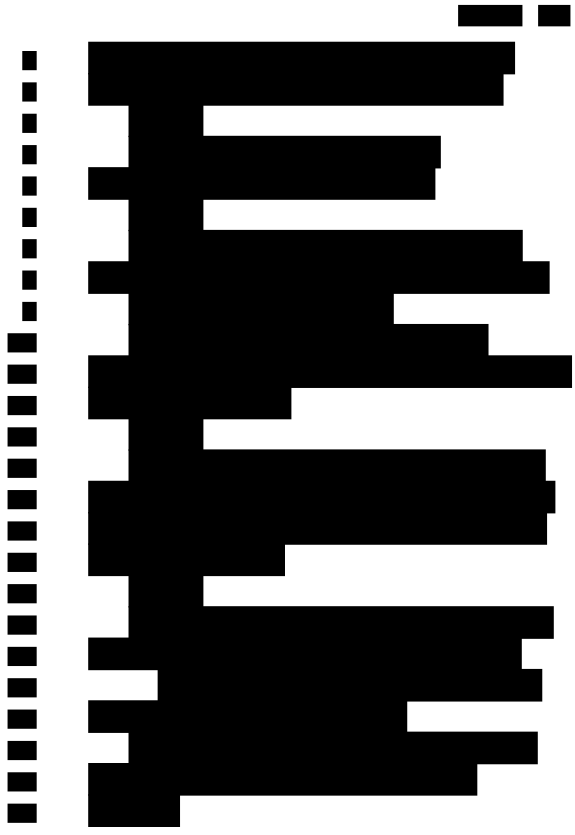
A. Maybe 2016?

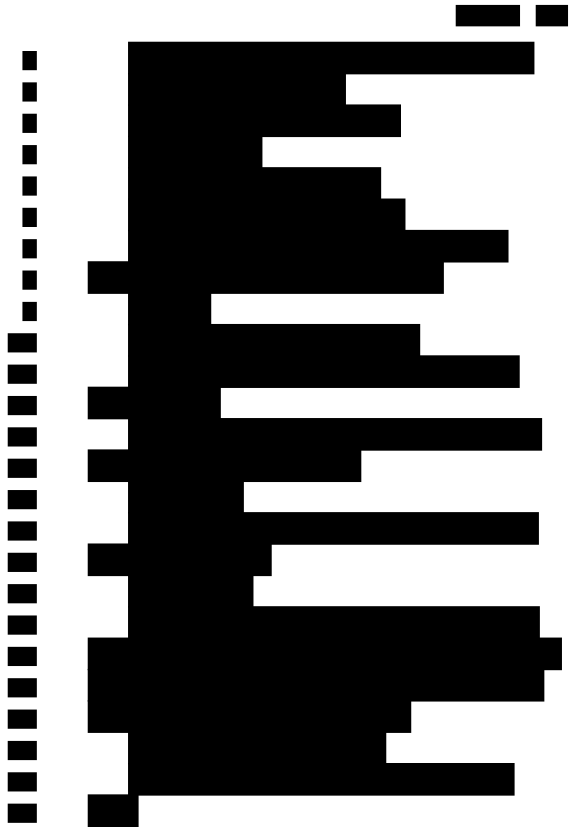
Q. Do you recall what street he was on, because he's going to be a tough name to track down.

A. He was with -- I know what practice, he was with CPM, California Pacific Medical, and, yeah, you would just look up for, I guess it would be a gynecologic oncologist. That's the word I was looking for.









Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
5/2/2024 4:23:58 PM
Filing ID 17758124

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent/Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

RESPONSE/OBJECTION TO PETITIONER'S EMERGENCY MOTION TO STRIKE AND REQUEST FOR IMMEDIATE SCHEDULING CONFERENCE

(Assigned to the Honorable Julie Mata)

Defendant/Respondent, **CLAYTON ECHARD**, by and through counsel undersigned, hereby files his Response and Objects to Plaintiff/Petitioner, **LAURA OWENS**, Emergency Motion to Strike and Request for Immediate Scheduling Conference.

There is *neither* an emergency *nor* cause to strike any part of the Reply to Petitioner's Response filed on April 30, 2024. Not only does Laura's Motion fail to conform to procedural Rules (*neither* Rule 29(e) *nor* Rule 35(a)(3)), but it also fails to acknowledge that when Laura filed a *Response* that (contrary to explicit court orders) appended her medical records and proclaimed "there is objective medical proof Ms. Owens was, in fact pregnant" and "**Ms.**

Owens Was Pregnant,**"** (emphasis in original), she opened the door for Respondent to reply to the same. Put simply, Laura's own medical records are *not* new evidence to Laura and only continue to demonstrate that this process has been predicated on *duplicity*.

As and for his Response/Objection, Clayton states as follows:

1. **Laura's Motion to Strike does not comply with Rule 29(e) nor requests the relief afforded by Rule 35(a)(3), *Arizona Rules of Family Law Procedure.*** A Motion to Strike is governed by Rule 29(e), which permits a party to move to strike from a motion "*an insufficient claim or defense or any redundant, immaterial, impertinent, or scandalous matter*." Laura's Motion does not reference this Rule, nor does it allege any facts that would justify a "strike" consistent with this Court's authority. Laura's Motion also does not comply with the Rule it *does* cite. Rule 35(a)(3) provides that, if a party believes they need to respond to matters raised in a Reply, it "*may not respond to a reply unless authorized by the court*." *If* Laura is asking this Court to allow her to respond to the *Reply to Petitioner's Response to Respondent's Amended Motion for Relief Based on Fraud*, she needs to request this relief and Clayton will respond (and object) as his verified Reply was appropriate and there is no cause for a sur-reply.

The disclosed material was neither "*untimely*" nor "*new*." The "*untimely*" material—Laura's own medical records—were properly disclosed to her[1] consistent with this Court's disclosure deadline[2] (which Laura is aware of per her counsel's personal Tweets, blog posts

[1] Specifically, in Respondent's 7th Supplemental Disclosure Statement.
[2] *See* Minute Entry dated 2/21/24 ("**IT IS FURTHER ORDERED** setting a discovery & disclosure deadline (**30**) days prior to trial") (emphasis in original).

and emails regarding the same) and within 24 to 48 hours of receiving the disclosure. The "*new"* material—Laura's medical records from 2016, her emails and texts regarding the same, yet *another* sonogram she shared with the media (well after the date she now seems to claim to have miscarried), a letter from an actual person whose ultrasound she allegedly pirated, and *her* own communications with her prior victims and the media—is *not* new to Laura.

The information Laura claims is "*new*" are her medical records and a third sonogram she dispatched via email to the media. [Parenthetically, the first two (2) sonograms were already addressed in court proceedings as well as in the underlying *Motion for Relief* and are therefore not "new" to anyone, nor is the general topic of improperly tampered sonograms].

Moreover, Laura testified about being treated by Dr. Chan and that he was "*a specialist, one for […] cancer, because they thought I might have precancerous for ovarian---*." Trans. at 56-57 **(Exhibit 1).** That Laura, upon information and belief, failed to disclose her relevant medical history to her expert is not Clayton's doing. It would be *paradoxical* if Laura being provided with her *own* medical records (which she now seems to deny, as is consistent with her believed *modus operandi* of denying any conflicting data) constituted "new" information.

2. **Clayton's *Reply* appropriately responded to the allegations in Laura's *Response*.** To the extent that this Court believes that the *Motion to Strike (*despite being procedurally improper) warrants further attention, Clayton's *Reply* complied with the requirement that a "reply may address only those matter raised in the response." Rule 35(a)(3).

In Laura's *Response*, she stated, "*there is objective medical proof Ms. Owens was, in fact pregnant,*" "*Ms. Owens Was Pregnant*," attached both expert reports and an affidavit by

Laura,[3] and acknowledged that Clayton's *Motion* alleges Clayton believes Laura was "*never pregnant,*" and that he asserts she "*lied about things such as the authenticity of a sonogram image and other aspects of her pregnancy*." Clayton's Reply concerns the same scope as Laura's Response, namely Laura's repeated assertions that she *was* pregnant. It is not "sandbagging" to provide the Court information directly responsive to, and conflicting with, the crux of Laura's Response. Rule 35(a)(3) is intended to prevent requesting a *different* form of relief or raising a claim that would deny the other party an opportunity to respond, not to prevent a party from elaborating on and replying to allegations in the response.

Of course, it is understandable *if* Laura does not want conflicting information surfacing in litigation that, at its core, is about allegations that she fabricated medical records and faked claims that she was pregnant by Clayton. Laura attached her own medical records, expert reports, and made statements regarding the "truthfulness" of her alleged pregnancy in her Response. Clayton responded in kind and with properly disclosed (and redacted) data, as he was permitted to do under the Rules.[4]

3. **It appears that Ms. Owens is unable to keep track of her story as the fiction compounds. This is the carnage of what, upon information and belief, is serial pregnancy fraud in efforts to compel relationships.** Notably, as more controverting data comes out, it is anticipated, based on Laura's counsels' emails and blogs, that Laura will claim that voice

[3] Which *included* the sonogram that has been confirmed not to have originated in SMIL or Planned Parenthood.
[4] Note, Clayton redacted medical records consistent with this court's orders, notwithstanding the fact that Laura continues to unilaterally publish filings and musings regarding the case and court via Twitter, including "affidavits" that have not been admitted to this Court. At trial, the Court will be provided with the unredacted ultrasounds, in addition to the one already confirmed to be tampered with. The ultrasound video was already admitted as an exhibit during Laura's deposition and the alleged "new" sonogram that shows Laura' being twenty-one (21) weeks along was sent to the media. The medical records from Drs. Chan and Yee are on letterhead and contemporaneous with communication from Laura in 2016.

recordings are the product of Artificial Intelligence (AI) and her emails and texts were hacked. She can address these alleged (and highly disputed) concerns at trial. Despite what she may claim to explain away these "new" records, they came *from Laura* – her email, her texts, her claimed medical records. Whether she *now* claims they are real or not does not change the fact that she sent them. It does beg the question of the extent of fraud consistent with someone who already admitted **to tampering with medical records**. *See* A.R.S. § 13-2809.

4. **The Order of Protection at issue in the *Motion for Relief* was procured based on a fraudulent sonogram.** Once again, in Laura's *Motion to Strike*, she fails to acknowledge that the very sonogram that was the basis for Judge Doody granting the Order of Protection has been proven not to have originated from Planned Parenthood or SMIL. Laura has since admitted she tampered with it. That there may be *more* records that are believed to be fraudulently created by Laura is problematic for her, but she published these "records" and sent them to members of the media. Those actions have consequences.

The fraud in the procurement of the Order of Protection matters requires it to be dismissed on the pleadings. The remaining issues in the establishment matter will be adjudicated on June 10th, notwithstanding her anticipated efforts to continue that hearing.

5. **There is no need for any scheduling conference.** Trial is set in more than a month – June 10, 2024. The deadline for discovery and disclosure is May 10, 2024. If Laura has what, upon information and belief, will be a new excuse for *why* her medical records from 2016 and the sonogram she sent to the media in 2023 are somehow "fake" or the product of an AI/technology, she is welcome to allege that at trial. This case is not complicated as the

Court articulated at the status conference in February, and both parties have had more than enough time to prepare to present their cases in June.

6. **Clayton is entitled to his reasonable attorney's fees and costs incurred in this entire action.** This improperly pleaded *Motion to Strike* is entirely. If Laura's counsel's Twitter is to be believed, more unpleasant filings are forthcoming. Trial is scheduled for June 10th and disclosure is still timely. Clayton is entitled to his reasonable attorney's fees and costs expended defending himself against Laura pursuant to statutes. **Note**: The court *already* tolled fees on the Motion to Compel pending trial. Perhaps, granting leave to file a China Doll Affidavit for fees incurred to date would serve to deter more toxic tactics geared only toward expanding the litigation and forestalling the resolution of this case.

WHEREFORE, Clayton respectfully requests the Court:

A. Deny Laura's *Motion to Strike*;

B. Grant leave to Clayton to submit a *Child Doll Affidavit*;

C. Order such further relief as the Court deems just, including sanctions available to this Court under Rule 26, *Arizona Rules of Family Law Procedure*.

RESPECTFULLY SUBMITTED this 2nd day of May, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent/Defendant

ORIGINAL of the foregoing e-filed
this 2nd day of May, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gringas
Gringas Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GringasLaw.com
Attorney for Petitioner/Plaintiff

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Response/Objection to Petitioner's Emergency Motion to Strike and Request for Immediate Scheduling Conference* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard

CLAYTON ECHARD

May 2, 2024

Date

Signature: Clayton Echard (May 2, 2024 16:07 PDT)

Email: claytonechard@gmail.com

Verification - Response to Mx to Strike

Final Audit Report 2024-05-02

Created:	2024-05-02
By:	Isabel Ranney (isabel@woodnicklaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAUcNSOH6XOInO_X1PmzaQv-y1IyCccdxz

"Verification - Response to Mx to Strike" History

Document created by Isabel Ranney (isabel@woodnicklaw.com)
2024-05-02 - 9:31:47 PM GMT

Document emailed to Clayton Echard (claytonechard@gmail.com) for signature
2024-05-02 - 9:32:21 PM GMT

Email viewed by Clayton Echard (claytonechard@gmail.com)
2024-05-02 - 11:07:35 PM GMT

Document e-signed by Clayton Echard (claytonechard@gmail.com)
Signature Date: 2024-05-02 - 11:07:52 PM GMT - Time Source: server

Agreement completed.
2024-05-02 - 11:07:52 PM GMT

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
5/7/2024 12:35:32 PM
Filing ID 17777469

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent/Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

RESPONSE/OBJECTION TO PETITIONER'S MOTION IN LIMINE

(Assigned to the Honorable Julie Mata)

Defendant/Respondent, **CLAYTON ECHARD**, by and through counsel undersigned, hereby files his Response and objects to Plaintiff/Petitioner, **LAURA OWENS**, Motion *In Limine*, filed April 30, 2024.

Laura has already filed the following, upon information and belief, to hinder or otherwise prevent a fair, equitable, and transparent resolution on the merits of this case: *Motion to Dismiss* (denied), *Motion to Quash Deposition of Petitioner* (denied), *Motion for Confidentiality and Preliminary Protective Order* (denied), *Motion for Extension of Time to Respond to Respondent's Motion to Compel* (denied), and *Motion for Lunch* (denied). She

now seeks to preclude the testimony of the three (3) prior victims/witnesses *she testified about* at her deposition, one (1) of whom she requested this Court take judicial notice about *and* two (2) of whom she has suggested have somehow tampered with her records (relevant to her fraud on this court) spanning 8 years.

Rule 404(b) does not prohibit testimony about Laura's related pregnancy schemes. Instead, the rule **expressly permits** the anticipated testimony to show "*proof of motive, opportunity, intent, preparation, plan, knowledge, or absence of mistake or accident*." [Rule 404(b)(2)].

As and for his Response/Objection, Clayton states as follows:

1. **Rule 404(b)(2) expressly permits the testimony of the three (3) prior victim/witnesses.** Contrary to Laura's assertion, evidence of "other wrongs" is expressly permitted for specific circumstances under Rule 404(b)(2) and *every* permitted reason for the testimony applies here.[1] To be clear, Rule 404 only prohibits evidence of other acts being used to prove the character of a person to show action in conformity therewith. Clayton will produce copious direct evidence of Laura's actions, statements, etc. and does not need to fill some factual void with propensity evidence. The testimony of the witnesses Laura seeks to exclude will show motive, opportunity, intent, preparation, plan, knowledge, and absence of mistake. It will also be used to rebut anticipated testimony from Laura herself about her

[1] Suggesting this case has *any* analog to the Harvey Weinstein trial in New York is yet another folly and overt attempt to distract from Laura's egregious conduct and behavior in the instant case. That was a criminal sexual assault jury trial in another state. This is an Arizona Title 25 paternity matter, with different rules, and where there is no risk of confusing the jury because the Court serves as the trier of fact.

truthfulness and credibility as contemplated in Rule 608(b)(1) & (b)(2) (i.e., if Laura testifies that she sincerely believed she was pregnant by Clayton and feigns ignorance about the numerous problems with the *curated* information she gave to her expert about her alleged pregnancy, the testimony of these witnesses will be entirely admissible and extremely probative).

Each witness listed, like Clayton, is anticipated to testify to their experiences of what they believe to be fabricated pregnancy claims from Laura Owens that arose from her effort to coerce them to commit to a relationship with her. They are anticipated to testify about her alleged motivation, which includes her alleged preparation and knowledge of fake medical records and repeated threats of self-harm if these men did not agree to *stay* with her if she aborted/miscarried the alleged fetuses. With Clayton, these harassing behaviors were already previewed before Judge Gialketsis, who issued and affirmed an injunction against harassment against Owens following over 500 texts and emails that served no legitimate purpose.

With witness Greg Gillespie, this Court already took judicial notice (per Laura's request) of the lawsuit Laura filed against him alleging he got her pregnant with twins (which she now denies), and then when it was clear he was not interested in her, she got an OOP against him and later sued him civilly. With the other two (2) witnesses, they are expected to testify to their belief that they had similar relationship demands with alleged pregnancy claims, that Laura similarly feigned miscarriages and abortions, and that Laura fabricated medical evidence to support her pregnancy ruse out of California.

If this entire case seems extraordinary to the Court, it is. That is the exact reason why these witnesses need to testify and can do so consistent with 404(b)(2). This is not about

improper character evidence, it is about showing Laura Owens had the motive, intent, knowledge, etc. necessary to fabricate pregnancies as expressly allowed by our Rules of Evidence.

The reasons for the witnesses testimony include:

- Laura's *motive* with the witnesses was to create pregnancy narratives and later "terminations" (abortions, miscarriage, cancers/oophorectomies) in effort to secure relationships after being rejected;
- Laura has the *opportunity* and *intent* to fabricate medical records to support her fictious pregnancy and later pregnancy "termination;" (In this case, she has admitted to tampering with an exhibit already used in court proceedings but the anticipated testimony will show this is not the first record she has tampered with);
- Laura *prepares* and *plans* to effectuate her pregnancy narrative, including notifying her victims *days* after a sexual encounter[2] to plant the seed that she may be pregnant by (allegedly) creating medical records and photos to support her story (with the plan and preparation also including pirating sonograms and correspondence from providers and reusing the "twins" allegory, which appears to have originated with witness Marraccini);
- Laura has *knowledge* that she was and is *not* pregnant as her fabrication of records would not be necessary if she had actual medical documentation (she only provides

[2] Even here, where Clayton maintains there was not intercourse.

positive hCG tests).[3] Laura also has *knowledge* that the medical records she submits in court proceedings and provides to her victims are not authentic. (Notably, Clayton would never have known the ultrasound Laura sent to him was *modified* if Laura had not been ordered to attend her deposition or cooperate with a HIPAA release).

- There is an *absence of mistake or accident* as the anticipated testimonies will address identical efforts of fabricated sonograms, claims of "twins" and failure to seek regular obstetric/gynecological care, and alleged abortions that result in the "loss" of one, but not both, fetuses (in both the Gillespie and Maraccini matters).[4]

2. **The disclosure of the three (3) prior witnesses and their expected testimony was provided under Rule 49(i).** First, the deadline for disclosure and discovery in this case is thirty (30) days before trial. That date is May 10, 2024 and has yet to pass (in any event, the identities and contact information for the three (3) prior victims was provided to Laura on March 29, 2024).[5] Therefore, any claim of "*untimeliness*" is confounding.

Second, Rule 49(i) was complied with. Rule 49(i) requires each party to "disclose the names, addresses, and telephone numbers of any witness whom the disclosing party expects to call at trial, along with a statement fairly describing the substance of each witness's

[3] Note, hcG tests are *not* proof of pregnancy. As will be explored at trial, a pregnancy must be verified by ultrasound – which Laura does not have because the one ultrasound she will admit to was falsely (per Laura's deposition) attributed to SMIL and it has been confirmed to not have originated at *any* of the Planned Parenthoods Laura has claimed she went to.

[4] The absence of mistake is also with prior actions and exemplified in Laura's testimony she was **actively being seen by** doctors Higley and Makhoul for a "high risk" twin pregnancy, who have since confirmed she was never seen by them for pregnancy. It is also shown in what now appears to be a story that she miscarried (again Echard denies they ever had sex) on July 23, 2023 but somehow her stomach was growing throughout court hearings in October/November when she testified to being "24 weeks" along before Judge Gialketsis and Judge Doody).

[5] *See* Respondent's 2nd Supplemental Disclosure Statement.

expected testimony." All of this was timely provided to Laura as early as the 2nd Supplemental Disclosure statement, provided March 29, 2024.

As conceded in Laura's *Motion in Limine,* statements describing the substance of each witness's expected testimony have been provided. Laura's claim that she is so in the dark about what her prior victims will testify about that there is a risk of a "*trial by ambush*" is paradoxical. They are each claiming to be victimized by her fake pregnancy con.

Moreover, **Laura has had four (4) legal conflicts with her prior victims, which all involved pregnancy claims.** She has had approximately thirteen (13) attorneys involved in her cases in Arizona, and an unknown number from California. She has published Medium articles, sent "*medical evidence*" to journalists, and even had a TEDx talk about one of the men. She continues to, through her attorney, Tweet and engage in a dialog with public commentators, which includes her counsel bizarrely publishing the entire 2018 deposition of witness Michael Marraccini (her lawyer Tweeted and blogged about an unredacted deposition transcript from a California case).[6] *See* **Exhibit 1.** Now, only after she *again* claimed to be pregnant by yet another man (after non-intercourse) and then went to the media when he rejected her, these men have found one another. Each of their testimonies are independent, relevant for non-propensity purposes, and admissible under Rule 404(b)(2).

Specifically, and despite it not yet being May 10, 2024:

[6] *See* Laura's granted Request for Judicial Notice of Greg Gillespie's case (CV2021-052893), where Laura alleged that she was pregnant with Greg's "twins" (which she now denies) days after intercourse, that he had coerced her into having an abortion, and that she had taken the abortion pills incorrectly several times. Laura initiated this litigation and then repeatedly stated in emails that she would abandon the litigation if Greg agreed to date her, which he was not interested in. This litigation ended with neither party being awarded costs for their respective emotional damage claims.

Mr. Marraccini's testimony is important to show her motive, intent, plan, preparation, knowledge and absence of mistake. There was extensive litigation in San Francisco regarding these parties. Owens claimed to Marraccini that she was pregnant with his "twins," that she miscarried, that she needed to take abortion pills/have a D&C because she had a "*severe allergic reaction*" to the abortion drug and that only one of the fetuses was terminated. Laura also allegedly told him she had ovarian cancer and that she had to have an ovary removed, fabricated medical records to support this, claimed that she might have cervical cancer, and that she might have "Asherman's Syndrome" and "Crohn's disease."

Laura, after seemingly realizing that Marraccini provided relevant information in the instant litigation, has since claimed that the medical records Marraccini provided (disclosed to Laura), were fabricated. Ostensibly, Marraccini was distressed by Laura (via counsel) posting the 2018 deposition and blogging about him being a liar and "*100% false*" which led him to surrender his laptop to a San Francisco based computer forensic expect (Jon Berryhill; Berryhill Computer Forensics). **Exhibit 2.** Mr. Berryhill analyzed thousands of pages of text messages and "medical records" communicated between Laura and Mr. Marraccini and determined all text messages/medical records from Laura's phone number came from Laura. Meaning, Laura appears to be continuing to commit perjury by filing affidavits that disclaim texts and "medical records" that *she* sent. It is no wonder she does not want Marraccini addressing her intent, motive, knowledge, absence of mistake, and preparation, despite his testimony being admissible under the Rules.

As for **Mr. Gillespie,** this Court has already taken judicial notice of his Court case and Laura is therefore very aware of his anticipated testimony, which is expected to be about

Laura's motive, intent, plan, preparation, knowledge and absence of mistake. As provided in the supplemental disclosure statement, Gillespie will likely testify as to "*his personal knowledge of Petitioner's false allegation that she was pregnant with his twins, the allegation that he doctored ultrasound images that Petitioner shared with the media, and the communications he had with Petitioner regarding the alleged pregnancy*." He is anticipated to testify about his belief that Laura was never pregnant by him, that she told him she was pregnant by him with "twins" days after intercourse, that she only showed him hCG tests, she claimed she erred in the abortion medication process resulting in the loss of one of the "twin" fetuses, and that Laura sent him fabricated sonograms. At least one of these sonograms (there were two to three in the Gillespie case) appears to have been taken directly from a blog of a woman who was *actually* pregnant twins and tragically lost one due to Vanishing Twin Syndrome.[7]

Mr. MM[8] is also expected to testify about Laura's motive, intent, plan, preparation, knowledge, and absence of mistake based on his personal knowledge and experiences of Laura claiming to be pregnant by him. Per Clayton's supplemental disclosure, he is expected to testify about "*his prior interactions with Petitioner, including his personal knowledge about her alleged fabricated pregnancy back in 2014*…." in San Francisco. This also is consistent with ***proof of motive, opportunity, intent, preparation, plan, knowledge, or***

[7] Witness, as disclosed, indicated that one of the Owens' sonograms was from her lost pregnancy as reported (and image copied) from a medical journal article and blog about Vanishing Twin Syndrome.

[8] This witness' name is not being used in a public filing, as he, upon information and belief, is unhappy with the publicity Laura and her counsel have stirred up, which included him being publicly doxxed by Laura (through counsel) over Twitter and his blog.

absence of mistake or accident. Notably, the existence of MM only came to light after *Laura* testified about him during her deposition.

3. **Oral Argument is an unnecessary delay tactic.** This is a bench trial and all proffered testimony is admissible under Rule 404(b)(2) for non-propensity purposes. Of course, for counsel, the larger issue will be time management at trial, but the testimony regarding *proof of motive, opportunity, intent, preparation, plan, knowledge, or absence of mistake or accident* should take only a handful of minutes per witness, and the tangible evidence to support their testimonies will be available for this Court's review. In any event, Laura (via her counsel's blog) has <u>*already*</u> determined that if the Court finds in Clayton's favor it will be a *mistake* as there is not "*any chance in hell the judge will say Laura had no reason to think she was pregnant when the case is filed."*[9] This statement, standing alone, supports admitting the evidence Laura seeks to preclude because that evidence will directly impeach the proffered "reasonableness" and "sincerity" of her beliefs with substantial proof of knowledge and lack of mistake. *See* **Exhibit 3 (Pages 33-37, Laura's Counsel's public comment on April 30, 2024).**[10] There is no cause under Rule 404 to preclude these three (3) witnesses testimony or otherwise engage in proceedings designed to further delay trial.

//

//

[9] Laura appears to be convinced that the standard is whether Laura "reasonably believed" she was pregnant by Clayton when she filed her petition in August.

[10] (Laura's counsel stating in response to "Paul" "it *is always possible the judge could still rule in Clayton's favor. I don't see any basis for this, but judges are human being and sometimes they make mistakes […] I don't think I see no way the judge could sanction Laura for filing the case in bad faith, and I see no way she could be sanctioned for failing to withdraw the case sooner*). Notably, this is <u>after</u> counsel received the records from Planned Parenthood that showed Laura had *not* been seen there on any date for any ultrasound pertaining to this alleged pregnancy, contrary to Laura's testimony in court proceedings, deposition, and statements in her "affidavit" for her medical expert.

WHEREFORE, Clayton respectfully requests the Court:

A. Deny Laura's *Motion in Limine*;

B. Order such further relief as the Court deems just.

RESPECTFULLY SUBMITTED this 7h day of May, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent/Defendant

ORIGINAL of the foregoing e-filed this 7th day of May, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gringas
Gringas Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GringasLaw.com
Attorney for Petitioner/Plaintiff

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Response/Objection to Petitioner's Motion in Limine* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (May 7, 2024 12:07 PDT)

CLAYTON ECHARD

May 7, 2024

Date

VERIFICATION - RESPONSE TO MIL

Final Audit Report 2024-05-07

Created:	2024-05-07
By:	Isabel Ranney (isabel@woodnicklaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAARQKEoUHyMqyRHYm3SAgjt0OgYSIXvaxP

"VERIFICATION - RESPONSE TO MIL" History

Document created by Isabel Ranney (isabel@woodnicklaw.com)
2024-05-07 - 7:04:22 PM GMT

Document emailed to Clayton Echard (claytonechard@gmail.com) for signature
2024-05-07 - 7:04:38 PM GMT

Email viewed by Clayton Echard (claytonechard@gmail.com)
2024-05-07 - 7:07:15 PM GMT

Document e-signed by Clayton Echard (claytonechard@gmail.com)
Signature Date: 2024-05-07 - 7:07:32 PM GMT - Time Source: server

Agreement completed.
2024-05-07 - 7:07:32 PM GMT

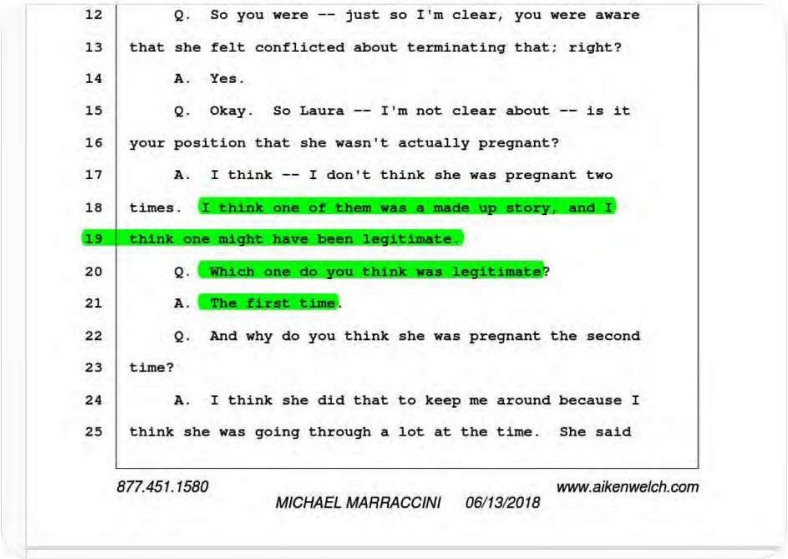
EXHIBIT “1”

David S. Gingras @DavidSGingras · 2h

One theme in Owens v. Echard is Laura "lied" about being pregnant with other men. Laura says that's 100% false, and several bloggers claim she's lying.

I'm about to provide some receipts you haven't seen which may change your mind about who to believe.

Coming later today.



Q. So you were -- just so I'm clear, you were aware that she felt conflicted about terminating that; right?
A. Yes.
Q. Okay. So Laura -- I'm not clear about -- is it your position that she wasn't actually pregnant?
A. I think -- I don't think she was pregnant two times. I think one of them was a made up story, and I think one might have been legitimate.
Q. Which one do you think was legitimate?
A. The first time.
Q. And why do you think she was pregnant the second time?
A. I think she did that to keep me around because I think she was going through a lot at the time. She said

877.451.1580 MICHAEL MARRACCINI 06/13/2018 www.aikenwelch.com

6 1.2K

David S. Gingras @DavidSGingras · 2h

And by the way, Mike Marraccini is one of the alleged ex-boyfriends who certain bloggers have cited as "PROOF" Laura faked pregnancies in the past, but here he is under oath saying he DID believe she was pregnant (and BTW, she was never pregnant twice with him). #JusticeForLaura

7 919

2:24

100

David S. Gingras
2.6K posts

Follow

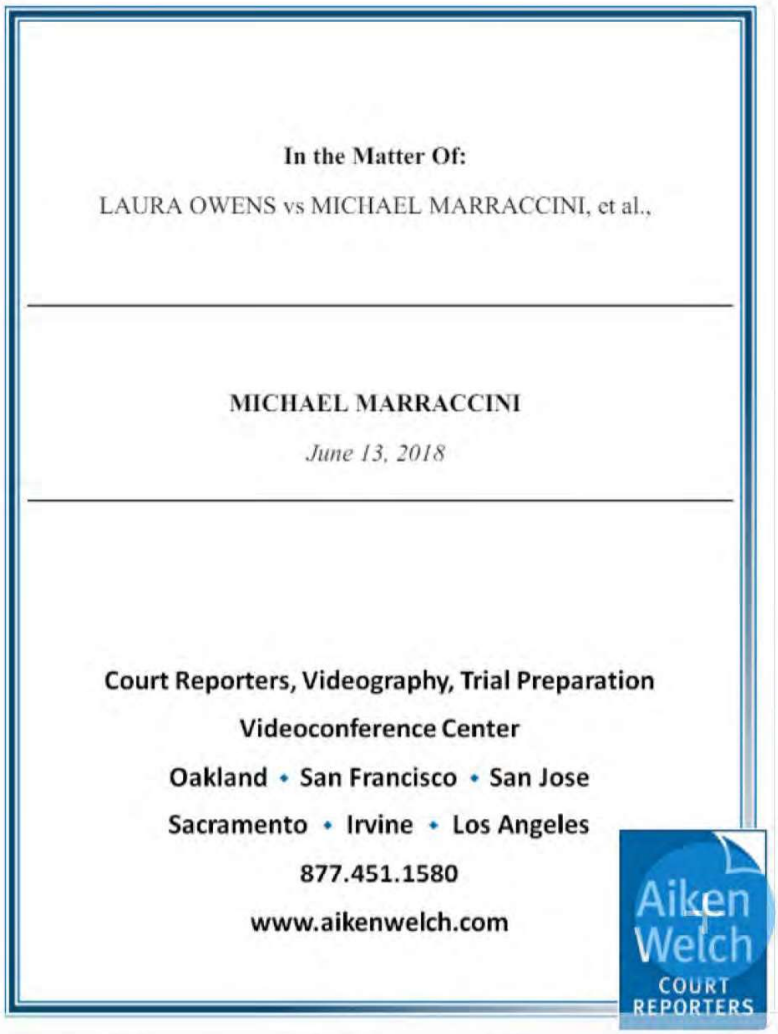
Posts Replies Media Likes

David S. Gingras @DavidSGingras · 1h

This is going to require a full blog post to explain, but certain bloggers are already publishing more lies about Laura, so I'll just share this without full context.

I'll explain later why, IMHO, this guarantees a win for Laura.

gingraslaw.com/MarraccinDepo...



In the Matter Of:

LAURA OWENS vs MICHAEL MARRACCINI, et al.,

MICHAEL MARRACCINI

June 13, 2018

Court Reporters, Videography, Trial Preparation

Videoconference Center

Oakland • San Francisco • San Jose

Sacramento • Irvine • Los Angeles

877.451.1580

www.aikenwelch.com

Aiken Welch COURT REPORTERS

10 979

David S. Gingras @DavidSGingras · 2h

(480) 744-1400 (https://twitter.com/DavidSGingras)
(https://www.linkedin.com/in/david-gingras-165b683/)

Gingras Law Office, PLLC (https://gingraslaw.com/)

Practice Areas (https://gingraslaw.com/practice-areas/)

Blog (https://gingraslaw.com/blog/)

(https://gingraslaw.com) > Internet Law (https://gingraslaw

Connect (https://gingraslaw.com/contact-2/)

Blog

Let's Talk About Lies – Part 2

David Gingras (https://gingraslaw.com/author/gingraslaw/) -
May 2, 2024 -
Internet Law (https://gingraslaw.com/category/internet-law/) / Lawsuits (https://gingraslaw.com/category/lawsuits/) -
18 Comments (https://gingraslaw.com/lets-talk-about-lies-part-2/#comments)

A while ago, I wrote a post with bullet points (https://gingraslaw.com/lets-talk-about-lies-part-1/) that Laura's critics have passed off as truth. The third point on that list was:

> *3.) Clayton says Laura has "done this to other men"*

I'm going to skip Point 2 for now, and let's talk about Point 3 — "Laura has done this to other men". Sounds bad, right? But is it true? Let's talk about that....

One of the "other men" frequently discussed is a guy name Michael Marraccini (she calls him "Mike", so I'll use that for now). If you have followed the story, you will know the Cult claims Laura faked being pregnant with Mike, and every time that story is repeated, it's spoken about as if this is a statement of true facts. LAURA LIED ABOUT MIKE'S BABY! But is it true?

Before I get into the details, there is something VERY important you need to understand. Have you ever seen a TV show or a movie about a court case, and one of the lawyers jumps up and shouts: "*Objection! Foundation!*" Do you know what this means?

I'll explain. When a lawyer objects to foundation (or lack of foundation), that's our shorthand way of saying we don't believe the witness has been shown to have something called "*personal knowledge*". OKAY, what's so special about personal knowledge?

Search

Recent Posts

Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/)

Let's Talk About Lies – Part 1 (https://gingraslaw.com/lets-talk-about-lies-part-1/)

What The Hell Is A "Vanishing Twin"? (https://gingraslaw.com/what-the-hell-is-a-vanishing-twin/)

What Does "Justice For Clayton" Look Like? Let me tell you.... (https://gingraslaw.com/what-does-justice-for-clayton-look-like-let-me-tell-you/)

My Guest Appearance On The Bachelor, I Mean Dr. Phil (https://gingraslaw.com/my-guest-appearance-on-the-bachelor-i-mean-dr-phil/)

Archives

May 2024 (https://gingraslaw.com/2024/05/)

April 2024 (https://gingraslaw.com/2024/04/)

October 2023 (https://gingraslaw.com/2023/10/)

August 2023 (https://gingraslaw.com/2023

This is Law School 101 stuff, but basically the Rules of Evidence say a witness can ONLY testify about things IF that person first shows they have "personal knowledge" of the subject matter they want to discuss. This comes straight from Rule 602 of the Rules of Evidence (https://govt.westlaw.com/azrules/Document/N478828A0E7D911E0B453835EEBAB0BCD?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)) (that link is for the AZ rules, but the federal rules are identical).

> ***Rule 602. Need for Personal Knowledge***
>
> *A witness may testify to a matter only if evidence is introduced sufficient to support a finding that* ***the witness has personal knowledge of the matter.*** *Evidence to prove personal knowledge may consist of the witness's own testimony. This rule does not apply to a witness's expert testimony under Rule 703.*

That text is pretty dry, so let me paraphrase — witnesses aren't allowed to blow smoke out of their ass. If a witness wants to say something is true, they first have to answer ONE question: ***how do you know that***?

Here's an example of how this works in practice. Let's say you are involved in a case and you want to prove it snowed in Hawaii on December 25, 2023. So, you call a witness to the stand and ask them: "Witness, did it snow in Hawaii on December 25, 2023?"

If this happened in court, your opposing counsel would immediately object. Why? Lack of foundation.

This is how a lawyer tells the judge you haven't met the requirements of Rule 602 because you have not shown the witness has personal knowledge of this issue. You haven't explained, *how this person knows that?*

/08/)

March 2019 (https://gingraslaw.com/2019/03/)

Recent Comments

Lonni on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4590)

Lonni on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4589)

fake babies on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4588)

Lying Liars on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4587)

MAY 2024

M	T	W	T	F
			2	
1				3
6	7	8	9	10
13	14	15	16	17
20	21	22	23	24
27	28	29	30	31

(https://gingraslaw.com/2024/05/02/)

« Apr (https://gingraslaw.com/2024/04/)

But this problem is easily fixed. Just like this (before asking anything about the weather): “Mr. Witness, were you physically present in the State of Hawaii on December 25, 2023, and were you in a position to SEE the weather conditions on that date?”

Assuming the witness says yes, you *then* ask if they saw any snow in Hawaii on that date. With that simple intro, you satisfied the requirements of Rule 602 by proving the witness was in a position to see the weather in Hawaii. You answered the question: h*ow do you know* what the weather was like in Hawaii? This quick little bit of foundation shows the witness has personal knowledge of the weather conditions in Hawaii on the date in question.

I know that’s boring and technical, but trust me – IT MATTERS. Again, this is basic Law School 101 level stuff, but if a witness can’t show they have personal knowledge of a THING, that witness will NOT be allowed to testify about that THING. PERIOD. I have literally won entire cases based on that one simple rule.

As the example shows, establishing personal knowledge is usually not a big deal. If you want to ask a witness about Topic X, before you dive into that topic, you just need to lay some foundation showing the witness HAS personal knowledge of Topic X. It’s easy (assuming the witness knows what they are talking about), but most non-lawyers would *never* think about this.

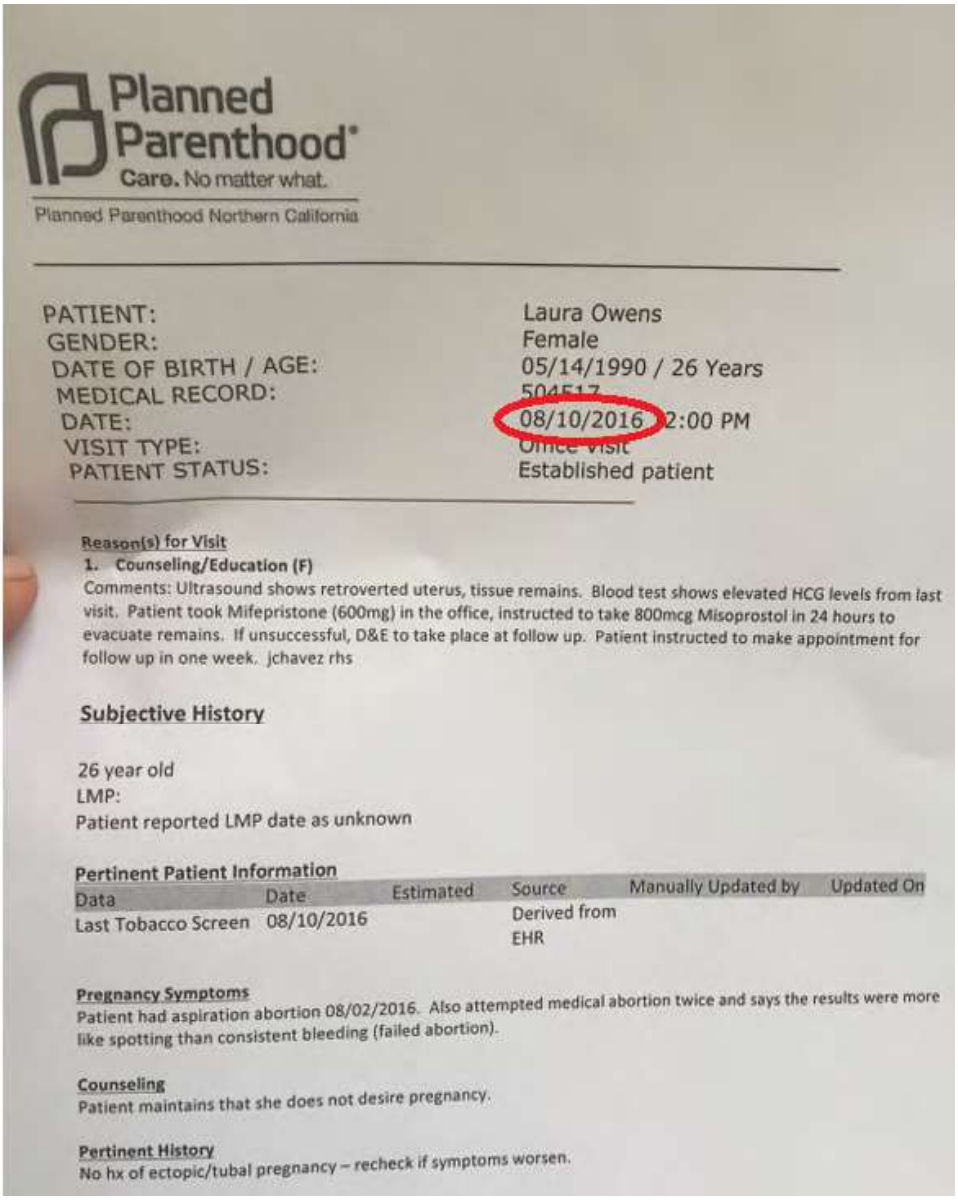
OK, with that boring intro behind us, let’s get back to the story of Mike Marraccini, and why his deposition transcript is so completely devastating for the anti-Laura crew. The full transcript is at the end of this post, but I’ll give you a summary.

Mike and Laura met through an online dating app in early 2016 (he talks about this on page 27 of his depo, and he’s not 100% sure of the date, or which app…but neither of those points are important). At that time, both Mike and Laura were living in San Francisco. Laura has told me she and Mike dated for “a couple years”, but the exact start and end dates aren’t clear from the records I’ve seen. For now, just assume this relationship lasted for at least a year, probably a while longer (basically from early 2016 through late 2017).

In mid-2016 Laura got pregnant. This was a medically-confirmed pregnancy with multiple records to support it, including HCG tests and an ultrasound. At the time, Laura and Mike were both in their mid-20s. They both felt they were too young to have kids, so they decided abortion was the best option.

Laura went to Planned Parenthood in July 2016 where she was given Mifepristone (a pill to medically terminate the pregnancy). Unfortunately, the first pill didn't work (not unusual), and Laura continued to test positive for pregnancy. This resulted in her going back to Planned Parenthood a few weeks later (with Mike). Again, plenty of records exist to support all of this.

According to Laura, this was NOT an issue of her "getting pregnant twice" (and certainly not faking pregnancy twice). She got pregnant with Mike ONCE, and it took a couple of doctor's visits to terminate the pregnancy. Mike participated in all this, and was fully aware that Laura WAS pregnant, and they jointly made the decision to terminate it. Here's a Planned Parenthood record showing the follow-up trip, and Laura also discusses this at length in a declaration I'm adding to the end of this post. Importantly, Laura's declaration was written back in 2018, LONG before this whole mess with Clayton ever happened.



Planned Parenthood®
Care. No matter what.
Planned Parenthood Northern California

PATIENT: Laura Owens
GENDER: Female
DATE OF BIRTH / AGE: 05/14/1990 / 26 Years
MEDICAL RECORD: 504517
DATE: 08/10/2016 2:00 PM
VISIT TYPE: Office Visit
PATIENT STATUS: Established patient

Reason(s) for Visit
1. Counseling/Education (F)
Comments: Ultrasound shows retroverted uterus, tissue remains. Blood test shows elevated HCG levels from last visit. Patient took Mifepristone (600mg) in the office, instructed to take 800mcg Misoprostol in 24 hours to evacuate remains. If unsuccessful, D&E to take place at follow up. Patient instructed to make appointment for follow up in one week. jchavez rhs

Subjective History

26 year old
LMP:
Patient reported LMP date as unknown

Pertinent Patient Information

Data	Date	Estimated	Source	Manually Updated by	Updated On
Last Tobacco Screen	08/10/2016		Derived from EHR		

Pregnancy Symptoms
Patient had aspiration abortion 08/02/2016. Also attempted medical abortion twice and says the results were more like spotting than consistent bleeding (failed abortion).

Counseling
Patient maintains that she does not desire pregnancy.

Pertinent History
No hx of ectopic/tubal pregnancy – recheck if symptoms worsen.

Unlike Clayton, the pregnancy and abortion was NOT the end of Laura's relationship with Mike. They continued dating for many more months, and yes Laura will admit she struggled with some emotional issues during that time. That's hardly unusual, especially when you understand how Mike treated her.

During their relationship, Laura was extremely generous with Mike. She paid to take him to Dubai. She bought him expensive gifts including a $10,000 watch. She claims Mike even called her his "sugar mama".

On December 30, 2016, Laura paid for a trip to Iceland with Mike. According to Laura's declaration (at the end of this post): "The [Iceland] trip cost at least $15,000, and I emptied my childhood savings account to pay for it."

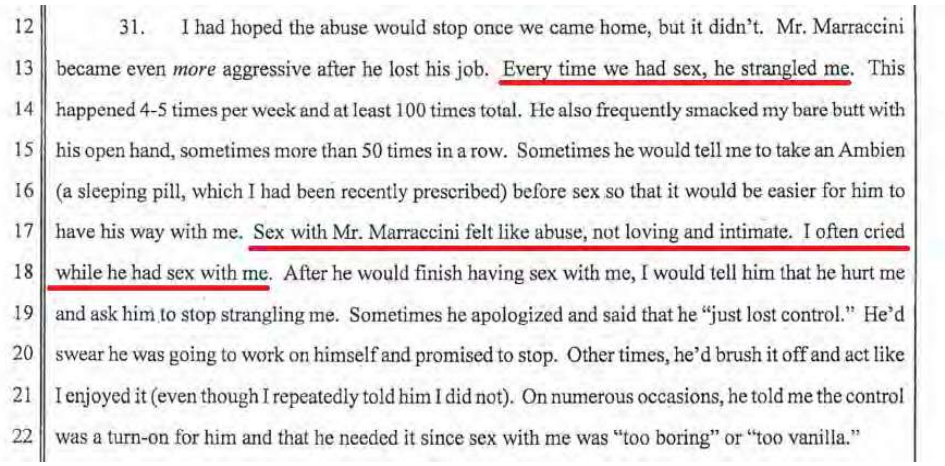
Laura & Mike in Iceland



While Laura and Mike may have looked like a happy couple on the outside, according to Laura, Mike had a very dark and abusive side. In her declaration filed in California back in 2018, Laura described the verbal abuse she received from Mike on the flight back from Iceland. This abuse was witnessed by a fellow passenger (a complete stranger) who later confirmed Laura's version of what occurred:

21. During the flight from San Francisco to Reykjavik, Iceland, Mr. Marraccini berated me nonstop for hours. He criticized me for nearly everything I said or did. If I turned my head to look at him when he said something, he'd criticize me for turning too quickly, telling me that my reflexes were "unnaturally fast" and that there was something wrong with me. He criticized my career and told me I was bad at my job and was worthless. He told me I was "ugly" and that nobody else would ever want to date me. When I would try to kiss him and cheer him up, he'd tell me I was "gross" and a bad kisser. He said I was bad in bed. Then he said he wanted to have a threesome since sex with me was so boring. He suggested a threesome with my sister or with a black man. He said it would turn him on to watch someone else have sex with me. I told him no and that I felt uncomfortable. He seemed to enjoy putting me down. His criticisms went on for hours, and I cried on and off throughout the entire flight.

After Iceland, according to Laura, things went from bad to worse. According to her sworn declaration filed in court in California, Mike began physically assaulting her, including "strangling" her during sex and verbally abusing her.



31. I had hoped the abuse would stop once we came home, but it didn't. Mr. Marraccini became even *more* aggressive after he lost his job. Every time we had sex, he strangled me. This happened 4-5 times per week and at least 100 times total. He also frequently smacked my bare butt with his open hand, sometimes more than 50 times in a row. Sometimes he would tell me to take an Ambien (a sleeping pill, which I had been recently prescribed) before sex so that it would be easier for him to have his way with me. Sex with Mr. Marraccini felt like abuse, not loving and intimate. I often cried while he had sex with me. After he would finish having sex with me, I would tell him that he hurt me and ask him to stop strangling me. Sometimes he apologized and said that he "just lost control." He'd swear he was going to work on himself and promised to stop. Other times, he'd brush it off and act like I enjoyed it (even though I repeatedly told him I did not). On numerous occasions, he told me the control was a turn-on for him and that he needed it since sex with me was "too boring" or "too vanilla."

Laura eventually ended the relationship with Mike in late 2017. She claims he began stalking her as a result. Fearful for her safety, in January 2018, Laura applied for a restraining order against Mike. Here's a complete copy of the file from that case (https://gingraslaw.com/MarraccinDV.pdf).

Now having said all this, you may be asking yourself — "Hang on, so Laura claims Mike was an abusive boyfriend. So what? You haven't explained why any of this 'guarantees' a win for Laura." And that's right, I haven't explained it yet, so I'll do that right now.

At the start of this post, I explained the concept (and the rule) which requires proof a witness has personal knowledge of something before they are allowed to testify about anything. Remember that?

Now, keeping the concept of "personal knowledge" in mind, go back and read through Mike's deposition. Show me a SINGLE example of him offering any explanation to show how he has personal knowledge of Laura faking being pregnant. YOU CAN'T, BECAUSE IT IS NOT THERE. And FYI – personal knowledge means PERSONAL knowledge. Hearing something from a 3rd party is hearsay, not personal knowledge.

Look specifically at his discussion of the pregnancy between pages 45-47 of the depo transcript. As you read this, try to ask yourself: "OKAY, the witness is saying he doesn't ***think*** Laura was pregnant, *BUT HOW DOES HE KNOW THAT? How does he personally know she was not pregnant*?" Remember, a witness can't say it snowed in Hawaii on Christmas 2023 unless they first prove they were in Hawaii on that date, so again, ask yourself what proof does Marraccini offer to show he peesonally KNEW Laura lied about being pregnant?

Mike is very clear about how he knows that — HE DOES NOT KNOW THAT. He offers nothing but pure speculation. None of this even comes close to clearing the hurdle of personal knowledge. In fact, he even says (repeatedly) he believes she probably WAS pregnant, "the first time". But he apparently forgot the "first time" was, in fact, **the ONLY time.** Maybe he has memory or mental issues, but the records on this are clear — Laura was only pregnant ONCE with Mike, but she had to go back a couple of times after the pills didn't work the first time. That's probably why Mike thinks it was two pregnancies. It wasn't. It was just one, and in his own words, Mike admits he thought she probably was pregnant. OOPS.

Folks, it doesn't get much clearer than that. Mike doesn't have personal knowledge of ANYTHING regarding Laura "faking" a pregnancy. If he tried to say that at trial in our case, I'd object to a lack of foundation and, separately, that he's just speculating about this. If Mike suddenly develops a shocking new level of clarity about this, I hope he can explain why he answered differently in his deposition SIX YEARS AGO.

NOTE – Laura informs me Mike's story about her father somehow "admitting" Laura lied about being pregnant is also 100% false. I haven't met Laura's dad (yet), but I'll go ahead and verify his side of things as soon as I can. But if the evidence stays this way moving forward, Laura's critics are going to have a very, very hard time avoiding liability for defamation.

Q. So you were -- just so I'm clear, you were aware that she felt conflicted about terminating that; right?
A. Yes.
Q. Okay. So Laura -- I'm not clear about -- is it your position that she wasn't actually pregnant?
A. I think -- I don't think she was pregnant two times. I think one of them was a made up story, and I think one might have been legitimate.
Q. Which one do you think was legitimate?
A. The first time.
Q. And why do you think she was pregnant the second time?
A. I think she did that to keep me around because I think she was going through a lot at the time. She said

abortion?
A. Maybe on the first go around. I don't know. I still to this day don't think she was pregnant.
Q. So you don't think she was pregnant at all?
A. I don't think she was pregnant because of all the stories. The timelines never made sense. So I don't -- looking back now -- at the time I definitely thought she was pregnant. Looking back now, I don't.
Q. Okay. So I just want to be a hundred percent because I thought earlier you said you did think she was pregnant one of those times. So is your story that you don't think she was ever pregnant?
A. If she was ever pregnant, I believe it was the first time. But I -- looking back now, I don't know if she ever was pregnant. So at the time -- I don't know how to give you a clear answer on this because at the time I thought she was pregnant both times because I'm not going to go and study the timelines of pregnancies and do everything like that. But looking back now, I think one of the pregnancies or both were made up.
Q. Okay.

In the Matter Of:

LAURA OWENS vs MICHAEL MARRACCINI, et al.,

Court Reporters, Videography, Trial Preparation

Videoconference Center

Oakland • San Francisco • San Jose

Sacramento • Irvine • Los Angeles

877.451.1580

www.aikenwelch.com

Aiken Welch
COURT REPORTERS

Declaration of Laura Owens

I, Laura Owens, declare as follows:

1. I make all of the statements herein of my own personal knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true, and if called as a witness, could and would testify competently thereto.

HISTORY OF RELATIONSHIP

2. Mr. Marraccini and I were romantically involved from March 2016 until late Fall 2017. Contrary to what he alleges in his declaration filed on January 22, 2018, we did not stop dating in March 2017.

3. I met Mr. Marraccini in March 2016 through The League, a dating app for professionals that matches people together based on their LinkedIn and Facebook profiles. His profile said that he was in "Real Estate Development" and that he went to California Polytechnic Institute. (See Exhibit 1, screenshots of Mr. Marraccini's profile from The League taken April 26, 2016 and May 10, 2017). He asked me out to dinner and I accepted.

4. Initially, Mr. Marraccini was very charming. In the early months of our relationship, we saw each other often and seemed to have a lot in common. Mr. Marraccini showed interest in my career (I am the CEO of Quartet Farms, a company that buys and sells show horses). He talked about his own career ambitions and said he was a real estate developer and that he had his real estate license. He also frequently talked about his many job offers at big developments firms. I wanted to be with someone who was career oriented like I am and thought we were a good match. We talked about my love for animals and animal welfare, which he also claimed to care deeply about. He also often talked about his alleged relationships with celebrities. He liked that my father Ronn Owens is a famous local talk show host and was excited at the prospect of meeting celebrities.

5. In or around late May or early June 2016, I was asleep when I was suddenly struck in the face by Mr. Marraccini. I don't know exactly how he hit me; I think either his elbow or fist hit me near my eye. I can't say for sure, but I believe he may have been asleep and involuntarily hit me somehow. I had a black eye for a day or two after this. (One of his friends told me that one of his ex-girlfriends also woke up with a black eye because Mr. Marraccini "accidentally" hit her while he was asleep).

YOU MIGHT ALSO LIKE

What Does "Justice For Clayton" Look Like? Let me tell you.... (https://gingraslaw.com/what-does-justice-for-clayton-look-like-let-me-tell-you/)

April 16, 2024

A CDA Expert's Response To A Novice's Anti-CDA Article (https://gingraslaw.com/a-cda-experts-response-to-a-novices-anti-cda-article/)

March 6, 2019



(https://gingraslaw.com/lets-clear-a-few-things-up-the-bachelor-update-4-4-24/)

Let's Clear A Few Things Up; The Bachelor Update 4/4/24 (https://gingraslaw.com/lets-clear-a-few-things-up-the-bachelor-update-4-4-24/)

April 4, 2024

THIS POST HAS 18 COMMENTS



Not Ugly (http://Youlose.com)

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4573#RESPOND)

Mike is way too good looking for her horse face. That's all. Also, he never abused her, he just didn't want to date her because she ugly.



Lauren

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4578#RESPOND)

Please don't insult her appearance. First of all, she's really not unattractive. You're just saying that to be mean. Second, it does nothing to help

Clayton's case. I find all the filings and discussion interesting, which is why I read here. I don't believe Laura was pregnant either (just my speculative personal opinion based on publicly available filings), but it takes a tremendously low amount of self-restraint to still be a decent human being and not hurl unnecessary insults at her (specifically on a blog she is most likely reading). Going out of your way to hurt her will not help you. You can do better than this.



Bystander

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4574#RESPOND)

I'm embarrassed for you, David. You took on the case of someone that nobody believes, claimed that you would drop her as a client if you found out she lied, and yet you keep digging yourself into an even deeper hole. You know that she lied. In fact, you say 'so what if she lied'. You keep finding the most minute technicalities in the legal filings to attempt to have things thrown out to procure a win for yourself, as if there's any honor to be had in winning that way. You KNOW that she lied. But now you're in too deep, and you keep lining your pockets while draining Clayton's AND Laura's. You don't care about the truth, you care about winning. And that is the dirtiest, scummiest thing that a defense attorney can do. Do you have no shame? You KNOW this woman was not pregnant and that she attempted to extort Clayton. I hope that one day you feel guilt and shame that is palpable, that it all presses down heavily on your conscience. You will never be seen as a hero in this; only an slimy, immoral embarrassment to the justice system. Shame on you for not giving your client what she actually needs, which is to stop

indulging in this ridiculous fantasy that she, and she alone, created. She needs help, not for someone to encourage her to continue a losing battle.
How long will you allow your integrity to be overshadowed by your refusal to accept that you were wrong?



Beth

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4575#RESPOND)

David, I keep forgetting to ask: to win the biggest defamation case in AZ history, wouldn't Laura have to prove very high financial damages? What are the ways Laura is experiencing financial loss as a result of the defamation you are alleging? Thanks for your correspondence!



Bobby

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4576#RESPOND)

So David, I can't testify that the mailman delivered the mail if I didn't see them? Even if there was no mail in the mailbox this morning but there was mail in box when I got home, and a mail truck parked on my street? Serious question.



Sarah

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4577#RESPOND)

When are you going to address her lying a little having ovarian cancer?



Lonni

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4579#RESPOND)

I am confused, Lauras critics are going to face defamation? So you can't question, have an opinion, or be a critic of this apparently very entitled person without facing a lawsuit? Hmmm, never knew someone was so special.



David Gingras (https://gingraslaw.com)

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4581#RESPOND)

You can absolutely have an opinion. That is 100% protected by the First Amendment. Knowingly spreading false information is not protected, and that is what a LOT of people have done while talking about this case. It's fine though. They will have their day in court and I'm sure "I saw it all on Reddit" will be a strong defense with the jury.



Free Speech on Social Media: The Complete Guide

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4584#RESPOND)

Now now Gingras, don't be a hypocrite, you defended Dirty.com. Your words "It was clear to me Dr. Phil did not understand the legal situation (under the law, website owners like Nik are not liable for what people post on their sites, just like Mark Zuckerberg is not liable for what you post on Facebook). And although the law was 100% on our side, Dr. Phil didn't see it that way." So you should know that social media platforms are private

companies and are not bound by the First Amendment. They have their own First Amendment rights. This means they can moderate the content people post on their websites without violating those users' First Amendment rights. It also means that the government cannot tell social media sites how to moderate content. WITH THAT BEING SAID, No one is posting false information, Gingras. The journalists and other professional forums have put in the work and time to narrow down every lie your client has made by her statement photoshopped documents and lies on top of lies to show that you and your client are liars.



Lying Liars

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4587#RESPOND)

THIS!!! love how he hasn't answered to any of the comments PROVING she is lying

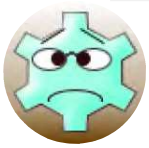


Lonni

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4589#RESPOND)

Name one false information that has been spread that you choose to follow? I will start simply, are you going after Megan Fox, Legal Vices, or Mike Gravlin? Will you go after an actual attorney, real journalist or just random online followers who have an opinion? I only say this because Gravlin laughed your client off online like an insect flicked to the side.. Show some balls and go after them all!

Gravlin made your client look so dumb it changed this case. Are you afraid to face off with him? “Who’s your daddy” videos brought most the interest to this case. Why are you not after him?



Make it Stop

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4580#RESPOND)

You’re taking her word (a known, documented, pathological liar) over contradicting testimony by someone with several corroborating witnesses. And you are the only one that believes her (if you really even do). Her documentation in this case is glaringly forged, like all the others.
Clayton is her fourth known victim, whom she diabolically and fraudulently sues after being romantically rejected. You’re enabling this abusive (and criminal) behavior. I believe you’re her fifth lawyer on this particular case, because all the others swiftly quit when they got up to speed on the case and surely realized she was perpetrating a scam. You must like the attention that comes with this high profile case, and have no scruples as to whether or not it’s ethical to continue to empower a sadistic malefactor destroying those that spurned her attention. The moral choice would be to withdraw, like all the others before you, and counsel her to seek additional psychiatric treatment.



Trisha D

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4582#RESPOND)

Dude…. The FAT Lady has sung!! You are NOT helping Laura in any way, shape or form by pretending an attorney is where her money is best spent at this late

stage in the game. It's very sad to me that you continue to gaslight everyone into believing you believe the "inconsistencies" after years and years of the same behavior. This is the very definition of insanity- continuing the same behavior over and over and expecting a different outcome. I'll give you the benefit of the doubt for arguments sake today and pretend everything you've presented is true, and in both cases true or false, common sense needs to enter this scenario and understand she needs a mental health provider, not an attorney !!! This is becoming too uncomfortable for me as a bystander watching this ten car pile up in real time. It's wrong and it's very sad watching you take advantage of this case. At this juncture you are looking worse than your client. Stop, get her some real help, then you'll be the hero this case deserves. I fear if everyone continues to perpetuate this behavior, good or bad, we will all be witnessing a tragedy we will have to live with. This is not okay! Do the right thing and get real help before you're the cause of a bigger tragedy than pregnancies, abortions and break ups. I will pray for your client, you and all the victims in this case.



Nunya

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4583#RESPOND)

Your threats of "dEfAmAtiOn" are lame, at best. Your client is a pathological liar who will soon be held accountable for altering medical documents and theft of ultrasound pictures from a grieving mother's blog. What a disgusting human- both of you.



Sarah

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4585#RESPOND)

Who told her she was having male and female twins? Which provider at which appointment? And once again, as long as we're talking lies, why did she lie about having ovarian cancer and an oophorectomy?



fake babies

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4588#RESPOND)

i'm sure it will come out that she doctored the oophorectomy and ovarian cancer documents just like she did the sonograms.



Laura's new victim

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4586#RESPOND)

david, what is your opinion of Ron Owens admitting laura makes up stories and lies? that is documented in the text messages from Mike and Mr Owens & Laura and Laura admitted it herself. Also, mike said in his testimony that he never called her his "sugar mama" .



Lonni

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4590#RESPOND)

Seems like you only want to tango with an audience rather than real lawyers. Where are you lawsuits against Mike Gravlin, Legal Vices, or Negan Fox? Not even a message to cease! Are you afraid to go after the big dogs?

Leave a Reply

Your comment here...

Name (required)

Email (required)

Website

POST COMMENT

About Gingras Law

David Gingras is a solo Internet and First Amendment attorney based in Phoenix, Arizona.

ABOUT (/PRACTICE-AREAS)

CONNECT (/CONTACT-2)

© 2024 GINGRAS LAW OFFICE, PLLC

EXHIBIT “2”

Berryhill computer forensics Inc.

7 May 2024

Gregg Woodnick
WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020

Ref: BCF1237 (Michael Marraccini)

Dear Gregg,

Attached is my report of findings in this case.

Let me know if you have questions.



Jon A. Berryhill
President & COO
Berryhill Computer Forensics, Inc

Phone – 707-745-1405
Toll Free – 888-745-1405
www.computerforensics.com
info@computerforensics.com
P.O. Box 1674
Benicia, CA 94510

Background

I, Jon A. Berryhill, declare:

I am President and COO of Berryhill Computer Forensics Inc., a firm which specializes in the collection, preservation, analysis and presentation of digital evidence, including computer hard drives, flash media, smart phones and other digital data. Our methods are court proven and ensure the integrity of the evidence and the chain of custody. The facts set forth in this declaration are based on my personal knowledge, and if called as a witness, I could and would testify thereto.

I hold a Bachelor of Science degree from Lamar University in Engineering Computer Science and a Master of Science degree from the American Public University System with a concentration in Digital Forensics. I received training in computer evidence handling, analysis and special investigations in the Air Force Special Investigations Academy, and I have been working in the field of computer forensic investigations for more than twenty-nine years. I have led computer forensic investigations for law firms, major corporations and small businesses, as well as for the United States Air Force (USAF). As a Major in the USAF, I was a Special Agent in the Air Force Office of Special Investigations, investigating crimes such as central systems fraud, homicide, theft, child pornography, and counterintelligence. I have also worked extensively with the California Department of Justice Advanced Training Center, serving as an instructor, curriculum developer, and teaching certified computer crime investigations courses. I have testified 55 times as an expert in computer forensics in the Superior Courts of the State of California, other state courts, United States District Courts, and in military courts in both civil and criminal cases. Additionally, I have provided 33 expert depositions.

Since being in private practice, I have conducted examinations of computer hard drives and other devices containing private and confidential information in more than 1230 cases in which I was entrusted with individual's personal data, corporate internal data and communications, financial data, privileged attorney-client information, trade secret information, patent and pending patent applications and confidential research and development information. These cases have included a broad spectrum of issues and parties, ranging from individuals involved in personal and financial disputes to multi-million-dollar corporate litigation.

My experience in conducting computer forensic analysis has included the analysis of more than 3490 computer hard drives and more than 6900 floppy disks, tapes, CD-ROMs, smart phones and other digital media. Since being in private practice, I have provided computer forensic analysis and support to many local, state and federal law enforcement agencies in their criminal and civil investigations. These have included the California Employment Development Department, California Office of Real Estate Appraisers, California Department of Insurance, California Highway Patrol, California Attorney General's Office, Federal Bureau of Investigation, Bureau of Alcohol Tobacco and Firearms, Immigration and Naturalization Service Investigations Division, Palo Alto Police Department, San Mateo County Sheriff's Office, Half Moon Bay Police Department, the Santa Barbara Police Department and many state and federal public defender offices.

Background

This office was contacted by Michael Marraccini who requested that his personal computer be processed as evidence pertaining to ongoing litigation for which he is a witness. Specifically, he requested text messages and related attachments to/from Laura Owens using the phone number 415-810-0604 be extracted, documented and analyzed for any evidence of tampering.

Evidence

On 4 May 2024, the computer designated evidence item BCF1237, an Apple MacBook Air model A1466, s/n C02LR8RKF5V8 was hand delivered by Michael Marraccini to the BCF office.

The computer was be released to Michael Marraccini on 6 May 2024 with the recommendation that it remain out of service and securely stored until the conclusion of any pending or potential litigation.

Analysis and Process

Full forensic image copy was created using Cellebrite Digital Collector version 3.7. A full acquisition log is maintained in the BCF files. The forensic image copy will be maintained in BCF records for a minimum of one year unless the client specifically requests otherwise.

It was noted during the forensic imaging process that the computer's internal clock read 3-9-2017 16:22 PST when actual date was 5-4-2024 15:34 PST. This is an indicator that the computer has not been in regular service for some time. The Apple OSX has default settings to keep the internal clock and calendar updated when the machine is connected to the Internet.

Findings

All text messages and associated attachments from/to Laura Owens (415-810-0604) were tagged and produced in a standard Cellebrite Inspector report. The report was produced as a single 2,489 page PDF document with links to the associated attachments. The report is identified with the date/time marker 2024-05-04 21-35-57. This report and attachment file structure was provided to Mr. Marraccini and Mr. Woodnick via a Dropbox link. Note that all times referenced in the report are in UTC. For the items of interest in the August-September 2016 time frame, to convert to PST, subtract 7 hours from UTC.

I have examined the file structure and continuity of the text message streams and associated attachments found on this computer. I find no evidence of tempering or alterations that would question the authenticity of the messages included in my report.

I was asked to address the allegation that Mr. Marraccini fabricated evidence in the matter. In reviewing the material one of the items of interest is a photo of a paper report from Planned Parenthood referencing Laura Owens' visit on 8/10/2016. This photo was attached to a text

message from 415-810-0604 on 8-12-2016 13:07:28 PST to Mr. Marraccini (see page 653 of 2489 of the BCF Cellebrite PDF report). The internal metadata of this photo shows it was taken 8-10-2016 with an iPhone 6. The location tracking (GPS) was turned off for this photo. Analysis of other photos found on the evidence computer show photos that I believe were taken by Mr. Marraccini around the same date. Those photos were taken with an iPhone 6s. This is one of many examples that refute any allegations of fabrication. Similarly, there are creation dates on the screen shots (PNG files) from around the August-September 2016 time frame that show the screen shots were captured prior to when they were attached to their various text messages. If requested I can extract all the metadata for all the associated pictures and screen shots.

I have confirmed with Mr. Marraccini by an examination of several photos that he confirmed he took with his phone in the months both before and after August 2016, that his phone at that time was an iPhone 6s.

As a further examples of the continuity and authentication of the presented evidence, I have extracted the metadata associated with the seven text message attachments listed below. The items listed show the page number from the provided PDF report, attachment file name and the date/time of the text message. Each of these are messages from 415-810-0604 (Laura Owens) to Mr. Marraccini. In each case the internal metadata for the attached image shows it was created just minutes before each text message was sent. I have also examined a sampling of other attachments to text messages on other dates from Laura to Mr. Marraccini. In no case did I find any evidence that contradicts this naritive.

670 – IMG_7692.png 8-13-2016 03:50 UTC
671 – IMG_7694.png 8-18-2016 04:18 UTC
671 – IMG_7695.png 8-18-2016 04:18 UTC
673 – IMG_7698.png 8-18-2016 04:26 UTC
675 – IMG_3477.png 8-18-2016 04:28 UTC
679 – IMG_7704.png 8-18-2016 04:35 UTC
682 – FullSizeRender-1.jpg 8-18-2016 14:15 UTC

I have found no evidence of tampering in any material related to this case (or otherwise) and believe the text messages as shown in the Cellebrite PDF report accurately depict the text communications between Mr. Marraccini and Laura Owens on the dates and times indicated.

EXHIBIT “3”

(480) 744-1400 (https://twitter.com/DavidSGingras)
(https://www.linkedin.com/in/david-gingras-165b683/)

Gingras Law Office, PLLC (https://gingraslaw.com/)

Practice Areas (https://gingraslaw.com/practice-areas/)

Blog (https://gingraslaw.com/blog/)

(https://gingraslaw.com) > Internet Law (https://gingraslaw

Connect (https://gingraslaw.com/contact-2/)

Blog

Let's Talk About Lies – Part 2

David Gingras (https://gingraslaw.com/author/gingraslaw/) -
May 2, 2024 -
Internet Law (https://gingraslaw.com/category/internet-law/) / Lawsuits (https://gingraslaw.com/category/lawsuits/) -
18 Comments (https://gingraslaw.com/lets-talk-about-lies-part-2/#comments)

A while ago, I wrote a post with bullet points (https://gingraslaw.com/lets-talk-about-lies-part-1/) that Laura's critics have passed off as truth. The third point on that list was:

> *3.) Clayton says Laura has "done this to other men"*

I'm going to skip Point 2 for now, and let's talk about Point 3 — "Laura has done this to other men". Sounds bad, right? But is it true? Let's talk about that....

One of the "other men" frequently discussed is a guy name Michael Marraccini (she calls him "Mike", so I'll use that for now). If you have followed the story, you will know the Cult claims Laura faked being pregnant with Mike, and every time that story is repeated, it's spoken about as if this is a statement of true facts. LAURA LIED ABOUT MIKE'S BABY! But is it true?

Before I get into the details, there is something VERY important you need to understand. Have you ever seen a TV show or a movie about a court case, and one of the lawyers jumps up and shouts: "*Objection! Foundation!*" Do you know what this means?

I'll explain. When a lawyer objects to foundation (or lack of foundation), that's our shorthand way of saying we don't believe the witness has been shown to have something called "*personal knowledge*". OKAY, what's so special about personal knowledge?

Search

Recent Posts

Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/)

Let's Talk About Lies – Part 1 (https://gingraslaw.com/lets-talk-about-lies-part-1/)

What The Hell Is A "Vanishing Twin"? (https://gingraslaw.com/what-the-hell-is-a-vanishing-twin/)

What Does "Justice For Clayton" Look Like? Let me tell you.... (https://gingraslaw.com/what-does-justice-for-clayton-look-like-let-me-tell-you/)

My Guest Appearance On The Bachelor, I Mean Dr. Phil (https://gingraslaw.com/my-guest-appearance-on-the-bachelor-i-mean-dr-phil/)

Archives

May 2024 (https://gingraslaw.com/2024/05/)

April 2024 (https://gingraslaw.com/2024/04/)

October 2023 (https://gingraslaw.com/2023/10/)

August 2023 (https://gingraslaw.com/2023

This is Law School 101 stuff, but basically the Rules of Evidence say a witness can ONLY testify about things IF that person first shows they have "personal knowledge" of the subject matter they want to discuss. This comes straight from Rule 602 of the Rules of Evidence (https://govt.westlaw.com/azrules/Document/N478828A0E7D911E0B453835EEBAB0BCD?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)) (that link is for the AZ rules, but the federal rules are identical).

> ***Rule 602. Need for Personal Knowledge***
>
> *A witness may testify to a matter only if evidence is introduced sufficient to support a finding that* ***the witness has personal knowledge of the matter.*** *Evidence to prove personal knowledge may consist of the witness's own testimony. This rule does not apply to a witness's expert testimony under Rule 703.*

That text is pretty dry, so let me paraphrase — witnesses aren't allowed to blow smoke out of their ass. If a witness wants to say something is true, they first have to answer ONE question: ***how do you know that***?

Here's an example of how this works in practice. Let's say you are involved in a case and you want to prove it snowed in Hawaii on December 25, 2023. So, you call a witness to the stand and ask them: "Witness, did it snow in Hawaii on December 25, 2023?"

If this happened in court, your opposing counsel would immediately object. Why? Lack of foundation.

This is how a lawyer tells the judge you haven't met the requirements of Rule 602 because you have not shown the witness has personal knowledge of this issue. You haven't explained, *how this person knows that?*

/08/)

March 2019 (https://gingraslaw.com/2019/03/)

Recent Comments

Lonni on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4590)

Lonni on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4589)

fake babies on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4588)

Lying Liars on Let's Talk About Lies – Part 2 (https://gingraslaw.com/lets-talk-about-lies-part-2/#comment-4587)

MAY 2024

M	T	W	T	F
			2	
1				3
6	7	8	9	10
13	14	15	16	17
20	21	22	23	24
27	28	29	30	31

(https://gingraslaw.com/2024/05/02/)

« Apr (https://gingraslaw.com/2024/04/)

But this problem is easily fixed. Just like this (before asking anything about the weather): “Mr. Witness, were you physically present in the State of Hawaii on December 25, 2023, and were you in a position to SEE the weather conditions on that date?”

Assuming the witness says yes, you *then* ask if they saw any snow in Hawaii on that date. With that simple intro, you satisfied the requirements of Rule 602 by proving the witness was in a position to see the weather in Hawaii. You answered the question: h*ow do you know* what the weather was like in Hawaii? This quick little bit of foundation shows the witness has personal knowledge of the weather conditions in Hawaii on the date in question.

I know that’s boring and technical, but trust me – IT MATTERS. Again, this is basic Law School 101 level stuff, but if a witness can’t show they have personal knowledge of a THING, that witness will NOT be allowed to testify about that THING. PERIOD. I have literally won entire cases based on that one simple rule.

As the example shows, establishing personal knowledge is usually not a big deal. If you want to ask a witness about Topic X, before you dive into that topic, you just need to lay some foundation showing the witness HAS personal knowledge of Topic X. It’s easy (assuming the witness knows what they are talking about), but most non-lawyers would *never* think about this.

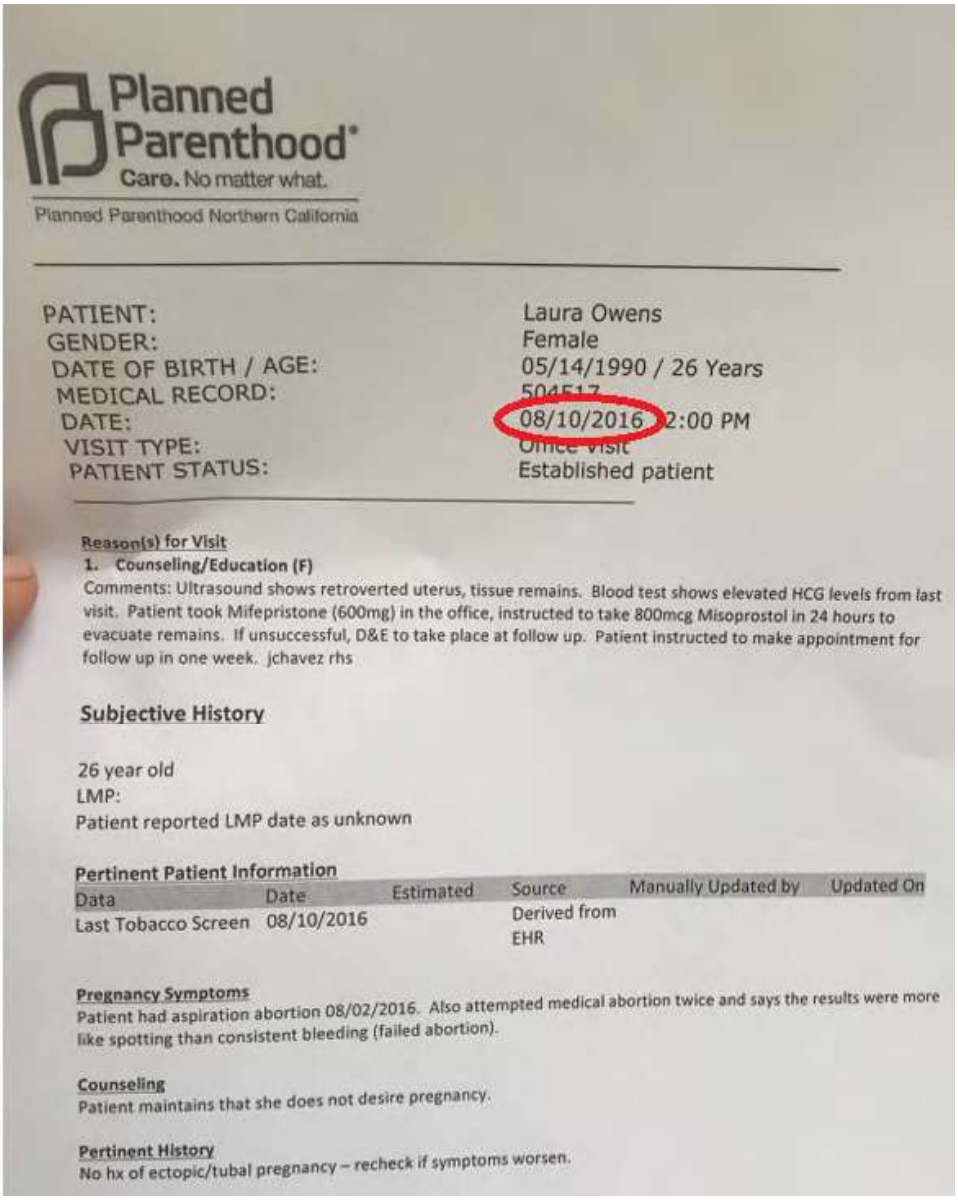
OK, with that boring intro behind us, let’s get back to the story of Mike Marraccini, and why his deposition transcript is so completely devastating for the anti-Laura crew. The full transcript is at the end of this post, but I’ll give you a summary.

Mike and Laura met through an online dating app in early 2016 (he talks about this on page 27 of his depo, and he’s not 100% sure of the date, or which app…but neither of those points are important). At that time, both Mike and Laura were living in San Francisco. Laura has told me she and Mike dated for “a couple years”, but the exact start and end dates aren’t clear from the records I’ve seen. For now, just assume this relationship lasted for at least a year, probably a while longer (basically from early 2016 through late 2017).

In mid-2016 Laura got pregnant. This was a medically-confirmed pregnancy with multiple records to support it, including HCG tests and an ultrasound. At the time, Laura and Mike were both in their mid-20s. They both felt they were too young to have kids, so they decided abortion was the best option.

Laura went to Planned Parenthood in July 2016 where she was given Mifepristone (a pill to medically terminate the pregnancy). Unfortunately, the first pill didn't work (not unusual), and Laura continued to test positive for pregnancy. This resulted in her going back to Planned Parenthood a few weeks later (with Mike). Again, plenty of records exist to support all of this.

According to Laura, this was NOT an issue of her "getting pregnant twice" (and certainly not faking pregnancy twice). She got pregnant with Mike ONCE, and it took a couple of doctor's visits to terminate the pregnancy. Mike participated in all this, and was fully aware that Laura WAS pregnant, and they jointly made the decision to terminate it. Here's a Planned Parenthood record showing the follow-up trip, and Laura also discusses this at length in a declaration I'm adding to the end of this post. Importantly, Laura's declaration was written back in 2018, LONG before this whole mess with Clayton ever happened.



Planned Parenthood®
Care. No matter what.
Planned Parenthood Northern California

PATIENT: Laura Owens
GENDER: Female
DATE OF BIRTH / AGE: 05/14/1990 / 26 Years
MEDICAL RECORD: 504517
DATE: 08/10/2016 2:00 PM
VISIT TYPE: Office Visit
PATIENT STATUS: Established patient

Reason(s) for Visit
1. Counseling/Education (F)
Comments: Ultrasound shows retroverted uterus, tissue remains. Blood test shows elevated HCG levels from last visit. Patient took Mifepristone (600mg) in the office, instructed to take 800mcg Misoprostol in 24 hours to evacuate remains. If unsuccessful, D&E to take place at follow up. Patient instructed to make appointment for follow up in one week. jchavez rhs

Subjective History

26 year old
LMP:
Patient reported LMP date as unknown

Pertinent Patient Information

Data	Date	Estimated	Source	Manually Updated by	Updated On
Last Tobacco Screen	08/10/2016		Derived from EHR		

Pregnancy Symptoms
Patient had aspiration abortion 08/02/2016. Also attempted medical abortion twice and says the results were more like spotting than consistent bleeding (failed abortion).

Counseling
Patient maintains that she does not desire pregnancy.

Pertinent History
No hx of ectopic/tubal pregnancy – recheck if symptoms worsen.

Unlike Clayton, the pregnancy and abortion was NOT the end of Laura's relationship with Mike. They continued dating for many more months, and yes Laura will admit she struggled with some emotional issues during that time. That's hardly unusual, especially when you understand how Mike treated her.

During their relationship, Laura was extremely generous with Mike. She paid to take him to Dubai. She bought him expensive gifts including a $10,000 watch. She claims Mike even called her his "sugar mama".

On December 30, 2016, Laura paid for a trip to Iceland with Mike. According to Laura's declaration (at the end of this post): "The [Iceland] trip cost at least $15,000, and I emptied my childhood savings account to pay for it."

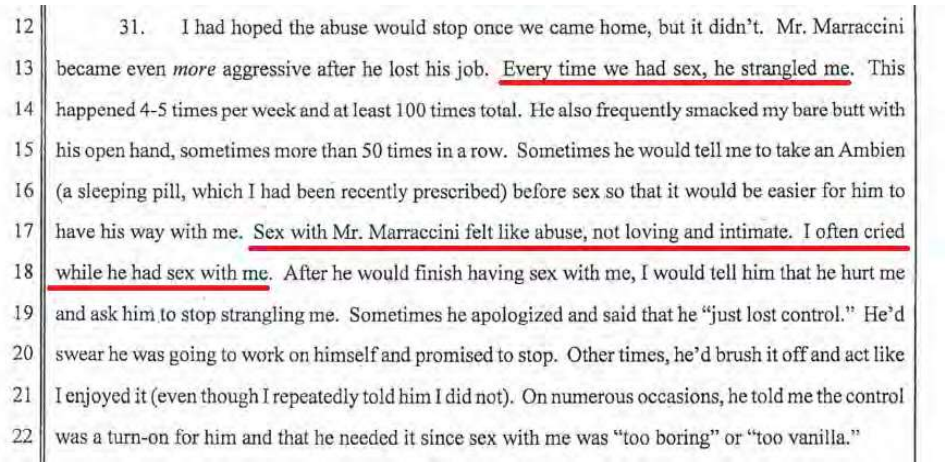
Laura & Mike in Iceland



While Laura and Mike may have looked like a happy couple on the outside, according to Laura, Mike had a very dark and abusive side. In her declaration filed in California back in 2018, Laura described the verbal abuse she received from Mike on the flight back from Iceland. This abuse was witnessed by a fellow passenger (a complete stranger) who later confirmed Laura's version of what occurred:

21. During the flight from San Francisco to Reykjavik, Iceland, Mr. Marraccini berated me nonstop for hours. He criticized me for nearly everything I said or did. If I turned my head to look at him when he said something, he'd criticize me for turning too quickly, telling me that my reflexes were "unnaturally fast" and that there was something wrong with me. He criticized my career and told me I was bad at my job and was worthless. He told me I was "ugly" and that nobody else would ever want to date me. When I would try to kiss him and cheer him up, he'd tell me I was "gross" and a bad kisser. He said I was bad in bed. Then he said he wanted to have a threesome since sex with me was so boring. He suggested a threesome with my sister or with a black man. He said it would turn him on to watch someone else have sex with me. I told him no and that I felt uncomfortable. He seemed to enjoy putting me down. His criticisms went on for hours, and I cried on and off throughout the entire flight.

After Iceland, according to Laura, things went from bad to worse. According to her sworn declaration filed in court in California, Mike began physically assaulting her, including "strangling" her during sex and verbally abusing her.



31. I had hoped the abuse would stop once we came home, but it didn't. Mr. Marraccini became even *more* aggressive after he lost his job. Every time we had sex, he strangled me. This happened 4-5 times per week and at least 100 times total. He also frequently smacked my bare butt with his open hand, sometimes more than 50 times in a row. Sometimes he would tell me to take an Ambien (a sleeping pill, which I had been recently prescribed) before sex so that it would be easier for him to have his way with me. Sex with Mr. Marraccini felt like abuse, not loving and intimate. I often cried while he had sex with me. After he would finish having sex with me, I would tell him that he hurt me and ask him to stop strangling me. Sometimes he apologized and said that he "just lost control." He'd swear he was going to work on himself and promised to stop. Other times, he'd brush it off and act like I enjoyed it (even though I repeatedly told him I did not). On numerous occasions, he told me the control was a turn-on for him and that he needed it since sex with me was "too boring" or "too vanilla."

Laura eventually ended the relationship with Mike in late 2017. She claims he began stalking her as a result. Fearful for her safety, in January 2018, Laura applied for a restraining order against Mike. Here's a complete copy of the file from that case (https://gingraslaw.com/MarraccinDV.pdf).

Now having said all this, you may be asking yourself — "Hang on, so Laura claims Mike was an abusive boyfriend. So what? You haven't explained why any of this 'guarantees' a win for Laura." And that's right, I haven't explained it yet, so I'll do that right now.

At the start of this post, I explained the concept (and the rule) which requires proof a witness has personal knowledge of something before they are allowed to testify about anything. Remember that?

Now, keeping the concept of "personal knowledge" in mind, go back and read through Mike's deposition. Show me a SINGLE example of him offering any explanation to show how he has personal knowledge of Laura faking being pregnant. YOU CAN'T, BECAUSE IT IS NOT THERE. And FYI – personal knowledge means PERSONAL knowledge. Hearing something from a 3rd party is hearsay, not personal knowledge.

Look specifically at his discussion of the pregnancy between pages 45-47 of the depo transcript. As you read this, try to ask yourself: "OKAY, the witness is saying he doesn't ***think*** Laura was pregnant, *BUT HOW DOES HE KNOW THAT? How does he personally know she was not pregnant*?" Remember, a witness can't say it snowed in Hawaii on Christmas 2023 unless they first prove they were in Hawaii on that date, so again, ask yourself what proof does Marraccini offer to show he peesonally KNEW Laura lied about being pregnant?

Mike is very clear about how he knows that — HE DOES NOT KNOW THAT. He offers nothing but pure speculation. None of this even comes close to clearing the hurdle of personal knowledge. In fact, he even says (repeatedly) he believes she probably WAS pregnant, "the first time". But he apparently forgot the "first time" was, in fact, **the ONLY time.** Maybe he has memory or mental issues, but the records on this are clear — Laura was only pregnant ONCE with Mike, but she had to go back a couple of times after the pills didn't work the first time. That's probably why Mike thinks it was two pregnancies. It wasn't. It was just one, and in his own words, Mike admits he thought she probably was pregnant. OOPS.

Folks, it doesn't get much clearer than that. Mike doesn't have personal knowledge of ANYTHING regarding Laura "faking" a pregnancy. If he tried to say that at trial in our case, I'd object to a lack of foundation and, separately, that he's just speculating about this. If Mike suddenly develops a shocking new level of clarity about this, I hope he can explain why he answered differently in his deposition SIX YEARS AGO.

NOTE – Laura informs me Mike's story about her father somehow "admitting" Laura lied about being pregnant is also 100% false. I haven't met Laura's dad (yet), but I'll go ahead and verify his side of things as soon as I can. But if the evidence stays this way moving forward, Laura's critics are going to have a very, very hard time avoiding liability for defamation.

Q. So you were -- just so I'm clear, you were aware that she felt conflicted about terminating that; right?
A. Yes.
Q. Okay. So Laura -- I'm not clear about -- is it your position that she wasn't actually pregnant?
A. I think -- I don't think she was pregnant two times. I think one of them was a made up story, and I think one might have been legitimate.
Q. Which one do you think was legitimate?
A. The first time.
Q. And why do you think she was pregnant the second time?
A. I think she did that to keep me around because I think she was going through a lot at the time. She said

abortion?
A. Maybe on the first go around. I don't know. I still to this day don't think she was pregnant.
Q. So you don't think she was pregnant at all?
A. I don't think she was pregnant because of all the stories. The timelines never made sense. So I don't -- looking back now -- at the time I definitely thought she was pregnant. Looking back now, I don't.
Q. Okay. So I just want to be a hundred percent because I thought earlier you said you did think she was pregnant one of those times. So is your story that you don't think she was ever pregnant?
A. If she was ever pregnant, I believe it was the first time. But I -- looking back now, I don't know if she ever was pregnant. So at the time -- I don't know how to give you a clear answer on this because at the time I thought she was pregnant both times because I'm not going to go and study the timelines of pregnancies and do everything like that. But looking back now, I think one of the pregnancies or both were made up.
Q. Okay.

In the Matter Of:

LAURA OWENS vs MICHAEL MARRACCINI, et al.,

Court Reporters, Videography, Trial Preparation

Videoconference Center

Oakland • San Francisco • San Jose

Sacramento • Irvine • Los Angeles

877.451.1580

www.aikenwelch.com

Aiken Welch
COURT REPORTERS

Declaration of Laura Owens

I, Laura Owens, declare as follows:

1. I make all of the statements herein of my own personal knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true, and if called as a witness, could and would testify competently thereto.

HISTORY OF RELATIONSHIP

2. Mr. Marraccini and I were romantically involved from March 2016 until late Fall 2017. Contrary to what he alleges in his declaration filed on January 22, 2018, we did not stop dating in March 2017.

3. I met Mr. Marraccini in March 2016 through The League, a dating app for professionals that matches people together based on their LinkedIn and Facebook profiles. His profile said that he was in "Real Estate Development" and that he went to California Polytechnic Institute. (See Exhibit 1, screenshots of Mr. Marraccini's profile from The League taken April 26, 2016 and May 10, 2017). He asked me out to dinner and I accepted.

4. Initially, Mr. Marraccini was very charming. In the early months of our relationship, we saw each other often and seemed to have a lot in common. Mr. Marraccini showed interest in my career (I am the CEO of Quartet Farms, a company that buys and sells show horses). He talked about his own career ambitions and said he was a real estate developer and that he had his real estate license. He also frequently talked about his many job offers at big developments firms. I wanted to be with someone who was career oriented like I am and thought we were a good match. We talked about my love for animals and animal welfare, which he also claimed to care deeply about. He also often talked about his alleged relationships with celebrities. He liked that my father Ronn Owens is a famous local talk show host and was excited at the prospect of meeting celebrities.

5. In or around late May or early June 2016, I was asleep when I was suddenly struck in the face by Mr. Marraccini. I don't know exactly how he hit me; I think either his elbow or fist hit me near my eye. I can't say for sure, but I believe he may have been asleep and involuntarily hit me somehow. I had a black eye for a day or two after this. (One of his friends told me that one of his ex-girlfriends also woke up with a black eye because Mr. Marraccini "accidentally" hit her while he was asleep).

YOU MIGHT ALSO LIKE

What Does "Justice For Clayton" Look Like? Let me tell you.... (https://gingraslaw.com/what-does-justice-for-clayton-look-like-let-me-tell-you/)

April 16, 2024

A CDA Expert's Response To A Novice's Anti-CDA Article (https://gingraslaw.com/a-cda-experts-response-to-a-novices-anti-cda-article/)

March 6, 2019



(https://gingraslaw.com/lets-clear-a-few-things-up-the-bachelor-update-4-4-24/)

Let's Clear A Few Things Up; The Bachelor Update 4/4/24 (https://gingraslaw.com/lets-clear-a-few-things-up-the-bachelor-update-4-4-24/)

April 4, 2024

THIS POST HAS 18 COMMENTS



Not Ugly (http://Youlose.com)

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4573#RESPOND)

Mike is way too good looking for her horse face. That's all. Also, he never abused her, he just didn't want to date her because she ugly.



Lauren

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4578#RESPOND)

Please don't insult her appearance. First of all, she's really not unattractive. You're just saying that to be mean. Second, it does nothing to help

Clayton's case. I find all the filings and discussion interesting, which is why I read here. I don't believe Laura was pregnant either (just my speculative personal opinion based on publicly available filings), but it takes a tremendously low amount of self-restraint to still be a decent human being and not hurl unnecessary insults at her (specifically on a blog she is most likely reading). Going out of your way to hurt her will not help you. You can do better than this.



Bystander

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4574#RESPOND)

I'm embarrassed for you, David. You took on the case of someone that nobody believes, claimed that you would drop her as a client if you found out she lied, and yet you keep digging yourself into an even deeper hole. You know that she lied. In fact, you say 'so what if she lied'. You keep finding the most minute technicalities in the legal filings to attempt to have things thrown out to procure a win for yourself, as if there's any honor to be had in winning that way. You KNOW that she lied. But now you're in too deep, and you keep lining your pockets while draining Clayton's AND Laura's. You don't care about the truth, you care about winning. And that is the dirtiest, scummiest thing that a defense attorney can do. Do you have no shame? You KNOW this woman was not pregnant and that she attempted to extort Clayton. I hope that one day you feel guilt and shame that is palpable, that it all presses down heavily on your conscience. You will never be seen as a hero in this; only an slimy, immoral embarrassment to the justice system. Shame on you for not giving your client what she actually needs, which is to stop

indulging in this ridiculous fantasy that she, and she alone, created. She needs help, not for someone to encourage her to continue a losing battle.
How long will you allow your integrity to be overshadowed by your refusal to accept that you were wrong?



Beth

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4575#RESPOND)

David, I keep forgetting to ask: to win the biggest defamation case in AZ history, wouldn't Laura have to prove very high financial damages? What are the ways Laura is experiencing financial loss as a result of the defamation you are alleging? Thanks for your correspondence!



Bobby

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4576#RESPOND)

So David, I can't testify that the mailman delivered the mail if I didn't see them? Even if there was no mail in the mailbox this morning but there was mail in box when I got home, and a mail truck parked on my street? Serious question.



Sarah

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4577#RESPOND)

When are you going to address her lying a little having ovarian cancer?



Lonni

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4579#RESPOND)

I am confused, Lauras critics are going to face defamation? So you can't question, have an opinion, or be a critic of this apparently very entitled person without facing a lawsuit? Hmmm, never knew someone was so special.



David Gingras (https://gingraslaw.com)

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4581#RESPOND)

You can absolutely have an opinion. That is 100% protected by the First Amendment. Knowingly spreading false information is not protected, and that is what a LOT of people have done while talking about this case. It's fine though. They will have their day in court and I'm sure "I saw it all on Reddit" will be a strong defense with the jury.



Free Speech on Social Media: The Complete Guide

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4584#RESPOND)

Now now Gingras, don't be a hypocrite, you defended Dirty.com. Your words "It was clear to me Dr. Phil did not understand the legal situation (under the law, website owners like Nik are not liable for what people post on their sites, just like Mark Zuckerberg is not liable for what you post on Facebook). And although the law was 100% on our side, Dr. Phil didn't see it that way." So you should know that social media platforms are private

companies and are not bound by the First Amendment. They have their own First Amendment rights. This means they can moderate the content people post on their websites without violating those users' First Amendment rights. It also means that the government cannot tell social media sites how to moderate content. WITH THAT BEING SAID, No one is posting false information, Gingras. The journalists and other professional forums have put in the work and time to narrow down every lie your client has made by her statement photoshopped documents and lies on top of lies to show that you and your client are liars.



Lying Liars

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4587#RESPOND)

THIS!!! love how he hasn't answered to any of the comments PROVING she is lying

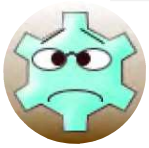


Lonni

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4589#RESPOND)

Name one false information that has been spread that you choose to follow? I will start simply, are you going after Megan Fox, Legal Vices, or Mike Gravlin? Will you go after an actual attorney, real journalist or just random online followers who have an opinion? I only say this because Gravlin laughed your client off online like an insect flicked to the side.. Show some balls and go after them all!

Gravlin made your client look so dumb it changed this case. Are you afraid to face off with him? “Who’s your daddy” videos brought most the interest to this case. Why are you not after him?



Make it Stop

MAY 2, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4580#RESPOND)

You’re taking her word (a known, documented, pathological liar) over contradicting testimony by someone with several corroborating witnesses. And you are the only one that believes her (if you really even do). Her documentation in this case is glaringly forged, like all the others.
Clayton is her fourth known victim, whom she diabolically and fraudulently sues after being romantically rejected. You’re enabling this abusive (and criminal) behavior. I believe you’re her fifth lawyer on this particular case, because all the others swiftly quit when they got up to speed on the case and surely realized she was perpetrating a scam. You must like the attention that comes with this high profile case, and have no scruples as to whether or not it’s ethical to continue to empower a sadistic malefactor destroying those that spurned her attention. The moral choice would be to withdraw, like all the others before you, and counsel her to seek additional psychiatric treatment.



Trisha D

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4582#RESPOND)

Dude…. The FAT Lady has sung!! You are NOT helping Laura in any way, shape or form by pretending an attorney is where her money is best spent at this late

stage in the game. It's very sad to me that you continue to gaslight everyone into believing you believe the "inconsistencies" after years and years of the same behavior. This is the very definition of insanity- continuing the same behavior over and over and expecting a different outcome. I'll give you the benefit of the doubt for arguments sake today and pretend everything you've presented is true, and in both cases true or false, common sense needs to enter this scenario and understand she needs a mental health provider, not an attorney !!! This is becoming too uncomfortable for me as a bystander watching this ten car pile up in real time. It's wrong and it's very sad watching you take advantage of this case. At this juncture you are looking worse than your client. Stop, get her some real help, then you'll be the hero this case deserves. I fear if everyone continues to perpetuate this behavior, good or bad, we will all be witnessing a tragedy we will have to live with. This is not okay! Do the right thing and get real help before you're the cause of a bigger tragedy than pregnancies, abortions and break ups. I will pray for your client, you and all the victims in this case.



Nunya

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4583#RESPOND)

Your threats of "dEfAmAtiOn" are lame, at best. Your client is a pathological liar who will soon be held accountable for altering medical documents and theft of ultrasound pictures from a grieving mother's blog. What a disgusting human- both of you.



Sarah

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4585#RESPOND)

Who told her she was having male and female twins? Which provider at which appointment? And once again, as long as we're talking lies, why did she lie about having ovarian cancer and an oophorectomy?



fake babies

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4588#RESPOND)

i'm sure it will come out that she doctored the oophorectomy and ovarian cancer documents just like she did the sonograms.



Laura's new victim

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4586#RESPOND)

david, what is your opinion of Ron Owens admitting laura makes up stories and lies? that is documented in the text messages from Mike and Mr Owens & Laura and Laura admitted it herself. Also, mike said in his testimony that he never called her his "sugar mama" .



Lonni

MAY 3, 2024 REPLY (HTTPS://GINGRASLAW.COM/LETS-TALK-ABOUT-LIES-PART-2/?REPLYTOCOM=4590#RESPOND)

Seems like you only want to tango with an audience rather than real lawyers. Where are you lawsuits against Mike Gravlin, Legal Vices, or Negan Fox? Not even a message to cease! Are you afraid to go after the big dogs?

Leave a Reply

Your comment here...

Name (required)

Email (required)

Website

POST COMMENT

About Gingras Law

David Gingras is a solo Internet and First Amendment attorney based in Phoenix, Arizona.

ABOUT (/PRACTICE-AREAS)

CONNECT (/CONTACT-2)

© 2024 GINGRAS LAW OFFICE, PLLC

Clerk of the Superior Court
*** Electronically Filed ***
M. Cain, Deputy
5/15/2024 12:33:52 PM
Filing ID 17825406

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent/Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

RESPONSE/OBJECTION TO PETITIONER'S MOTION FOR JUDGMENT ON THE PLEADINGS AND RENEWED MOTION TO DISMISS

(Assigned to the Honorable Julie Mata)

Defendant/Respondent, **CLAYTON ECHARD**, by and through counsel undersigned, hereby files his Response and objects to Plaintiff/Petitioner, **LAURA OWENS**, *Motion for Judgment on the Pleadings and Renewed Motion to Dismiss,* filed May 10, 2024.

I. **General availability of attorney fees and sanctions.**

Before addressing the balance of the Motion on its face, the Court must be aware that Laura's entire argument presents a *false choice fallacy* in an attempt to artificially limit both the scope of the pleadings and the Court's authority. Rule 26 is not, and has never been, the exclusive source of the Court's authority to award attorney fees and it does not govern

Clayton's substantive claims for relief raised in the pleadings. Therefore, the question before the Court is *not* whether it can award sanctions under Rule 26 or no sanctions at all (as Laura falsely frames her argument). Rather, the question is whether Clayton is entitled to adjudication on his claims for fees and sanctions under any authority invoked in the pleadings or inherent to the Court by virtue of its statutorily mandated duties. The answer to that question is **clearly yes**. Laura knows—or at least should know based on the plethora of written communications and filings about this issue—that her proffered "Rule 26 or dismiss the action" dichotomy is *both* frivolous and misleading.

Title 25 contains at least three (3) statutes that expressly instruct the Court to award attorney fees and sanction a party in response to unreasonable conduct in the litigation: A.R.S. § 25-324 (attorney fees in actions under §§ 25-401 through 25-417 for unreasonable conduct); A.R.S. § 25-415 (sanctions for presenting false claims or violating orders compelling discovery in family law actions); and A.R.S. § 25-809(G) (attorney fees for unreasonable positions in paternity proceedings). Clayton has already articulated in several filings—including in his Motion for Leave to Amend, Amended Response, Response/Objection to Petitioner's Motion to Dismiss, and Motion to Withdraw the Motion for Sanctions Pursuant to Rule 26—the statutory basis for his claims for relief. Moreover, those provisions apply to **all proceedings** brought under the relevant chapters of Title 25 (of which this paternity action is one example).

Every litigant has notice of the Court's duty and authority to sanction unreasonable conduct in family court actions. Rule 26 is a procedural mechanism for sanctioning a party for the contents of their filings at any time—even before final resolution and notwithstanding

the prevailing party in the action—and does not replace, supersede, or otherwise affect the statutory claims for relief whatsoever.[1] Arizona courts have repeatedly recognized that when a substantive statute conflicts with a procedural rule, the statute prevails. *Albano v. Shea Hoes Ltd. Partnership*, 227 Ariz. 121, 127, ¶ 26 (2011); *see also In re Marriage of Waldren*, 217 Ariz. 173, 177, ¶ 20 (2007) ("Court rules may not 'abridge, enlarge, or modify substantive rights of a litigant.' A.R.S. § 12-109(A) (2003)").

Rule 26 governs relief *pursuant to Rule 26* and nothing more. Even if Laura's arguments interpreting Rule 26 were correct—a conclusion Clayton certainly opposes—the net result on the posture of the case would be *absolutely no change at all* from the existing trial scheduled on the merits of the pleadings. Accordingly, her prayer for relief, improperly styled as a "Motion for Judgment on the Pleadings and Renewed Motion to Dismiss," was already moot before it was even filed because Rule 26 is not at issue. The motion has no bearing on the resolution of this case. As detailed in prior filings, by withdrawing his Rule 26 motion, Clayton hoped to avoid Laura's noxious agenda of papering the court with dozens of pages of meaningless debate on this topic, but Laura appears determined to have this purely theoretical argument regardless.

II. Response to Motion for Judgment on the Pleadings.

As and for his Response/Objection, Clayton states as follows:

//

[1] To crystallize this point even further, Rule 26 is not even the exclusive source of sanctions in the procedural rules themselves. The Court can sanction a party for service violations (Rule 43.1), discovery violations (Rules 51 and 65), and failure to participate in various aspects of the proceeding (Rules 66, 67, 71, 76.2), to name a few.

1. **Clayton provided written notice as required by Rule 26, *Arizona Rules of Family Law Procedure* through emails and filings.**[2] As addressed in depth in his *Motion to Withdraw*, Clayton's *Motion for Leave to Amend* (filed December 12, 2023) (**Exhibit 1)**, provided notice of his intent to seek sanctions against Laura and cited Rule 26. The Court granted leave to amend and accepted the Amended Response (also citing Rule 26 and indicating an intent to seek sanctions against Laura) on January 25, 2024. On December 28, 2023—more than 10 days *after* being notified of Clayton's intent to seek Rule 26 sanctions via the Motion for Leave to Amend—Laura moved to Dismiss her Petition because she was (*cryptically*) "*no longer pregnant*." Clayton timely objected.

On January 25, 2024, the Court deliberately indicated it was not dismissing the action because Clayton is entitled to resolution of his claims for a finding of non-paternity, attorney fees and sanctions. *See* Minute Entry dated 1/25/2024; *See* Minute Entry dated 2/14/2024 (**IT IS ORDERED** denying Petitioner's Motion to Dismiss). *See also* Rule 46(a)(1)(B), (prohibiting voluntary dismissal without court approval after an answer is filed and permitting the court to dismiss a petition on such terms and conditions the court deems proper, including the resolution of any claims by the responding party); *Holgate v. Baldwin,* 325 F. 3d 671, 678 (9th Cir. 2005) (The Court upheld an award of sanctions despite the **parties not sending a separate notice of their intent** to seek Rule 11 sanctions, finding that the "safe harbor" period commenced when the parties' **filed their initial joinder motion evidencing an intent to seek sanctions**) (emphasis added).

[2] This is all addressed *ad nauseam* in Clayton's *Motion to Withdraw*, which is provided as an Exhibit for the Court's convenience, as a litany of unnecessary filings designed with the overt goal of delaying or otherwise avoiding trial (as here, with the Motion for Judgment on the Pleadings) have followed.

2. **Even if this Court finds Clayton did not provide proper notice, Rule 26 is just one avenue for sanctions.** If the Court treats Clayton's *Response to Petition for Paternity* as true and correct (as Laura now requests), there are independent statutory claims for attorney's fees and sanctions that have *nothing* to do with Rule 26 sanctions and have no "safe harbor provision" (e.g., A.R.S. § 25-324(A)). Statutes are superior when it comes to *substantive* claims and rules are superior when it comes to *procedural* matters, and the statutes (A.R.S. §§ 25-325, -415, -809) provide substantive claims for relief separate and apart from Rule 26. Rule 26 is a carryover from the Rules of Civil Procedure as a remedial measure for frivolous claims and filings during the pendency of the proceedings, not a mechanism for defeating substantive statutory claims for relief as Laura suggests.

As a broader legal point, case law interpreting the limitations of the court's authority to sanction improper filings in a civil matter is not directly analogous to Rule 26, insofar as Rule 26 exists in a completely different environment of statutory claims under Title 25, allowing different relief such as sanctions and attorney fees by statute. Interpreting Rule 26 as an analogue to Rule 11, *Arizona Rules of Civil Procedure* makes sense in the context of the language of the rule itself, but once the analysis moves beyond that and onto the question of whether there are alternative grounds for the same relief, Title 25 is tremendously broader and more remedial than the legal authorities relevant to the various cases interpreting Rule 11.

3. **Regarding the "safe harbor notice" provision, that portion of Rule 26 permits a party to correct or withdraw a filing within the notice period, but it is not an absolute right to withdraw the entire action.** As previously addressed in his *Motion to Withdraw*, if Laura's theory that she was denied an absolute right to withdraw her entire action

were true, no party would ever move for Rule 26 sanctions. Under Laura's view, that would hand the other side a Monopoly style "Get Out of Jail Free" card to avoid consequences regardless of the extent of the frivolous, inflammatory, and impermissible claims in their filings, or the outrageousness of their conduct after filing[3] (which is an independent basis for statutory relief entirely independent of Rule 26, e.g., A.R.S. §§ 25-324, 25-415, 25-809(G)). Laura's *Motion for Judgment on the Pleadings* seeks the legally extraordinary and practically inexplicable relief of *dismissing the entire action that she improperly brought*.

4. **Even assuming, *in arguendo*, that Laura was entitled to a 10-day "miracle cure" period to undo her past bad acts, she has already been given those opportunities and did not accept them.** Yes, she moved to dismiss her petition *eventually*, but it was well *after* 10 days from Clayton's *Motion for Leave to Amend* and was denied because Clayton has material statutory claims entitled to resolution on the merits. There is simply no reason to believe there was ever a time that Laura would have voluntarily withdrawn her claims even if she was given that opportunity with no strings attached. Instead, her antics continued, including alleging that a prior victim fabricated *her* medical records (which she now appears to be claiming *she does not* "*remember*" creating the allegedly fabricated medical records).

[3] Here, Laura's conduct in this action (and the other two protective order proceedings) clearly fall within all of these categories as Laura (allegedly) frivolously brought the underlying action alleging she was pregnant after non-intercourse with Clayton's "twins" and continued to perpetuate alleged fraud upon the court by submitting knowingly fabricated medical records. Laura has behaved inflammatorily by continuing to present herself as "24 weeks pregnant" with "boy and girl twins" and repeatedly testifying to actively being seen by physicians (who have since disclaimed ever seeing Laura as a patient) and by engaging in toxic diatribe on Twitter and blog posts including attempting to intimidate witnesses. Nearly all of Laura's filings have contained legally impermissible claims, for limited example: Laura's Motion to Communicate and this Motion for Judgment on the Pleadings. Lastly, her conduct in this litigation has been extremely outrageous to wit: admittedly fabricating medical records, baselessly accusing others of fabricating the records she herself tampered with, and (allegedly) committing perjury in *multiple* filings and in statements before this Court (notably, Laura bizarrely appears to continue to allege the sonogram that she admitted to doctoring and that did not originate in *either* location she alleged is legitimate despite mountains of evidence to the contrary).

Moreover, Clayton even offered, *several times*, for Laura to walk away from this litigation if she apologized and admitted that she was never pregnant by him with "twins". Laura rejected every effort to resolve this matter and even engaged in overt efforts to intimidate witnesses into not participating in the process by threatening to have them arrested. As referenced in **Exhibit 2** she (through counsel) mentioned having Mr. Maraccini arrested for attending the hearing (his subpoena is attached). Then, she conveniently failed to mention in her recent *Reply in Support of Laura's Motion in Limine* that she *has* been in contact with Mr. Marraccini and his attorney, and he has clearly indicated his desire to have his voice heard at trial. **Exhibit 3.** Moreover, **on April 22, 2024**, Laura (via counsel) stated:

> "*I am happy to discuss settlement, but I also need to be honest – when Laura prevails in this case, she is going to sue Clayton and many other people for defamation and other torts. We can certainly avoid that if you want, but it's going to involve someone writing a very large check to Laura.* ***If you offered $1 million right now, I'd advise her to reject that offer*****"** (emphasis added). **Exhibit 4.**

It is tremendously convenient for Laura to announce, here at the proverbial eleventh hour, that she would have withdrawn the petition months ago if given the chance. The well-documented history of this case—and the companion order of protection cases where her conduct *under oath* was even more outrageous—necessitates a different conclusion.

5. **Again, even if Laura had attempted to withdraw from the action entirely, that was only subject to the Court's approval and Clayton's right to object consistent with Rule 46**. Rule 46 must be read harmoniously with Rule 26 and the Title 25 statutes. A harmonious reading of Rules 46 and 26 tells us that a pleading can be withdrawn voluntarily before a responsive pleading is filed, but after a responsive pleading is filed, it can *only* be

withdrawn with the Court's permission after consideration of the opposing party's right to have their responsive claims and counter claims adjudicated. *Laura has already tried this and was denied by this Court.*

The Rule 26 notice would allow a party to correct a pleading or withdraw a claim but not to dismiss the action without the Court's permission after an answer is filed. The Court should not grant permission if, as here, the respondent asserted substantive claims entitled to adjudication in their responsive pleading. This is the only way to read Rule 26, Rule 46, and Title 25 together that does not subordinate one procedural rule to another or nullify statutory claims (that cannot be abridged by procedural rules).

6. **Notwithstanding all of this, a Motion for Judgment on the Pleadings makes absolutely no sense in this case's context.** Judgment on the pleadings would require the Court to find Clayton's allegations in the Response that Laura was never pregnant with his "twins" as *true* and therefore find her subsequent representations to three (3) different Judges under oath were maliciously fraudulent. That kind of conduct is *exactly* why A.R.S. §§ 25-324, 25-415 and 25-809 exist. Her position here would turn Rule 26 into an escape hatch for any litigant wishing to avoid the consequences of their own actions. If Laura now concedes that her claims were always fraudulent (as Clayton believes) or just (according to her counsel) "*misstatements*," then the Court can proceed just in determining the appropriate sanctions and attorney fees to award. It still must award them pursuant to statute.

7. **Whether Clayton filed for Sanctions under Rule 26 or not, trial would still occur.** Even assuming this Court agrees with Laura's (highly contested) interpretation of Rule 26, the parties would still be heading to trial. Clayton is entitled to a hearing on his

counterclaim for a finding of non-paternity and attorney fees and costs. As Laura has repeatedly indicated in her filings, emails, blog posts, and Tweets, she has no interest in conceding what Clayton has alleged since the beginning: that she was never pregnant by Clayton with "twins" after their non-intercourse. Had Clayton never mentioned Rule 26, Laura would have no "safe harbor" to withdraw her claims and the Court would proceed to trial under any of the half-dozen or more other sources of authority to adjudicate the claims before it and sanction misconduct. Interpreting Rule 26 and the "safe harbor" period as a necessary precedent condition for the Court to sanction a party under any other source of authority at law or in equity would be the most absurd result imaginable. The Court cannot read a rule as requiring an absurd result unless that is the only plausible reading, and that is clearly not the situation presented here.

8. **Oral argument is an unnecessary and expensive distraction on the eve of trial.** Efforts to delay and avoid this trial are over the top. This is a bench trial that is set to take place in less than a month. If Laura desires to use this Motion or her limited time at trial to argue about procedural rules that have no bearing on the substantive issues of this case, that is her prerogative and should count against her limited time. Clayton should not be forced to participate in such futility because his analysis of the "Rule 26 issue" has been thoroughly explained on the record—twice. This is the "Conor McGregor" litigation that was promised by Laura's counsel and is only exemplified by the personal tweets, blogs and what this court may see as efforts to intimidate for no reason other than to dissuade just resolution of claims. It needs to stop.

9. **Clayton is entitled to his reasonable attorney's fees and costs under A.R.S. §§ 25-324, 25-415, and 25-809 incurred in this entire proceeding, including in filing this *Response.*** Clayton exhaustively outlined in his *Motion to Withdraw* most, if not all, of the factual and legal bases outlined in this *Response*. Laura did not even reply to Clayton's Motion – instead, she *agreed with it* and filed a Notice of Non-Objection. The withdrawal was filed to avoid more of the toxic litigation, threats of appeals and personal sanctions and bullying efforts. It did not work. Still, Laura seeks yet *another* impossible form of relief in a motion designed to increase expenses and avoid trial. She requests Oral Argument on the matter despite already knowing—constructively if not actually—that her argument is not well-grounded in law. Clayton requests that he be permitted to submit a *China Doll Affidavit* that includes all of the prior unwarranted and legally inappropriate filings he has had to defend himself against in this litigation.

WHEREFORE, Clayton respectfully requests the Court:

A. Deny the Motion for Judgment on the Pleadings and Renewed Motion to Dismiss;

B. Grant Clayton leave to submit a *China Doll Affidavit*;

C. Grant other relief this Court deems just and proper.

RESPECTFULLY SUBMITTED this 15th day of May, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Defendant

ORIGINAL of the foregoing e-filed this 15th day of May, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gringas
Gringas Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GringasLaw.com

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Response/Objection To Petitioner's Motion For Judgment On The Pleadings And Renewed Motion To Dismiss* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (May 15, 2024 11:49 PDT)

CLAYTON ECHARD

05/15/2024

Date

EXHIBIT “1”

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

MOTION TO WITHDRAW MOTION FOR SANCTIONS PURSUANT TO RULE 26

(Assigned to the Honorable Julie Mata)

Respondent, Clayton Echard, moves to withdraw only his *Motion for Sanctions Pursuant to Rule 26* dated January 3, 2024 based on the following:

Although Clayton believes he more than complied with Rule 26, ARFLP, and that the Court already overruled Laura's objection, it is clear she intends to pursue more toxic litigation predicated on threats as a rouse to avoid this Court reaching the heart of this matter (the overwhelming fraud). Clayton's claims for fees and sanctions exist independently of the Rule 26 Motion and have *already* been set for trial. Clayton would rather avoid the "$35,*000*" sideshow repeatedly threatened by Laura's new counsel and overt efforts to delay adjudication on the facts. Because the Rule 26 Motion is not the substantive pleading basis for his claims

against Laura, there is no reason to participate in the pointless litigation over this issue (and threats to appeal to further delay justice) notwithstanding Clayton's disagreement with Laura's legal positions on Rule 26. Moreover, Laura's threat to seek personal sanctions against Clayton's counsel based on her proffered Rule 26 violation, while frivolous, will only draw more attention and animus to this case. Subjecting the Court to this collateral circus, which is intended only to increase legal fees and prevent resolution on the merits, would be a waste of judicial (and other) resources.

Accordingly, Clayton hereby moves to withdraw the Rule 26 *Motion for Sanctions* filed January 3, 2024. He does not withdraw his counterclaims and other relief afforded and any other relief appropriate and available to him under A.R.S. §§ 25-324, 25-415, 25-809, etc.

He also, for completeness of record, provides the following:

Background and Procedural History

1. This matter is before the Court on Petitioner Laura Owens's *Petition to Establish* filed August 1, 2023 and Clayton's *Amended Response to Petition to Establish Paternity* filed December 12, 2023 (relating back to original filing date of August 21, 2023 under ARFLP 28(c)).

2. On December 12, 2023, Clayton moved for leave to amend his Response. In the Amended Response, Clayton cited Rule 26 and provided notice of intent to seek sanctions for statements made in Laura's Petition. *See* Amended Response, pp. 5-6, §§ 25-26. The Court granted leave to amend and accepted the Amended Response on January 25, 2024.

3. On December 28—more than 10 days after notice of Clayton's intent to seek Rule 26 sanctions via the motion for leave to amend—Laura moved to dismiss her Petition based on her assertion she was "no longer" pregnant. Her motion to dismiss sought to dismiss the entire action with prejudice. Clayton objected because, inter alia, he had alleged counterclaims seeking an affirmative finding of non-paternity, attorney fees, and sanctions for Laura bringing the action in bad faith, for improper purpose, etc. On January 25, the Court granted Laura's motion, in part, by dismissing her Petition, but the Court did not dismiss the action because Clayton is entitled to resolution of his claims for a finding of non-paternity, attorney fees, and sanctions. *See* Minute Entries dated January 25, 2024 ("While the Court will grant the *Motion* [to Dismiss], the issue of sanctions and attorney's fees remain. […] The Court will set an evidentiary hearing on the issues of sanctions and attorney fees by separate minute entry."); *see also* ARFLP 46(a)(1)(B) (prohibiting voluntary dismissal without court approval after an answer is filed and permitting the court to dismiss a petition on such terms and conditions the court deems proper, including the resolution of any claims by the responding party).

4. On January 3, 2024, Clayton filed a Motion for Sanctions Pursuant to Rule 26 (hereafter the "Motion for Sanctions"). The Motion for Sanctions came more than 10 days after the Motion for Leave to Amend—in which Clayton gave written notice of intent to seek Rule 26 sanctions from Laura's complaint—and after Laura moved to dismiss her Petition.

5. Laura responded to the Motion for Sanctions on January 23, 2024. In her response, she argued, inter alia, that the Motion was deficient because of lack of notice

required by Rule 26(c)(2)(B). The Court did not expressly rule on the Motion for Sanctions but set the matter for trial on attorney fees and sanctions.

Changes of Counsel and Rule 26 Dispute

6. At the time she filed her motion to dismiss, Laura was represented by Alexis Lindvall. At the time she responded to the Motion for Sanctions, she was represented by Cory Keith. Again, Laura brought this same argument relating to Rule 26's 10-day notice requirement in her response to the Motion for Sanctions, albeit with less force, and the Court still set the case for trial (ostensibly because even if she is correct and Clayton's Rule 26 Motion is denied, there remain other claims that must be resolved before the case concludes).

7. Her current attorney (as of the time of this filing), David S. Gingras, began aggressively asserting various claims, positions, and legal threats in emails to Clayton's counsel after entering appearance on or about March 25.

8. Several of these unpleasant emails pertain to the Motion for Sanctions under Rule 26. Laura asserts that the Motion was improperly brought because of lack of written notice required by Rule 26(c)(2)(B) (hereafter referenced as the "safe harbor" notice). This argument is partly articulated beginning on page 14 of her *Motion for Extension of Time to Respond to Respondent's Motion to Compel* filed April 1, 2024. (Properly denied by the Court on April 2, 2024).

9. According to her argument, Clayton did not provide sufficient written notice to comply with the rule. Laura interprets Rule 26(c)(2)(B) as providing the party against whom sanctions are sought a 10-day grace period in which to withdraw or appropriately correct the alleged violation. She interprets "withdraw or appropriately correct" as giving her an

"absolute right" to withdraw her pleading without consequence or further proceedings. *Response to Motion to Compel* at 16-17.

10. Further, Laura appears to believe she should have had the right to withdraw her entire Petition by virtue of Clayton moving for Rule 26 sanctions without the "safe harbor" notice[1] notwithstanding Rule 46.

11. She bases her renewed objection to complying with discovery orders and disclosure obligations on this notion: "The only current remaining issue in this case is Mr. Echard's Motion for Rule 26 Sanctions … which is presently set for evidentiary hearing on June 10, 2020. The pending Motion to Compel seeks evidence which is only, and could only, be relevant to the issue of sanctions (because there are no other pending issues for this Court to address). Thus, the only *fact of consequence* necessary to determine this matter is the question of whether Ms. Owens lied about ever being pregnant in the first place. […] Mr. Echard has no right to this discovery (or indeed, to any discovery) because none of the discovery is relevant to any of the remaining issues of consequence in the case." (Emphasis in original).

12. This untenable position completely ignores the Court's trial setting order and Clayton's Amended Response. Clayton has requested relief to which he is entitled under Title 25, including a finding of non-paternity and attorney fees and costs, that are entirely independent from the Rule 26 Motion. The applicable statutes, including A.R.S. §§ 25-324 (attorney fees and costs for filing in bad faith, filing without grounding in fact or law, filing

[1] As articulated more fully below, Clayton believes the Motion for Leave to Amend operates as sufficient written notice consistent with precedent Laura's counsel cited.

for improper purpose in legal decision-making and parenting time proceedings), -415 (sanctions for litigation misconduct related to claims made under § 25-403, -403.03, or -403.04) and -809(G) (attorney fees for unreasonableness in paternity proceedings), provide independent remedies that have no grounding in Rule 26. Based on the Court's comments on the record at the most recent status conference and the order setting trial, the Court intends to hear those claims for attorney fees and sanctions notwithstanding the Rule 26 Motion. That is why the Court did not dismiss the action in its entirety: the Court must first resolve Clayton's claims for relief.

13. Laura's current counsel's communications on this topic are tremendously aggressive and counsel has taken to Twitter, posting pleadings and medical documents contrary to the Court Order, all of which the Court will have to determine the propriety of reasonableness under A.R.S. § 25-324 come trial. These communications include declaring that Clayton refusing to withdraw the motion would itself be sanctionable under Rule 26, promising to litigate the issue to higher courts at great expense to both parties, threatening to seek personal sanctions against Clayton's attorneys, threatening new bar complaints (Laura having already filed two (2) against undersigned counsel and at least two (2) prior attorneys) and so on.

14. In one example, counsel estimates $35,000 in "risk" if Clayton does not withdraw his Motion for Sanctions: "*If I was in your position, I would seriously stop and think about that before telling me to GF myself. You can literally avoid about $35,000 in risk simply by admitting you made a mistake, then doing the right thing. If you decide NOT to take that safe harbor, it's your decision….but a pretty freaking bad one*." It is not clear whether the

$35,000 is a prediction of legal fees for both parties, a possible attorney fees award to Laura for acts not yet undertaken, an amount expected as a sanction, etc., but what is clear is that Laura's scorched Earth approach to this litigation remains the same as always: to threaten and drive up costs in an attempt to exhaust Clayton's remedies and willingness to defend himself and seek affirmative relief to which he is entitled under Title 25.

15. The emails also concede, however, that "There are *other* options available to you if you want to seek fees. But you have not made any other motions seeking fees under those other authorities. If you think you have a factual/legal basis to do so, GO FOR IT." (Emphasis in original). Clayton has already invoked those claims in his Response, Amended Response, and various other filings and positions in open court. Laura's position self-contradicts in that it simultaneously declares Clayton has no avenue for relief other than Rule 26 (and therefore should have no discovery) but also that he can bring claims for relief under other authorities.

Clayton's Positions

Interaction between Rule 26, Rule 46, and Title 25

16. As a threshold matter, the policy implications of Laura's position that Rule 26's 10-day notice and "safe harbor" language grant an "absolute right" to withdraw a petition and defeat the responding party's entire case are both severe and obvious. A party who has already filed a response and brought counterclaims for relief would never invoke Rule 26 if doing so would give the petitioner *carte blanche* to withdraw their pleading with no limitations.

17. Rule 46 expressly prohibits voluntary dismissal of a petition after a responsive pleading is filed or evidence is taken, particularly when the responding party alleges

affirmative claims for relief as Clayton did here. The suggestion that the Rule 26 10-day notice supersedes Rule 46 is illogical and would deter parties from seeking Rule 26 relief at all, *especially* in cases of the most egregious conduct Rule 26 is meant to prevent. Rule 46 "locks in" the party's petition once a response is filed and guarantees the respondent the opportunity to present their claims for relief even if the petitioner changes their mind and wants to opt out of the litigation.

18. Laura is correct that failure to comply with Rule 26 results in relief *for that motion* being denied, but to suggest that failure to comply with Rule 26 results in effective waiver of all claims in the litigation would interpret a procedural provision of one rule in a way that swallows the entirety of another. A harmonious reading of Rules 26 and 46 is simple: failure to comply with Rule 26 results in not receiving Rule 26 sanctions for that motion. It does not prohibit a subsequent Rule 26 filing with a new 10-day notice, nor does it afford a party who violated Rule 26 an opportunity to dismiss the entire litigation during the 10-day notice period. Laura's interpretation would render Rule 26 practically useless because no party with valid claims for relief would risk waiving their right to resolution of those claims—a right guaranteed by Rule 46.

19. Rule 26's procedural requirements do not supersede independent claims for relief given by law, including claims under A.R.S. §§ 25-324, -415, and -809. Nothing in Rule 26 indicates, nor could it given the supremacy of statutes over procedural rules, that a party waives their right to bring their statutory claims by invoking Rule 26. This would create an absurd result and exalt form over function in a most problematic way.

//

Differences between ARFLP 26 and ARCP/FRCP 11

20. Laura's position relies on case law interpreting Rule 11 of both the Arizona and Federal Rules of Civil Procedure. Although Rule 26 is based on Rule 11 and case law interpreting Rule 11 is instructive, it is not dispositive. Of relevance to this case, Rule 26 exists in the context of remedial statutes present in Title 25 that are not available in other civil proceedings at either the state or federal levels.

21. Laura herself believes—correctly—that attorney fees and sanctions are available under A.R.S. § 25-809(G) independent of Rule 26. Clayton has already identified this statute and at least two others in Title 25 that similarly require the Court to consider reasonableness of positions, bad faith, improper purpose, etc. as part of this action. None of these statutes apply to general civil matters in the state or federal courts. Put another way, Rule 11 precedent exists in a completely different legal context where awards of attorney fees are more limited, such as fees provisions in contracts under A.R.S. § 12-341.01, damages not to exceed $5,000 for frivolous claims, delay, or discovery abuses under A.R.S. § 12-349, liability for excessive costs under 28 U.S.C. § 1927 (relevant to the *Holgate* decision discussed below), etc.

22. Clayton denies that these cases, or indeed any Rule 11 case at the state or federal level, categorically disposes of analogous issues under Rule 26. That said, to the extent they provide persuasive authority, he will address the primary cases Laura cites on their merits.

23. In the *Holgate* matter Laura's counsel cites and argues in support of her position, the trial court could not award sanctions under 28 U.S.C. § 1927 because it did not find bad faith required under that statute. Accordingly, the movant's alternative claim for

sanctions under the court's statutory authority was unavailing, and they brought no substantive legal basis to request those sanctions except under their flawed Rule 11 motion. *Holgate v. Baldwin*, 425 F.3d 671, 680-81 (9th Cir. 2005). It should also be noted the *Holgate* decision **expressly declines to award sanctions for a Rule 11 notice error or for opposing a plaintiff's motion for voluntary dismissal**, stating the appropriate remedy is to denial the request for Rule 11 sanctions, not award "counter-sanctions" as Laura threatens to request. *Holgate* at 680. Clayton denies his Rule 26 Motion for Sanctions lacked proper notice, but even if it did, **Laura's threats are contrary to the very precedent on which she relies to make them**.

24. Of relevance here, there was no alternative basis for the claim for attorney fees and sanctions under applicable federal law in *Holgate*, so the court could not sanction on its own motion without finding bad faith. Rule 11 was an exclusive remedy in that context, but Rule 26 is not the exclusive remedy or basis for Clayton's requests for fees and sanctions under Title 25 of Arizona Revised Statutes. **Notably, under Rule 26, the Court can move for sanctions on its own motion, which is likely appropriate given the exorbitant amount of fraud perpetuated by Laura in this and the collateral matters.**

25. Similarly, Laura relies on *Gallagher v. Surrano Law Offices, P.C.*, a trial court decision summarizing applicable Rule 11 precedent. Although *Gallagher* is not precedential, Clayton finds the same problem with the analysis in that case: the party seeking sanctions cited A.R.S. §§ 12-349 and -250 as an alternative basis but did not prove the required factors, including bad faith, subjective intent, financial positions of the parties, etc. Critically, the court considered awarding fees and sanctions under authority unrelated to Rule 11

notwithstanding the movant's failure to comply with Rule 11's 10-day notice requirement. This case does not stand for the proposition that Rule 11 is the exclusive mechanism for seeking fees and sanctions. The court declined to award the statutory remedies, but the fact it considered them belies Laura's position that the 10-day notice in Rule 26 gives her an "absolute right" to withdraw her petition and thereby dismiss all Clayton's claims. Title 25 is far more remedial and contains numerous mechanisms for fees and sanctions that do not exist in the Rule 11 context, warranting a much broader interpretation of Rule 26 and the availability of other remedies.

26. Laura also cites *Barber v. Miller*, another Ninth Circuit case involving an appeal from FRCP 11 sanctions without the 10-day notice. 146 F.3d 707 (9th Cir. 1998). The primary issue in *Barber* is whether a party received sufficient notice and opportunity to withdraw or correct their offending filing when the movant moved for sanctions after the complaint had already been dismissed. 146 F.3d at 710. The movant also failed to serve a copy of the motion before filing (under a prior version of Rule 11 that required service of a motion for sanctions and a 21-day waiting period before filing). *Id*. The *Barber* court reversed the sanctions because a party cannot wait until after summary judgment to move for sanctions under Rule 11. *Id*.

27. In *Barber*, the court also devoted significant attention to the difference between Rule 11 sanctions imposed by motion of a party and imposed *sua sponte* by the court. *Barber* states that sanctions imposed upon motion of a party and those imposed by show-cause order on the court's initiative are substantively and procedurally different. Critically, the version of Rule 11 the *Barber* court interpreted only allowed an order for payment of attorney fees

directly to the movant **if imposed on motion**, not on the court's own initiative. *Barber* at 711. The *Barber* court could not interpret the sanctions award as "the equivalent of an election by the court to impose sanctions on its own motion" because the rule did not substantively allow that form of award except by motion of a party under the version of Rule 11 then-existing. *Id*. (contrast with Rule 26, allows "the court—**on motion or on its own**—[to impose] an appropriate sanction, which may include an order to pay the other party or parties the amount of the reasonable expenses incurred because of the filing of the document, including a reasonable attorney fee") (emphasis added).

28. Rule 26 does not distinguish between party motions and *sua sponte* sanctions in the same way Rule 11 did **when that case was decided in <u>1998</u>**. ARFLP did not even exist at the time, and it allows the same form of sanctions regardless of whether the sanctions are upon motion of a party or the court's own initiative. *Barber* tells nothing meaningful about Rule 26 in this context.

<u>Sufficiency of Clayton's Notice and Authority to Sanction</u>

29. Clayton asserts the notice he gave in his Motion for Leave to Amend and the Amended Response complied with Rule 26(c)(2)(B). The Amended Response specifically identifies the pleading and conduct that he believes violates Rule 26(b). Clayton filed his Motion for Sanctions separately several weeks later (i.e., long past the 10-day "safe harbor" period Laura claims she did not receive).

30. In *Holgate*, one of the parties, the Newells, has their sanctions award upheld on appeal despite **not sending separate notice** of their intention to seek Rule 11 sanctions. Instead, they filed a motion to join in the sanctions motion of another party and served their

joinder motion the same day they filed it. *Holgate*, 425 F.3d at 678. The joinder motion was the first notice the opposition had of their intention to seek sanctions against him. *Id*. They filed a second motion requesting sanctions months later. *Id*. The *Holgate* court found the safe harbor period commenced when the Newells filed their initial joinder motion and the second motion for sanctions supported an award of sanctions. *Id*. In summary, "because Levinson had prior notice of the frivolousness of the complaint (from the Baldwin motion), and notice of a second forthcoming motion for sanctions, we conclude the district court did not abuse its discretion by awarding sanctions to the Newell defendants"). *Id*.

31. Nothing in Rule 26 suggests the safe harbor notice is not satisfied by filing and serving an earlier motion that provides the opposition with notice of the conduct alleged to violate the rule. Rule 26 does not reference a form or provide specific language that must be included in the notice like many other rules and statutes do; rather, it requires the party to be sanctioned has actual notice of the allegedly offending conduct and an opportunity to withdraw or correct the filing.

32. In fact, Laura *did* try to withdraw her petition after Clayton's Motion for Leave to Amend, and the Court declined to award the complete dismissal she now asserts she had an "absolute right" to receive. (Recall *Holgate*, 425 F.3d at 680, in which the court declined to sanction a party for opposing a plaintiff's voluntary motion to dismiss, just as Clayton did here).

33. Laura's present-day assertion that she would have withdrawn her petition upon receiving Rule 26 notice is not persuasive of anything because her actions would not have changed whatsoever. She was not prejudiced. She asserts that she did not receive proper notice

and therefore had no opportunity to withdraw her petition, but the fact she **changed position in response to the Motion for Leave to Amend by moving to dismiss her petition**, albeit after the 10-day window before Clayton could file the Motion for Sanctions. Laura was not prejudiced because she would not have done anything differently had she received a separate notice in whatever form she believes would have been proper. She had actual written notice, changed position in response to that notice in an attempt to withdraw her petition, and the Court denied her that relief because it must resolve Clayton's claims before disposing of the action.

34. Even if the Court finds Clayton's notice insufficient, the remedy is to deny the request for sanctions based on his Rule 26 motion. *Holgate*, 425 F.3d at 680. Rule 26 sanctions for improper procedure in seeking Rule 26 sanctions would create an illogical cascade of motions and countermotions akin to two mirrors facing one another.

35. Nothing in Rule 26 would prevent: (1) Clayton issuing a new notice and filing for sanctions after the new 10-day "safe harbor" period; (2) the Court issuing sanctions on its own motion (which the Rule expressly allows); (3) Laura filing a motion for sanctions, if she believes one is appropriate, after following the procedures; or (4) the Court awarding attorney fees, costs, and other appropriate awards under any of the numerous statutes allowing (or requiring) such relief with no relationship to Rule 26. Indeed, the Court must resolve the statutory claims for relief notwithstanding whether Clayton or Laura ever filed anything pertaining to Rule 26, and the denial of Rule 26 sanctions has no impact on the substantive claims the parties have brought.

//

Withdrawal of Rule 26 Motion

36. Ultimately, although Clayton believes he complied with Rule 26 and that the Court already overruled Laura's objection, it is clear she intends to continue her established pattern of threatening her way through the litigation, refusing to comply with her discovery obligations, and seeking to avoid the merits of the case through any means necessary.

37. Clayton's claims for fees and sanctions exist independently of the Rule 26 Motion and have already been set for trial. With or without the Rule 26 Motion, those claims require resolution (as the Court already found when it preserved them while dismissing Laura's Petition).

38. Clayton would rather avoid the "$35,000" sideshow Laura intends to use to distract from and avoid the merits of the claims against her. Because the Rule 26 Motion is not the substantive pleading basis for his claims against Laura, there is no reason to participate in the pointless litigation of this issue notwithstanding Clayton's disagreement with Laura's positions on Rule 26.

39. Subjecting the Court to this collateral chaos, which is intended only to increase legal fees and prevent resolution on the merits, would be a waste of judicial resources. Moreover, Laura's threat to seek personal sanctions against Clayton's counsel based on her proffered Rule 26 violation, while considered frivolous, will only draw more attention and animus to this case.

40. Withdrawing the Rule 26 Motion will not affect the Court's duty to resolve the claims Clayton properly brought under Title 25. It will, however, prevent the wholesale wasting of judicial resources and attorney fees on this meaningless procedural issue.

Accordingly, he moves to withdraw the Rule 26 Motion for Sanctions filed January 3, 2024. He does not withdraw his counterclaims for a finding of non-paternity, attorney fees, costs, sanctions, and any other relief appropriate and available to him under A.R.S. §§ 25-324, 25-415, 25-809, etc.

WHEREFORE, Respondent respectfully requests the Court:

A. Withdraw Respondent's *Motion for Sanctions Pursuant to Rule 26* filed January 3, 2024.

B. Order such further relief as the Court deems just.

RESPECTFULLY SUBMITTED this 3rd day of April, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 3rd day of April, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gingras
Gringas Law Office, PLLC
David@GingrasLaw.com

Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Motion To Withdraw Motion For Sanctions Pursuant To Rule 26* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Apr 3, 2024 14:25 PDT)

CLAYTON ECHARD

04/03/2024

Date

EXHIBIT “2”

Here's the Granted RO renewal against Mike 202.pdf for you to review.
Here's the 2018.1.10_THE_TEMPORARY_RO.pdf for you to review.

RANDY SUE POLLOCK
Law Office of Randy Sue Pollock
286 Santa Clara Avenue
Oakland, CA 94610
T 510-763-9967
F 510-380-6551
C 510-703-3370
www.rspollocklaw.com

From: David Gingras <david@gingraslaw.com>
Sent: Monday, May 6, 2024 1:48 PM
To: Randy Sue Pollock <rsp@rspollocklaw.com>
Subject: RE: Owens trial

Ms. Pollock,

I am writing to document our discussion just now and to explain my position. Per the email below, we spoke about your client Mike Marraccini about two weeks ago. At that time, I told you I just wanted to speak with Mike and hear his side of the story. I also explained that IF Mike was going to be a witness in the Arizona paternity matter, I could (and would) be willing to subpoena him for a deposition, if he was unwilling to have a simple phone conversation.

In response to that discussion, you sent me the email below stating that Mr. Marraccini was NOT going to testify at the trial in June.

Since then, counsel for Mr. Echard has indicated Mr. Marraccini WILL be testifying in person at trial in June. This is, of course, inconsistent with what you said below.

To clarify the situation, I called you again today to ask if it was possible for me to speak with Mr. Marraccini. Your response was (to paraphrase): "No, we are not willing to cooperate with you."

In light of that response I want to make two things clear:

1.) If Mr. Marraccini intends to testify at trial, then I have an absolute right to know this, and I have a right to interview him. That interview can be done informally in a phone call, or it can be done formally in a deposition. Either way, refusing to cooperate is NOT an available option IF Mr. Marraccini wants to participate as a trial witness.

2.) On the phone, you suggested Mr. Marraccini may just "show up" at trial rather than participating as a subpoenaed witness (i.e., he would simply choose to be there, either as a spectator, or as a non-subpoenaed witness).

    If that is his plan, I need to be clear about our position – if Mr. Marraccini shows up as *either* a spectator or as a non-subpoenaed witness, Laura will ask the Phoenix Police to have Mr. Marraccini immediately arrested for violating the restraining order issued against him (copies attached).

In short, I agree Mr. Marraccini CAN testify at trial without fear of arrest, *provided* he complies with the rules of procedure. That means, among other things, I have the right to interview him and take his deposition if necessary.

If Mr. Marraccini does not want to comply with the procedural rules, that's 100% OKAY. I am more than happy if he wants to stay home (assuming he hasn't been lawfully summoned). But if he comes within 100 yards of Laura without being compelled to appear by valid subpoena, then he will risk arrest and prosecution for violating the restraining order.

NOTE – Rule ER 3.4(f) of the Arizona Rules of Professional Conduct provides a lawyer shall not: "request a person other than a client to refrain from voluntarily giving relevant information to another party...."

Based on this rule, I *assume* Mr. Woodnick has not instructed you or Mr. Marraccini to refrain from speaking to me. If that has occurred, it would be a *per se* violation of the ethical rules.

Also, and just to be clear – I am not, under any circumstances, suggesting Mr. Marraccini should *not* participate in the trial if he has relevant information. All I am saying is that if he WANTS to testify, he needs to do so in a manner that complies with the rules and the law. This is mandatory to ensure basic fairness to ALL sides.

Finally, please note that it is a felony under Arizona law for any person to unlawfully withhold testimony, to evade legal process to appear, and/or to fail to appear when legally summoned. For avoidance of any doubt, nothing in this email should be construed as an attempt to cause Mr. Marraccini *not* to appear. On the contrary, I would very much like him to appear, provided he does so in a manner that complies with the rules (including the rule that requires the prompt disclosure of the substance of his testimony, and the rule which entitles me to interview him prior to trial).

If you have any questions, please let me know.

DV-730 **Order to Renew Domestic Violence Restraining Order**

Clerk stamps date here wh
FIL
San Francisco Count
SEP 11 2
CLERK OF THE
BY:

(1) Name of Protected Person:
Laura Owens
Your lawyer in this case *(if you have one)*:
Name: In Pro Per State Bar No.:
Firm Name:
Address *(If you have a lawyer for this case, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, give a different mailing address instead. You do not have to give your telephone, fax, or e-mail.)*:
Address: 3330 Pierce Street, #305
City: San Francisco State: CA Zip: 94123
Telephone: Fax:
E-Mail Address:

Fill in court name and street
Superior Court of Califo
SAN FRANCISCO
SAN FRANCISCO SU
400 McAllister
San Francisco C

(2) Name of Restrained Person:
Michael Marraccini
Description of restrained person:
Sex: [x] M [ ] F Height: 6'4 Weight: 220 Hair Color: brown Eye Colo
Race: White Age: 33 Date of
Mailing Address *(if known)*:
City: State: Zip
Relationship to protected person:

Fill in case number:
Case Number:
FDV-18-813693

(3) Hearing
There was a hearing on *(date)*: 9/11/2020 at *(time)*: 9:00 [x] a.m. [ ] p.m. Dept. 40
These people were at the hearing:
a. [x] The person in (1) c. [ ] The lawyer for the person in (1) *(name)*:
b. [x] The person in (2) d. [ ] The lawyer for the person in (2) *(name)*:

(4) Renewal and Expiration
The request to renew the attached restraining order, issued on *(date)*: July 9, 2018
a. [x] GRANTED. The attached restraining order is renewed and will now be in effect for:
[x] 5 years [ ] permanently *(the renewed restraining order must be attached to thi*
The attached order will expire on:
(date): July 10, 2025 *(time)*: 12:00 noon [ ] a.m. [ ] p.m. or

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



From: Randy Sue Pollock <rsp@rspollocklaw.com>
Sent: Friday, April 19, 2024 7:15 PM
To: David Gingras <david@gingraslaw.com>
Subject: Owens trial

Mr. Gingras,
My client will not be testifying.

Randy Sue Pollock

RANDY SUE POLLOCK
Law Office of Randy Sue Pollock
286 Santa Clara Avenue
Oakland, CA 94610
T 510-763-9967
F 510-380-6551
C 510-703-3370
www.rspollocklaw.com

Gregg R Woodnick, State Bar Number: 020736
Woodnick Law PLLC
1747 E Morten Ave Ste 205
Phoenix, AZ 85020-4691
602-449-7980
office@woodnicklaw.com

Representing: Respondent

SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY

In the matter of:

LAURA OWENS
Petitioner
vs.
CLAYTON ECHARD
Respondent

Case No.: FC2023-052114

SUBPOENA IN A FAMILY CASE

TO: MICHAEL MARACCINI
c/o Randy Sue Pollock, Attorney at Law
286 Santa Clara Ave.
Oakland, CA 94610

For Attendance of Witness at Hearing or Trial:

YOU ARE ORDERED TO APPEAR in the Superior Court of Arizona in Maricopa County at the place, date, and time specified below to testify at a trial in the above-named case, before:

Judicial Officer: The Honorable Julie Mata

Place: Northeast Regional Center
18380 N 40th St
Phoenix, AZ 85032
Room: 102

Date: 06/10/2024

Time: 8:45 AM Arizona Time

Your Duties In Responding To This Subpoena

ATTENDANCE AT A TRIAL: If this subpoena commands your attendance at a deposition, hearing, or trial, you must appear at the place, date and time designated in the subpoena unless you object (see below, procedures for objecting). Unless a court orders otherwise, you are required to travel to any part of the state to attend and give testimony at a trial.

ATTENDANCE AT A HEARING OR DEPOSITION: If this subpoena commands you to appear at a hearing or deposition, you must appear at the place, date and time designated in this subpoena unless either:

(1) you timely object (see below, the procedures for objecting); or

(2) you are not a party or a party's officer and this subpoena commands you to travel to a place other than:

(1) the county where you reside or you transact business in person; or

(2) the county in which you were served with the subpoena or within forty (40) miles from the place of service; or

(3) such other convenient place fixed by a court order.

PRODUCTION OF DOCUMENTARY EVIDENCE: If this subpoena commands you to produce and permit inspection, copying, testing or sampling of designated documents, electronically stored information, or tangible things, you must make the items available at the place, date and time designated in this subpoena, and in the case of electronically stored information, in the form or forms requested, unless you provide a good faith written objection to the party or attorney who served the subpoena. You may timely object to the production of documentary evidence (see below, the procedures for objecting).

You may object to the production of electronically stored information from sources that you identify as not reasonably accessible because of undue burden or expense, including sources that are unduly burdensome or expensive to access because of the past good-faith operation of an electronic information system or good faith or consistent application of a document retention policy.

If this subpoena does not specify a form for producing electronically stored information, you may produce it in native form or in another reasonably usable form that will enable the receiving party to have the same ability to access, search, and display the information as the responding person, but you need not produce the same electronically stored information in more than one form.

If the subpoena commands you to produce documents, you have the duty to produce the designated documents as they are kept by you in the usual course of business, or you may organize the documents and label them to correspond with the categories set forth in the subpoena.

INSPECTION OF PREMISES: If this subpoena commands you to make certain premises available for inspection, you must make the designated premises available for inspection on the date and time designated in this subpoena unless you provide a timely, good faith written objection to the party or attorney who served the subpoena.

COMBINED SUBPOENA: You should note that a command to produce certain designated materials, or to permit the inspection of premises, may be combined with a command to appear at a trial, hearing or deposition.

You do not, however, need to appear in person at the place of production or inspection unless the subpoena also states that you must appear for and give testimony at a hearing, trial, or deposition.

Your Right To Object To This Subpoena

I. If you have concerns or questions about this subpoena, you should first contact the party or attorney who served the subpoena. The party or attorney serving the subpoena has a duty to take reasonable steps to avoid imposing an undue burden or expense on you. The Superior Court enforces this duty and may impose sanctions upon the party or attorney serving the subpoena if this duty is breached.

- You may object to this subpoena if you feel that you should not be required to respond. You must make any objection within 14 days after the subpoena is served upon you, or before the time specified for compliance, by providing a written objection to the party or attorney serving the subpoena. *
- If you object to the subpoena in writing, you do not need to comply with the subpoena until a court orders you to do so. It will be up to the party or attorney serving the subpoena to seek an order from the court to compel you to provide the documents or inspection requested, after providing notice to you. *

Unless otherwise ordered by the Court for good cause, the party seeking discovery from you must pay your reasonable expenses incurred in responding to a subpoena seeking the production of documents, electronically stored information, tangible things, or an inspection of premises.

- If you seek payment of expenses other than routine clerical and per-page costs as allowed by A.R.S. §12-351, you must object on the grounds of undue burden to producing the materials without the subpoenaing party's payment, and send an advanced estimate of those expenses to the subpoenaing party before the time specified for compliance or within 14 days after the subpoena is served, whichever is earlier. *
- You need not comply with those parts of the subpoena that are the subject of the objection, unless the Court orders you to do so. The court may enter an order conditioning your response to the subpoena on payment of your additional expenses, including ordering payment of those expenses in advance. *

II. PROCEDURE FOR OBJECTING TO A SUBPOENA FOR ATTENDANCE AT A HEARING, TRIAL OR DEPOSITION:

A. Form and Time for Objection.

(i) A person commanded to comply with a subpoena may object to the subpoena in writing on the basis that the information requested is not reasonably accessible or because complying with the subpoena would cause an undue burden or expense. The objection must state the basis for the objection, and must include the name, address, and telephone number of the person, or the person's attorney, serving the objection. The objection must be served on the party or attorney serving the subpoena before the time specified for compliance or within 14 days after the subpoena is served,

whichever is earlier.

(ii) A person served with a subpoena that combines a command to produce materials or to permit inspection, with a command to attend a deposition, hearing, or trial, may object to any part of the subpoena. A person objecting to the part of a combined subpoena that commands attendance at a deposition, hearing, or trial must attend and testify at the date, time, and place specified in the subpoena, unless excused from doing so by the party or attorney serving a subpoena, by a court order, or by any other provision of Rule 52.

B. Procedure After Objecting.

(i) A person objecting to a subpoena to produce materials or to permit inspection need not comply with those parts of the subpoena that are the subject of the objection, unless ordered to do so by the issuing court.

(ii) The party serving the subpoena may move under Rule 65(a) to compel compliance with the subpoena. The motion must be served on the subpoenaed person and all other parties under Rule 43.

(iii) Any court order to compel must protect a person who is neither a party nor a party's officer from undue burden or expense resulting from compliance.

C. Claiming Privilege or Protection.

(i) A person withholding subpoenaed information under a claim that it is privileged or subject to protection as work-product material must promptly identify in writing the information, document, or electronically stored information withheld and describe it in a manner that, without revealing information that is privileged or protected, will enable other parties to assess the claim.

(ii) If information subject to a claim of privilege was accidentally produced in response to a subpoena, the party who accidentally produced the information may notify any other party that the information was privileged. After being notified of such a claim, a party who received the information has several obligations. They must promptly return, sequester, or destroy the information and any copies they have. They must not disclose the information until the claim is resolved, and if they have already disclosed it, they must take reasonable steps to retrieve the information. They must also present the information to the court under seal for a decision as to whether it is subject to privilege. The party who accidentally disclosed the information must preserve it until the privilege claim is resolved.

*See Arizona Rules of Family Law Procedure (A.R.F.L.P.) Rule 52, and the "Your Right to Object to this Subpoena" section.

III. COURT MODIFIES or VOIDS (quashes) CIVIL SUBPOENA

A. The court must quash or modify a subpoena if . . .

(1) the subpoena does not provide a reasonable time for compliance;

(2) unless the subpoena commands your attendance at a trial, if you are not a party or a party's officer and if the subpoena commands you to travel to a place other than:

a. the county in which you reside or transact business in person;

b. the county in which you were served with a subpoena, or within forty (40) miles from the place of service; or

c. such other convenient place fixed by a court order; or

(3) the subpoena requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(4) the subpoena subjects you to undue burden.

B. The court may quash or modify a subpoena if . . .

(1) the subpoena requires you to disclose a trade secret or other confidential research, development or commercial information;

(2) you are an unretained expert and the subpoena requires you to disclose your opinion or information resulting from your study that you have not been requested by any party to give on matters that are specific to the dispute;

(3) you are not a party or a party's officer and the subpoena would require you to incur substantial travel expense; or

(4) the court determines that justice requires the subpoena to be quashed or modified.

In these last four circumstances a court may instead of quashing or modifying a subpoena, order your appearance or order the production of material under specified conditions if:

a. the party or attorney serving the subpoena shows a substantial need for the testimony or material that cannot otherwise be met without undue hardship; and

b. the person's travel expenses or the expenses resulting from the production are at issue, the party or attorney serving the subpoena assures that the subpoenaed person will be reasonably compensated for those expenses.

ADA Notification

Requests for reasonable accommodation for persons with disabilities must be made to the division assigned to the case by the party needing accommodation or his/her counsel at least three (3) judicial days in advance of a scheduled proceeding.

Interpreter Notification

Requests for an interpreter for persons with limited English proficiency must be made to the division assigned to the case by the party needing the interpreter and/or translator or his/her counsel at least ten (10) judicial days in advance of a scheduled court proceeding.

SIGNED AND SEALED this 7th day of May, 2024
Jeff Fine, CLERK



By: The State Bar of Arizona on behalf of the clerk pursuant to ARCP 45(a)(2)

Gregg R Woodnick, State Bar Number: 020736
Woodnick Law PLLC
1747 E Morten Ave Ste 205
Phoenix, AZ 85020-4691
602-449-7980
office@woodnicklaw.com

Representing: Respondent

SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY

In the matter of:

LAURA OWENS
Petitioner(s)

CLAYTON ECHARD
Respondent(s)

Case No.: FC2023-052114

AFFIDAVIT OF SERVICE FOR SUBPOENA in a Family Case

Arizona Rules of Family Law Procedure, Rule 52

I received the subpoena addressed to: MICHAEL MARACCINI, c/o Randy Sue Pollock, Attorney at Law 286 Santa Clara Ave. Oakland, CA 94610
which was dated 05/07/2024 I personally served the subpoena as follows:

On this date: _____ At this time: _____

At this location: _____

To (Name): _____

Manner of Service: _____ (how served)

☐ I was over the age of 18 at the time the subpoena was served. I am not a party to the case.

UNDER PENALTY OF PERJURY:
By signing below, I state to the Court under penalty of perjury that the contents of this document are true and correct.

Date: _____ _____
Signature:

Printed Name: _____

Street Address: _____

City, State, Zip Code: _____

Telephone Number(s): _____

FEES: $ _____ OTHER: $ _____

MILEAGE CHARGES: $ _____ **TOTAL:** $ _____

EXHIBIT “3”



From: Michael Marraccini <m.marraccini@gmail.com>
Sent: Thursday, May 9, 2024 8:15 AM
To: David Gingras <david@gingraslaw.com>
Subject: Owens v Echard

Mr. Gingras,

Gregg Woodnick reached out to me and gave me your contact number because you have expressed a desire to speak to me. I want you to know that I was about to call you and tell you about my harrowing experience with Laura Owens and all the lies she told including, but not limited to, lying about being pregnant with twins, telling me she had cancer, threatening suicide, and emotionally terrorizing me to coerce me into a relationship with her. But before I could pick up the phone, I saw that you tweeted out a photograph of me and Laura and audio from a radio show we did together from that traumatic time in my life. I cannot express to you how inappropriate and offensive that action was. You have accused me of fabricating evidence and lying which led me to take my laptop directly to an expert for analysis.

I had moved on with my life and had no interest in opening up old wounds that have so injured me but you made it impossible for me to sit quietly. You posted my deposition online to accuse me of lying and you humiliated me purposefully. I deeply resent the allegations, which is why I decided to turn over my laptop as evidence in the Clayton Echard case against Laura. We both know that she sent those doctored medical records to me and now you have the proof. I could not in good conscience remain quiet and watch Laura use this same playbook against another innocent man.

I have decided that I will not speak with you on the phone. I will speak in a court of law on June 10th, under oath, and I will tell the truth about the horrors that Laura visited on my life. You may ask me any question you want and I will answer with the whole truth. You do not understand, or willfully refuse to accept, how traumatizing my interaction with Laura Owens has been. She has destroyed my reputation and ruined background checks by taking out a fraudulent order of protection against me based on lies that have affected me personally & professionally. She accused me of horrific acts of domestic abuse that never happened. She fabricated medical evidence and held threats of suicide over my head to keep me locked in a relationship that was toxic and deeply disturbing.

But perhaps the worst thing you have done is to suggest that I should talk to Laura, the woman who attempted to, and in many ways did, destroy me. This is the same woman who continues to renew the false order of protection against me and pretends to be terrified I'll be in the same courtroom as she. Why would someone so afraid of me want to speak to me and violate that order she insists she needs? This, just a day after you threatened to have me arrested if I showed up at the courthouse to be a witness. The fact you would suggest such an inappropriate call between me and my abuser proves to me you have no idea how inappropriate it would be to speak to the woman who fabricated

wild tales about me and turned them into a TedX talk and an entry in Chicken Soup for the Soul that will live on forever.

This letter, which has been painful for me to write, has addressed everything you wanted to speak to me about by phone.

All the best,

Michael Marraccini

Maribeth Burroughs

From: David Gingras <david@gingraslaw.com>
Sent: Thursday, May 9, 2024 9:27 AM
To: Gregg Woodnick
Cc: Isabel Ranney
Subject: FW: Owens v Echard

Gregg,

See the email below from Marraccini. I haven't responded to him, since I still don't know if he's represented by counsel. I don't really consider Randy Pollock to be representing him with respect to the AZ case since she's not licensed in AZ and hasn't done anything to appear in the case on his behalf. Still, I don't want to communicate directly with Mike unless/until someone confirms he is not represented, or if he is, that I have consent from counsel to talk to him.

I realize Mike isn't actually your "client" (to my knowledge), so I don't know how much control you have with him, but I'm hopeful maybe you can get Mike to change his mind.

He's apparently unhappy about something I tweeted yesterday (which I removed after seeing his email). This doesn't seem fair – Laura is being attacked relentlessly on a daily (virtually constant) basis by people on Clayton's side, but somehow if I say or do *anything* to respond, this is somehow deemed outrageous. It's really frustrating. There are two sides to the story here, and one side seems to be monopolizing the narrative, often with less than total candor.

Anyway, I want to keep the lines of communication open with you, and I promise to keep things on the same professional level as the conversation yesterday, but I just need to let you know – if Mike won't speak to me, then I have to go back to my previous position that I'm going to ask the court to exclude him from the trial. That's just what the rules require here, so if Mike it's willing to be flexible, then neither can I.

Again, this is NOT any sort of criticism directed at you. It's just hard when I'm dealing with people who demand that ONLY their side of the story can be told.

Because time is so short, I need to know ASAP if Mike is standing on this position. If he is, I will need to file another short MIL seeking to exclude him for nondisclosure.

P.S. I sincerely do appreciate you talking the time to talk yesterday, and I'm hopeful that if you need anything or want to talk further, you can just pick up the phone and give me a call. Those direct conversations are so helpful; emails just don't have the same benefits.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196

EXHIBIT “4”

Maribeth Burroughs

From: David Gingras <david@gingraslaw.com>
Sent: Monday, April 22, 2024 12:36 PM
To: Gregg Woodnick; Isabel Ranney
Cc: Maribeth Burroughs
Subject: RE: Owens v. Echard - Witness Stuff

Some comments back in **RED**...

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Monday, April 22, 2024 11:29 AM
To: David Gingras <david@gingraslaw.com>; Isabel Ranney <isabel@woodnicklaw.com>
Cc: Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: Owens v. Echard - Witness Stuff

David,

1. Video testimony: I agree that all witnesses (not parties) can appear virtually if they are not local. That seems to work well with bench trials. To be clear, we are not stipulating to the admission of your expert's report but his testimony can certainly be done via video.

My preference is to have everyone testify in person, if possible, but I'm just not 100% sure about Dr. Medchill's travel plans. He lived in Phoenix for the last 30+ years and just recently retired and moved to Florida, but he has family here in AZ and he comes here regularly. Given a choice, I'd like him to appear personally at trial, but if he can't make it, I guess video will be fine assuming the court allows it. I don't object to you calling anyone by video, but again, I don't know Judge Mata's policy on this stuff (which is why I asked). To the extent it matters, I'll stipulate to video if you want it.

2. Trial Time: I will streamline my presentation to fit into our allotted hour. Laura invoked Rule 2 with one of her prior lawyers. *Maybe we can maximize our court time if we stipulate to proceeding without Rule 2?* I think that also helps keep costs down.

I always favor streamlining and simplification, but we need to follow the rules of evidence, so I won't agree to waive Rule 2. That just isn't appropriate in light of the allegations here. There is WAY too much inappropriate stuff being brought in by your side, so we need the evidentiary rules to help narrow things down.

3. Witnesses: Matt, Mike, and Greg would (time permitting and consistent with the disclosure, will testify that they experienced false pregnancy claims, altered medical records, suicidal threats of breakups, behavior with their families and abortions contingent on relationship contracts etc.) Our disclosure statement is reattached for your convenience and includes a summary of their testimony. I am not sure what happened with your call with Randy but she likely did not recognize your name, as you are not the first attorney Laura has had in this melee. I have spoken to her but it was months ago and before your involvement. I have confirmation that Mike fully supports this process. Of course I can subpoena him, but that won't be necessary. If you call Laurie Ford she will confirm what happened with Mr. Mulvey. I sent Greg Gillespie your contact information so hopefully you connected. If you feel you need more information per Rule 49j that is not included in the attached, let me know.

Just FYI – based on the comments above, I'm going to file a motion in limine to preclude the testimony of Matt, Mike, and Greg. This is classic prior bad act evidence that is not admissible under 404(b). In addition, you have

never disclosed the substance of any of these people's expected testimony, and it's clear you had that information more than 30 days ago, so the MIL will argue both 404(b) and untimely disclosure (and, frankly, relevance – an unproven allegation from an angry ex boyfriend is literally meaningless in this situation).

4. Experts/Doctors: I forwarded your expert's draft to our experts. I am a little confused by your expert report and, while ours (forthcoming) will certainly not align and was delayed because we are giving planned parenthood a second chance at providing the ultrasound, I don't think your doctor's testimony (if accepted by the court) addresses the fundamental problem of your client's behavior in the litigation. Once we receive the final version we will be making specific content objections permitted by law. I am not going to engage in a debate over the facts as we can do that in court or with a mediator as was previously suggested. Parenthetically, I would point out that your theory about "weight gain" is quickly refuted by your client's own medical records (per her Banner record, she weighed 121 lbs on June 1st 2023).

I'm hoping to get you Medchill's final report today, and this will include more information that you don't yet have (such as an affidavit that Laura gave to Medchill, as well as my cover letter to him which explains the scope of the testimony I asked for, as well as some specific questions I asked him to consider). You obviously need that additional information to provide context, so this will be sent to you today, if possible.

Since I don't have your expert reports, I can't really speculate about what they are going to say, but based on the limited info in your 3rd disclosure statement, I'm probably going to bring a motion to exclude your experts based on 702/Daubert and relevance. I'll let you know once I see their reports and have a chance to discuss them with Dr. Medchill.

SIDE NOTE – your 3rd disclosure statement says Dr. Deans is going to testify that "HCG tests were never *dispositive* of pregnancy". Assuming she says this (which is hardly a contested issue), I think it's important to remind you that you are applying exactly the *wrong* standard here.

The ONLY remaining issue is whether Laura should be sanctioned for bringing a claim she knew was false. While you are going to lose that argument for other reasons, to obtain sanctions you seem to believe that Laura has some obligation to show to a 100.000000000% degree of medical certainty that she was pregnant. That is what the JFC crew has been claiming for weeks.

That is exactly backwards – Laura simply has to show she had SOME reason to think she MIGHT be pregnant. If she had that basis, she cannot be sanctioned, even if her belief was wrong. At no point is she obligated to establish the pregnancy was confirmed in some "dispositive" manner, whatever that even means.

This is just another reason why I will probably move to exclude Dr. Deans' testimony about HCG not being "dispositive". Who cares? That is simply not relevant to any issue in this case. Honestly, I'm guessing Dr. Deans would agree that a positive HCG test DOES give a woman a reason to believe she probably was pregnant, which would make her a strong witness for Laura's side.

I guess I'll ask her when I see her report.

5. Motion for Judgment on the Pleadings and intention to file for sanctions against me personally: If this is how you choose to litigate (and to relitigate things that have already been addressed and denied) then a phone call to discuss is not going to impact anything. It will be more posturing and I don't think it is helping our clients. File what you must and we will respond in kind.

I don't understand what you mean by this: "things that have already been addressed and denied". I think you must be referring to the fact that Laura's prior counsel ask the court to dismiss the case, and then the judge apparently granted that and then changed her mind?

Those are two completely different issues. My motion for judgment on the pleadings is going to argue that you cannot get sanctions as a matter of law because you didn't follow the rules. I don't believe that issue was fully raised before, which is why I'm going to raise it now. As for the ARS 12-349 issue, that pretty much speaks for itself.

6. Meet and Confer: The purpose of a meet and confer is to discuss possible resolution of issues. If you have a proposed settlement you would like to discuss over the phone, I am happy to coordinate the call but I am not interested in the scorched earth Conor McGregor stuff. You apologized previously but reverted to the same behavior online via Twitter and your blog. If you really think the call would be productive, I am happy to coordinate it but your mind seems very made up (at least from your Blogs and whatnot). If you think a call would change your perspective about what you are going to file, I will find time to talk with you this afternoon.

Did Dave Neal ever share that LONG email I sent? If you haven't seen it, let me know and I'm happy to share it with you. The point is you misunderstood what I meant about Conor McGregor.

As I explained to Dave Neal, I have been involved in MANY cases that were MUCH more contentious than this one. And in many of those cases, opposing counsel ended up losing their licenses and, in more than one case, the lawyers ended up in jail.

The Conor McGregor reference simply means I've been dragged into a LOT of really nasty fights (never by my choice), and in many of those fights, my adversaries have ended up self-destructing, while I'm still here standing (that's what Conor McGregor means to me). It was never a suggestion that I *enjoy* violent confrontation or that I am out to gratuitously hurt anyone. My point was to say that I am veteran of many tough battles, and while I would prefer to avoid messy conflicts, I am not afraid of going there if given no other choice.

Having said that, I do think we should talk because there are so many moving parts here. Among other things, I just want to get a clear understanding of WHO is really coming to trial, and WHAT they are going to say (bearing in mind I'm still going to seek to exclude pretty much all your witnesses based on lack of timely disclosure). It's hard to have that conversation via email…and YES – I'm more than happy to give you a verbal summary of everything on my side as well.

Speaking of which, now that I fully understand the case (from Laura's side), I would *really* find it helpful if you could give me additional detail from Clayton's side, especially with regard to this claim that Laura faked pregnancies with other men.

Let me give you an example – in talking to Laura about all this, I asked her to explain the story of Gillespie. I was curious to know exactly WHAT basis he had for claiming that she "faked" being pregnant.

Laura's response was (paraphrased):

- She had a brief relationship with Gillespie (I think she said they had sex twice and went on like roughly 6 dates over a period of a few weeks).
- Laura tested positive for pregnancy. Gillespie asked her to terminate the pregnancy medically, which she did about 4 weeks later (by taking pills in Gillespie's presence).
- According to Laura, that is the entire story (aside from the later litigation, which went nowhere). There was never any ultrasound (why would there be?) and there were basically no other medical records involved other than the initial pregnancy test and the later medical abortion.

Assuming Laura has accurately communicated the above facts, I'm guessing that Gillespie's only basis for claiming that Laura faked the pregnancy is because…..what?…..he just doesn't think she actually got pregnant?

Pure speculation like that is clearly inadmissible, and if you tried to call Gillespie as a witness and ask him whether he thinks Laura faked being pregnant with him, I'd object due to a lack of foundation and calls for speculation.

After this many years of legal practice, you should know this by now – you can't just call a witness and ask them to guess about whether something happened. The witness must first prove they have personal knowledge of the matter in question. I see no basis to establish that Gillespie has personal knowledge of Laura *NOT* being pregnant. Same thing with Marraccini (his lawyer also told me he is not testifying at trial). Same thing with Mulvey.

7. Moving forward: I know Laura wants this to be over and candidly Clayton does too, but that requires her acknowledging how dishonest her behavior has been. I only speak for Clayton (via Rule 408) but he does not seem interested in more litigation both because Laura is probably judgment proof and because he has wanted the same thing since day one. He does not believe the pregnancy as they did not have sex and for all of the myriad reasons you already know, including the nearly identical stories from three (3) other men. All Clayton has ever wanted is an acknowledgment by Laura she has a pattern of lying about pregnancies to force relationships with guys who have rejected her. Even accepting (which we don't) that she was pregnant without intercourse and your expert's conclusion that she was pregnant with Clayton's twin children without *any* DNA testing and with a fabricated ultrasound, it does not change what has happened *since* her alleged miscarriage or her conduct predating this litigation. This ends either with trial in June or with Laura coming clean. This is her out.

I am happy to discuss settlement, but I also need to be honest – when Laura prevails in this case, she is going to sue Clayton and many other people for defamation and other torts. We can certainly avoid that if you want, but it's going to involve someone writing a very large check to Laura. If you offered $1 million right now, I'd advise her to reject that offer.

So yeah, happy to talk about settlement if you want, but I don't think that is likely to happen.

8. Progress: Assuming she wants to continue down this litigation path, are we agreeing that witnesses by video and no more Rule 2? (We can still preserve *Daubert*/702 issues with regard to the docs.)

I think we can at least agree on the video issue.

Gregg

From: David Gingras <david@gingraslaw.com>
Sent: Friday, April 19, 2024 3:36 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>; Isabel Ranney <isabel@woodnicklaw.com>
Cc: Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: Owens v. Echard - Witness Stuff

Gregg,

We need to talk about witnesses. I'm asking because obviously it's not possible for you to call nine people in the 60 minutes your side has. I'm also asking because when I see newly disclosed witnesses (as here) and there isn't any disclosure about what the person is going to say (as here), I like to just pick up the phone and ask the witnesses.

So I just tried calling the contact person you had listed for Mike Marraccini (Randy Pollock). Randy really surprised me – she said she had never heard of this case, never heard of me, never heard of you, and as far as she was aware, Mr. Marraccini wasn't coming to testify as a trial witness.

I also tried calling the contact person you listed for Matt Mulvey. Got voicemail. Hopefully she will call me back.

I was going to call Greg Gillespie, but it's not clear to me whether he's represented by counsel (your disclosure does not say you're representing him, but I know you obviously had that prior relationship). So, please clarify whether it's OK for me to talk to him directly, or whether you want that to go through you.

If I don't get any response, I'm considering whether we should just depose these folks, but I'd like to avoid the extra costs if possible.

Anyway, the easiest thing to do here is for us to have a conversation about who you are actually planning to call at trial. Right now, my witnesses are 1.) Laura, 2.) Clayton, 3.) Laura's mom, and 4.) Dr. Medchill. I'm planning to send you an updated disclosure statement next week which includes summaries of all witnesses' expected testimony, plus all my trial exhibits, and if Dr. Medchill's report is ready by then, I will include it as well.

On that note, I'd also like your input on whether you are OK with having out-of-state folks appear by phone or Zoom or whatever. Medchill lives in Florida, but he has family in AZ so I think his first preference is appear remotely, but he can also be here in person if that's the only choice.

I'd appreciate getting the same info from you re: which people you actually plan to call, and what they are going to say. Obviously, it should come as no surprise that we are *not* expecting you to wait until the last minute (i.e., May 10th) to finally disclose the substance of what each witness is going to say. If that happens, I'll move to exclude all that info as untimely per Rule 49(b)(2)(B) since you didn't disclose it within 30 days of learning the information. I'm also considering a Rule 404(b) motion in limine as to Gillespie, Marracinni, and Mulvey, but I can't really do that without knowing what you plan to have them talk about.

Look – despite all the animosity, there is still a lot of stuff we can do to get this thing ready for resolution. All I'm asking is for you guys to follow the rules. I'm trying to do that, and it's not unreasonable for me to ask the same from you.

David Gingras, Esq.
Gingras Law Office, PLLC
David@GingrasLaw.com
https://twitter.com/DavidSGingras
http://gingraslaw.com
Tel.: (480) 264-1400
Fax: (480) 248-3196



Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
5/21/2024 11:54:42 AM
Filing ID 17855903

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent/Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No.: FC2023-052114 **STIPULATED MOTION FOR VIRTUAL APPEARANCE OF WITNESS** (Assigned to the Honorable Julie Mata)

Respondent/Defendant, CLAYTON ECHARD, by and through his undersigned counsel, and Petitioner/Plaintiff, LAURA OWENS, by and through her undersigned counsel, respectfully request that that this honorable Court grant permission for Respondent/Defendant's witness, Dr. Samantha Deans, be allowed to appear virtually for the 6/10/24 trial in this matter.

1. Rule 8(c), *Arizona Rules of Family Law Procedure*, states that, "On the request of a party or a witness or on its own, and subject to A.R.S § 25-1256(F), the court may allow a party or witness to testify telephonically if the court finds it would not substantially prejudice any party and the testifying party or witness: (1) is not reasonably able to attend the hearing or trial

(2) would be unduly inconvenienced by attending the hearing or trial in-person, or (3) would incur a burdensome expense to attend the hearing or trial in-person."

2. Dr. Deans' appearance as a witness and this request for her to appear virtually at trial has been timely disclosed to Petitioner/Plaintiff, who has indicated she has no objection to her telephonic appearance.

3. As Dr. Deans is based out of Buffalo, New York, the requirement for her to travel and appear in person at this matter would be both unduly burdensome and expensive.

4. There is no risk of prejudice to either party or the witness by permitting Dr. Deans to appear telephonically.

WHEREFORE, the parties respectfully request that Dr. Samantha Deans be permitted to appear virtually before this court at the upcoming trial on June 10, 2024.

RESPECTFULLY SUBMITTED this 21st day of May, 2024.

GINGRAS LAW OFFICE, PLLC	WOODNICK LAW, PLLC
With permission	
David Gingras	Gregg R. Woodnick
Attorney for Petitioner/Plaintiff	*Attorneys for Respondent/Defendant*

ORIGINAL of the foregoing e-filed
this 21st day of May, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing delivered
This 21st day of May, 2024 with:

Honorable Julie Mata
Maricopa County Superior Court

David Gingras
Gingras Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GingrasLaw.com

By: __*/s/MB*_____

DESERT LEGAL GROUP, PLLC
Cory B. Keith, #035209
3800 N. Central Ave, Suite 570
Phoenix, Arizona 85012
Phone: (480) 956-5676
Cory@desertlegalgroup.com
Previous Attorneys for Petitioner

Clerk of the Superior Court
*** Electronically Filed ***
M. Cain, Deputy
6/3/2024 4:55:25 PM
Filing ID 17925906

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS,** Petitioner, -and- **CLAYTON ECHARD**, Respondent.	Case No.: FC2023-052114 **ETHICAL RULE 3.3 NOTICE OF CANDOR** (Assigned: Hon. Julie Ann Mata)

COMES NOW Cory B. Keith, previous attorney for Petitioner, LAURA OWENS, pursuant to the Arizona Rules of Professional Conduct, Ariz. R.S.Ct. 42, Ethical Rule 3.3(a) and the mandatory obligation to correct the record before the tribunal, hereby states as follows:

The parties appeared for an in-person Status Conference on February 21, 2024. During the Status Conference and while discussing the previous Injunction Against Harassment proceedings from November 2, 2023,[1] above-mentioned counsel stated, "[Ms. Owens] has not lied in this case. She has not intentionally lied to the Court." At the time,

[1] Counsel notes that he did not represent Ms. Owens during this previous Injunction Against Harassment proceeding.

counsel believed this statement to be true. Counsel no longer believes this statement to be true for the reasons outlined *infra*.

The below questions and answers are from Mr. Echard's March 1, 2024, deposition of Ms. Owens.

6 Q. [Mr. Woodnick]I'm going to show you Exhibit 9. Exhibit
7 9 is from Scottsdale Medical Labs. Have you been a
8 patient at Scottsdale Medical Laboratory or Labs?
9 A. [Ms. Owens] Yes.
10 Q. This is an ultrasound dated July 7, 2023?
11 A. Yes.
12 Q. Is that your name on the top and your
13 birth date next to it?
14 A. That is my name and birth date, yes.
15 Q. And this is the ultrasound that you
16 received at SMIL that was presented by Bonnie Slater
17 in the prior proceedings; correct?
18 A. Yes, it was, it was. But this was
19 actually at Planned Parenthood.
20 Q. Okay, I want to make sure I clarify that.
21 Let's start off with the basics.
22 On Exhibit 9, is this your ultrasound?
23 A. Yes.
24 Q. Did you go into a facility, a SMIL
25 facility, because it is ear marked SMIL, to get this

1 ultrasound?
2 A. I did not.
3 Q. Where did you get this ultrasound?
4 A. Planned Parenthood in Mission Viejo.
5 Q. So I don't know Mission Viejo well, but
6 is what you are suggesting that Scottsdale Medical
7 Imaging has a branch in Mission Viejo, California?
8 A. No.
9 Q. I'm totally confused here, I will give
10 you a chance here to explain how there is a
11 Scottsdale Medical Imaging ultrasound that you claim
12 came from Mission Viejo.
13 A. There is not, this was the -- actually
14 taken in Mission Viejo, this was not taken at SMIL.
15 Q. Why does it say SMIL on it?
16 A. I did change the top of that from Planned
17 Parenthood to SMIL, because I didn't want him to
18 contact the doctor.
19 Q. I'm showing you real clearly Bates stamp

20 0183, it's an ultrasound image that you are admitting
21 to having changed information on, is that true?
22 A. Just the top left, yes, the location.
23 Q. I'm going to ask the question again.
24 A. Yes.
25 Q. Did you change data on the -- on what has

1 been marked as Exhibit 9?
2 MR. KEITH: She answered the question,
3 Gregg. Objection, form.
4 BY MR. WOODNICK:
5 Q. Other than changing the word SMIL on
6 that exhibit, did you change anything?
7 A. No.

Owens Dep. 80:6-82:7.

6 Q. That's the one that you say that you
7 changed and attributed to another medical provider
8 located in Scottsdale Arizona, correct?
9 A. Correct.
10 Q. And that's SMIL, which is an acronym for
11 Scottsdale Medical Imaging labs or something like
12 that; correct?
13 A. Correct, I have gone there before.
14 Q. You are a patient of SMIL?
15 A. Correct.
16 Q. So when I get the subpoena for the
17 records release from SMIL, this isn't going to be
18 there because they didn't do this test?
19 A. Correct.
20 Q. Because you just put their name on the
21 test?
22 A. Correct.
23 Q. This test, according to you, was
24 originated in California?
25 A. Correct.

1 Q. And you went in there anonymously?
2 A. Correct, and I -- yeah, I added my name
3 in the -- in the facility name, correct.
4 Q. So we are changing your testimony, so
5 it's not -- you originally said you just changed and
6 added the word SMIL, but now under oath you are
7 saying you added your name to it too; correct?
8 A. Correct.
9 Q. And your date of birth?
10 A. Yeah, I changed the top.

Owens Dep. 87:6-88:10.

During the same deposition, Ms. Owens also testified to the following:

**Lines 16-23 below are a video clip of the November 2, 2023 hearing.*
16 Could you please repeat that, Ms. Owens,
17 who is your OB/GYN?
18 My main OB/GYN is a perinatologist,
19 Dr. Makhoul.
20 And what is the last time -- you said the
21 main OB/GYN. Who else are you seeing, what other
22 pregnancy-related doctors are you seeing?
23 Dr. Higley, who I saw last Friday.
24 BY MR. WOODNICK:
25 Q. You didn't see Dr. Higley that last

1 Friday, and before you answer that, you don't have
2 to, you can plead the Fifth because it will be a
3 really inconsistent statement with what you told
4 Judge Gialketsis?
5 A. I had an appointment with Dr. Higley.
6 Q. You said, you specifically told Judge,
7 Gialketsis under oath, that you saw Dr. Higley the
8 week before.
9 A. I had an appointment with Dr. Higley.
10 Q. You did not see Dr. Higley the week
11 before, did you?
12 A. I did not go to the appointment.

Owens Dep. 146:16-147:12.

The admissions from Petitioner during her deposition confirm that counsel's above-quoted statement made during the February 21, 2024, Status Conference was factually inaccurate. Specifically, Petitioner admittedly altered her sonogram photo to include her name.[2] Petitioner also admitted she did not see Dr. Higley the week prior to the November

[2] Petitioner has addressed modifying this sonogram to alter the name of the facility. See *Petitioner's Response to Respondent's Amended Motion for Relief Based on Fraud* at 13 ¶ 2.

2, 2023, injunction hearing. As such, counsel files this notice to retract his statement and to ensure candor to the Court as is required by Ethical Rule 3.3(a) because undersigned counsel is not aware of Petitioner having notified the court of these other factual inaccuracies.

RESPECTFULLY SUBMITTED this 3rd day of June 2024.

DESERT LEGAL GROUP, PLLC

/s/ Cory Keith

_____

Previous Attorney for Petitioner

ORIGINAL of the foregoing e-filed with the clerk this 3rd day of June 2024.

COPY presumed delivered even date to:
The Honorable Julie Ann Mata
Maricopa County Superior Court

COPY emailed even date to:
Davis S. Gingras
Gingras Law Office, PLLC
4802 E Ray Road #23-271
Phoenix, AZ 85044
David@GringasLaw.com
Attorney for Petitioner

Gregg R. Woodnick
Isabel Ranny
Woodnick Law, PLLC
1747 E. Morton Ave., Suite 205
Phoenix, Arizona 85020
office@woodnicklaw.com
Attorney for Respondent

By: *CK*

Clerk of the Superior Court
*** Electronically Filed ***
C. Diaz, Deputy
6/3/2024 4:55:59 PM
Filing ID 17925911

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg Woodnick, #020736
Isabel Ranney, #038564
Attorneys for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, And **CLAYTON ECHARD**, Respondent.	Case No.: FC2023-052114 **RESPONDENT'S PRETRIAL STATEMENT** (Assigned to the Honorable Julie Mata) **[Evidentiary Hearing scheduled for June 10, 2024 at 8:45 a.m.]**

Respondent/Defendant, CLAYTON ECHARD, hereby provides this Pre-Trial Statement for the Evidentiary Hearing scheduled for June 10, 2024 at 8:45 a.m.

This proceeding is not complicated, but it is certainly unique given the fraud and circus-style antics from Petitioner/Plaintiff, LAURA OWENS. Laura, who seems unburdened by *both* science and societal expectations of truth, filed an improper Establishment Petition and Order of Protection predicated on faked medical records *after* being rejected by Clayton Echard. Laura's medical record arts and crafts skills have been honed over a decade wherein she falsified records to support fabricated "twin" pregnancies, forged ultrasounds, manufactured

hcG reports, faked ovarian cancer, and feigned having an oophorectomy (ovary removal). She cannot claim that she lacked the "intent" to commit fraud upon this court when she filed these actions after oral sex and then appeared in court—twice—donning what appeared to be a fake moon bump. Laura's malignancy was exposed because she targeted Clayton, the former ABC *Bachelor,* as her fourth mark.

Clayton immediately disputed the pregnancy, causing Laura to utilize her playbook – alleging "twins," crafting dating "contracts," offering abortions, claiming suicidality, and alleging that she was the victim of sexual assault. Laura also contacted the media,[1] which resulted in three (3) prior victims of the same pregnancy con connecting. What Laura failed to consider was that her claims of being "24 weeks" pregnant with "twins" and vague miscarriage allegations (including suggesting that "twins" were "*reabsorbed*" into her body) would result in the media (she contacted) comparing her to known fraudsters like *Scamanda.*

As if unable to stop, Laura continued to commit fraud, including misleading her own medical expert (who, impressively and contrary to science, appears to have determined paternity without DNA testing) by failing to tell him about her medical history (or faked history), including but not limited to ovarian cancer, an oophorectomy as well as the fabrication of the sonogram he reviewed (and perhaps even the "July 23" "miscarriage" photos).

Laura's attempts to prevent a full and fair adjudication have only escalated as, through counsel, she (per witness Michael Marraccini) suggested a witness would be arrested if he appeared at Court for this trial. Further efforts to embarrass Mr. Marraccini involved Laura's

[1] In addition to Laura contacting *The Sun*, *Page Six,* and *People*, her counsel has made comments about looking forward to reading the *obituaries* of reporters and about making them *homeless*; ostensibly consistent with how "Conor McGregor" would act if he was litigating this case.

counsel posting a California deposition transcript from 2018 online. She, through counsel, even Tweeted commentary about the case and this court[2] as well as posted "medical records" contrary to the court's orders. She even mocked Dr. Dean's expertise and expert report and then published it online. On May 28, 2024, Laura *and* her counsel published a joint blog post, in which Laura made overt claims of suicidality and appears to admit the 2,500 pages of texts with Marraccini were legitimate, and that she never received an ultrasound for her alleged "twin" pregnancy. Days later, Laura (through counsel) posted parts of the video deposition of Clayton Echard on YouTube.[3] The level of inappropriate behavior in this matter is astounding.

Laura's anticipated *crocodile tears* and claims to have been the *victim* of the media (who exposed her cons) are disingenuous. Laura's behavior should result in findings from the court in these two (2) causes and may justify a referral to the Maricopa County Attorney for charges of *both* perjury and evidence tampering (A.R.S. § 13-2702 and § 13-2809).

I. BACKGROUND

1. On August 1, 2023, Laura initiated litigation when she filed her *Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support*, alleging that she became pregnant with Respondent's "*twins*" on May 20, 2023.

2. On August 8, 2023, Laura filed a **denied** *Motion to Communicate* and, on August 23, 2023, a **denied** *Motion to Compel.* On August 29, 2023, Laura filed a **denied** *Expedited*

[2] Tweeting on or about May 26, 2024 that Clayton's counsel "*wanted to inflame and bias the judge*" and it "*seems to have worked.*"

[3] *See* https://www.youtube.com/watch?v=BnYoVsQez5g ("Clayton implies he wanted to have sex, but Laura didn't"); https://www.youtube.com/watch?v=IlCdmvLc_7I&t=74s ("Taking pregnancy test at Clayton's apartment").

Consideration Requested! Motion to Communicate and, on September 14, 2023, a **denied** *Expedited (!) Motion to Seal Court Record*.

3. On August 21, 2023, Clayton (representing himself) filed his Answer, denying any pregnancy with "twins" after only oral sex.[4] *See also* Respondent's **granted** *Motion for Leave to Amend Response*, filed December 12, 2023 and Respondent's *Amended Response to Petition to Establish,* filed January 26, 2024.

4. On September 28, 2023, through an Early Resolution Conference parties entered a Rule 69 Agreement stating, "*Petitioner agrees to contribute a sample on October 2, 2023 to determine paternity of the alleged pregnancy*"; testing to be conducted by Ravgen.

5. On October 6, 2023, Laura filed for an ex parte Order of Protection (FC2023-052771), claiming that she was pregnant by Clayton and that he was cyberbullying her by posting her medical records online. That same day, the Ravgen results came back, indicating "*little to no fetal DNA*" and Clayton *thought* the nightmare was over. He was very wrong.

6. On October 18, 2023, Laura filed a Request for Pre-Decree Mediation (**denied** November 22, 2023) alleging Clayton would not speak to her and "*he even acts as if the unborn children don't exist despite a pro ponderous of evide* [sic]."

7. On October 24, 2023, Laura appeared by video before Judge Cynthia Gialketsis (CV2023-053952) wearing what appears to be a fake pregnant stomach (moon belly). She was

[4] Laura's evolving tale regarding May 20, 2023 has changed during the litigation and now includes a rape insinuation. In messages to Clayton in effort to force a "*dating contract*", Laura acknowledges there was *no* intercourse, and offered that her vagina is "tight" after "not having sex in more than a year" but then claimed "*some of [his] fluids were 'down there'*" and that "*I don't know the difference between types of cum […].*" It was not until 2024 that she alleged she was raped (after first alleging that *Clayton* was too high to remember having intercourse – insinuating *she* had taken advantage of *him*).

also photographed on September 27, 2023 competing in a horse jumping competition with a visibly flat stomach and was signed up to compete in late November 2023 but allegedly backed out after attempting to sign up under a different name.

8. On October 25, 2023, Laura appeared before Judge Doody (FC2023-052771) *again* wearing what appears to be a moon belly and testified as to the veracity of a "sonogram" of their "*son*," which she has since claimed no knowledge of but that she sent to both Clayton and the media, as well as including in her publicly accessible Dropbox on Reddit. (*See also* Respondent's *Motion for Relief from Judgment*, filed March 26, 2024.)

9. On November 2, 2023, the second day of trial on Clayton's **granted** Injunction Against Harassment, Laura testified that she was "*100*%" and "*24 weeks*" pregnant by Clayton and that she was due "*February 14, 2024*." Laura further specifically detailed she was experiencing a *high-risk* pregnancy (due to her alleged epilepsy) and that she was being seen by specialists "*Dr. Makhoul*" and "*Dr. Higley"* and that she had had an appointment with Dr. Higley "*last Friday*." After this Court ordered Laura to comply with disclosure (she had refused to comply with Rule 49), it was confirmed that Laura's testimony was false and she was never treated by Drs. Makhoul, Higley or any obstetrician or gynecologist *during* her alleged high-risk pregnancy with "twins".[5]

[5] Laura self-reported to her neurologist *via video* while in the seated position that she was 21 weeks pregnant with "twins". Laura also told the provider that she saw for the first time on November 14, 2023 (Momdoc) that she *had* been pregnant, that the pregnancy had been "*confirmed by planned parenthood*," that she "*passed two sacs*" and that she had been told that her blood hcG levels were "*not consistent with a viable pregnancy*." There was no sonogram at Planned Parenthood and, *if* the latter statement bears *any* truth, this means Laura was told she was not pregnant ***before*** she testified in front of Judges Doody, Gialketis, *and* this Court.

10. On December 6, 2023, results of the yet another Ravgen test again confirmed "little to no fetal DNA" Again, Clayton thought the nightmare was over—he was wrong, *again*. (Note the second Ravgen test was *allegedly* "lost" in transit).

11. On December 12, 2023, Clayton filed a *Notice of Filing Affidavit of Non-Paternity*, avowing that he could not be the father to any children from Laura as they never had sexual intercourse. Clayton also filed his **granted** *Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing.*

12. On December 28, 2023, Laura filed her **denied**[6] *Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice* as well as a *Notice Requiring Strict Compliance with Arizona Rules of Evidence*, which invoked Rule 2(a), *Arizona Rules of Family Law Procedure*. For the first time, Laura's *Motion* cryptically claimed that she "*is not now pregnant […].*"

13. That same day, Clayton notified Laura of his intent to depose her pursuant to Rule 57(a)(1) and requested the production of documents pursuant to Rule 62.

14. On January 2, 2024, Laura filed a **denied** *Expedited Motion to Quash Deposition of Petitioner*. Laura's counsel (her first of three attorneys) withdrew.

15. On January 3, 2024, Clayton filed a *Response/Objection to Petitioner's Motion to Dismiss*[7] as well as a (withdrawn) *Motion for Sanctions Pursuant to Rule 26.*

---

[6] Although the Court's Minute Entry dated January 25, 2024 does suggest that Laura's *Motion to Dismiss* was granted but maintained as "the issue of sanctions and attorney's fees remain," the Court's Minute Entry dated February 21, 2024 and discussion in Court *clarifies* that the Court was "*denying Petitioner's Motion to Dismiss Petition to Establish* […]."

[7] For brevity, this background summary excludes all other *Response* and *Reply*'s filed in this matter.

16. On January 17, 2024, Clayton filed a *Notice of Non-Appearance at Deposition Pursuant to Rule 57(g)*, notifying the Court that Laura willfully failed to appear at her deposition and requesting attorney's fees pursuant to Rule 57(g).

17. On January 18, 2024, Laura, with her 2nd counsel, filed a **denied** *Motion for Confidentiality and Preliminary Protective Order* claiming, for the first time, that Laura had a miscarriage. Notably, no other information about the *alleged* miscarriage was provided.

18. On February 2, 2024, Clayton was deposed by Laura.[8]

19. On February 6, 2024, Respondent filed a **granted** *Expedited Motion to Continue Trial and Motion for Additional Trial Time.*

20. On February 12, 2024, Respondent filed a **granted** *Expedited Motion to Set Virtual Status Conference*. The Court scheduled an in-person Status Conference for 2/21/24.

21. At the Conference on February 21, 2024, this Court addressed Petitioner's failure to comply with Rule 49 (see attorney's fees below). Petitioner claimed that she had a miscarriage sometime in "***September or October***." The Court indicated it would "*hear evidence and testimony as it applies to […] all pleadings filed within the Maricopa County Superior Court*" and it would be viewing the *Order of Harassment* Hearings.

[8] Pursuant to Rule 59(c)(2), Clayton intends on offering this deposition against Laura, including discussion of the ultrasound Laura has admitted to altering and presented as an exhibit as well as the ultrasound video on pages 42-44, 46, 63, 90-91, 111-122.

22. On March 1, 2024, Laura was deposed, and it was discovered that there was yet another pregnancy *fraud* allegation (#4) from 2014 in San Francisco. Clayton intends to offer the entire deposition[9] as evidence against Laura, consistent with Rule 59(c)(2).

23. On March 11, 2024, Respondent filed a **granted** *Motion to Compel.* On March 12, 2024, Petitioner's 3rd attorney withdrew.

24. On March 25, 2024, Respondent filed a **granted** *Motion for Joint Hearing* and a **granted (in part)**[10] *Motion for Relief from Judgment,* which was *Amended* on April 26, 2024.

25. On April 1, 2024, Petitioner's 3rd attorney filed a **denied** *Motion for Extension of Time to Respond to Respondent's Motion to Compel* and a *Declaration of David S. Gringas In Support of Petitioner Laura Owens' Motion for Extension of Time to Respond to Respondent's Motion to Compel.*

26. On April 3, 2024, Respondent filed a **granted** *Motion to Withdraw Motion for Sanctions Pursuant to Rule 26.* Petitioner filed a *Notice of Non-Objection* on April 4, 2024.

27. On April 8, 2024, Petitioner filed a **denied** *Motion to Compel Lunch and For Alternative Relief.*

28. On April 12, 2024, Petitioner filed a **granted** *Request for Judicial Notice*, requesting this Court take notice of Petitioner's case against Greg Gillespie.[11]

---

[9] Specifically pages 1-175. Line numbers would be unhelpful, as parts of the entire deposition will be utilized as evidence against Laura. [10] In the Courts Minute Entry dated 5/22/24, the Court clarified that it would be viewing the Order of Protection hearing before Judge Doody and deferring ruling on the *Motion* pending the trial.

[10] In the Courts Minute Entry dated 5/22/24, the Court clarified that it would be viewing the Order of Protection hearing before Judge Doody and deferring ruling on the *Motion* pending the trial.

[11] Mr. Gillespie is expected to testify that he experienced "twin" pregnancy fraud by Laura after rejecting her and as addressed by Judges Bachus and Gordon and which involved a fake sonogram

29. On April 30, 2024, Petitioner filed a **denied** *Emergency Motion to Strike and Request for Immediate Telephonic Scheduling Conference* and **denied** *Motion in Limine*, attempting to preclude testimony from the three (3) men who are anticipated to testify that Laura fabricated pregnancies, medical records, cancer, oophorectomies to force unrequited relationships.

30. On May 10, 2024, Petitioner filed a **denied** *Motion for Judgment on the Pleadings and Renewed Motion to Dismiss* and, on May 13, 2024, a *Notice of Non-Availability and Notice of Errata*.

31. On May 21, 2024, Respondent filed a *Stipulated Motion for Virtual Appearance of Witness* (Dr. Deans, MD, MPH).

II. CONTESTED ISSUES

1. **NON-PATERNITY: This Court should find that Clayton was not responsible for any alleged pregnancy**. That Laura will claim she *believed* she was pregnant from oral sex is farcical and not the legal standard. Even *if* that was the standard, it is indisputable that Laura did not have any basis to believe she was pregnant with "twins", as she alleged in her Petition because she faked the sonogram records, she never sought obstetric/gynecological care, she never had an ultrasound, and she lied to the Court about her "high risk pregnancy" with "twins."[12]

---

that Laura purchased (it is water marked "*Fiverr*," a website where you can ostensibly hire people to photoshop images).

[12] Before Judge Gialketsis on November 2, 2023, Laura testified to having a high-risk pregnancy with "boy" and "girl" twins, being "100%" and"24 weeks pregnant," and to being "seen" by Drs. Higley and Makhoul. Laura offered (admitted) as an Exhibit a screenshot of her making an appointment with Dr. Makhoul. Laura has since testified that she never received care from any pregnancy provider or specialist.

Alleged Pregnancy: Pregnancy is caused by sex, not relationship cons. Laura and Clayton did not have penile-vaginal sex . Laura's allegations about what happened that night have morphed over time in order to fit Laura's narrative as she is confronted with science and the significant holes in her story. Laura has claimed there were "fluids" "down there," then claimed Clayton was "too high" to remember having intercourse, and then claimed Clayton raped her.[13]. Laura even sent an email admitting they did **not** have sex and essentially begging Clayton to have sex with her for the first time, because she was "*tight*" and had not had sex in years.[14]

Laura's only "proof" of pregnancy is one (1) urine hcG[15] test conducted at Banner on June 1, 2023, one (1) blood hcG test on October 16, 2023 that indicated levels of hcG that, by Laura's own admission are inconsistent with a pregnancy.[16] Note, even her October 16, 2023 hcG test (provided to her expert) is dubious as Laura (through counsel) has admitted to sending an altered version with 102,000 hcG (1,000 x higher) levels to the media. Laura again fabricated a medical record while simultaneously refusing to cooperate with Rule 49 disclosure

---

[13] Curiously, in her underlying *Petition to Establish,* Laura stated there was no domestic violence and requested Joint Legal Decision-Making (and a holiday schedule), as the sexual assault allegation did not arise until *after* Laura realized Clayton (like others) had zero interest in a relationship and that he was questioning her "twin" pregnancy narrative.

[14] Note: with Gillespie, Laura also claimed she had not had sex in years. She later (with Gillespie) concocted a disturbing story that Gillespie and his counsel (undersigned) were involved in her kidnapping and rape and that it was being investigated by the FBI in an *ex parte* letter to Judge Bachus.

[15] HcG tests are *not* dispositive of pregnancy. As Dr. Deans will confirm, hcG can be present in an individual for reasons unrelated to pregnancy – including medications for epilepsy and fertility treatment, as well as if the person *injects themselves* with hcG.

[16] Laura also alleges that she "lost 30 pounds" and that is somehow proof of pregnancy or that her body absorbed 24-28 weeks fetuses, all while competing in horse jumping competitions. Per her records, on June 1st, 2023, Laura weighed 121.25 pounds; On November 14th she weighed 133 lbs.)

obligations resulting in the Order to Compel. Laura is guilty of both *copious* perjury and evidence tampering, warranting this Court endorsing the Maricopa County Attorney's Office.

Alleged Sonogram(s): Laura faked the sonograms (at least three (3) with Clayton). There are no verifiable (and requisite) sonograms to support Laura's claim of being pregnant (with "boy" and "girl" "twins") after oral sex.[17] On 10/25/23, Laura testified before Judge Doody to getting a sonogram of their "*son*" and providing it to Clayton because she was "*concerned about the baby's profile*", whom she accused of using it to make an online Halloween meme (which he vehemently denies). Laura also admitted an Exhibit[18] where she tells Clayton that she has a "*sonogram video*" dated 9/5/23. On 2/2/24, Laura used the doctored sonogram as an exhibit during her deposition of Clayton. On 3/1/24, Laura testified to obtaining the same sonogram "anonymously"[19] at Planned Parenthood "Mission Viejo" on July 7, 2023 and falsely (and illegally) attributing it to Southwest Medical Imaging (SMIL) and that she "*found out she was pregnant with twins"* in July. On or about 4/15/24, Laura then claimed the appointment date was July 2, 2023 and that she was seen at the Planned Parenthood in Costa Mesa. Both SMIL and Planned Parenthood have confirmed Laura was never seen there for an ultrasound. Planned Parenthood further confirmed that the alleged July sonogram is ***not***

[17] Per Dr. Deans, an ultrasound provider may be able to determine a possible twin gestation (not gender) no earlier than 7 weeks gestation during an ultrasound. The only sonogram Laura states is hers indicates a gestational age of 6 weeks, 4 days. (Parenthetically, the gestational age on the doctored sonogram (if obtained on 7/2/23) would be consistent with a conception date of June 2, 2023 – not May 20, 2023). Sexes would *not* be discernable until around sixteen (16) weeks). Laura texted Clayton "*We are having a boy and a girl and I have an ultrasound to show you and they dated it literally exactly to when we were together*."

[18] Laura's Exhibit 6 (an email from Laura to Clayton) was admitted during the Order of Protection hearing before Judge Doody (FC2023-052771).

[19] Planned Parenthood confirmed they do not offer anonymous appointments.

"consistent with ultrasound images generated by" their practice. Still, Laura signed an affidavit for her expert that *included the fake sonogram* and stated, "*This image was taken at Planned Parenthood*" (emphasis in original). No evidence supports Laura ever being seen by any provider for an ultrasound, as this Court noted in its 5/22/24 minute entry stating "*neither Planned Parenthood in Mission Viejo nor SMIL have any records for any ultrasound appointment for Plaintiff.*"

Alleged miscarriage: Laura was never pregnant by Clayton could not have miscarried Clayton's "twins." Laura's miscarriage tale (now apparently dated July 23rd) only arose ***after*** she was confronted by Clayton's desire to prevent her from getting away with her extreme pregnancy fraud con (and exploiting *another* TedX talk or *Chicken Soup* essay). This included Clayton notifying Laura he had contacted the Putative Father Registry to prevent Laura from claiming she put the "twins" up for pretend adoption as a means of explaining their nonexistence (all *after* testifying she was "24 weeks," actively being seen for "high-risk" pregnancy and due in "February"). Meanwhile, Laura continued to post on Reddit, published various blogs on Medium.com portraying herself as a victim, and contacting the media to advance her fictitious narrative.

This is not the first time Laura has feigned a miscarriage or leveraged offers to terminate a pregnancy in exchange for the victim agreeing to date her. With Michael Marraccini in 2016[20], Laura alleged she was pregnant with his "twins," that she believed she

[20] Clayton disclosed 2,500 pages of text messages between Michael Marraccini and Laura. In light of Laura's repeated claims that her victims (including Michael) have fabricated or tampered with communications, a computer forensic expert, Mr. John Berryhill, assessed the meta data and confirmed that there was **no** tampering. This confirmed that Laura historically claimed she had

had a "miscarriage" and that after speaking with providers she knew "what to look for [to determine whether she was miscarrying]." With Gillespie, it was offering to abort the "twins" if he agreed to date her. With Clayton, Laura alleged, for the first time, that she miscarried when she requested a protective order on 1/18/24. On 11/14/23, Laura self-reported to Momdoc (a provider she had never seen before) that she "*passed two sacs which appeared to have membrane but denies having much bleeding.*" During the status conference on 2/21/24, Laura told this Court she miscarried sometime in "*September*" or "*October*" 2023.[21] Days later, at her deposition on 3/1/24, Laura testified that in "*September or October*" she passed *"two sacs*" that were "*less than the size of [her] hand*" that she took a picture of them and sent it to an online provider.[22] On 4/8/24, Laura (via counsel) stated that she passed the "*two sacs*" on "July 23, 2023" (***BEFORE*** Laura filed the underlying Petition, her OOP, and ***before*** she testified before three (3) different judges about her feigned pregnancy). Clayton's experts have reviewed the images (which may be *fake* but even *assuming* they are real), and Dr. Deans will testify that "***there is no obvious embryonic or fetal tissue*****"** which is complicated by the theory that Laura would have been miscarrying "twins" that were 8-11 weeks and would have experienced significant bleeding. (Note: Laura refused to provide her phone to a forensic expert to confirm the images' authenticity, which is highly dubious given her admitted history of fabricating records).

---

ovarian cancer and an ovary removed, in addition to alleging she was pregnant with twins, had a miscarriage, had a *"severe allergic reaction*" to an abortion drug, and that only *one* of the fetuses was terminated via abortion (which she also told Gillespie).

[21] Laura also was engaging in repeated communication with Clayton and the media referring to sonograms and videos that showed she was "**still pregnant**" in addition to testifying before two (2) judges in late October/early November to being "*100%*" and "*24 weeks pregnant*."

[22] There is no record indicating Laura showed any provider these alleged "two sacs."

2. **ORDER OF PROTECTION: The OOP against Echard must be dismissed because it was procured through intrinsic and extrinsic fraud by Laura**. Clayton's positions are well summarized by this Court in its 5/22/24 ruling and fully briefed in the Motion for Relief. The order was upheld by Judge Doody (who did not know the history of fraud) as a result of extrinsic and intrinsic fraud by Laura because she was never pregnant with his "twins" and the ultrasound in the image Judge Doody found to uphold the Order of Protection was manufactured by Laura (who has since denied the image belongs to her, despite her sending it to Clayton and the media and including it in her public Dropbox on Reddit).

3. **ATTORNEY'S FEES, SANCTIONS *AND* REFERRALS: This court has broad authority to assess the conduct of Owens throughout the three (3) proceedings before three (3) different Judges and to sanction Laura pursuant to A.R.S. §§ 25-324, 25-415, and 25-809(G)**. Laura ignored disclosure obligations for nearly seven (7) months and it was not until this Court compelled her cooperation that evidence of a fourth (4th) victim was revealed or that she committed to her recent tale of a miscarriage in July. But despite allegedly passing two fetuses less than the size of her hand, she allegedly did not "know" she had miscarried until November and curiously did not inform Clayton or this Court until January).

Laura's conduct cannot be accurately captured in the word "*unreasonable*," as faking a "twin" pregnancy after oral sex, doctoring and submitting medical records, threatening witnesses, and committing continuous perjury deserves a word more befitting behavior beyond even the Family Court pale. In addition to the fraud underpinning the entire litigation, the Court merely needs to read Laura's Medium articles, the Tweets, and blog posts to appreciate the scope of the damage she has caused which, as recent as May 28, 2024, includes a **joint blog**

post from Laura and her counsel and YouTube postings of Clayton's video deposition.

Clayton is entitled to all his reasonable fees and costs incurred pursuant to A.R.S. § 25-324. To date, Laura has provided no evidence to support that she was ever pregnant by *Clayton* and with *Clayton's "twins"*. Laura has refused every opportunity to resolve the matter outside of court and all efforts to comply with disclosure (including failing to appear at a scheduled deposition and *not* fully complying with the eventual Order to Compel). Recall, this entire saga was initiated by Laura going to *The Sun* and making false claims of pregnancy ostensibly because Clayton rejected her. Laura's Order of Protection and the underlying Petition were both filed in bad faith, as Laura knew that she was not and could not have been pregnant with Clayton's *"twins."* Laura then proceeded to fabricate evidence (not for the first time)[23], testify before three (3) Judges to being "100%" and "24 weeks" pregnant with "twins"[24], and file irrational and legally unsupported filings that continued to assert what Laura cannot prove: that she was pregnant with Clayton's twins.

And it was more than just simple "*misstatements,*" as this is extrinsic and intrinsic fraud upon the Court encompassing false testimony, altering evidence, and using coercive threats to tamper with potential witnesses and extort Clayton. Laura, the day before her deposition on March 1st, sent Clayton a letter threatening to *sue* him for a collateral allegation for around $1.4 Million unless he agreed to dismiss *this* action. This overt extortive effort is eerily similar to Laura's antics with Judge Bachus in the Gillespie matter, where she maliciously claimed

[23] As witnesses Marraccini and Gillespie are expected to testify, Laura fabricated medical records (including sonograms) in her pregnancy con with their fake "twins."

[24] At the same time as her claimed "high-risk" pregnancy, Laura was actively participating in horse jumping competitions with a visibly flat stomach (contrary to her very visible "moon belly").

Gillespie and his counsel were involved in her rape in an attempt to avoid a hearing. Through her third counsel in this matter, Laura has intimidated witnesses (including suggesting Marraccini would be *arrested* if he appears to testify); filed legally unsound filings designed to waste fees and delay trial; sent overt threats and harassing communications to Clayton's counsel and members of the media; engaged in toxic and inappropriate diatribe regarding this case through Twitter and blog postings (including using derogatory terms, insinuating that any ruling in Clayton's favor would be a "mistake," and that the judge was biased against Laura) and appeared to intimidate Laura's *own* prior counsel into *refraining* from complying with his Rule 3.3 ethical obligations.

III. WITNESSES

Respondent's Witnesses:

1. Clayton Echard will testify to all issues.

2. Laura Owens will testify to all issues.

3. **Michael Marraccini**, former romantic partner of Laura. *See Response to Motion in Limine*. He is expected to testify regarding the origin of the 2,500 pages of messages with Laura from 2016/2017 where she made nearly identical claims involving fake "twins", miscarriages, abortions, threatened suicidality (including claiming to be admitted into a mental hospital). He is expected to also testify regarding the personal claims in Laura's recent affidavit claiming he faked her medical records, which have been disproven by the forensic technology expert who verified that the "medical records" indicating ovarian cancer/ovary removal were sent to him by Laura.

4. **Gregory Gillespie**, former romantic partner of Laura. *See Response to Motion in Limine.* He is expected to testify that Laura fabricated being pregnant with twins, claimed she had an abortion several times, and repeatedly stated she would dismiss her lawsuit if he agreed to date her. Gillespie is expected to confirm that the sonogram of "twins" sent to him by Laura was from "Fiver." He is also expected to testify in response to Laura's allegations that *he* doctored her "medical records."

5. **Dr. Samantha Deans, MD, MPH**, will testify regarding her expert review of the medical records of Ms. Owens, including her analysis that the alleged hCG tests were never dispositive of pregnancy and that the related miscarriage timeline, which includes detailed analysis of the likely origin of hCG in Petitioner's blood and urine, is not indicative of human gestational norms. Her testimony will also address the veracity of Petitioner's miscarriage of two (2) fetal sacs and alleged sonogram from Planned Parenthood.

6. **Jon A. Berryhill**, a forensic data expert, will testify regarding his expert review of the personal computer of Michael Marraccini, including his analysis of the meta data, which confirms that no text messages or images sent by either party were altered or otherwise fabricated.

7. Any and all witnesses listed by Petitioner subject to appropriate objection.

Respondent's Objections to Petitioner's Witnesses:

Respondent objects to any and all of Petitioner's witnesses which have not been timely disclosed. Respondent specifically objects to the expert testimony of Dr. Medchill under Rules

702 and 703, Ariz. R. Evid., as he relied on an admittedly tampered with data set, made inappropriate conclusions regarding his "beliefs" unrelated to science, and appears to have concluded, with zero scientific/DNA basis, that Clayton was the father of "twins." His testimony is not the product of "reliable principles and methods" or based on "sufficient facts or data" and his opinion does not "reflect[] a reliable application of the principles and methods to the facts of the case" and should be precluded (or given the weight it deserves).

IV. EXHIBITS

Respondent's Exhibits:

NO.	DESCRIPTION
1.	Text from Petitioner re: unblocking
2.	Text between parties re: blocking and meeting up
3.	Messages between the parties
4.	LinkedIn messages between the parties, dated 5/17/23
5.	Text messages between the parties, dated 5/25/23
6.	Emails between the parties, dated 6/28/23
7.	Email from Petitioner, dated 7/1/23
8.	Emails between the parties, dated 9/17/23
9.	Email from Petitioner re: Sonogram, dated 10/14/23
10.	Email from Petitioner to Respondent's Father
11.	Email from Petitioner re: Ultrasound, dated 10/6/23
12.	Text from Petitioner re: unblocking
13.	Email from Petitioner re: Going Public
14.	Article Petitioner wrote "I am the anonymous woman in the Clayton Echard scandal. Here is my story," dated 9/22/23
15.	Articles where Petitioner spoke to the press
16.	Article Petitioner wrote "Unveiling the Unbearable: My Battle Against Cyberbullying and Online Harassment"
17.	Petitioner's Medical documents
18.	Petitioner's email to HOPE, re: Respondent speaking, dated 8/3/23
19.	Emails from Petitioner's Mother to Respondent
20.	Email from Petitioner re: Threating to Sue, dated 9/21/23

21.	Email from Petitioner re: Medical Documents
22.	Text messages between Petitioner and Greg Gillespie dated 7/11/2021- 8/24/21
23.	Text messages between Petitioner and Greg Gillespie re: ultrasound dated 8/6/21
24.	Records produced by Family Planning Associates in response to HIPAA Release
25.	Audio of Greg Gillespie and Laura Owens re: being pregnant with twins
26.	Audio of Greg and Laura Conversation Re: Fabricated Sonogram from August 2021
27.	Petitioner's Affidavit, dated 5/3/24
28.	Petitioner's "sonogram," dated 7/7/23
29.	Planned Parenthood Response to follow up letter, dated 4/26/27
30.	Emails between Respondent's Attorney and Stormy Mitchell, dated 4/26/24
31.	Petitioner faking ultrasound
32.	FTR for October 2023 Hearing part 1
33.	FTR for October 2023 Hearing part 2
34.	FTR for November 2023 Hearing part 1
35.	FTR for November 2023 Hearing part 2
36.	Records produced by Dr. Hunter and Any Lab Test Now in response to HIPAA Release
37.	Records produced by Dr. Makhoul and Scottsdale Perinatal Associates in response to HIPAA Release
38.	Records produced by Barrow Neurological Institute in response to HIPAA Release
39.	Samantha J Deans, MD MPH Curriculum Vitae
40.	Faye Elizabeth Justicia-Linde, MD Curriculum Vitae
41.	Samantha J Deans, MD MPH and Faye Elizabeth Justicia-Linde, MD Expert Report
42.	Email to Steve Carbone, dated 4/24/24
43.	Email from Steve Carbone, dated 4/29/24
44.	Email to Dave Neal, dated 4/25/24
45.	Email from Michael Marraccini, dated 4/26/24, including medical records sent from Laura Owens in 2016
46.	Twitter Posts from David S. Gingras
47.	Berryhill Expert Report, dated 5/7/24
48.	Berryhill Digital Forensics Report, selected text messages
49.	Petitioner's Deposition
50.	Respondent's Deposition

51.	Petitioner's Counsel's Blog Posts
52.	Petitioner's email to the Court, dated 8/1/22
53.	Petitioner Counsel's emails and tweets
54.	Email between Petitioner current and former counsel
55.	Notice of Intent to Sue
56.	Petitioner's MomDoc records
57.	Email from Petitioner re: suicide, dated 9/21/23
58.	Email from Petition to Scottsdale PD, dated 7/31/23
59.	Medical Records from Women's Care of AZ/Dr. Higley

Respondent and his counsel reserve the right to supplement this List of Exhibits as necessary.

Respondent's Objections to Petitioner's Exhibits:

Respondent objects to Petitioner's expert's report under Rule 703, Ariz. R. Evid. Petitioner submitted admittedly falsified medical records to her expert for his review, including the sonogram that she has admitted to tampering and which has been confirmed *not* to have originated at Planned Parenthood or SMIL and notably *not* including the ovary removal she allegedly had in 2016 (which she appears to be claiming she does not "remember" fabricating). Her expert relied on fabricated data to reach his conclusion (which itself is inadmissible under 702), meaning his written opinion is not based on "those kinds of facts or data" that experts in his field would "reasonably rely on."

Respondent objects to any and all of Petitioner's exhibits which have not been timely disclosed. Respondent objects to any and all of Petitioner's exhibits, which have been doctored in any way, including those already admitted to being fabricated by Petitioner and which were confirmed not to have originated from any source Petitioner testified to being seen by.

Respondent further objects to any of Petitioner's exhibits which are not relevant, cumulative or lack foundation to these proceedings. Respondent is unable to prepare specific objections as Petitioner has not disclosed her list of exhibits.

RESPECTFULLY SUBMITTED this 3rd day of June, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent/Defendant

ORIGINAL of the foregoing e-filed
This 3rd day of June, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document
Delivered/emailed this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

David Gingras
Gingras Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GingrasLaw.com
Attorney for Petitioner/Plaintiff

By: */s/MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Respondent's Pretrial Statement* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Jun 3, 2024 15:28 PDT)

CLAYTON ECHARD

06/03/2024

Date

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
8/29/2023 9:44:14 AM
Filing ID 16511439

Name: Laura Owens
Address: 11440 N 69th Street
City, State. Zip: Scottsdale, Arizona 85254
Telephone: (415) 810-0604
Email: laura@lauramichelleowens.com
Attorney: PRO PER

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
In and for the County of Maricopa

IN RE THE MATTER OF

CASE NO. FC2023-052114

Laura Owens,
Petitioner

EXPEDITED CONSIDERATION REQUESTED!

MOTION TO COMMUNICATE

vs.

Clayton Echard,
Respondent

COMES NOW the Petitioner, representing Pro Per, alleging as follows:

1. On August 7th, Petitioner filed a Motion to Communicate, asking the Court to order the Respondent to communicate regarding her pregnancy. Prior to filing, Petitioner had made dozens of attempts to discuss these urgent issues with the Respondent without involving the court.
2. Since filing the Motion to Communicate, Petitioner has made almost daily efforts to contact the Respondent, who has also refused to participate in the Good Faith Consultations required by Ariz. R. Fam. Law. 9(c)(1) before Petitioner filed. Similarly, Respondent refused to participate prior to Petitioner's filing of the Motion for Contempt filed on August 23rd.
3. Petitioner has offered to schedule a paternity test through the lab of Respondent's choice, Ravgen, more than thirty times, which is evidenced in email correspondence. Petitioner even

paid a deposit and scheduled a test with them for August 23rd, which was a date that Respondent claimed worked for him, but he did not get back to Ravgen about scheduling a time, so the test was canceled.

4. **Petitioner suffers from generalized epilepsy, which causes grand mal seizures, and which has caused this pregnancy to be labeled high risk, as evidenced by the fact that patient was referred to a high risk specialist from the start. Petitioner has requested expedited consideration by the Honorable Judge Mata because there are urgent issues that Petitioner needs to discuss with the Respondent regarding her pregnancy with his twins that impact the health and wellbeing of both the Petitioner as well as her unborn twins with Respondent.**

5. There is no Order of Protection between the parties that would prevent them from meeting up in person to discuss this (or, for that matter, that would have prevented Good Faith Consultations from taking place in the past).

WHEREFORE, Petitioner Laura Owens requests that the Court order Respondent Clayton Echard:

1. To communicate **immediately** with her regarding the urgent issues with their twin pregnancy.
2. That the Respondent be ordered to pay any and all Court costs, fees, and the like in connection with bringing this litigation to this Court's attention, and;
3. That this Honorable Court order any and all additional relief as is deemed just and proper in the circumstance.

ORIGINAL AND ONE COPY of the foregoing document e-mailed this 29th day of August, 2023 to:

Clayton Echard
6855 E Camelback Road #7002
Scottsdale, AZ 85251
claytonechard@gmail.com
Respondent Pro Per

By: /s/ Laura Owens

RESPECTFULLY SUBMITTED this date: August 29, 2023.

Laura Owens /s/
Filing Party

By signing below, I state to the Court, under penalty of law, that the information stated on these pages is true and correct to the best of my knowledge and belief.

I further state that I have filed/mailed the attached document(s) as shown above. I understand that if I do not file/mail the attached document(s) as shown above, the judge in my case will not read my request/motion.

/s/ Laura Owens
Plaintiff Pro Per

Clerk of the Superior Court
*** Electronically Filed ***
T. Hays, Deputy
9/14/2023 11:28:27 AM
Filing ID 16594405

Laura Owens
11440 N 69th Street
Scottsdale, AZ 85254
(415) 810-0604
laura@lauramichelleowens.com
Pro Per

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS

Petitioner,

vs.

CLAYTON ECHARD

Respondent,

_____/

Case No. FC2023-052114

EXPEDITED (!)
MOTION TO SEAL COURT RECORD

COMES NOW, Petitioner Laura Owens, who requests that the Court seal the case (all that has been submitted so far and everything that will be filed in the future) so that the general public may not access it. This filing is EXPEDITED due to the fact that media outlets New York Post and Page Six have expressed interest in publicizing the case (*EXHIBIT 1)*, which involves unborn minor children, and have attempted communication with both parties for comment.

ARFLP Rule 17(c)(1) states that the court may order files or records to be sealed if "there exists an overriding interest that overcomes the right of public access to the record." The Respondent, Clayton Echard, was *The Bachelor* on ABC in 2022. The show was watched by millions and Echard is still a public figure. The Petitioner, Laura Owens, is a popular self-help podcaster and TEDx speaker.

The Respondent makes knowingly false allegations against the Petitioner in his Response to the Petition to Establish Paternity that would be detrimental to the Petitioner's reputation.

These statements, made under penalty of perjury, include “Party A is making up this entire claim and is refusing a paternity test” and “pregnancy has not been proven, neither has paternity”.

When the Respondent was initially told about the pregnancy, he was provided with discharge papers from the Petitioner’s visit to the Banner Urgent Care Health Clinic on June 1st, 2023 (*EXHIBIT 2*). Therefore, Respondent knew that Petitioner was not “making up the claim”.

When the Respondent initially showed doubts about the validity of the pregnancy test, he purchased one for Petitioner to take, which she took in front of him. It came back positive. Petitioner acknowledges this in *EXHIBIT 3* when he states, “I wanted you to come over to confirm what I was doubting. And it did confirm that. So, I don’t see you as a liar anymore.” Based on the medical test results provided in *EXHIBIT 2* and those seen with the Respondent’s own eyes, Respondent undoubtedly knew that the pregnancy was “proven”.

Respondent’s multiple claims that Petitioner has “refused a paternity test” are blatant lies. From the onset of the pregnancy, Petitioner offered to take a prenatal paternity test at the soonest possible time and never waivered. To date, Petitioner has offered more than fifty times in writing. At one point, Respondent agreed to the test and selected a lab that he trusted named Ravgen. Petitioner paid $725 as a deposit and scheduled her blood draw. Respondent never responded to Petitioner, nor Ravgen, to schedule his part, nor pay for his portion. The test was canceled due to the Respondent’s unwillingness to participate (*EXHIBIT 4)*. Despite this, Respondent filed in his Response to the court that it was the Petitioner who was refusing. Petitioner has the backing of Ravgen in regards to the action of the Respondent. In a recorded call on September 13th, 2023, a representative from Ravgen stated, "you tried to do everything right the first time and he backed out on you", "It sounds like he wouldn't come”, “he's being uncooperative". The representative also suggested trying to get a Motion to Compel to force the

Respondent to participate. The audio of the call is available upon request.

The Respondent makes inflammatory statements about the Petitioner in the section "Statements About Paternity", where under the "Summary" section of "Other", after he once again states that the "entire petition is made up", he writes that, "upon information received and belief, Party A suffers from mental health issues". The Respondent is not a medical doctor and his "diagnosis" of the Petitioner's emotional well being is not necessary, accurate, nor required in answering that section. In addition, the Respondent writes that he is "concerned that she is stalking me", despite the fact that it is the Petitioner who has made a police report about the Respondent, not the other way around (*EXHIBIT 5)*. Those extremely serious allegations are completely unfounded and would undoubtedly be damaging to the Petitioner's reputation if they were to be exposed in an article written by any media news outlet.

The Respondent's blatant disregard for the truth in his Response, which is public record, has left the Petitioner in a very vulnerable state if the New York Post and Page Six publish them as they plan to. Despite the fact that the Respondent's statements are false, the allegations would be linked to the Petitioner, who is a speaker on domestic violence, and would surely harm her career. This speaks to ARFLP Rule 17(c)(3) that "a substantial probability exists that the overriding interest will be prejudiced if the record is not sealed or redacted."

The Petitioner also referred to the fact that the public would likely not respond well to the fact that the Respondent stated on his Response that even if he is proven to be the natural father, he does not want to appear on the unborn twins' birth certificates, nor give them his last name. The Petitioner attempted to get the Respondent to file a Stipulated Motion to Seal in an effort to protect the Respondent's false claims from becoming public knowledge, but did not receive a response. A good faith effort was made, however, as it is in the best interest of the children that

both parents maintain a good public image. If information from this case is disseminated to the public through tabloid media outlets, it would be negative in nature, portray the Petitioner in a false light, and affect the careers of both the Petitioner and Respondent. This would mean that both would have decreased earnings and therefore less money to contribute to child support.

Public disclosure serves neither the best interest of the parties nor public access to judicial records.

WHEREFORE, the Petitioner requests:

That the Court seal FC2023-052114 in its entirety as soon as possible to prevent tabloid media outlets from being able to publish filings in this case.

ORIGINAL AND ONE COPY of the foregoing document e-filed and e-mailed this 14th day of September, 2023 to:

Clayton Echard
6855 E Camelback Road #7002
Scottsdale, AZ 85251
claytonechard@gmail.com
Respondent Pro Per

By: /s/ Laura Owens

RESPECTFULLY SUBMITTED this date: September 14th, 2023.

Laura Owens /s/
Filing Party

By signing below, I state to the Court, under penalty of law, that the information stated on these pages is true and correct to the best of my knowledge and belief.

I further state that I have filed/mailed the attached document(s) as shown above. I understand that if I do not file/mail the attached document(s) as shown above, the judge in my case will not read my request/motion.

/s/ Laura Owens
Petitioner Pro Per

Gmail [redacted] <[redacted]gmail.com>

Clayton Echard [redacted]

Bernie Zilio <bzilio@nypost.com> Mon, Sep 11, 2023 at 4:17 PM
To: [redacted] <[redacted]gmail.com>

Ok, thank you.

Regarding your request, our legal team has no control over what is public record.
[Quoted text hidden]

Gmail [redacted] <[redacted]gmail.com>

Clayton Echard [redacted]

Bernie Zilio <bzilio@nypost.com> Mon, Sep 11, 2023 at 5:23 PM
To: [redacted] <[redacted]gmail.com>

I've been in the information gathering phase. I have a million other stories and things on my plate at the moment. If you are not ok with me publishing information you have provided me, I understand. However, if the information is public record, that is a different story.

On Mon, Sep 11, 2023 at 5:16 PM [redacted] <[redacted]gmail.com> wrote:

> [Quoted text hidden]

[Quoted text hidden]

Gmail [redacted] <[redacted]gmail.com>

Clayton Echard [redacted]

Bernie Zilio <bzilio@nypost.com> Mon, Sep 11, 2023 at 4:21 PM
To: [redacted] <[redacted]gmail.com>

I don't know yet. Your name being part of the public record might change things.

On Mon, Sep 11, 2023 at 4:20 PM [redacted] <[redacted]gmail.com> wrote:

> [Quoted text hidden]

[Quoted text hidden]

acid please, with folic acid please, 55 kg, 06/01/23 11:25:00 MST,...

Encounter for pregnancy test

Ordered:
81025 Urine Pregnancy POC Amb, 06/01/23 11:17:00 MST, Encounter for pregnancy test

Point of Care Test Results
hCG Ql POC: Positive

What You Were Seen for Today

First trimester pregnancy
Encounter for pregnancy test

EXHIBIT 2

Vital Signs

T: 36.8 °C (Tympanic) **HR:** 85(Monitored)
RR: 16 **BP:** 134/87 **SpO2:** 98%
WT: 55 kg
Weight (lb): 121.25 lb
Temperature (F): 98.24 Fahrenheit

Allergies

No known allergies

Your Care Team

Attending Physician - LISTER NP, TAMARA S
Primary Care Physician - 1TEMP, DOC

What Happened Today

Test Results from Today

Results not available today will be available in your Banner Health patient account on the portal once they are complete.

Scheduled Appointments

Save time and schedule online by downloading the Banner Health app or by visiting bannerhealth.com and find doctors to book your appointment. It's that easy!

Scheduled Appointments
No future appointments scheduled

Banner He
This document and othe
do not have a account, p
www.BannerHeal

Banner Health

- Home
- www.bannerhealth.com
- Health Profile
  - COVID Center
  - Health Profile
  - **Lab Results**
  - Pathology
  - Radiology
  - Documents
  - Visit Summaries
  - Medications
  - Procedures
  - Advance Directives
- Messaging
- Appointments
- Pharmacy
- Requests

Laura Owens

Lab Results History

Print

OWENS, LAURA MICHELLE

The information provided below is in the electronic medical record. If you believe any data is incorrect, please notify your provider's office.

hCG QI POC

Learn more about this

Positive

Date: Jun 01, 2023 11:31 a.m. MST

Show less info

Ordered By: LISTER NP, TAMARA S

Previous Next

Info

To: Clayton Echard

EXHIBIT 3

I'm sorry this made it harder. I wanted you to come over to confirm what I was doubting. And did confirm that. So, I don't see you as a liar anymore. But, that doesn't change how I feel ab

EXHIBIT 4

Gmail

Laura Owens <laura@lauramichelleowens.com>

Re: Canceling NIPP test on August 23rd

bvallecillo ravgen.com <bvallecillo@ravgen.com> Mon, Aug 21, 2023 at 7:06 AM
To: Laura Owens <laura@lauramichelleowens.com>, Clayton Echard <claytonechard@icloud.com>, Clayton Echard <claytonechard@gmail.com>
Cc: "asender ravgen.com" <asender@ravgen.com>

Good morning Laura,

We have canceled the test and refunded the $725 back to the card. It should take 3-4 days for the payment to post. Let us know if you have any questions or concerns.

Thanks,
Brett

Brett Vallecillo
Ravgen, Inc
9241 Rumsey Road
Columbia MD 21045
410-715-2111
www.ravgen.com

From: Laura Owens <laura@lauramichelleowens.com>
Sent: Friday, August 18, 2023 5:43 PM
To: Clayton Echard <claytonechard@icloud.com>; Clayton Echard <claytonechard@gmail.com>; info ravgen.com <info@ravgen.com>
Subject: Canceling NIPP test on August 23rd

Hi,

Unfortunately, Clayton Echard has refused to take the prenatal paternity test that I had scheduled at Exam One in Phoenix on Wednesday, August 23rd. Can you please cancel it and refund the $725 back to my card? Please let me know if you have any questions.

Thank you for your help scheduling it. I'm very disappointed to have to cancel!

All the best,

Laura Owens
--
All the best,



Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

EXHIBIT 5

To: Scottsdale Police Department

Report prepared by: Laura Owens

Subject: Threats, intimidation, verbal abuse, endangerment and extortion from Clayton Echard

Date: July 31, 2023

To Whom It May Concern:

Clayton Echard is the father of my unborn twins. When I told him I was pregnant, he started writing erratic, illogical and threatening messages. He has been clear that being a father has not been in his life plan and would get in the way of his dating and professional life. These would be followed by periods of silence and him blocking me, then unblocking me to demand alternative forms of proof of pregnancy beyond the medical report I had provided him from Banner Health Urgent Care confirming it.

Clayton has said he would file legal charges (criminal fraud) against me for stating that he is the father of my unborn twins. Extortion is a crime under ARS 13-1804. He alleges I am being untruthful; however, I have even done a test in front of him that he purchased himself. It was positive. In addition, he has been provided with medical test results, recorded phone calls with doctor's offices confirming the viability of the pregnancy, and screenshots of my patient portals. I also agreed to take a prenatal paternity test through a lab he found called Ravgen, but he has now gone MIA and will not allow me to schedule the test, which would prove to him once and for all that the twins are his. Finally, I told him that I would sign a HIPAA release to allow him to speak to any and all of my medical providers regarding the validity of the pregnancy.

I have included written correspondence with Clayton to date that clearly demonstrate his potentially violent, threatening and intimidating behavior. I have invited him to attend a doctor's appointment on August 7th at Scottsdale Perinatal Associates with Dr. Makhoul for a consultation and ultrasound. His paranoia extends to the level that he believes I will have hired someone to pretend to be a doctor and who will confirm the pregnancy. He simply refuses to believe that I am pregnant, despite seeing a test with his own eyes, and that he is the father, despite my willingness to take a paternity test.

Clayton also demanded contact information for my abusive ex, whose attempts to kill me I did a TEDx talk about, and which Clayton linked to in the message for his request. I have a CLETS restraining order against the man he wanted to speak to, and engaging him in communication would put me in a vulnerable position. Endangerment is a crime under ARS 13-1201.

I am very concerned about my safety and I don't know what actions Clayton will take because he is so volatile, controlling, demeaning and hateful. I have asked him on many occasions to reassure me that he will not hurt me or our unborn babies, and he will not respond to that simple question. I told him I would file a police report if he didn't. I have proof that Clayton has read

those messages, which I am attaching. Crimes of intimidation and threats, by word or conduct, are listed as a criminal offense under ARS 13-3601.

A domestic violence offense against a pregnant person is a felony offense under ARS 13-3601. For all of the reasons above, I am concerned that Clayton will cause physical harm/injury to me. Please enter all attached documents and recordings into evidence and include them with this report.

Thank you,

Laura Owens

TEXTS FROM CLAYTON (note: I have the originals, just listed here for convenience)

You're trying to destroy my mental state.

Laura, I legitimately hate you right now.

You've made my life so stressful since I've known you and if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more. *[note: I obviously was pregnant]*

my hatred will only grow if you decide to put me through all of this.

My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. Even if a kid was present…I would not say a word to you. I would not acknowledge you.

One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever

My hate is toward you and you only.

God is telling me this man will provide me with the clarity I need, as I have many questions and those questions have turned into beliefs…ones that have led to animosity and a complete lack of trust toward you. *(note: God told him my abusive ex whose abuse caused me to get epilepsy would be a better resource than me? And he could trust him more than me?)*

You better be serious about being pregnant because if you're not, I'm bringing this all to light. People like you need to be held accountable. You can back off now if this is all a game and I'll let it go, but if you continue any longer and it's all a lie, I won't hesitate to reveal the truth.

My personal hell would be having to have you be a part of my life

I'm living in the fear of having to be associated with you for my lifetime.

Gmail

Laura Owens <laura@lauramichelleowens.com>

Paternity test, etc.

Clayton Echard <claytonechard@icloud.com> Sat, Jun 24, 2023 at 4:32 PM
To: Laura Owens <laura@lauramichelleowens.com>

I will pay for 100% of it. You have my word. Let this message serve as the proof. Just schedule it and let me know where you scheduled and I'll pay.

Thanks,

Clayton Echard

> On Jun 24, 2023, at 3:20 PM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

And proof of payment at Planned Parenthood...

Clayton Echard <claytonechard@icloud.com> Wed, Jun 28, 2023 at 3:47 PM
To: Laura Owens <laura@lauramichelleowens.com>

Thank you for the picture of the pills. I still would like the ultrasound image from Planned Parenthood. They keep a record of it…I worked in the medical industry. They don't take images without recording them. Have them send the image over to me. They can do so, you just have to provide them with consent. It's not a HIPAA violation if you give permission. As for what will follow, I am resending what I sent earlier for next steps…

" I will contact you on June 8th with information of a local clinic that will provide a paternity test, as June 8th marks 8 weeks. I will ask you to schedule a time and date. You will go in and submit your DNA and then I will come in after and submit mine. That is how we will be proceeding."

Clayton Echard

> On Jun 28, 2023, at 3:36 PM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

And proof of payment at Planned Parenthood...

Clayton Echard <claytonechard@icloud.com> Wed, Jun 28, 2023 at 3:53 PM
To: Laura Owens <laura@lauramichelleowens.com>

What? I'm confused what you mean? I just need to see the ultrasound to make any decision. I cannot make any decision without seeing it.

Clayton Echard

> On Jun 28, 2023, at 3:50 PM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

And proof of payment at Planned Parenthood...

Clayton Echard <claytonechard@icloud.com> Wed, Jun 28, 2023 at 4:15 PM
To: Laura Owens <laura@lauramichelleowens.com>

Just please get me the ultrasound.

Thanks,

Clayton Echard

> On Jun 28, 2023, at 4:12 PM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]
> <IMG_5375.jpeg>
> <IMG_5378.jpeg>

Gmail

Laura Owens <laura@lauramichelleowens.com>

Where things stand

Clayton Echard <claytonechard@gmail.com> Thu, Jun 29, 2023 at 5:48 AM
To: Laura Owens <laura@lauramichelleowens.com>

Here's the last request I'll make. I don't need your patient portal information. But I would like for you to give me permission to speak with Mandeep Sidhu about your visit to their CA PPH clinic. Confirmation from a licensed medical physician assistant will be enough confirmation to me. If you can, please call them, give verbal permission for me to talk with her and then fill out the release forms.

If you really want me to believe you, then give me a chance to. Let me talk to the medical provider that saw you. That's a fair request, considering the circumstances.

Clayton Echard

> On Jun 29, 2023, at 4:38 AM, Clayton Echard <claytonechard@gmail.com> wrote:
>
> No, it would not make a difference. My final answer is to not date, as I have no interest in doing so.
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

Where things stand

Clayton Echard <claytonechard@gmail.com> Thu, Jun 29, 2023 at 6:53 AM
To: Laura Owens <laura@lauramichelleowens.com>

It would change because as of now, I have only heard from you. And it's clear that I have trust issues with you. Since I do not trust you, I am allowing myself to create doubt in my head, which may be warranted…or it may not be. But I just want to know the truth. So, by speaking to a medical professional that has interacted directly with you, I will not be able to doubt their word, as it's their job to inform others of the truth. If they did anything other than that, they would be at risk of losing their license.

So, I would trust Mandeep's words and that would then allow me to trust you. From there, I would stop creating doubt. I would stop being emotional and would operate from a place of reason, which is where I want to be.

It's a fair thing to ask. If I am indeed the father, then the father should be able to access medical records as well for confirmation. That's all I'm asking for.

Clayton Echard

> On Jun 29, 2023, at 6:31 AM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

Where things stand

Clayton Echard <claytonechard@gmail.com> Thu, Jun 29, 2023 at 7:28 AM
To: Laura Owens <laura@lauramichelleowens.com>

It would definitely make me much nicer. As I have stated, I've only hear information come from your mouth since this whole ordeal started. Never have I heard from a medical provider. But if I did, it would drastically change how I interact with you.

I just wanted to throw this out there as a possibility. It seems you would rather leave me in a place of doubt, so I suppose that's where I will stay.

Clayton Echard

> On Jun 29, 2023, at 7:26 AM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

Where things stand

Clayton Echard <claytonechard@gmail.com> Thu, Jun 29, 2023 at 8:22 AM
To: Laura Owens <laura@lauramichelleowens.com>

There's no reason to jump to all these conclusions that haven't happened yet. Just give me a chance to talk with Mandeep. Once she confirms your story, I will then want a paternity test scheduled, but I will stop doubting your words. Let's make this easier on the both of us. There's no reason not to.

Clayton Echard

> On Jun 29, 2023, at 8:06 AM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

Where things stand

Clayton Echard <claytonechard@gmail.com> Thu, Jun 29, 2023 at 8:35 AM
To: Laura Owens <laura@lauramichelleowens.com>

Ok, when and where are you doing that ultrasound?

Clayton Echard

> On Jun 29, 2023, at 8:26 AM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

Paternity test

Clayton Echard <claytonechard@icloud.com> Tue, Jul 25, 2023 at 8:09 PM
To: Laura Owens <laura@lauramichelleowens.com>

I'll respond to you this one time, just so that it's 1000% clear where I stand.

1. I will not meet up and explore things with you.
2. I want you to schedule the Ravgen test ASAP, but I believe you won't do so because you're not pregnant with my children. Hence why you keep making up illogical excuses to wait until February. You also won't provide consent for me to speak with any of the doctors that dealt with administering the ultrasounds. That's because you never got one done. What I've seen is what I believe is a created image from the internet. At this point, your lack of willingness to provide what I'm asking tells me all I need to know.
3. I'm giving you one out right now to not proceed with legal action. In this moment, I am organizing all the documents and am planning to speak with a lawyer in the next few days. I have every intention of suing you for emotional damage and fraud, especially if you continue to harass me. Your "out" is this…stop sending any more messages. I will allow you to send one message stating when you are scheduling the Ravgen test. Nothing else! If you cannot schedule the exam in the next two weeks, then do not send any other message to me and I will not pursue legal action at all. But if you send me another message at any point and it's about anything other than scheduling the Ravgen test, then I will proceed forward with hiring a lawyer. You have my word.

Clayton Echard

> On Jul 25, 2023, at 5:24 PM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

Paternity test

Clayton Echard <claytonechard@icloud.com> Tue, Jul 25, 2023 at 8:14 PM
To: Laura Owens <laura@lauramichelleowens.com>

I don't need to decide anything. I will not be exploring anything with you in any capacity.

Schedule the Ravgen exam for the soonest possible date and time and let me know when you do.

Do not send me anything else.

Clayton Echard

> On Jul 25, 2023, at 8:11 PM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Gmail

Laura Owens <laura@lauramichelleowens.com>

Paternity test

Clayton Echard <claytonechard@icloud.com> Tue, Jul 25, 2023 at 9:27 PM
To: Laura Owens <laura@lauramichelleowens.com>

Yes, schedule the Ravgen test asap.

Clayton Echard

> On Jul 25, 2023, at 8:54 PM, Laura Owens <laura@lauramichelleowens.com> wrote:
>
> [Quoted text hidden]

Can you reiterate that I want her to schedule the Ravgen test in the next week and a half? And can you let me know what her ultimate decision is to do (whether she schedules the Ravgen test now or not)? If she refuses to schedule the exam now and decides to wait until February, then I would like that confirmation in writing so that I can proceed forward on my end with legal action.

I'm sorry you've had to deal with this and also with my frustrations last week. But I think you can see now why I have been so aggravated. Laura's reasoning is not based in any rationale and I do believe at this point, I have enough evidence to prove she is faking a pregnancy.

Let me know what she ultimately decides to do about the paternity test.

Thanks,

Clayton Echard

Begin forwarded message:

From: Laura Owens <laura@lauramichelleowens.com>
Date: July 24, 2023 at 2:20:06 PM MST
To: Clayton Echard <claytonechard@icloud.com>
Subject: Ravgen test

[Quoted text hidden]

Person Filing: Laura Owens

Address (if not protected): 11440 N 69th Street

City, State, Zip Code: Scottsdale, AZ 85254

Telephone: 415-810-0604

Email Address: Laura@lauramichelleowens.com

ATLAS Number:

Lawyer's Bar Number:

For Clerk's Use Only

Representing ☒ Self, without a Lawyer OR ☐ Attorney for ☐ Petitioner OR ☐ Respondent

SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY

Laura Owens
Petitioner

Clayton Echard
Respondent

Case No. FC2023-052114

GOOD FAITH CONSULTATION CERTIFICATE

Name of Judge/Commissioner Judge Mata

The following issue exists between the parties and the applicable Rule of Family Law Procedure requires "good faith consultation" to resolve the issue before presenting the issue to the Court:

EXPEDITED (!) Motion to Seal

Pursuant to Rule 9(c) of the Arizona Rules of Family Law Procedure, the ☒ Petitioner or ☐ Respondent submits this Good Faith Consultation Certificate and states either:

a. ☒ A good-faith attempt to resolve the issue was made with the opposing party, or counsel if represented, and the consultation or attempted consultation was made in person or by telephone (and not merely by letter or email) as follows:

The Petitioner has made several attempts to have a Good Faith Consultation with the Respondent, who has been unresponsive.

OR

© Superior Court of Arizona in Maricopa County
ALL RIGHTS RESERVED

b. ☐ The parties are not required to meet personally or contact each other because there is a current court order prohibiting contact between the parties, there is a history of domestic violence between the parties, or an allegation of domestic violence, and the alleged victim of the domestic violence is self-represented.

VERIFICATION

Under penalty of perjury, I state to the Court that the contents of this document are true and correct.

Date	Signature of Person Filing Document

CERTIFICATE OF SERVICE

☒ I filed the original of the attached document with the Clerk of Superior Court in the county listed above on September (Month) 14th (Date) 2023 (Year).

☒ I mailed or delivered a copy of the attached document to the judicial officer (judge or commissioner) assigned to this case on September (Month) 14th (Date) 2023 (Year).

☐ I mailed or delivered a copy of the attached document to the Office of the Attorney General for the State of Arizona (if applicable) on _____ (Month) _____ (Date) _____ (Year).

☒ I mailed or delivered a copy of the attached document to the opposing party or the opposing party's attorney, if represented by counsel, on September (Month) 14th (Date) 2023 (Year).

Clayton Echard	
Name of Opposing Party	Name of Opposing Party's Attorney
6855 E Camelback Road #7002	
Address of Opposing Party	Address of Opposing Party's Attorney
Scottsdale, AZ 85251	
City, State, Zip Code	City, State, Zip Code
9/14/2023	Laura Owens
Date	Signature

© Superior Court of Arizona in Maricopa County
ALL RIGHTS RESERVED

Clerk of the Superior Court
*** Electronically Filed ***
C. Diaz, Deputy
12/12/2023 11:22:18 AM
Filing ID 17035065

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com
Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

and

CLAYTON ECHARD,

Respondent,

Case No.: **FC2023-052114**

MOTION FOR LEAVE TO AMEND RESPONDENT'S RESPONSE TO PETITION TO ESTABLISH PATERNITY

(Assigned to The Honorable Julie Mata)

Pursuant to Rule 28(A)(2) of the *Arizona Rules of Family Law Procedure* ("ARFLP"), Respondent, CLAYTON ECHARD, through undersigned counsel, respectfully requests leave from this Court to file the Amended Response attached hereto as Exhibit A, which clarifies the modifications that Respondent is requesting.

The reasons for this Amended Response are as follows:

1. Rule 28(A)(2) provides that "Leave to amend will be freely given when justice requires."

2. Respondent's Amended Response is attached as **Exhibit A**. Note, for clarification purposes, the Amended Response is not provided on the self-service documents

that were initially filed. Any changes are bolded, and the remainder remains consistent with the initial filing.

3. Specifically, Respondent seeks to amend his Response to include pertinent background information for this Court, request this Court sanction Petitioner under Rule 26, request his reasonable attorney's fees, and request this Court enter a finding of nonpaternity.

WHEREFORE, Respondent respectfully requests that this Court permit Respondent to file the attached Amended Response, attached hereto as **Exhibit A,** and incorporated herein by reference.

RESPECTFULLY SUBMITTED this 12th day of December, 2023.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
this 12th day of December, 2023 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document
delivered/emailed this 12th day of December, 2023, to:

The Honorable Julie Mata
Maricopa County Superior Court

Laura Owens
lauramichelleowens@gmail.com
Petitioner Pro Per

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Motion for Leave to Amend Respondent's Response to Petition to Establish Paternity* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

CLAYTON ECHARD

12/11/23
Date

Exhibit “A”

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Deandra M. Arena, #033369
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No.: FC2023-052114 **<u>AMENDED</u> RESPONSE TO PETITION TO ESTABLISH PATERNITY** (Assigned to the Honorable Julie Mata)

Respondent, CLAYTON ECHARD, by and through undersigned counsel, hereby submits his **Amended** Response to Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support and states the following:

I. **BACKGROUND**

1. Petitioner has not provided any verifiable scientific evidence that she is pregnant, and all DNA tests have come back showing "little to no fetal DNA." The testing company, Ravgen Inc, has indicated that it will not release records of the testing without

a Court Order.

2. Petitioner filed her Petition only *after* Respondent indicated that he did not want to have <u>any</u> relationship with her, romantic or otherwise, after she performed oral sex on him on May 20, 2023.

3. Prior to and following her filing, Petitioner repeatedly threatened to go to the media about her "pregnancy" and sent Respondent over 500 messages from different phone numbers and email accounts. Judge Gialketsis found these messages and Petitioner's conduct to constitute harassment when she granted Respondent's Injunction Against Harassment on November 2, 2023 (Exhibit 1).

4. A sampling of Petitioner's efforts to force Respondent into a relationship are documented, in part, below:

a. Petitioner drafted a "contract" for Respondent to sign that promised "*for a period of one week, while determining the best court [sic] of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with "intention" […] There is no obligation to engage in intercourse if either Party is uncomfortable with the act.*" (Exhibit 2 – *Initial Response Exhibit 1*)

b. 6/28/23: "*I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for one another […] I need to know your decision tonight because I am getting rid of the abortion pills it it's a no or if I don't hear back from you.*" (Exhibit 3).

c. Petitioner threatened to post on her public Instagram account that she

was pregnant with Respondent's children if he did not "unblock" her and said "*if I can't get you to do it, then maybe the public can convince you to.*" (Exhibit 4)

d. Petitioner contacted Respondent's Father, ostensibly to convince him to force his son, Respondent, to speak with her ("*I have not heard back from Clayton and presume he has still blocked me.*") (Exhibit 5).

5. While this Family case was pending, Petitioner posted an "anonymous" blog post on Medium.com (which she later deleted) (Exhibit 6), contacted the news media, and made multiple postings on Reddit.com claiming that she was pregnant with Respondent's children and including a Dropbox of doctored "medical" documents. (Exhibit 7).

6. Despite two (2) fetal DNA tests indicating "little to no fetal DNA" (and one (1) test lost in transit), Petitioner posted another Medium.com article identifying herself as the "anonymous woman" on December 8, 2023. In the article, Petitioner continues to maintain she is pregnant with twins by Respondent. (Exhibit 8).

II. RESPONSE TO PETITIONER'S PETITION TO ESTABLISH

7. Respondent affirmatively alleges that Petitioner is fabricating pregnancy, as well as refusing a paternity test.

8. Respondent affirmatively alleges that neither pregnancy nor paternity has been proven.

9. Respondent contests that Petitioner is pregnant by him and therefore venue is not relevant.

10. Respondent contests that Petitioner is pregnant by him and since Petitioner is

unwilling to participate in a **fourth** paternity test, paternity and the jurisdiction for determining its validity are unable to be proven/determined.

11. Respondent contests that Petitioner is pregnant by him and affirmatively alleges that Petitioner has neither proven pregnancy nor Respondent's paternity.

12. Respondent contests that Petitioner is pregnant by him and therefore there is no legal parenthood to establish. Respondent alleges that only oral sex was performed between the parties. Respondent further alleges that despite multiple requests to do so, Petitioner has refused to take a paternity test. Petitioner responded to Respondent's request via email stating that she would only take a paternity test if the parties were to date exclusively **(Exhibit 1).** Petitioner has threatened that she will write defamatory comments about this matter and release it to the press **(Exhibit 1)**. Petitioner has not established proof of paternity. Upon information and belief, Petitioner suffers from mental health issues, and has caused Respondent to become concerned that she is stalking him.

13. Petitioner was not married at the time the minor child(ren) were born or conceived or at least 10 months before minor child(ren) were born or conceived.

14. Respondent contests that Petitioner is pregnant by him and therefore legal decision-making and parenting time are not relevant.

15. Respondent does not have any information regarding any court action in this state involving the minor child(ren) in question that could affect this case including court cases for enforcement and relating to domestic violence, protective orders, termination of parental rights and adoptions.

16. Respondent does not know a person other than Petitioner who has physical

custody or who claims legal decision-making (legal custody) or parenting time rights to any of the minor children in question.

17. Respondent contests that Petitioner is pregnant by him and therefore unreimbursed medical expenses incurred by Petitioner are not relevant.

18. Respondent contests that Petitioner is pregnant by him and therefore unreimbursed other expenses are not relevant.

19. Respondent contests that Petitioner is pregnant by him and therefore the Parent Information Program is not relevant.

20. Respondent affirmatively alleges that domestic violence has not occurred in this relationship.

21. Respondent affirmatively alleges that to his knowledge, neither party has been convicted for a drug offense or driving under the influence of drugs or alcohol in the last twelve (12) months.

22. Respondent contests that Petitioner is pregnant by him and therefore child support orders for either party are not relevant.

23. Respondent denies any allegations not specifically admitted herein.

24. Respondent is entitled to an adjudication of non-paternity. Petitioner's relentless and harassing behavior through the media will only continue if this matter is not resolved by this Court finding Respondent is <u>not</u> the father of any alleged (and believed to be fictitious) children.

25. Rule 26 sanctions are appropriate. Petitioner has violated Rule 26(b), *Arizona Rules of Family Law Procedure*, and sanctions under Rule 26(c) are appropriate.

Petitioner filed this action for the purposes of harassing Respondent and forcing him to communicate with her. Despite Respondent's repeated requests, Petitioner has provided Respondent with no verified scientific evidence proving she is or was pregnant. Further, *after* filing her Petition, Petitioner filed a "Motion to Communicate," threatening to take her "pregnancy" to the media if Respondent did not communicate with her. This Motion was denied. *See* Petitioner's Motion to Communicate, filed August 8, 2023. Petitioner also filed a "Motion for Contempt," which this Court also denied, which requested this Court hold Respondent in contempt for not communicating with her. *See* Petitioner's Motion for Contempt filed August 23, 2023 (also denied by this Court). As such, Petitioner's Petition lacks evidentiary support, is being presented for the improper purpose, to harass Respondent into communicating with her, and to cause Respondent to incur fees.

26. The requirement of Rule 9(c) have been met in so far as there has been excessive communication regarding these issues, not limited to Petitioner's recent Medium article and the 500+ texts and emails that predicate Judge Gialketsis' granting of the Injunction Against Harassment.

27. Respondent is entitled to his reasonable attorney's fees and costs incurred based on Petitioner's unreasonableness pursuant to A.R.S. § 25-324. Petitioner initiated this filing based on a pregnancy that could not have occurred from oral sex. Despite this, Petitioner repeatedly harassed Respondent, filed numerous bad faith pleadings with this Court in an effort to force Respondent to communicate with her, went to the media when Respondent would not unblock her, and fabricated medical documents. Petitioner's behavior is the very definition of unreasonableness.

WHEREFORE, based upon all of the foregoing, Respondent respectfully requests the Court enter the following Orders:

A. Issue an order declaring that Respondent is not the natural father of ~~**the minor children;**~~ **any children born to Petitioner;**

~~**B. Order that both parties be ordered to submit to such blood and tissue tests as may be necessary by this Court to establish paternity, and Petitioner be ordered to pay all costs and expenses of this lawsuit under Arizona law, A.R.S. 25-809.**~~

C. Issue an Order compelling Ravgen Inc produce all records and documents related to the fetal DNA testing in this matter;

D. That this Court sanction Petitioner pursuant to Rule 26;

E. That this Court award Respondent his reasonable attorney's fees and costs based on Petitioner's unreasonableness, pursuant to A.R.S. § 25-324;

~~**F. Enter appropriate orders regarding costs and attorneys' fees herein; and**~~

G. For such other and further relief as the Court deems just and proper under these circumstances.

RESPECTFULLY SUBMITTED this 12th day of December, 2023.

WOODNICK LAW, PLLC

_____
Gregg R. Woodnick
Isabel Ranney
Deandra Arena
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
This 12th day of December, 2023 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document
delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document
emailed this same day to:

Laura Owens
-
lauramichelleowens@gmail.com
Petitioner Pro Per

By:

EXHIBIT “1”

COPY ELECTRONICALLY RECORDED

CLERK OF THE SUPERIOR COURT
FILED
11-2-2023 2:02 PM

C. Curley
DEPUTY CLERK

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY
Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032
Monday-Friday 8:00-5:00

Injunction Against Harassment

[ ] Amended Order

[ ] Sexual violence—no service fee

Case No. CV2023-053952

Court ORI No. AZ007035J

County Maricopa State AZ

PLAINTIFF

Clayton		Echard
First	Middle	Last

PLAINTIFF IDENTIFIERS

4/29/1993
Plaintiff's Date of Birth

And on behalf of any minor family member or other Protected Person listed below:

V.

DEFENDANT

Laura		Owens
First	Middle	Last

DEFENDANT IDENTIFIERS

SEX	RACE	DOB	HT	WT
Female	Unknown	5/14/1990	Unknown	Unknown
EYES	HAIR	***Arizona Prohibits Release of Social Security Numbers***		
Unknown	Unknown			
DRIVER'S LICENSE #		STATE	EXP DATE	
			1/1/1900	

[ ] Estimated Date of Birth

Defendant/Plaintiff Relationship: The Defendant and I are dating or have dated and have not had a romantic or sexual relationship.

Defendant's Address:
11440 N 69TH ST, Scottsdale, AZ 85254

CAUTION: [ ] Weapon Alleged in Petition

WARNINGS TO DEFENDANT: This injunction shall be enforced, even without registration, by the courts of any state, the District of Columbia, any U.S. Territory, and may be enforced by Tribal Lands (18 U.S.C. § 2265). Crossing state, territorial or tribal boundaries to violate this injunction may result in federal imprisonment (18 U.S.C. § 2262).
Only the Court, in writing, can change this injunction.

This order is effective for one year from date of service.

THE COURT HEREBY FINDS THAT:
It has jurisdiction over the parties and subject matter.
[ ] **Defendant received actual notice of this Hearing and had an opportunity to participate.**
THE COURT, finding reasonable evidence of harassment or that great or irreparable harm would result if this injunction is not granted before Defendant can be heard in opposition, and there are specific facts attesting to efforts to give notice to Defendant or there are reasons why notice should not be given, **HEREBY ORDERS:**

NO CRIMES. Defendant shall not commit any act of harassment (A.R.S. § 12-1809(T)) or sexual violence (A.R.S. § 23-371) against Plaintiff or Protected Persons.

[x] **NO CONTACT.** Defendant shall have no contact with **Plaintiff** except through attorneys, legal process, court hearings, and as checked: [ ] Phone [ ] Electronic (email, text, etc.) [ ] Mail [ ] Other:

THE COURT FURTHER ORDERS:
PROTECTED LOCATIONS. Defendant shall not go to or near Plaintiff's or other Protected Person's:

[x] Residence (confidential)
[ ] Workplace:
[ ] School:
[ ] Other:

[ ] **ARIZONA FIREARMS LAW.** Under Arizona Rules of Protective Order Procedure Rule 25(g), the court finds that Defendant poses a credible threat to the physical safety of Plaintiff or Protected Persons. Therefore, Defendant shall not possess, receive, or purchase firearms and shall surrender same within 24 hours of service to the Maricopa County Sheriff's Office or other local law enforcement agency.

OTHER ORDERS:
The Court finds reasonable evidence of harassment of the Plaintiff by the Defendant or that great or irreparable harm would result to the Plaintiff if the Injunction is not granted before the Defendant can be heard in opposition, and that there are specific facts attesting to the efforts to give notice to the Defendant or that there are reasons why notice should not be given. Defendant is not to have contact with Plaintiff or the protected party[ies] at any time by any means, including but not limited to any in-person, physical, verbal, nonverbal, telephonic (text, email, apps), internet (social media, instant messaging, apps) or third-party contact. Defendant shall not record by video or audio Plaintiff or the protected party[ies] using any device, including but not limited to cell phones, cameras or other recording devices. Defendant shall not approach Plaintiff or the protected party[ies] at their residence, workplace, school or vehicle. The Maricopa County Superior Court does not give specific distance instructions in its injunctive orders. However, Plaintiff and or protected party may make a report to law enforcement if Defendant is close enough to cause concern or make contact. Defendant shall not be near Plaintiff and/or any protected party. Defendant shall not approach Plaintiff or a protected party in public places.



11/2/2023		Cynthia Gialketsis
Date	Judicial Officer	Printed Name

WARNING: This is an official court order. If you disobey this order, you may be arrested and prosecuted for the crime of interfering with judicial proceedings and any other crime you may have committed in disobeying this order.

NOTICE: If you disagree with this injunction, you have the right to request a hearing, which will be held within 10 business days after your written request has been filed in the court that issued this injunction. Violations of this injunction should be reported to a law enforcement agency, not the court.

ADDITIONAL WARNINGS TO DEFENDANT: Nothing the plaintiff does can stop, change, or undo this Injunction without the court's written approval. You must appear in court to ask a judge to change (modify) or dismiss (quash) this Injunction.

EXHIBIT “2”

Laura Owens
[redacted]

Clayton,

I was going to ask if you wanted to read the article I wrote before submitting it to the Huffington Post, but I know you won't respond so I'll take it that I have your permission to send it in as is. Before I do that and prior to your work getting involved with withholding income for child support, I wanted to ask one last time about the agreement. **I added a few things to it that are in bold.** Here it is:

Version 4 - Relationship Non-Disclosure Ag...

I also contacted another abortion pill company who said we could still do it at this point if we wanted to. You haven't and aren't putting pressure on me to do that, but it is *really* important that we talk about this if you don't want to have the twins with me. Your behavior leads me to believe that would be your preference, so you need to say something if it is. I will not hold it against you whatsoever if you sign the agreement. If you don't, that's fine, but we are having them.

I just want to have a fresh start and remove all of this animosity from the picture. We need to be making smart decisions right now, not ones driven by emotions. Neither one of us wanted this, but it's happened, and we need to make smart choices. If I don't hear back, then fine, we can continue like this and I will submit my piece to Huff Post, but your unresponsiveness is getting you nowhere with me and will get you in trouble with the court.

Please simply consider the agreement with modifications. It is written entirely in your favor, not mine.

All the best,

Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

Laura Owens
[redacted]

Here are the changes:

IV. Terms of the agreement.

The Couple agrees that:

1. For a period of one week, while determining the best court of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with "intention", meaning with the goal of it turning into something long-lasting and meaningful. There is no obligation to engage in intercourse if either Party is uncomfortable with the act.

2. From the date that this agreement is signed until one week after, no action whatsoever will be taken in FC2023-052114 or in any family, civil, or criminal court case.

3. Party A and Party B agree to take a paternity test with the lab of Party A's choice, Ravgen, and will schedule it within 24 hours of when this agreement is signed.

4. After the paternity test results come back providing Party A to be the father of Party B's twins, then Party B will execute a HIPAA release for Party B to discuss the pregnancy with any of Party A's providers from the date of conception (May 20th) through the end of the pregnancy in February 2024.

5. If a joint decision is made to terminate the pregnancy, then Party A and Party B will stipulate to dismiss FC2023-052114 once the pregnancy is confirmed by a doctor to no longer be viable. Party B will pay Party A's legal fees to date.

6. During the one week period, if the decision is made to continue the pregnancy, then Party A and Party B will discuss what would make the best situation for the children, whether that be raising them together or apart. The goal would be to keep the case out of the court and to avoid accruing continued legal fees. FC2023-052114 will remain active until an agreement is made outside of court, then the parties will stipulate to dismiss it.

7. There is no obligation for the relationship to work out beyond the one weeks, however if it is apparent that this agreement was entered into for the wrong reasons, evidenced by abuse of any kind (verbal, emotional, or physical), it is null and void.

8. At the end of the one week period, provided the terms have been met, then Party A and Party B are forever barred from bringing charges against each other for any reason up to that date.

EXHIBIT “3”

Laura Owens June 28, 2023 at 8:11 PM

Having the baby if I don't hear back tonight.

To: Clayton Echard

I'm physically and emotionally exhausted from the pregnancy and all of this. I just need clarity as to what we are doing. I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for each other. I bring a lot to the table and feel like I could really make you a better person. Yes, I've called out your BS a lot, but it's because I know you are better than how you act sometimes. I get your anxiety because I've been there and truly believe in your mission despite the fact that you haven't shown me kindness when clearly I have been emotionally struggling through all of this.

I couldn't give a shit that you were The Bachelor and still know nothing about you other than the clips I saw of you with two girls when I was angry at you. I want to get to know you and be a great partner for you. I would feel exactly the same way if I was in this situation with any man; I need to care about someone and trust them to consider ending a human life when I want nothing more than to be a mom someday. Don't you understand that?

In regards to intimacy -- I know it's important to you and it is to me as well. If you think about it, having sex with me is the safest thing you can do at this point. I'm already pregnant and if we choose to go this route (and trust each other enough to have sex), then we are at the point where I would be taking abortion pills...so there's no risk. Also, under no circumstances would I have an abortion if you want to be on dating apps or seeing other women while we are figuring this out. I would want to date with intention.

I know what I bring to the table as a partner and I'm well aware that you don't want to become a father right now. It's a win-win situation for you, but a huge leap of faith for me. You haven't been trustworthy to this point, so I'm the one taking a gamble on the outcome of this. You could be leading me on, but I would take your word that you're not because for whatever reason, despite how you've treated me, I believe in you. We're both hard headed as hell, but I think we can make a very good team. If I didn't think so, I would just go ahead and have the kid since like I said, I want to be a mom more than anything in the world.

I need to know your decision tonight because I am getting rid of the abortion pills if it's a no or if I don't hear back from you. I really do need to adjust my seizure medication and take other precautions for my health and the wellbeing of our baby if we are going to have a kid. You're the father -- there's no two ways about it -- so saying no here is a guarantee you will be a dad.

Laura

Found in Sent - Google Mailbox



Clayton Echard June 28, 2023 at 8:36 PM

Re: Having the baby if I don't hear back tonight.

To: Laura Owens

I will not date you in any capacity, as I do not have any interest in you. So, you can proceed however you'd like.

I will be awaiting the ultrasound on the 8th week and then will do a paternity test as soon as I'm able to.

You have told me a million times now that you'll give me "one more chance" to move forward with dating you, but I'm 100% not going to do that, so please just stop communicating with me from this point forward. I will find someone else to love and share my life with. I may honestly move to the east coast at this point as well. We'll see. I can do whatever I want with my life, but what I won't do is allow you to hold me back. And don't try to explain to me that I can't move out of the state and away from you. I absolutely can. All I have to do is either take 100% custody of the child or allow you to have 100% custody. Joint isn't an option and is never mandated. That's common sense. Besides, I will fight until I have no fight left in me to not have you be a part of my life. The courts can't force someone to stay with someone else. That's unheard of and has never been done. Just remember, there is no scenario in which we raise the child together, if you even have a child, which I'm still not convinced. But if you do and it is somehow miraculously mine, like I said, I'll take care of the child if that's what it comes to, but I WILL NOT UNDER ANY CIRCUMSTANCE co-parent with you. Just want to make that clear. I would rather co-parent with literally anybody else besides you, as you have shown me you don't respect my opinion. You just force what you want onto people to get your way and it is gross.

That's my two-cents. Take it or leave it. Again, there's no more need for conversation and no more need for you to pester me each day until the 8th week. I tell you to stop sending me messages and you just have zero respect and keep sending them regardless. So, I suppose I'll just continue to receive them and not respond, as my days are much better when I don't interact with you.

Clayton Echard

EXHIBIT “4”

LO **Laura Owens** Yesterday at 2:23 PM

Only open this if you want option A and will unblock me. Seriously.

To: Clayton Echard

...and if you want option A, I will not post this. I am just looking for support during this incredibly overwhelming time.

Final email regarding this, but I wanted to give you the courtesy of showing you the post. I'm attaching the photo I'm going to use. I'm over being treated like shit and at least if this is public, you'll have to give a statement to the media. Not sure when I will put it up.

The caption is:

> *Surprise! I can't wait for the arrival of these two next Valentine's Day!*
>
> *On a more serious note, their father, @claytonechard, has said he "wants nothing to do with this process". He has blocked me from messaging him, refuses to see me and his growing babies, and says he will continue to ignore me. He doesn't want to have anything to do with them when they're born and thinks they will negatively impact his dating life. Tag him and let him know what you think.*

Please note the following legal waiver:
If, after proof of opening is obtained, I choose not to respond to this email, I am confirming that its content is true. This includes my acknowledgment of paternity. In addition, by not responding, I am giving my approval to Laura Owens to post the above content on social media.

Clayton, this is a situation you can't run and hide from -- you will need to take accountability for your actions which created twins. If I can't get you to do it, then maybe the public can convince you to.

All the best,



Laura Owens

Nobody Told Me! | *Quartet Farms* | *TEDx talk*

Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604

Email lauraowens@nobodytoldmeshow.com

Pregnancy announcement

EXHIBIT “5”

LO **Laura Owens** Trash - iCloud 8:49 AM

Pregnancy confirmation via ultrasound & next steps

To: bechard@powermotionsales.com, Clayton Echard

Good morning,

I wanted to give an update on where things stand as I have not heard back from Clayton and presume he has still blocked me, which he told me before he does when he doesn't want to deal with a situation. If only I had the opportunity to do the same (!), but obviously, my body isn't allowing me to forget that I am pregnant. Rather than continuing to send him several emails a day, I hope that we can meet in person to discuss what is going on, because as Clayton said last week, "I feel we need to have a face to face discussion. It's too easy to get upset via text. But in-person, conversations are more caring and cordial. I believe this is exactly what we need, as texting hasn't been working well," and, "We should have been talking in-person for most of this anyways. Texting isn't meant for meaningful/impactful/life-changing conversations and I've known and learned that plenty of times."

I told Clayton last week that I was going to be going to California for the weekend and that if I was going to get abortion pills, it would be much easier to do so there in California for many reasons, and less traumatic because there isn't a law there like there is in Arizona that the mother has to view the ultrasound. He has told me that he wants me to take the pills, but understands that his preference for me doing so (because it would impact his ability to date other women in the future) is not enough of a reason for me to end a human life. I am attaching a screenshot of my chart after my visit on Sunday to Planned Parenthood in Orange County, which confirms that I had an ultrasound that was consistent with the conception date of 5/20 when I was with Clayton (and like I've said, he's the only person I've been with since March of 2022), that there *was* a gestational sac meaning a viable pregnancy, and that I refused to view the ultrasound and take the abortion pills at the clinic. They don't typically allow you to take them home, but since I live out of state and was as conflicted as I was, they allowed me to.

Now that we know we have a viable pregnancy, things seem all the more urgent. I'll continue to say until I'm blue in the face that Clayton is the father and that there is *zero* percent chance that it is anyone else. I told him that he needs to pay for the prenatal paternity test because it is not providing me with any information that I don't know, but that I will gladly reimburse him for the full amount if I'm wrong. He agreed to that. I am eager to get it done and have contacted multiple companies about the timing of it. The consensus is that while it can be performed at seven weeks, there is a chance that there is not enough fetal DNA present at that point, in which case you would have to repeat the $1500 test. It seems like we would be safest doing it at eight weeks, although ArcPoint Labs based in Scottsdale said twelve weeks was their minimum. The results will come back in 7-10 business days.

It was explained to me at Planned Parenthood that medication abortions are most successful early on in the pregnancy and that as the weeks go on, they become less effective. By the time the results are back from the prenatal paternity test, I would need to do a surgical abortion, which I will not do under *any* circumstances. I only mention this because once the prenatal paternity test is taken, it's a done deal that I am having the child and there will not be an option for an abortion once the results come back. My preference has been to have the baby all along, so that's obviously not an issue for me, but if it is for Clayton, he needs to know that. I haven't lied about one thing so far, despite his doubts; he himself had me take a pregnancy test, which turned out positive, and now, a doctor has confirmed the pregnancy on an ultrasound and said that it was the very small size it should be based on the date I was intimate with him. If he doesn't trust me, that's fine, and I am more than happy to prove him wrong again. I just know how high the stakes are right now and want to be clear that this really is the last time that I will consider an abortion.

The last thing I would want if I were in Clayton's position is to feel like I didn't have an opinion on something so important, but it seems like his reaction to the stakes getting higher is to withdraw even further. However, there are several factors at play that he needs to consider regarding my health and its impact on the baby if we decide to carry it to term. First of all, my stress levels have a major impact on the fetus's development in the womb and not having any emotional support from Clayton like he promised has been extremely difficult on me. Most importantly, though, my neurologist has emphasized that I need to change my dose of epilepsy medication significantly because I'm at a higher risk of a seizure during pregnancy and having one could have a terrible impact on the baby. I've delayed going up on it because I haven't known what we are doing, but I really need to make a decision. I don't think that either Clayton nor I could forgive ourselves if the child ends up having a lifelong condition that could have been preventable.

On a personal level, I wanted to share that a big reason I am against terminating the pregnancy is because of the impact *not* having an abortion had on my family. My great-grandma was fourteen when she gave birth to my grandma, who she gave up for adoption. If she had an abortion, I wouldn't be here. It's impossible for me to think about terminating the pregnancy without thinking of that, even though in many ways, not having the baby would be an easier option. I'm also getting feedback from my sister, whose baby was born a month early on May 24th, and who says that it is the greatest thing she's ever experienced, but that it is also the hardest and she can't imagine how she could do it without a partner. On the other hand, my mom has been my main source of support on this and has asked me to think about what I would regret more when I'm ninety years old and on my deathbed: having had an abortion or having had the child? When I think of it that way, the idea of giving up the child feels implausible, even though Clayton has told me many times that he would not want any custody nor to have anything to do with him or her. I imagine that would change at some point once he saw the baby. I would absolutely expect him to share custody and parenting time with me.

I apologize for yet another email, but I feel really helpless in terms of communicating with Clayton, and as the father of the child, he's the only person whose support and input really matter to me. Obviously, having a child would completely change the course of our lives and I want to figure out what we are doing together. I know that many women would make their own decision without regard for the baby's father's opinion, but that's not me and I need him to understand that. I really care about Clayton's feelings, but can't take them into consideration if he is treating me like this. If we are going forward with it, that's great and I want to be able to get excited about it! But right now, it feels like there's tension in the air about what is happening and the silence is deafening. If there's anything you can do to talk to him, I would really appreciate it.

Thank you so much for your time!

All the best,



Laura Owens

Nobody Told Me! | *Quartet Farms* | *TEDx talk*

Phone 415-810-0604

Email lauraowens@nobodytoldmeshow.com

EXHIBIT “6”

The Wayback Machine - https://web.archive.org/web/20230922030934/https://anonymouswoman1.medium.com…

Search Medium

I am the anonymous woman in the Clayton Echard scandal. Here's my story.

Anonymous · Follow
3 hours ago

--

I am the anonymous woman who has been labeled Clayton Echard's "ex-fling". I am accomplished in my own right and have no desire to gain notoriety from this, which is why I chose not to be named. I was very clear that I had no desire for money from him. All I wanted from him was communication to figure out a parenting plan for our unborn twins. He has refused to talk to me for a long time, with the exception of the occasional hurtful email. I told him many times that if he did not figure this out with me privately, I would go to the media because I thought that would get him to step up to the plate.

I am coming forward simply because there has been confusion over whether or not Clayton sent the cruel text messages and emails that he did. I've chosen to publish them here and will put my entire reputation on the line by saying that he sent every one of those messages. If anyone wants to claim these were doctored, I have the phone and email records to prove it. He knows better than to sue me for libel because the truth is a complete defense to defamation, and I am telling the truth.

I first met Clayton on the night of May 20th, which is when we unexpectedly hooked up. I was not on birth control because a) I hadn't been sexually active since March of 2022, and b) my anti-seizure medication interfered with it. In the days after, I told Clayton that I had been considering taking Plan B because I wasn't on birth control. In the end, I didn't.

On May 31st, I had a pregnancy test done prior to a medical test. It was negative. I was still concerned I was pregnant since again, I wasn't on birth control, and bought a pregnancy test the next day. On June 1st, I tested positive. I knew Clayton wouldn't believe me, so I decided to go to urgent care to get a test done. I figured he would believe it if there was official medical documentation. Contrary to what many have said, it was not on that day that I learned I was having twins; all that happened was that I discovered I was pregnant.

I sent Clayton an email with a timeline and all of the evidence. I got this in response, which is proof that Clayton very much knew and believed that I was pregnant after we hooked up:



We did not communicate much after that for several days, but I did get this message from him:



He also spewed the following insults at me, and for those who doubt that he did, I have records to prove it.

I don't believe you for a second and it's honestly sad this is what you've resorted to

you're embarrassing yourself at this point.

You need to seek professional help and I hope you will do so to take a deep dive into addressing all this trauma.

I hope you understand how sick this is of you to try and pull on me. You want me to stress about wondering if I impregnated you for weeks.

Laura, ask yourself why you're doing this. Please, reflect now. Why are you subjecting another human being to this?

You're trying to destroy my mental state.

But that pain you feel....don't place it upon someone else.

But to try and bring someone else into it all is just cruel.

I legitimately hate you right now.

You've made my life so stressful since I've known you and if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.

my hatred will only grow if you decide to put me through all of this.

My animosity would last for a lifetime and that's not something either of us want to subject ourselves to.

Even if a kid was present…I would not say a word to you. I would not acknowledge you.

One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever

I am the victim!!! You are acting so irrational that it's scary!!! You can stop every last one of these consequences and you're choosing not to because you have lost touch with reality!

I mean, it's fucking hysterical how sad this is. And I'm pissed for allowing myself to even be bothered by it.

You have lost your mind and I hope YOU think about how terrible this is that you would subject me to this.

My hate is toward you and you only.

I have decided I will no longer be in contact with you, unless your mom takes a phone call with me. If she will not, that's ok, but then all communication will be cut off.

God is telling me this man will provide me with the clarity I need, as I have many questions and those questions have turned into beliefs…ones that have led to animosity and a complete lack of trust toward you. (God told you my abusive ex who caused me to get epilepsy would be a better resource than me? And you could trust him more than me?)

I believe this is some sick game you play for attention.

You better be serious about being pregnant because if you're not, I'm bringing this all to light. People like you need to be held accountable. You can back off now if this is all a game and I'll let it go, but if you continue any longer and it's all a lie, I won't hesitate to reveal the truth.

My personal hell would be having to have you be a part of my life

The desperation is something I hope you can address.

I'm living in the fear of having to be associated with you for my lifetime.

You will bring nothing, but pain and misfortune into my life.

You're manipulative, obsessive and display narcissistic behaviors.

But I don't have any empathy for those that attack the mental health of others through manipulation and then try and play the victim card.

Individuals like you that play with people's emotions are the worst kind of person. I've met many, been taken advantage of by many and am sick and tired of playing nice with them.

You don't deserve my empathy.

You're obsessed with the idea of being adjacent to me.

After his litany of insults, I was surprised to receive these messages from him on June 19th:

If you decide to have the kid, then that is your decision and I will respect it. However, one of us will have 100% custody...there will be no joint custody. I feel strongly about this and that decision is also final.

I feel we need to have a face to face discussion. It's too easy to get upset via text. But in-person, conversations are more caring and cordial. I believe this is exactly what we need, as texting hasn't been working well.

So, let's plan on 7:30?

I feel God is telling me we should meet up tonight, so yes, I'd like to do that. We should have been talking in-person for most of this anyways. Texting isn't meant for meaningful/impactful/life-changing conversations and I've know and learned that plenty of times.

I'll text you when I'm heading back home tonight, but around 7:30pm should work.

On that night, Clayton purchased a pregnancy test and had me take it in front of him. It was positive. We sat down for a couple of hours and talked. He explained to me that he had a dream about his future wife and son. The woman was blonde, and not me. He said he was attracted to ethnic women, not petite brunettes like me. He said that he always swiped left on women with children, and his biggest argument to end the pregnancy was that women would swipe left on him. He worried that it would impact his dating life. Despite this, we had a decent conversation and decided we would consider giving dating a try for the sake of the baby (we didn't know we were having twins then). He promised to be supportive and said that he would check on me every day. That lasted one day.

On June 20th, I received these messages:

I'm sorry you're feeling sick.

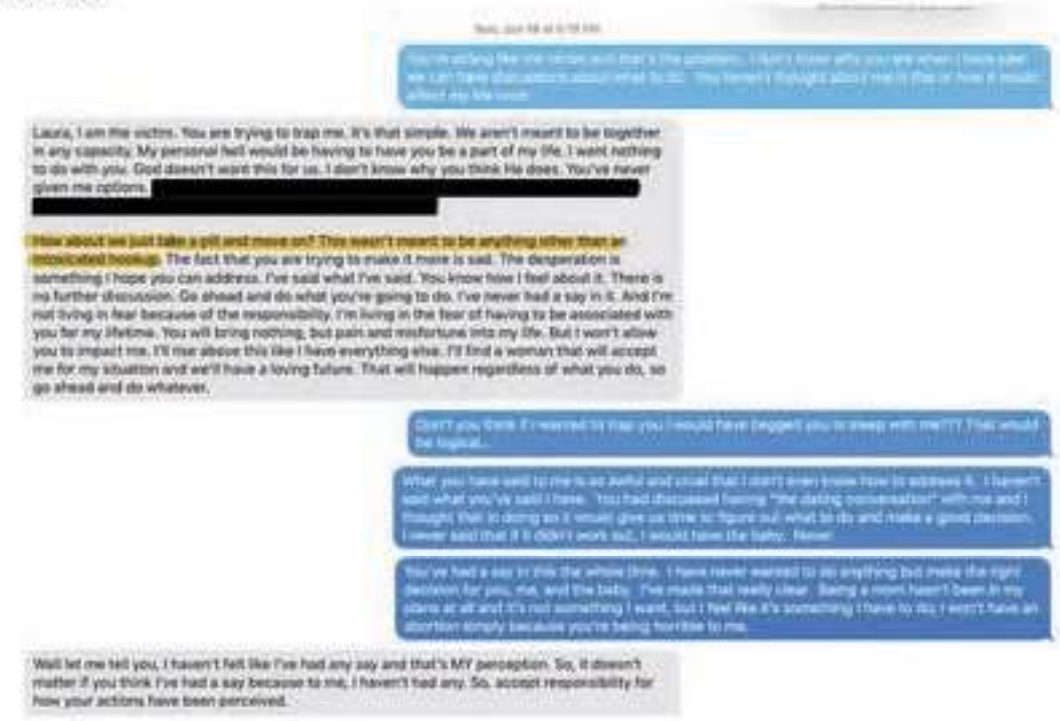
I'm going to try and give us a chance this week. I'm keeping an open mind and maybe this weekend we can meet back up and see if it's a possibility to be intimate. I'm really trying to have you feel seen and heard so I want to give it a chance your way. At least at the end of it, I'll know I tried everything I could.

An hour later. Clayton changed his mind, but this text confirms he knew that the test was positive:

To: Clayton Echard

I'm sorry this made it harder. I wanted you to come over to confirm what I was doubting. And it did confirm that. So, I don't see you as a liar anymore. But, that doesn't change how I feel about proceeding forward. I can believe you're telling the truth, but still stand firm in not wanting to pursue anything further with you. That is what I'm choosing to do.

On the very same day, he went from wanting to be intimate to this, confirming that we did indeed hookup:



On June 21st, I received an email from Clayton with a theory that my anti-epileptic medications caused me to test positive. I disproved this theory, which you can view below. You can also see that the positive pregnancy test I took at his house is on the counter:




pregnant
not pregnant


Absorbent Tip
Result Window
OR
pregnant
not pregnant
NOT PREGNAN
ONE PINK LINE in
the Result Windo



[redacted]

I say all this to say it's a possibility you are not in fact pregnant. This is why it's important for us to do the Paternity test because there is no question if that comes back positive. It is done. Else

I was somewhat shocked to find out antisocial/cold medication can cause false positives, but yet you haven't even mentioned that as a possibility. So, I wanted to bring it to light. It is possible, done. Plus, a pregnancy claimed me confirmed with an ultrasound is, done. So, I believe both maneuvers should be taken and will be awaiting both from you. That said then, I have decided to not waiting to have a rational and mature conversation. So, we're better off keeping communications to a minimum.

Thank you,

Clayton Echard

[redacted] Mail - Something to Consider

[redacted]

Hi Clayton,

Thanks for the email. I can diagnose both females easily.

First of all, I was unaware that any at-home/urinalysis drug could expose a false positive, but yourself a quick call to my doctor, who said that but is absolutely NOT a possibility at any case

1) She said it's extremely rare to happen at all and has only been heard of with a drug called cetrorelix, which it's not on and never have been. She said even with that one, it's extremely rare and if that were to happen, it would be when someone just started it

2) I've been on the same dose of the ophgyny drug I am on since 2017, which again is not associated with false positives, and have had my urine tested many times since without a false positive before

3) I also wouldn't have the side effects I am having from the pregnancy if it was a false positive

Finally, here is the term dated and stamped photo that I sent you that day (zoomed out without using iPhone's auto-enhance feature, which I did to show the line, which was obviously there. Just not as visible on a camera as it was in the naked eye. You may tell it is much more faint. Plus, my doctor said that tends that fade typical on the latter and state you take the fluid and even on the month, and that it's somewhat of a coincidence as to how the line looks based on this here in the pregnancy.

In regards to ceasing communication, that is something that you promised me you would not do once I confirmed the pregnancy to you. Keep in mind that a doctor has also confirmed it using a different test as well, so there's no question on to whether or not I am pregnant, and you seemed to be satisfied with that result after performing your own test.

My "threats" last night were after you had made threats to contact the media about me if I was lying about being pregnant (which I wasn't) and to contact my absolute ex-boyfriend. Still, I was fine having a rational and civilized conversation with you despite those. My point was to show you that you wouldn't be proud of your communications if this public found out, which you said you were worried about. Despite my telling you that I wanted to be on your side and figure this out together, I'm stunned that you have once again chosen to leave me in the dark here.

Just as I told you I would take a pregnancy test anytime, I will be happy to do this same with a paternity test as soon as I am able to, and know with the same amount of certainty that you are the father. I was very upfront with you about what I would need from you to look comfortable terminating this pregnancy and said that it wouldn't be comfortable doing it later on — that this was the only time I would be okay going through with it if that was what we decided even if it was done as early as possible. Still, you seem to be very confident with whom you claim

[redacted]

[redacted]

[redacted]

On June 24th, Clayton emailed me saying that **he would pay for the paternity test**, despite telling the press that he has said that I would be responsible for the full amount. I told him that I already knew that he was the father, and if he needed reassurance he needed to pay: While Clayton claimed that he told me that I needed to pay for the paternity test, you can see that was not the case:

[redacted] **EXHIBIT 7**

Gmail **Petitioner's messages to Respondent regarding taking prenatal paternity test** [redacted]

Paternity test, etc.

Clayton Echard <claytonechard@[redacted]> Sat, Jun 24, 2023 at 4:32 PM
To: [redacted]

I will pay for 100% of it. You have my word. Let this message serve as the proof. Just schedule it and let me know where you scheduled and I'll pay.

Thanks,

Clayton Echard

On June 28th, I received this:

Gmail [redacted]

[redacted]

Clayton Echard <claytonechard@gmail.com> Wed, Jun 28, 2023 at 8:38 PM
To: [redacted]

[redacted]

[redacted] I will find someone else to love and share my life with. I may honestly move to the east coast at this point as well. We'll see. I can do whatever I want with my life, but what I won't do is allow you to hold me back. And don't try to explain to me that I can't move out of the state and away from you. I absolutely can. All I have to do is either take 100% custody of the child or allow you to have 100% custody. Joint isn't an option and is never mandated. That's common sense. Besides, I will fight until I have no fight left in me to not have you be a part of my life. The courts can't force someone to stay with someone else. That's unheard of and has never been done. Just remember, there is no scenario in which we raise the child together, if you even have a child, which I'm still not convinced. But if you do and it is somehow miraculously mine, like I said, I'll take care of the child if that's what it comes to, but I WILL NOT UNDER ANY CIRCUMSTANCE co-parent with you. Just want to make that clear. I would rather co-parent with literally anybody else besides you, as you have shown me you don't respect my opinion. [redacted]

[redacted]

Clayton Echard

I reached out to Clayton's parents several times, but received no response. On July 2nd, I even invited them to an ultrasound, since he had not gotten back to me about attending my doctor's appointment:



Gmail [redacted]

Proof provided to Clayton & your family's invitation to ultrasound

[redacted] Sun, Jul 2, 2023 at 9:57 AM

To: [redacted]

Hi Mr. and Mrs. Echard,

On Thursday, Clayton said that if I provided him with additional information, such as the date and time of my next ultrasound, he would be able to be cordial. I gave it to him and invited him, but have not heard back. I was lucky enough to get accepted to see a high-risk specialist, [redacted] on July 24th at 9am for an ultrasound and an hour long consultation. I told Clayton that he was welcome to go and that I wanted him to, and even offered to change the date and time if it didn't work for him. I explained to him that it's a referral based practice that does not accept patients without medical records, including verification of the pregnancy and test results/notes from a specialist to prove that there is a condition that requires a high-risk obstetrician (my neurologist about my generalized epilepsy in my case). I understood his need for extra proof, so I sent him screenshots from my patient portal to show him proof of the appointment and the records they received. [redacted]

Even though I have gone above and beyond to prove to Clayton that the pregnancy is real, nothing is enough for him to be civil to me, even though he claimed weeks ago that the test I took in front of him that was positive was sufficient. I've taken the initiative to contact three different labs to organize a prenatal pregnancy test at the one that can do it the soonest and that will be acceptable by the court so that I can establish paternity as soon as possible and so that we can make a parenting plan as we are required to do. I am very financially stable and want absolutely no money from him except what is required by law. All I want is the support he promised to provide me with. I'm under an immense amount of stress and have developed high blood pressure and have explained that this could cause the baby to be born with developmental issues, which I know we don't want.

[redacted]

With all of that being said, the purpose of this email is twofold:

1. I wanted to show you how much information Clayton has been provided with by me to verify the pregnancy. This is what he asked for, all of which was given. There was so much that it wouldn't all fit in a single email, so I had to make a Dropbox file of it. You can access all of the proof by clicking here here.

Based on how he has treated me, I don't want him present at the ultrasound and appointment on July 24th. Hearing the heartbeat for the first time is sacred to me but I know it means nothing to him since he has not had the courtesy to respond to my invitation to be there or even change the date and time. Either or both of you, or your other sons, are welcome to be at the appointment if you would like to be. I know it's an important event and I want people there who feel the same. I just didn't want you guys to not feel included just because Clayton is no longer welcome unless he drastically changes his behavior and shows some respect. If he does, of course he can come.

There's no need to respond if you don't want to, but please know that your family is most definitely welcome to be there and I would change the day and time for you guys too if the current date didn't work out.

Thank you for reading this and hope you are having a great weekend!

I discovered I was having twins after that. In mid-July, I decided to hire an attorney to act as a middleman, since Clayton would not communicate directly with me. He told the lawyer that he thought I was on weight loss drugs or fertility drugs that made me test positive. I offered for him to attend an ultrasound appointment, which the lawyer conveyed to him His response was this:


Gmail [redacted]

[redacted] v. Echard

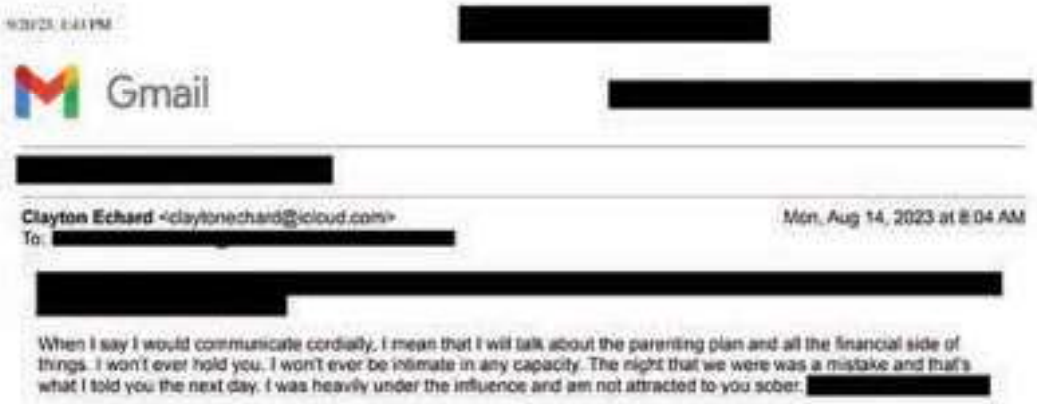
[redacted] Wed, Jul 19, 2023 at 7:17 PM

To [redacted]

Yes I will tell him. I also proposed if he didn't want to see you in person but wanted to talk to your doctor, what about being on the phone or by FaceTime? His response was how would he know you weren't just in some random place with someone impersonating a doctor. Sadly, that is how far his doubt/paranoia goes. And he acknowledges he is paranoid but he believes it is justified. As I said it may be the only way he's able to process this at the moment.

Yes your best bet is to enjoy this process with your "village" of people who will celebrate in the joy with you and who love and support you.

On August 14th, Clayton sent me this and then went dark on me for days. Telling me that he was "heavily under the influence" and "not attracted to [me] sober" hurt:


[redacted]

Gmail [redacted]

[redacted]

Clayton Echard <claytonechard@icloud.com> Mon, Aug 14, 2023 at 8:04 AM

To: [redacted]

[redacted]

When I say I would communicate cordially, I mean that I will talk about the parenting plan and all the financial side of things. I won't ever hold you. I won't ever be intimate in any capacity. The night that we were was a mistake and that's what I told you the next day. I was heavily under the influence and am not attracted to you sober. [redacted]

All along, I told Clayton I wanted to do a paternity test at any point at the lab of his choosing; in fact, I offered more than fifty times to take it in email and have the messages to prove it. Finally, he agreed to testing. I paid $725 as a deposit and scheduled it for August 23rd, which he said worked well for him. However, he never called to schedule his portion, so I was forced to cancel the test:



Gmail

Re: Canceling NIPP test on August 23rd

Good morning [redacted]

We have canceled the test and refunded the $725 back to the card. It should take 3-4 days for the payment to post. Let us know if you have any questions or concerns.

Thanks,

[redacted]

From: [redacted]
Sent: [redacted]
To: [redacted]
Subject: Canceling NIPP test on August 23rd

Hi,

Unfortunately, Clayton Echard has refused to take the prenatal paternity test that I had scheduled at Exam One in Phoenix on Wednesday, August 23rd. Can you please cancel it and refund the $725 back to my card? Please let me know if you have any questions.

Thank you for your help scheduling it. I'm very disappointed to have to cancel.

All the best,

[redacted]

Clayton's behavior caused me to be borderline-suicidal twice, simply because I have felt panicked about raising twins on my own. All I have wanted is communication and a plan. I explained this in emails to him, which I will not post due to the very personal nature of them. I presumed that as a 'suicide prevention advocate' (and the father of our unborn children), he would be able to help me. I needed reassurance that he would help care for them and he could not provide it. Clayton knew that if I took my own life, I would be ending the lives of our unborn twins. I truly believe that is what he wanted, as it would solve all of his problems.

Clayton was also supposed to meet up with me five days prior to our Early Resolution Conference on September 28th, but he has not responded to my emails trying to organize this.

Clayton claimed I was "obsessed" with dating him, which is not true. I emailed him to clarify this after The Sun article came out, saying: "I. DO. NOT. WANT. TO. DATE. YOU." I had not seen *The Bachelor*, and if I had, I never would have chosen him as my realtor, let alone as someone I would be intimate with. I have told him many times that I would take a lie detector test to prove that I had not seen his season. After he started to display deceptive behavior in a real estate transaction, I finally searched for him on YouTube and watched three clips of him sending Susie, Gabby, and Rachel home. To date, that is all I have seen.

If I am missing anything, or if someone doubts these messages from Clayton, I am happy to provide any records needed to prove that I am indeed telling the truth. I will put my entire reputation on it.

Finally, Clayton wrote on his Response to Establish Paternity that he did not want to give the children his last name or be put on their birth certificates if he is found to be the natural father.

REQUESTS TO THE COURT:

1. **FOR ORDER OF PATERNITY:**

Issue order declaring that ☐ **Party A** or ☒ **Party B** **claimed to be the father, (named below)**

Clayton Echard

☐ **IS** (OR) ☒ **IS NOT** **the natural father of the minor child(ren),**

IN THE EVENT THE COURT ORDERS THAT ABOVE-NAMED PARTY IS THE NATURAL FATHER, THEN THE COURT SHOULD ALSO ORDER AS FOLLOWS:

A. BIRTH CERTIFICATE: (check the box and complete if this is desired)

☐ **Order that the name of the father as appears on his birth certificate or other legal document should be added to each minor child's birth certificate as the father;**

B. LAST NAME: (check the box and complete if this this is desired)

☐ **Order that each minor child's last name be changed to the last name of:**

Bachelor | Clayton Echard | The Bachelor

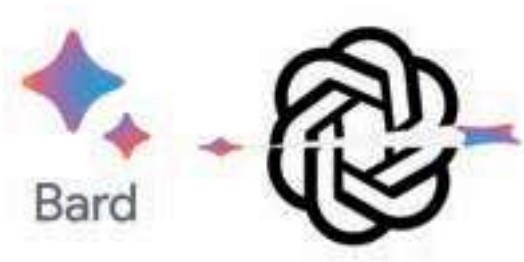
Written by Anonymous

Follow

0 Followers

The anonymous woman in the Clayton Echard pregnancy scandal

Recommended from Medium



AL Anany

The ChatGPT Hype Is Over—Now Watch How Google Will Kill...

It never happens instantly. The business game is longer than you know.

6 min read · Sep 1

-- 252



Sean Kernan

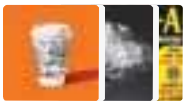
How Your Personality Is Revealed By Your Choice of Words

Use deliberate listening and empathy to better understand people.

5 min read · 6 days ago

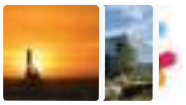
-- 67

Lists



Staff Picks

449 stories · 292 saves



Stories to Help You Level-Up at Work

19 stories · 219 saves



Self-Improvement 101

20 stories · 588 saves



Productivity 101

20 stories · 549 saves



Unbecoming

10 Seconds That Ended My 20 Year Marriage

It's August in Northern Virginia, hot and humid. I still haven't showered from my...

✨ · 4 min read · Feb 16, 2022

-- 937



Wil Wheaton

i was nine years-old when i had my first crush

Her name was Candice, and she went by Candi. She was my first—and biggest—...

15 min read · 5 days ago

-- 117



Nick Hilton



Jano le Roux in ILLUMINATION

The End of the Subscription Era is Coming

You're overpaying for your porn (and journalism)

10 min read · Aug 30

-- 194

Scientists Gave Homeless People $7,500, Here's How They Spent It

What is the best way to give back?

✦ · 5 min read · Sep 5

-- 233

See more recommendations

EXHIBIT “7”

Sign in

Search the web

Discover Following | News US News World News ... Personalize

Ad
COUPON CODES AVAILABLE GET CODES
Ad

The Messenger Follow

'Bachelor' Alum Clayton Echard Allegedly Told Woman Who Claims to Be Pregnant With His Twins to Get an Abortion: Report

Story by Daniel Trainor • 2mo

'Bachelor' Alum Clayton Echard Allegedly Told Woman Who Claims to Be Pregnant With His Twins to Get an Abortion: Report

Echard is accused of impregnating a former fling earlier this year, though he allegedly told her via text message, 'I will not be raising it in any capacity'

Published | Updated
Daniel Trainor



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

Clayton Echard Jon Kopaloff/WireImage
© Jon Kopaloff/WireImage

Clayton Echard is being accused of texting a woman who claims to be pregnant with his twins to undergo an abortion.

According to documents obtained Tuesday by Page Six, the former *Bachelor* star also allegedly refuted paternity in text messages.

"I would like for you to get an abortion (if you are pregnant with my child, which I still don't believe, but it doesn't really matter either way)," Echard allegedly texted the woman, according to the court docs. "If you do not, that's your choice."

Arizona Will Cover Cost to Install Solar Panels in These Zip Codes



Ad EasySolar

The woman, a 33-year-old podcast host from Scottsdale, Ariz., who wishes to remain anonymous, claims she and Echard had a one-night stand in May that resulted in the pregnancy.

"Then, in that case, if it ends up being my child, I have decided that either you'll take 100% custody of the child, or it will be put up for adoption," Echard's alleged text continued. "I will not be raising it in any capacity."

The text was just one in a flurry of allegedly "erratic, illogical and threatening messages" said to be sent by Echard.

The woman submitted screenshots of the messages, which included, "I don't believe you for a second"; "I legitimately hate you right now"; and "You have lost your mind and I hope YOU think about how terrible this is that you would subject me to this."

Echard also allegedly wrote, "My personal hell would be having to have you be a part of my life."

29+ Coolest Gifts Nobody Would Think Of



Ad Trending Gifts

In response, Echard accused the woman of "harassing" him because she is "obsessed" with him. He also denies they ever had sexual intercourse. Echard told *The Sun*, who was the first to obtain the documents, that he plans to sue the woman.

The Messenger reached out to a representative for Echard, who Page Six reports is now scheduled to take a paternity test Sept. 26, two days before the parties meet in court.

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

Sponsored Content



SmartAsset

Vanguard vs. Fidelity vs. Schwab

Ad



Top Consumer Guide

Here Are 23 Of The Coolest Gifts For Christmas 2023

Ad

More for You



SmartAsset

7 Secrets Comfortable Retirees Know About Hiring a Financial Advisor

Ad



Women's Health

Taylor Swift Just Clarified The Timeline For Her And Travis Kelce's Relationship

17 1

USA TODAY

'Bachelor in Paradise' couple Kylee, Aven break up days after the show's season finale

"Bachelor in Paradise" couple Kylee Russell and Aven Jones. Russell shared that the relationship dissolved due to "multiple...

1



NBC News

UNLV gunman res tenured professor making sexual co

150 52



The Messenger

Pregnant Woman in Kentucky Abortion Lawsuit Learns Embryo No Longer...



ABC News

Suspect jailed on $2 million bail in fatal stabbing of teen cheerleader

1k



Online Shopping Tools

Arizona Shoppers Should Think Twice Before Buying from These 2 Stores

Ad



SmartAsset

Vanguard vs. Fide Schwab

Ad



Arizona Republic

In Utah, 2 children say they were abused. A trial will determine if the accused



Evening Standard

Britney Spears says it's 'weird' being single as she opens up on Sam Asghari

FOX News

Missing Wyoming woman's estranged boyfrien 'suspect in a homicide case': court

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

28

2

The Telegraph Follow

Jennifer Aniston reveals she and Matthew Perry exchanged messages on day he died

Story by Timothy Sigsworth • 5h



Aniston with Perry in 1995 at an NBC event in New York - RON DAVIS/GETTY IMAGES
© Provided by The Telegraph

Jennifer Aniston has revealed she texted a "happy and healthy" Matthew Perry on the morning of the Friends star's death.

Perry, who shot to worldwide fame for his role in the cult American television series, was found dead at his Los Angeles home in late October.

"I was literally texting with him that morning, funny Matty," Aniston told Variety magazine.

"He was not in pain. He wasn't struggling. He was happy."



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback



Jennifer Aniston (left with Reese Witherspoon) gives her first interview since the death of Matthew Perry to Variety magazine - Dan Doperalski for Variety
© Provided by The Telegraph

It was Aniston’s first interview since her American-Canadian co-star’s death at the age of 54. Perry’s cause of death has not been officially determined.

“He was happy. He was healthy. He had quit smoking. He was getting in shape. He was happy – that’s all I know,” she added.

“I want people to know he was really healthy, and getting healthy. He was on a pursuit. He worked so hard. He really was dealt a tough one.

“I miss him dearly. We all do. Boy, he made us laugh really hard.”



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback



Jennifer Aniston and Reese Witherspoon front VARIETY'S Emmy Edition and speak with Hollywood's most iconic entertainment magazine about 'The Morning Show', Aniston texting with Matthew Perry on the day of his passing, intimacy coordinators, if the show is camp, and more.
© Provided by The Telegraph

Perry played Chandler in all 234 episodes of the sitcom, which ran for 10 series from 1994 to 2004.

The sitcom catapulted him, Aniston and their four co-stars to household fame and by its final series the group were paid more than £800,000 ($1 million) per episode.

But Perry struggled with drug and alcohol addiction for much of his adult life.

In a 2021 memoir he said he had attended 6,000 Alcoholics Anonymous meetings, been to rehab 15 times and had 14 stomach surgeries.

He added that his alcoholism meant drinking 14 triple vodka shots was not enough to get him drunk.

“Not only do I have the disease, but I also have it bad,” he wrote.

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

"I have it as bad as you can have it, in fact. It's back-to-the-wall time all the time. It's going to kill me."

Aniston said the outpouring of tributes to Perry in the wake of his death was "so beautiful".

"I hope he can know that he was loved in a way he never thought he was," she said.

%n

Sign up to the Front Page newsletter for free: Your essential guide to the day's agenda from The Telegraph - direct to your inbox seven days a week.

Sponsored Content

More for You

SUBSCRIBE

ENTERTAINMENT > TV

'The Bachelor' Alum Clayton Echard Declares the 'Truth Will Always Set You Free' amid Paternity Scandal

A woman that Echard allegedly slept with once reportedly claimed in a new lawsuit that he refused to take a paternity test after she became pregnant with twins

By **Esther Kang** | Published on September 21, 2023 10:54PM EDT

SUBSCRIBE



Clayton Echard. PHOTO: ABC/PAMELA LITTKY

The Bachelor alum Clayton Echard is setting the record straight.

On Thursday, the 30-year-old reality star posted a screenshot of a receipt for a paternity test in order to clear the air after he was named in a paternity lawsuit in August by an unidentified woman.

In the lawsuit, the woman alleged that Echard got her pregnant after the two met for a one-night stand. Since filing the suit, the woman has requested Echard take a test to find out the paternity of her unborn twins before she gives birth in February. The 33-year-old woman, who has chosen to remain anonymous, has recently claimed that the former Bachelor wasn't complying with her requests for a test.

"This is the timeline. The truth will always set you free," Echard wrote over the email receipt in a post to his Instagram Story. Per his screenshot, the television personality paid $725 to schedule an appointment with a paternity clinic.

SUBSCRIBE

"Results will then take about a week to get back. I believe we're all on the same page now."

PEOPLE has reached out to Echard's reps for comment.

SUBSCRIBE

Clayton Echard's Instagram Story. PHOTO: CLAYTON ECHARD/INSTAGRAM

SUBSCRIBE

that he refused to take a test and that she had to pay a $725 deposit for it, but Echard called her accusations "baseless" and "lacking in merit."

In court documents obtained by PEOPLE, the woman stated that Echard refused to believe she was pregnant when she originally informed him back in June.

"I wanted you to come over to confirm what I was doubting. And you did confirm that. So, I don't see you as a liar anymore," he allegedly texted the unidentified woman.

RELATED: Clayton Echard and Rachel Recchia Poke Fun at 'Reality TV Trauma' as They Reunite Beside 'Bachelor' Pals

After the two parties take the paternity test, they are scheduled for an early resolution conference and will appear in court immediately on Sept. 28.

Echard's alleged paternity scandal comes nearly one year after he and Susie Evans announced their decision to split. The former couple met on his season of *The Bachelor* and lived together for less than a year before going long distance and eventually parting ways.

SUBSCRIBE

Susie Evans and Clayton Echard. PHOTO: CRAIG SJODIN/ABC

RELATED: Clayton Echard Says He's Focusing on Himself After Susie Evans Split: 'I'm Not Mentally Healed'

"With incredibly heavy hearts, we wanted to share that we have decided to go our separate ways," Echard and Evans wrote in a joint Instagram statement at the time. "For anyone who has ever loved, knows this was a painful decision to make and not one taken lightly."

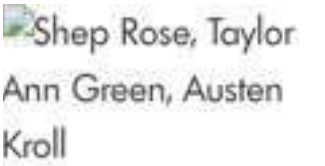
"We understand that there will likely be a lot of questions about this decision — social media is definitely a highlight reel and much of our experiences together we have kept private as I'm sure most can understand. But we will share this — although this last year together has brought us so much joy and so many laughs, there has also been a significant amount of pain," they continued. "We know no healthy relationship comes without its struggles, but we've realized that we were not prepared for the external forces that hindered our ability to not only heal as individuals but also as a couple."

SUBSCRIBE

news to compelling human interest stories.

The former couple said they would be "focused on continuing to work on ourselves, so we can be the best version of ourselves" going forward.

Related Articles



TV

Shep Rose Starts to Suspect Chemistry Between Ex Taylor Ann Green and Austen Kroll: 'I Would Not Be Surprised'

By Dana Rose Falcone



TV

'America's Got Talent' Announces New 'Fantasy League' Spinoff — and Mel B Is Returning to Judge!

By Kelly Martinez

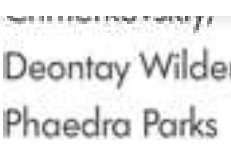


WEDDINGS

Madison Prewett Defends Quick Journey to the Altar: 'We Took the Time That We Felt We Needed' (Exclusive)

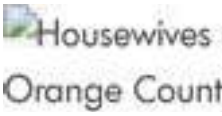
By Dory Jackson and Amy Rosner

SUBSCRIBE



Chmerkovskiy, Deontay Wilder and Phaedra Parks Among 21 Stars Competing

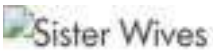
By Dave Quinn



TV

'RHOC': The Hits Keep Coming as 1 Woman Says She's a 'Punching Bag' and Another Feels Socked 'in the Stomach'

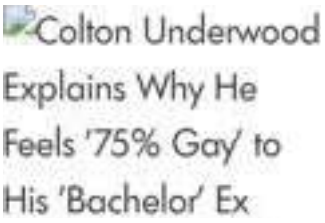
By Esther Kang



TV

Sister Wives' Kody and Janelle Reveal 2-3 Prior Separations as She Disavows His Digs at Christine (Exclusive)

By Charna Flam



TV

Colton Underwood Explains Why He Feels '75% Gay' to His 'Bachelor' Ex Hannah Brown

By Alexis Jones

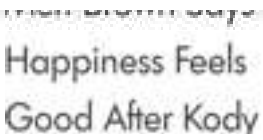


TV

'Bachelorette' Alums Brayden Bowers and Aaron Schwartzman Rescued from Sinking Fishing Boat

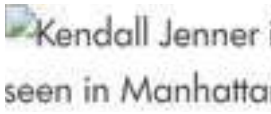
By Stephanie Wenger

SUBSCRIBE



Being 'Willing to Eat Alone Until You Find the Right Table'

By Erin Clack



STYLE

Kendall Jenner Styles Oversized Pinstripe Work Shirt as Dress While Out in New York City

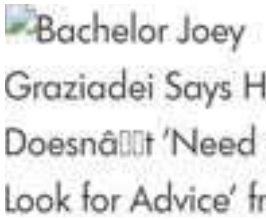
By Kimberlee Speakman



TV

Watch 'Surviving Paradise' Contestants Swing Between Sheer Luxury and 'Fyre Festival' Deprivation (Exclusive)

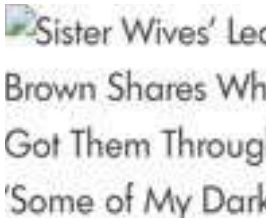
By Esther Kang



TV

Bachelor Joey Graziadei Says He Doesn't 'Need to Look for Advice' from Ben Higgins and Arie Luyendyk Jr.

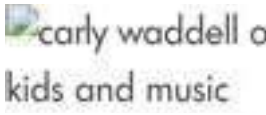
By Stephanie Wenger



TV

Sister Wives' Leon Brown Shares What Got Them Through 'Some of My Darkest Days'

By Esther Kang



PARENTS

Carly Waddell Says She's 'Rocking' Being a Single Mom to Her Two Kids: 'Every Day Got Easier' (Exclusive)

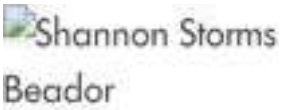
By Hannah Sacks

SUBSCRIBE



Meredith to Melt Down and Threaten Househusband Dirt

By Maggie Kreienberg



TV

Shannon Beador Is 'Extremely Apologetic' and 'Prepared to Accept Full Responsibility' After DUI Crash: Lawyer

By Esther Kang

People

NEWSLETTER

People Magazine Subscription Image

Follow Us

NEWS ENTERTAINMENT

ROYALS LIFESTYLE

STYLEWATCH SHOPPING

People SUBSCRIBE

Privacy Policy
Terms of Service
Your Privacy Choices
Contact Us
Advertise

Dotdash meredith

PEOPLE is part of the Dotdash Meredith publishing family.

Please review our updated Terms of Service.

Home
Popular

TOPICS
Gaming
Sports
Business
Crypto
Television
Celebrity
See more

RESOURCES
About Reddit
Advertise
Help
Blog
Careers
Press
See more

POPULAR POSTS

r/thebachelor • 3 mo. ago
[deleted]

I am the anonymous woman in the Clayton scandal. Here's the proof. Here's my story:

CLAYTON STREET

As a side note, for those who are questioning whether I want attention/followers, please remember I am anonymous in this case. I deactivated my Instagram earlier this week, accidentally logged into that account again, and Instagram will not let me deactivate my account again for a week. I have tried. I don't want money from Clayton. All I have asked for is communication to figure out a parenting plan.

https://anonymouswoman1.medium.com/i-am-the-anonymous-woman-in-the-clayton-echard-scandal-heres-my-story-97e48632fa9d

Please remember that Clayton has not denied that he sent any of these messages.

He has been warned that if he does not take down his second story, he will be sued. He is trying to spread false information about me. The two other cases that I have in family court are restraining orders against a man from 2021 and 2022. I have told him that putting me out to the wolves like that regarding cases where I have a restraining order against a man is not okay. It feels unfair and cruel, and for a man who is a mental health/suicide prevention advocate, it crushes me that he won't take it down.

Locked post. New comments cannot be posted.

1.7K 1.6K Share

Sort by: New

bachbachbaby • 2 mo. ago • Stickied comment

Additional, conflicting information keeps coming in regarding this issue, and we are not able to verify or keep up in a meaningful or reliable way — this is way above our pay grade. We are no longer allowing discussion on the topic until a resolution is reached.

1 Share

r/thebachelor

Join

The Bachelor

r/thebachelor is a subreddit dedicated to thoughtful discussion about The Bachelor franchise, the lives of contestants, and how...

Show more

313K	1.8K	Top 1%
Members	Online	Rank by size

Related | The Bachelor | The Bachelor (franch

r/fortwayne
For any who has ever been harassed by the legal system, here's your proof that it's not you that's...
77 upvotes · 59 comments

r/BachelorNation
Dave Neal's response to the new Medium article


103 upvotes · 115 comments

r/Degrassi
Jordy Todosey does personality test as Adam Torres (hi its me btw<3)


130 upvotes · 16 comments

r/Scams
I suspect this eviction note to be false.
1 upvote · 5 comments

r/LegalAdviceUK

EXHIBIT “8”

Open in app ↗

Sign up Sign in

Medium Search Write





Life's been a bit of a challenge lately... and that's putting it mildly.

Unveiling the Unbearable: My Battle Against Cyberbullying and Online Harassment



Laura Owens · Follow

10 min read · 4 days ago

70

> *It's incredibly hard to put this into words and share what's been going on. I've never asked my friends or family for emotional support, but I'm feeling truly shattered, defeated, mentally drained, and worthless due to the events of these past several months. I have been the subject of a smear campaign that I wouldn't wish on my worst enemy, and the target of cyberbullying, cyberharassment, and cyberstalking at a level that I truly think no one would believe was imaginable. My heart has been torn to shreds, and it seems like nobody beyond my family truly sees or understands who I am anymore. Maybe that's my fault, since the sheer embarrassment of it all has been so overwhelming that I've found myself hiding from the world.*

Since around mid-September, I've been noticeably absent from social media and pretty much detached from the life I used to lead. I can count on one hand the times I've stepped out of my home since then, but the number of times I've found myself in tears is beyond calculation. Earlier this morning, around 4:30, I found myself on the floor, overwhelmed with emotions,

feeling more bullied and alone than I've ever felt. It struck me that maybe it's time to stop concealing what I've desperately tried to keep under wraps for months now. I've come to understand that by not being public about what I'm struggling with, I've made this battle harder for myself. It's now abundantly clear that the only way to stand up to bullies is by confronting them directly.

I know that some of you caught wind of the rumors that I got pregnant by Clayton Echard, the star of The Bachelor's season 26. Clayton had briefly been my real estate agent, and during a May evening, our professional dealings turned into something more personal. Following three positive pregnancy tests — one taken at home, another at an urgent care center, and the final one done in Clayton's presence — it was evident that I was indeed expecting. Soon after, I discovered I was pregnant with twins, and I knew with 100% certainty that he was the father. Clayton went radio silent when it came time to take a paternity test, despite my persistent requests — twenty-nine times, to be exact — at a lab he had selected previously. When he finally responded, he dared me to reach out to the tabloids, a move I knew would compel him to comply with the test. Before the news hit the public, I pleaded with the media to keep my identity under wraps, and they agreed. However, their description of me as the "anonymous woman" contained enough details for those familiar with me to make connections and for strangers to track me down online.

Like many, I was familiar with Reddit before news about my pregnancy became public, but I had no grasp of the level of dedication its members had. Shortly after the initial articles surfaced, a friend reached out, informing me that self-proclaimed "sleuths" were actively discussing and mentioning me by name in "subreddits" centered around *The Bachelor.* There was a barrage of misinformation circulating, and initially, I wrote back to

correct those who were getting the facts twisted. However, these so-called 'keyboard warriors', shielded by anonymous usernames, only seemed to intensify their interest in my life once they knew I was engaging with them.

Things took a truly devastating turn when an abusive ex decided to reach out to Clayton, telling him that I had 'done this before'. He was referring to two prior pregnancies — a part of my life I've guarded fiercely, not just from the wider audience I'm speaking to now, but from everyone. Rather than having a private discussion with me about it, Clayton broke the news to his hundreds of thousands of followers, and Redditors, like relentless detectives, latched onto this snippet of my personal history. They dove deep into my life, tearing through layers I desperately wanted to keep hidden and, truth be told, deservedly so. My life was becoming a mere public spectacle, and it caught the eye of a *Bachelor* content creator named Dave Neal, a major figure on Reddit, who has completely turned my world upside down.

Dave has blatantly victim-shamed me for my reproductive decisions, stating that my life would hold no interest for him if it weren't for two prior abortions. The source of the misinformation he's spreading traces back to two men I'd been pregnant by before. Their animosity against me, triggered by the restraining orders I have against them, is the driving force behind the distorted tales being circulated about me, and ones they have shared with Dave. They supplied him with court documents containing entirely baseless, never-seriously-considered-by-a-judge claims about me, which Dave has disseminated as if they were factual. Although their accusations were unequivocally untrue, they were mortifyingly embarrassing and not something I wanted anyone to know. My decision to stay silent inadvertently bolstered Dave's platform, giving him free rein to harass me without facing any consequences.

The allegations they had previously made against me in response to cases I filed against them were horrendous, alleging that I falsified my pregnancies, tampered with records regarding my past pregnancies, and fabricated the severity of the injuries I sustained due to abuse. In a desperate effort to get him to stop spreading false and extremely damaging information about me, I offered to sign a release to have my previous pregnancy records sent directly to him from my providers. I sent him proof that I was one of only 630 patients accepted into the Domestic Violence Brain Injury Program at Barrow Neurological Institute, the only one of its kind in the nation, as a result of "multiple strangulation injuries" resulting in me developing epilepsy. However, he ignored my offers, revealing that he cared little for the truth.

Dave's motivation in continuing to create content about me has been the massive surge in viewers and listeners on his monetized platforms by peddling sensationalized, entirely untrue tales about my life. He claims that he "doesn't take a shit without monetizing it", and so his motivation is clearly financial. Dave puts out so much content that it feels like doing damage control is a full time job: he posts three shows, usually one about me, to YouTube and two podcasts a day. Each time, it sparks a fresh wave of discussions that only add more fuel to this never-ending fire.

Dave's enormous following on Reddit has made my life incredibly difficult. They've created countless threads in Bachelor-related subreddits, and in the ultimate showing of targeted harassment, one person even went as far as creating a subreddit in my name just to bully me. I was taken aback when I read a post purported to be from a high school peer with outrageously far-fetched and blatantly false allegations, claiming that during that time, I was pregnant by multiple men, including a special needs student and fathers of my peers. One fabricated story claimed that my father offered one student

$6000 to buy new speakers for his car if he would date me for a month. The reality was quite different — I was extremely introverted throughout high school, never attended a party, and had my first kiss during the week of graduation. These claims hold no resemblance to reality, yet they've left me feeling utterly powerless and deeply ashamed. It feels as though the reputation I painstakingly built and every achievement I've held dear have been ruthlessly torn apart and relentlessly mocked in profoundly disheartening posts.

The comments said about me have been brutal, such as, "I hope she's an organ donor so something good can come out of her pathetic existence", and that I am "a complete waste of skin and bones". I've been told to kill myself, with comments suggesting it might help my family move past the supposed disgrace they claim I've brought upon them. My dad's Wikipedia has even been edited several times by trolls to state that he only has one daughter, my sister.

Dave claims to have only referred to me by "Jane Doe", but my name has appeared in his content many times, and his fixation on me has reached the level of an obsession. Since September, he's churned out over fifty videos about me, boldly claiming that the count might escalate to "more than one hundred and forty" as he continues to probe into my life. Moreover, he's generated well over a hundred hours of podcast content solely focused on me and actively pursued opportunities to appear on any podcasts, offering to fly anywhere in the country to do so, because he is so eager to discuss my life through his lens of lies.

I would be lying if I said I wasn't afraid of Dave. During one of his live streams, he inadvertently displayed a map leading to my home. In an interview just this week, his comments became even more alarming as he

said he wished I had been a passenger on the missing Malaysian flight 370. Adding insult to injury, he shamelessly exhibited a picture of me in a bra with an exposed pregnant belly during one of his episodes. When I requested its removal, he callously dismissed my concerns, laughing as he told his audience, "Bra or no bra, who cares?". He's joked about me having a miscarriage, which is something that is not remotely funny.

As a last resort, I filed for an Injunction Against Harassment against Dave due to his obsessive interest in me and his flat out refusal to stop making videos and podcasts about me when asked. However, when I informed him that he would be served by a process server, he turned the tables. Deceptively, he began painting himself as fearful of me. His followers swiftly joined in, spreading these unfounded notions that I might pose a threat. I've been called "unhinged" an innumerable amount of times and his followers have posted countless times that I need to be institutionalized. It's been outrageous, entirely unwarranted, and incredibly upsetting.

My physical appearance has been a relentless subject of mockery. Multiple memes have been created, emphasizing my looks and targeting me with hurtful comments about my looks. People claimed to be stunned that Clayton chose to be intimate with me for just one night after having numerous beautiful women to select from during his time as The Bachelor. Clayton himself mentioned I didn't look as pretty as I appeared in some Instagram photos he scrolled through.

I thought that maybe if I were able to change my identity on the outside, I might get back to feeling like myself on the inside. After a lot of thought, I decided to file for a legal name change, which was discovered by Dave the day after I filed the petition with the court, and my new identity as Emily

Wilson was disclosed to his audience, making it obsolete. I felt like I had run out of ideas to escape the relentless nightmare I was living in.

My integrity means everything to me. I've never lied about being pregnant nor the extent to which I've been abused, and I have medical records to back both of those things up. However, I won't be sharing updates regarding the status of my pregnancy with Clayton. *I kindly ask not to receive congratulations or engage in discussions about Clayton and my pregnancy.* This post is not intended for that purpose. What I can confirm is that I sought an order of protection against him. Despite my only sending him pregnancy updates, interestingly, a month later, he obtained an Injunction Against Harassment against me.

Dave's followers have chosen to write my full name on Reddit and in the comments sections on his YouTube videos because they say that in doing so, they will alter the SEO algorithm so that these blatant lies about me are shown at the top of Google search results. He has incited hatred, harassment, and threats against me, and I am just exhausted from it.

Over the last few months, I've often questioned: What is the allure of a 33-year-old woman, confirmed to be pregnant three times, to him and his audience? How much more content can he create, and how much more can I take? Although I would be more than entitled to file a defamation lawsuit against Dave, I have no desire to have my life drained by the legal system and simply want him to stop and remove the videos. **If you want to watch how cruelly, and flat-out bizarrely, Dave has spoken to and about me, you can watch this video.**

I'm sure this post will spark more hateful content from Dave, and he will incite his followers to make more cruel comments about me. Despite

outwardly claiming to my family that I've become desensitized to anything that can be said to me at this point, Dave's videos still deeply affect me, as do the words of his supporters. While I *know* I will advocate against cyberbullying in the future, right now, I just wish for this torment to stop. His relentless bullying has pushed me to the brink, causing moments where I've felt close to the edge of despair. I've even expressed to him that the blood would be on his hands if I harmed myself due to his relentless harassment, but it had no impact on him. It just provided him with something else to talk about on his shows. And why would he stop talking about me? Spreading misinformation generates profit for him, and that appears to be his sole concern. It's an ongoing struggle to try to rise above this situation.

My life has changed after witnessing how cruel people can be, and while I'm a changed person after all of this (how could I not be?), I still want to be Laura Owens, not Emily Wilson. I'm anxious about how people might perceive me once I share my story, but holding all of this inside hurts. **In the face of relentless cyberbullying, I yearn for the torment to cease, hoping that someday, my story will speak louder than the falsehoods, and the strength I find within will reclaim the identity they sought to shatter.**

Cyberharassment Cyberbully Struggle Overcoming Obstacles Empowerment



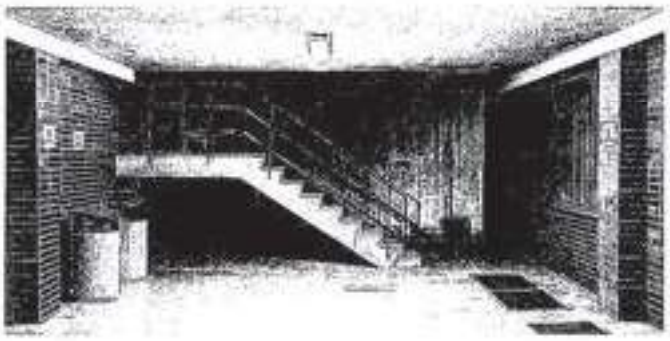
Written by Laura Owens

Follow

9 Followers

Sharing my story isn't about seeking sympathy; it's about reclaiming power, standing up against online abuse, and empowering others along the way.

Recommended from Medium



TrueAlreadyHappenedStories

When I was a kid, my dad kept a second family in our basement.

Growing up, I thought everyone had a second family in their basement. In retrospect, I...

· 12 min read · Nov 23

5K 81



Alexandru Lazar in ILLUMINATION

Ten Habits that will get you ahead of 99% of People

Improve your life and get ahead of your peers in 10 simple steps

9 min read · Nov 18

8.8K 157

Lists



Staff Picks

531 stories · 517 saves



Admiral Cloudberg

A Matter of Millimeters: The story of Qantas flight 32

How a mistake of less than half a millimeter in a single part nearly brought down the world'...

42 min read · 3 days ago

1.92K 28



Lessig

ChatGPT, or: How I Learned to Stop Worrying and Love AI

In my first book, Code and Other Laws of Cyberspace (1999), I told the story of why I...

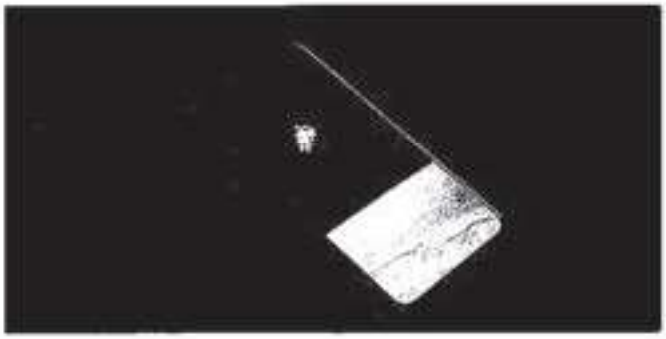
7 min read · Nov 28

4.8K 122



Maevyn Frey in Fourth Wave

The Gender Divide, Holiday Workload Edition



Kiera Bolden in Human Parts

TikTok Diagnosed Me With Autism

The controversial social media algorithm has been the answer to my identity crisis

I'm throwing out the old model and proposing something new

· 9 min read · 3 days ago

938 18

· 9 min read · 4 days ago

877 9

See more recommendations

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/2/2024 8:57:04 AM
Filing ID 17114192

Alexis Lindvall, Esq. #034734
MODERN LAW
1744 S. Val Vista Drive, Suite 205
Mesa, Arizona 85204
(480) 649-2905 Phone
alexis.lindvall@mymodernlaw.com
Attorney for Petitioner

IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS,** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No.: FC2023-052114 **EXPEDITED MOTION TO QUASH DEPOSITION OF PETITIONER** ***(Expedited Ruling Requested)*** (The Honorable Julie Mata)

Petitioner, **LAURA OWENS**, files this Motion to Quash the deposition noticed by Respondent for January 17, 2024. There is a pending Motion to Dismiss this paternity establishment matter. Both parties agree that Petitioner is not pregnant, and they do not share any minor children. Despite this agreement that there is no paternity for this court to establish, Respondent will not stipulate to dismissal and instead noticed Petitioner's deposition. On December 28th, undersigned counsel emailed Petitioner's counsel and asked if Petitioner was "willing to postpone the deposition until we have a ruling on the dismissal?" Exhibit A, *Email Exchange Between Counsel* at 4. Respondent's counsel responded with a revised Notice of Deposition.

There are no hearing dates upcoming. Petitioner concedes she is not pregnant with Respondent's children. There is nothing left for this Court to adjudicate. Even if the

Court does not rule in favor of Petitioner's request for dismissal, there is no reason Petitioner's deposition must be taken immediately and cannot wait until after this Court rules on the Motion to Dismiss. This request is expedited because the deposition is currently scheduled for approximately two weeks from now.

WHEREFORE, Petitioner respectfully requests this Court quash Respondent's deposition of Petitioner currently scheduled for January 17, 2024, and any other deposition of Petitioner until after the dismissal is ruled upon.

RESPECTFULLY SUBMITTED this 2nd day of January 2024.

MODERN LAW

By: /s/ Alexis Lindvall
Alexis Lindvall
Attorney for Petitioner

ORIGINAL of the foregoing eFiled this 2nd day of January 2024 with:

Clerk of the Superior Court
Maricopa County Superior Court

COPIES of the foregoing delivered this 2nd day of January 2024 to:

Honorable Julie Mata
Maricopa County Superior Court

Gregg Woodnick, Esq.
WOODNICK LAW, PLLC
office@woodnicklaw.com
Attorney for Respondent

By: /s/ Sarah Saxon
Sarah Saxon

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/2/2024 10:27:01 AM
Filing ID 17115721

Alexis Lindvall, Esq. #034734
MODERN LAW
1744 S. Val Vista Drive, Suite 205
Mesa, Arizona 85204
(480) 649-2905 Phone
alexis.lindvall@mymodernlaw.com
Attorney for Petitioner

IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS,** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No.: FC2023-052114 **EXPEDITED MOTION TO QUASH DEPOSITION OF PETITIONER** ***(Expedited Ruling Requested)*** (The Honorable Julie Mata)

Petitioner, **LAURA OWENS**, files this Motion to Quash the deposition noticed by Respondent for January 17, 2024. There is a pending Motion to Dismiss this paternity establishment matter. Both parties agree that Petitioner is not pregnant, and they do not share any minor children. Despite this agreement that there is no paternity for this court to establish, Respondent will not stipulate to dismissal and instead noticed Petitioner's deposition. On December 28th, undersigned counsel emailed Petitioner's counsel and asked if Petitioner was "willing to postpone the deposition until we have a ruling on the dismissal?" Exhibit A, *Email Exchange Between Counsel* at 4. Respondent's counsel responded with a revised Notice of Deposition.

There are no hearing dates upcoming. Petitioner concedes she is not pregnant with Respondent's children. There is nothing left for this Court to adjudicate. Even if the

Court does not rule in favor of Petitioner's request for dismissal, there is no reason Petitioner's deposition must be taken immediately and cannot wait until after this Court rules on the Motion to Dismiss. This request is expedited because the deposition is currently scheduled for approximately two weeks from now.

WHEREFORE, Petitioner respectfully requests this Court quash Respondent's deposition of Petitioner currently scheduled for January 17, 2024, and any other deposition of Petitioner until after the dismissal is ruled upon.

RESPECTFULLY SUBMITTED this 2nd day of January 2024.

MODERN LAW

By: /s/ Alexis Lindvall
Alexis Lindvall
Attorney for Petitioner

ORIGINAL of the foregoing eFiled this 2nd day of January 2024 with:

Clerk of the Superior Court
Maricopa County Superior Court

COPIES of the foregoing delivered this 2nd day of January 2024 to:

Honorable Julie Mata
Maricopa County Superior Court

Gregg Woodnick, Esq.
WOODNICK LAW, PLLC
office@woodnicklaw.com
Attorney for Respondent

By: /s/ Sarah Saxon
Sarah Saxon

EXHIBIT A

MODERN LAW

DIVORCE AND FAMILY LAW ATTORNEYS

Alexis Lindvall <alexis.lindvall@mymodernlaw.com>

RE: Owens/Echard

1 message

Isabel Ranney [redacted] Thu, Dec 28, 2023 at 2:14 PM
To: Alexis Lindvall <alexis.lindvall@mymodernlaw.com>
Cc: Gregg Woodnick [redacted], [redacted]

Lexi,

Of course, just let me know when you are able. I will place it on our calendar for the 17th at 1:00 pm, pending your client's confirmation.

Thank you,

Isabel Ranney

Isabel Ranney

Attorney

WOODNICK LAW PLLC

1747 E. Morten Ave., #205

Phoenix, Arizona 85020

Phone: 602-449-7980

Fax: 602-396-5850

www.woodnicklaw.com

[redacted]

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

From: Alexis Lindvall <alexis.lindvall@mymodernlaw.com>
Sent: Thursday, December 28, 2023 1:13 PM
To: Isabel Ranney [redacted]
Cc: Gregg Woodnick [redacted]
Subject: Re: Owens/Echard

Isabel, sorry, I have another hearing at 9:45 a.m. on the 17th. If you could wait for my availability and my client's availability before drafting notices that would probably save you further unnecessary attorney's fees. I already reached out to her regarding 1/17 at 1 p.m. and I am waiting for her response. I understand professional courtesy requires us to agree on a date even though I will be filing my motion tomorrow.

Thank you,

Lexi Lindvall, Esq.

Attorney | **Modern Law**

Call/Text: [redacted]

Mesa | Peoria | Scottsdale
www.mymodernlaw.com

Modern law is a paperless office and hard copies of documents will not be mailed unless requested.

This email contains confidential, legal information. If you realize this email was not intended for you, please ignore the content, immediately notify me that you received it, then delete it. Otherwise bad legal stuff could happen.

Please be advised, this communication does not constitute an agreement pursuant to Rule 69, Arizona Rules of Family Law Procedure. Any statement concerning settlement is made pursuant to Rule 408, Arizona Rules of Evidence, and shall be considered protected from use in any future litigation.

On Thu, Dec 28, 2023 at 2:11 PM Isabel Ranney [redacted] wrote:

> Lexi,
>
> No problem regarding the deposition on the 12th, as we will of course work with your schedule. I am attaching another Notice for January 17th, at 9:00 a.m. Please note this will be in person as our office, pursuant to Rule 57.

We look forward to seeing you and Laura on the 17th at our office.

Thank you,

DICTATED BUT NOT READ

Gregg Woodnick

Isabel Ranney

Attorney

WL | WOODNICK LAW PLLC

1747 E. Morten Ave., #205

Phoenix, Arizona 85020

Phone: 602-449-7980

Fax: 602-396-5850

www.woodnicklaw.com

[redacted]

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

From: Alexis Lindvall <alexis.lindvall@mymodernlaw.com>
Sent: Thursday, De ember 28, 2023 12:57 P
To: Isabel Ranney [redacted]
g Woodnick [redacted]
Subject: Re: Owens/Echard

Isabel,

By now you have probably seen the motions that we filed earlier today. Is your client willing to postpone the deposition until we have a ruling on the dismissal? If not, I will be filing an expedited Motion to Quash the deposition sometime tomorrow. Even if it is not quashed, I am not available on 1/12 at 9:00 a.m. I have a hearing in a dependency matter scheduled for 10:45 a.m. (I am assuming you plan to depose my client for a while).

Laura is not willing to commit perjury by signing the Affidavit you sent over. The Court will not be able to order her to sign it. She concedes she is not pregnant. There cannot be a finding of non-paternity for a non-existent child. Clayton's only viable claim at this point is for attorney's fees. If he insists on proceeding with a deposition when a motion to dismiss is pending, he's racking up needless fees.

Please let me know whether you will agree to postpone the deposition as soon as possible. If I don't hear from you or if you don't agree, I will proceed with filing the Motion to Quash.

Thank you,

Lexi Lindvall, Esq.

Attorney | **Modern Law**

Call/Text: [redacted]

Mesa | Peoria | Scottsdale
www.mymodernlaw.com

Modern law is a paperless office and hard copies of documents will not be mailed unless requested.

This email contains confidential, legal information. If you realize this email was not intended for you, please ignore the content, immediately notify me that you received it, then delete it. Otherwise bad legal stuff could happen.

Please be advised, this communication does not constitute an agreement pursuant to Rule 69, Arizona Rules of Family Law Procedure. Any statement concerning settlement is made pursuant to Rule 408, Arizona Rules of Evidence, and shall be considered protected from use in any future litigation.

On Thu, Dec 28, 2023 at 12:56 PM Isabel Ranney [redacted] wrote:

> Lexi,
>
> Please see the attached Notice of Deposition for your client at our office on **January 12, 2024 at 9:00 a.m.** If this time does not work for you, we are also available on January 17th at 9:00 a.m. or 1 p.m. I am more than happy to reschedule it to better accommodate your schedule, but our preference is sooner rather than later.

You will also find attached Exhibit A, consistent with Rule 57(b)(2), *Arizona Rules of Family Law Procedure*. This was initially sent to your client weeks ago, so she is well aware of her Rule 49 disclosure obligations as well as her duty to produce the documents requested. If you need me to send along a blank HIPAA release for your client to sign, I am happy to do so (one was included in our December 12th email to her).

Thank you,

Isabel Ranney

Isabel Ranney

Attorney

WL | WOODNICK LAW PLLC

1747 E. Morten Ave., #205

Phoenix, Arizona 85020

Phone: 602-449-7980

Fax: 602-396-5850

www.woodnicklaw.com

[redacted]

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

[redacted]

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/3/2024 4:43:32 PM
Filing ID 17128207

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, and **CLAYTON ECHARD,** Respondent,	Case No.: **FC2023-052114** **MOTION FOR SANCTIONS PURSUANT TO RULE 26** (Assigned to The Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through undersigned counsel and pursuant to Rule 26(b) and 26(c), *Arizona Rules of Family Law Procedure* (ARFLP), hereby filed his Motion for Sanctions against Petitioner, **LAURA OWENS**, for filing her Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support, as well as all other subsequent filings by Petitioner.

Petitioner filed the underlying action for an improper purpose without medical evidence to support her claim that she was pregnant and/or that she was pregnant by Respondent. Petitioner could not have become pregnant from the limited encounter the parties had and

therefore premised this entire action on a fiction. Petitioner violated Rule 26(b)(1)-(3) in her Petition and subsequent filings.

ARGUMENT

1. This matter arises from the establishment petition filed August 1, 2023. Also pending before the Court are: Respondent's Motion for Leave to Amend Respondent's Response to Petition to Establish Paternity, Respondent's Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing, Respondent's Notice of Filing Affidavit of Non-Paternity, Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice, Petitioner's Response to Expedited Motion and Respondent's Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice (filed consecutively).

2. Rule 26(b) ARFLP provides, as relevant here, that "*by signing a pleading, motion or other document, the attorney or party certifies to the best of the person's knowledge, information, and belief formed after reasonable inquiry: (1) it is not being presented for any improper purposes, such as to harass [...] (2) the claims, defenses, and other legal contentions are warranted by existing law [...] (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery [...]*".

3. Rule 26(c) provides: "*if a pleading, motion, or other document is signed in violation of this rule, the court—on motion or on its own—may impose on the person who signed it, a represented party, or both, an appropriate sanction, which may include an order*

to pay to the other party or parties the amount of the reasonable expenses incurred because of the filing of the document, including a reasonable attorney fee."

4. The requirements of Rule 9(c) have been met and a good faith consultation certificate is attached hereto. *See also* Respondent's Motion for Leave to Amend Respondent's Response to Petition to Establish Paternity; Respondent's Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice.

A. Rule 26 sanctions are appropriate and warranted

Petitioner's behavior is the exact type of conduct that Rule 26 is intended to sanction. Petitioner was never pregnant by Respondent and filed this underlying action in bad faith and with the sole intent of coercing Respondent into having a relationship with her.

1. Petitioner's commencement of this action and original filing was made for an improper purpose under Rule 26(b)(1).

Petitioner instigated this action when she filed her Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support on August 1, 2023, which alleges she had sexual intercourse with Respondent, became pregnant by him, and requested this Court enter Orders for Joint Legal Decision-Making, a parenting plan, and order Respondent to pay her Child Support. Petitioner's Petition to Establish was filed for an improper purpose because Petitioner was never pregnant by Respondent and could not have become pregnant based on their one (1) encounter of oral sex on May 20, 2023.

Despite no underlying Orders, Petitioner filed a Motion to Communicate on August 8, 2023, and Motion to Compel on August 23, 2023. This Court denied both Motions. Respondent

filed a Response on August 21, 2023, denying that Petitioner could be pregnant by Respondent after one incident of oral sex on May 20, 2023. When Petitioner did not get what she wanted (including attempting to get Respondent to enter into a dating "*contract*") she went to the media (Reddit, *The Sun, People Magazine, Page Six,* Medium.com, etc), the police, Respondent's father, and even threatened self-harm. *See* Respondent's Response/Objection to Petitioner's Motion to Dismiss (filed 1/3/24). When the media turned on Petitioner and had doubts about the veracity of her pregnancy (as no verifiable medical evidence exists), Petitioner obtained an Order of Protection against Respondent based on "cyberbullying." (**Exhibit 1).**

Respondent obtained an Injunction of Harassment against Petitioner based on the receipt of 500+ harassing messages in (CV2023-05392). During the proceedings, on November 2, 2023, Petitioner wore a fake stomach ("moon bump") to appear pregnant and claimed, with no scientific support, that she was 24 weeks pregnant with Respondent's twins and due on February 14, 2024 *See* Respondent's Response/Objection to Petitioner's Motion to Dismiss (filed 1/3/24); *see also* FTR for hearing on 11/2/23. Petitioner then sought to have this Court enter Orders against Respondent despite no verifiable proof Petitioner was pregnant and no child subject to this Court's jurisdiction (with respect to entering parenting-related Orders) by filing an *Application and Affidavit for Entry of Default* on August 23, 2023.

Despite providing no verifiable medical evidence that she was pregnant or that she was pregnant by him (only positive HCG tests and fabricated sonograms), Petitioner sought to force Respondent to communicate with her and threatened to go to the media if he did not comply. Notably, in her Motion to Communicate, Petitioner requested "*that Respondent […] is ordered to communicate with Petitioner […] The Respondent was* The Bachelor *on* ABC *and the*

Petitioner knows it would be in his best interests to keep the details of this case out of the public eye." *See* Petitioner's Motion to Communicate filed August 8, 2023.

Also, in her Motion to Compel (filed August 23, 2023), Petitioner admitted she "*had requested* [Respondent agree to] *a one to two week trial relationship"* prior to filing her underlying Petition and asked this Court to hold Respondent in **contempt of Court** for not talking to her. Petitioner's own words prove that she instigated this entire action (including fabricating a pregnancy) to coerce Respondent into talking to and dating her.

2. Petitioner's Motion to Dismiss is unsupported by existing law under Rule 26(b)(2).

Jurisdiction was established at the time of Petitioner's initial filing, which Petitioner continued to avail herself of through each additional filing made in the course of this matter. Ostensibly fearing that she would be held accountable for her disturbing and unsettling behavior, Petitioner recently filed a (contested) *Motion to Dismiss* on December 28, 2023 the entire action alleging lack of subject matter jurisdiction.

As discussed more fully in the Response to that Motion, Arizona law is crystal clear that jurisdiction attaches at the time the action is filed. Subsequent events or acts by the parties cannot deprive the court of jurisdiction once attached, even if those events would have defeated jurisdiction if occurring before the action was filed (i.e., Petitioner claimed at the time of filing that she was pregnant with Respondent's children at the time of filing, so the fact that she is not currently pregnant does not deprive the court of jurisdiction). Statutory jurisdiction does not automatically divest unless the statutes expressly state whether and to what extent divestiture occurs. Title 25 contains no such provision, and the *Fry* case cited in Respondent's

January 3, 2024 *Response to the Motion to Dismiss* is highly analogous to the current circumstances.

For purposes of Rule 26(b)(2), Petitioner's claim is not warranted by existing law and does not attempt to make a non-frivolous argument for modifying the law or establishing new law. Simply put, Petitioner misstates the law of subject matter jurisdiction despite clearly contrary precedent in an opaque attempt to avoid the consequences of her improper filings. This is sanctionable.

3. Petitioner's factual contentions are not supported by evidence and did not become supported by evidence after investigation and discovery under Rule 26(b)(3).

The Petition lacks evidentiary support beyond Petitioner's assertions that she was pregnant with Respondent's children. Admittedly, any establishment petition made prior to the birth of the child is necessarily lacking evidentiary support, but Title 25 and Rule 26 permit such filings because those claims, if true, will have evidentiary support after a reasonable opportunity for further investigation or discovery. In this case, however, Petitioner's claims were never true and could not be true because the parties did not have sexual intercourse requisite to conception. In matters where pregnancy and paternity are contested, Title 25 contemplates subsequent testing—either before or after the birth of the child—to establish the necessary factual support.

Since filing, Petitioner has provided no Rule 49 disclosure (and seeks to avoid a deposition) that would support her claim that she was pregnant by Respondent (no sonogram reports, fetal anatomy scans, reports of weekly ultrasounds, etc). She has participated in fetal DNA tests, none of which have conclusively established the existence of a pregnancy or

Respondent's paternity. At least two (2) fetal DNA tests have come back with "*little to no fetal DNA*," indicating that not only was Petitioner not pregnant by Respondent, but she was not pregnant at all. Petitioner carefully alleges in her Motion to Dismiss that she is "no longer pregnant" but refuses to provide evidence of the termination or miscarriage of the pregnancy (e.g., fetal death certificates). It is critical for this Court to take evidence and investigate whether Petitioner was ever pregnant in the first instance, both for purposes of declaring non-paternity and for determining the appropriateness of Rule 26(b)(3) sanctions.

4. Rule 26(c)(1) contemplates sanctions by motion or on the court's own impetus.

Even if Respondent did not request sanctions—which he previously did and now reiterates by separate Motion to address any proffered procedural irregularity—this Court may investigate and impose sanctions on its own motion. Rule 26 requires signatures on pleadings and filings and attaches substantial meaning to those signatures: a person filing a document certifies to the Court that it is being presented for a proper purpose and is supported by law and evidence. The Rule requires parties and attorneys to conduct at least a reasonable inquiry before signing filings, and sanctions exist to ensure compliance, vindicate misuse of the Court's resources and authority, and to make responding parties whole for frivolous lawsuits. Respondent asserts that the circumstances of this case are so egregious that this Court ought to impose sanctions on its own, even if for no other reason than to deter specific and general abuse of process.

///

///

CONCLUSION

Pursuant to the above and consistent with Rule 26(b) and (c), ARFLP, this Court should impose appropriate sanctions against Petitioner, including but not limited to awarding Respondent his reasonable attorney's fees and costs incurred.

RESPECTFULLY SUBMITTED this 3rd day of January, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
this 3rd day of January, 2024 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document
delivered/emailed this 3rd day of January, 2024, to:

The Honorable Julie Mata
Maricopa County Superior Court

Alexis Lindvall
MODERN LAW
1744 S. Val Vista Drive, Suite 205
Mesa, Arizona 85204
Alexis.lindvall@mymodernlaw.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Motion for Sanctions Pursuant to Rule 26* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Jan 3, 2024 16:05 MST)

CLAYTON ECHARD

01/03/2024

Date

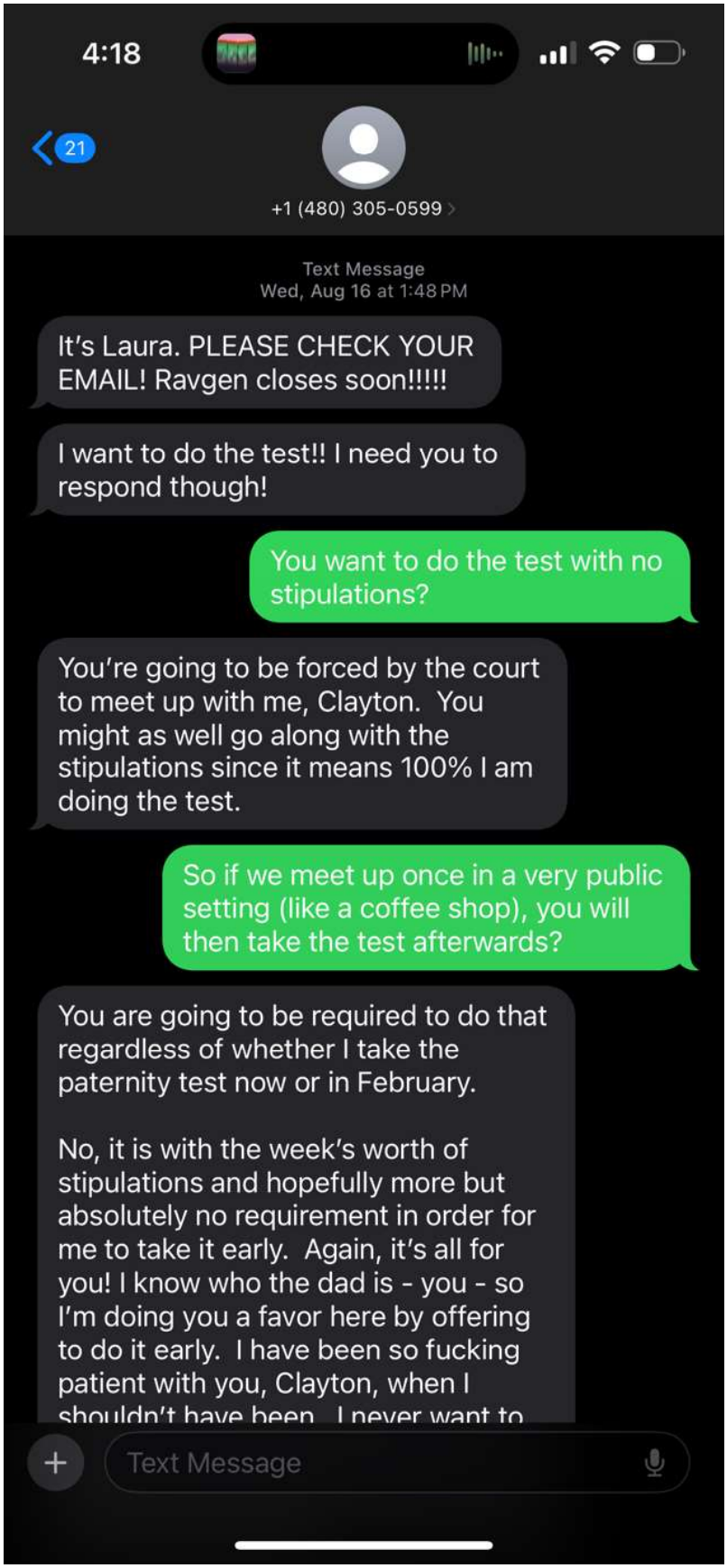
GOOD FAITH CONSULTATION CERTIFICATE

In conformance with Rule 9(C), *Arizona Rules of Family Law Procedure*, counsel undersigned hereby certifies that Respondent, Clayton Echard, satisfied his Rule 9(c) obligation when he attempted to meet and confer with Petitioner, Laura Owens, on August 16, 2023 at 1:48 p.m. and 2:50 p.m. (text messages below) as well as in all of his subsequent filings and communications to Petitioner that indicated he could not be the father of her alleged twin fetuses (including but not limited to in Respondent's Injunction Against Harassment proceedings (CV2023-052952) against Petitioner on October 24, 2023 and November 2, 2023). *See also* Respondent's Motion for Leave to Amend Respondent's Response to Petition to Establish Paternity; Respondent's Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice. Additionally, undersigned met and conferred with Petitioner's counsel, Alexis Lindvall (who already has filed to withdraw from representing the Petitioner), over the phone on December 27, 2023.

WOODNICK LAW, PLLC



Gregg R. Woodnick
Attorneys for Respondent


4:18
21
+1 (480) 305-0599
Text Message
Wed, Aug 16 at 1:48 PM
It's Laura. PLEASE CHECK YOUR EMAIL! Ravgen closes soon!!!!!
I want to do the test!! I need you to respond though!
You want to do the test with no stipulations?
You're going to be forced by the court to meet up with me, Clayton. You might as well go along with the stipulations since it means 100% I am doing the test.
So if we meet up once in a very public setting (like a coffee shop), you will then take the test afterwards?
You are going to be required to do that regardless of whether I take the paternity test now or in February.
No, it is with the week's worth of stipulations and hopefully more but absolutely no requirement in order for me to take it early. Again, it's all for you! I know who the dad is - you - so I'm doing you a favor here by offering to do it early. I have been so fucking patient with you, Clayton, when I
Text Message

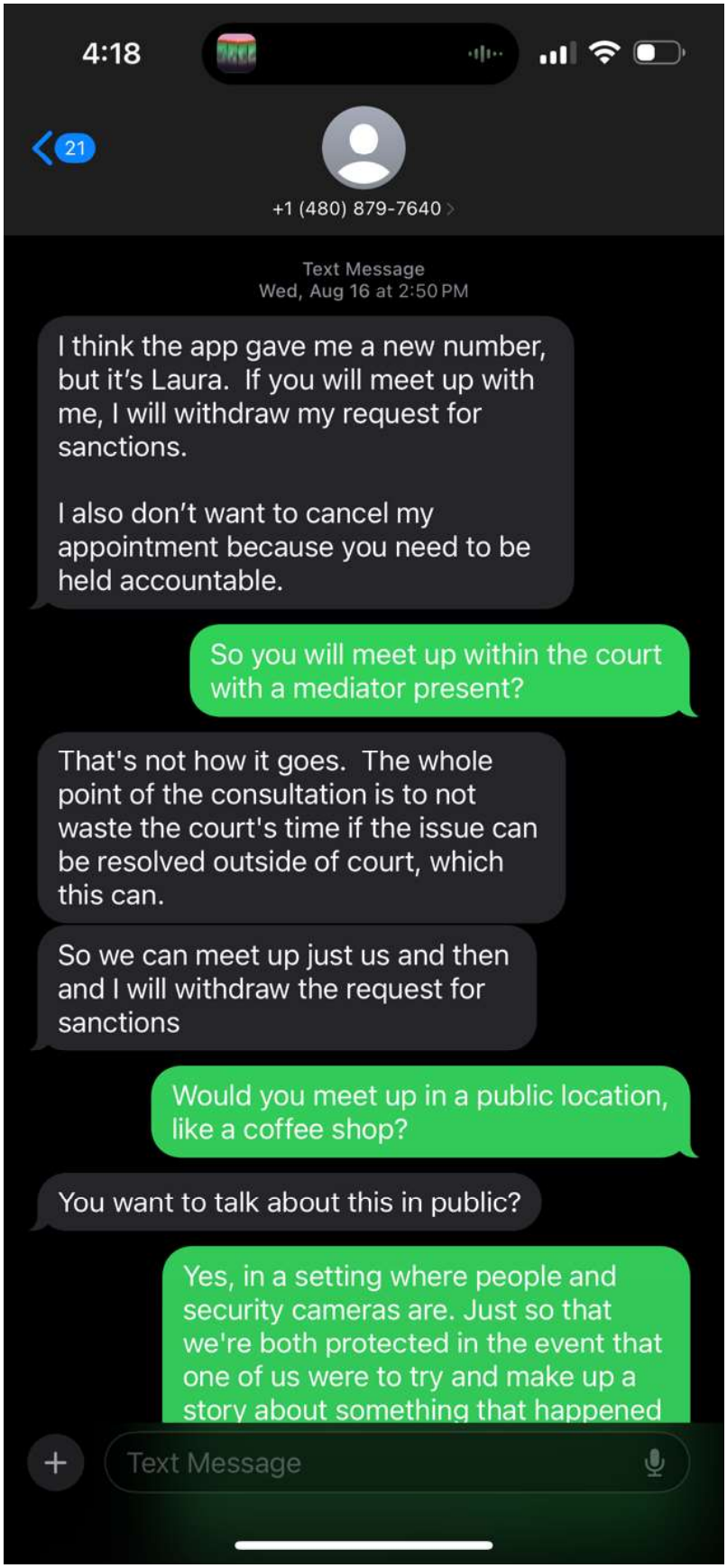

4:18
21
+1 (480) 879-7640
Text Message
Wed, Aug 16 at 2:50 PM
I think the app gave me a new number, but it's Laura. If you will meet up with me, I will withdraw my request for sanctions.
I also don't want to cancel my appointment because you need to be held accountable.
So you will meet up within the court with a mediator present?
That's not how it goes. The whole point of the consultation is to not waste the court's time if the issue can be resolved outside of court, which this can.
So we can meet up just us and then and I will withdraw the request for sanctions
Would you meet up in a public location, like a coffee shop?
You want to talk about this in public?
Yes, in a setting where people and security cameras are. Just so that we're both protected in the event that one of us were to try and make up a story about something that happened
Text Message

EXHIBIT “1”

CLERK OF THE SUPERIOR COURT
FILED
10/6/2023 @ 10:43AM
, Deputy

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032
602-506-7353 Monday - Friday 8am - 5pm

Plaintiff ☐ Employer-Plaintiff if Workplace Injunction Laura Owens	**Defendant** Clayton Ray Echard	**Case No.** FC2023-052771
☐ **On behalf of minor/person in need of protection named:**	**Defendant's address** 6855 E Camelback Road 7002 Scottsdale, AZ 85254	**PETITION for:** ☒ **Order of Protection** ☐ **Injunction Against Harassment** ☐ **Workplace Injunction**
Agent's name (if Workplace Injunction)	**Defendant's birth date** 4/29/1993	
	Defendant's phone 314-956-6975	

This is NOT a court order.
This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

DIRECTIONS: Please read the Plaintiff's Guide Sheet before filling out this form.

1. **Defendant/Plaintiff Relationship** *(Choose the options that best describe your relationship to the defendant. *If you are applying on behalf of another person, choose the relationship between the other person and the defendant)*

   ☐ Married (past or present)
   ☐ Live/lived together as intimate partners
   ☐ Parent of a child in common
   ☒ One party is pregnant by the other
   ☒ Romantic or sexual relationship (past or present)
   ☐ Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step)
   ☐ Live/lived together but not as intimate partners
   ☐ Other (describe):

2. ☒ If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in Maricopa County Superior Court, Case # FC2023-052114.

3. Name of court, if any, in which any other protective order related to this conduct has been filed.
   Court name Case #

4. Tell the judge what happened and why you need this order. PRINT both the dates and a brief description of what happened. If there is a contested hearing, a judge can consider only what you write here.
   NOTE: Defendant will receive a copy of this petition when the order is served.

Approx. Date	(Do not write on back or in the margin. Attach additional paper if necessary.)
6/1/2023	Clayton has sent threatening messages since discovering I was pregnant, such as: I legitimately hate you right now. my hatred will only grow if you decide to put me through all of this. My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever My hate is toward you and you only. if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.
9/21/2023	Clayton Echard was The Bachelor and has many diehard loyal fans. He and I are involved in a very public paternity case that is being covered by every major media outlet. Clayton posted to a story to his 270k followers to look me up, which they have, and I have been sent threatening and harassing messages by his followers. I explained this to him and asked him to take down the post, which he did not. By posting personal and sensitive information about me publicly (and without my consent), he has made me feel humiliated and embarrassed.

9/21/2023	Scottsdale PD Officer Vince Johnson called Clayton to explain that what he was doing was harassment in and of itself, coupled with the fact that he was inciting his followers to harass me as well. Despite this call, Clayton still did not take down the post.
10/5/2023	Between 9/22 and 10/5, Clayton has posed as several users on Reddit, including "sillygoosetits", "GossipGooseTits", "Sandbetweenhertoes", and others. He has posted private and confidential information, including facts about my medical history, that is known only to him because of our paternity case. This is why it is 100% traceable back to him. He has also been writing defamatory and very hurtful things about me, including comments about how I have gained weight (I am pregnant), how I am not attractive, how my photos are so poorly edited that it is laughable, how I am bad at my job (a self-help podcaster), and how my prior abusive relationship, which inspired a TEDx talk, never happened, despite mountains of evidence. He is doing everything in his power to ruin and hurt my reputation. As a result of what he has posted, I have gotten harassing messages that have told me to harm myself as a result of becoming pregnant with his twins. I am getting other threatening messages as well, and all of this attention from the general public that he has incited is very much unwanted. As a result of this public shaming, he has caused me extreme psychological harm and disrupted my peace. I have asked Clayton to stop the harassment on Reddit and social media so many times, but he won't. I have reported his accounts and posts to Reddit, but he continues to write unacceptable, cruel things about me. He has multiple accounts now and so even if one is blocked, he can create another one. As a result of him spreading false and damaging information under pseudonyms, I feel demeaned, humiliated, and like my deepest sense of privacy has been invaded. In addition, he has been in communication with my ex, who I have an order of protection against, and who he knows is dangerous. I have asked him to stop talking to him because it will put me in danger, but he continues to communicate with him.
10/6/2023	When combined, all of this has led me to feel extreme anxiety and fear for my safety. I have not left my house since September 28th because of this.

5. The following persons should also be on this order. They should be protected because Defendant is a danger to them:

6. Defendant should be ordered to stay away from these locations at all times, even when I am not present.
NOTE: Do not list confidential addresses here.

   ☒ Residence (confidential)
   ☒ Work/Business
   ☒ School/other

7. ☐ Defendant owns or carries a firearm or other weapons.
   ☐ Defendant should be ordered NOT to possess firearms while this order is in effect because of the risk of harm to me or other protected persons.

8. ☐ Defendant should be ordered to stay away from any animal that is owned, possessed, leased, kept or held by me, Defendant, or a minor child living in either my household or Defendant's household.

9. Other requests: No cyberharassment or cyberbullying under real name or pseudonyms.;

Under penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge, and I request an Order / Injunction granting relief as allowed by law.

/s/ Laura Owens
Plaintiff

Attest:
Judicial Officer/Clerk/Notary

10/6/2023.
Date

Clerk of the Superior Court
*** Electronically Filed ***
10/26/2023 8:00 AM

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052771

10/25/2023

HONORABLE JOHN R. DOODY

CLERK OF THE COURT
T. Sachse
Deputy

IN RE THE MATTER OF
LAURA OWENS

JOSHUA A LOPEZ

AND

CLAYTON RAY ECHARD

CLAYTON RAY ECHARD
6855 E CAMELBACK RD # 7002
SCOTTSDALE AZ 85254

COMM. DOODY

MINUTE ENTRY

There is a *LATER* at the end of this minute entry.

Prior to the commencement of today's proceedings, Plaintiff's Exhibits 1 through 18 and Defendant's Exhibits 19 through 51 are marked for identification.

Courtroom 101-NER

8:32 a.m. This is the time set for Hearing on Order of Protection issued on October 6, 2023. Plaintiff, Laura Owens, is present with the above-named counsel. Defendant, Clayton Ray Echard, is present on his own behalf.

A record of the proceedings is made digitally in lieu of a court reporter.

Laura Owens and Clayton Ray Echard are sworn.

The Court addresses previous motions filed by Plaintiff.

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052771 10/25/2023

IT IS ORDERED denying Plaintiff's Motion Requesting That the Hearing be Closed From the Public or That This Hearing Be Closed From Watching Online, filed October 25, 2023 and denying Plaintiff's Motion Requesting Laura Owens Attend Virtually or Telephonically for Hearing Scheduled October 25, 2023, filed on October 25, 2023.

Counsel for Plaintiff presents opening statements.

Laura Owens testifies.

Plaintiff's Exhibits 1 and 11 are received into evidence and Exhibit 52 is marked for identification and received into evidence.

Clayton Ray Echard testifies.

Defendant's Exhibits 34, 35, and 51 are received into evidence and Exhibit 53 is marked for identification and received into evidence.

Discussion is held.

Based on the testimony and matters presented,

THE COURT FINDS by a preponderance of the evidence that there is reasonable cause to believe that Defendant has committed an act of domestic violence within the last year.

THE COURT FURTHER FINDS that good cause exists to continue the Order of Protection in this case.

IT IS ORDERED that the Order of Protection issued at Superior Court on October 6, 2023 shall remain in full force and effect.

LET THE RECORD FURTHER REFLECT that the parties receive a copy of the aforementioned document in open court.

LET THE RECORD FURTHER REFLECT that Plaintiff's Exhibits 2 through 10, 12 through 18 and Defendant's Exhibits 19 through 33, and 36 through 50 are disposed.

Counsel for Plaintiff makes an Oral Motion to withdraw from these proceedings.

IT IS ORDERED granting Counsel's Motion to withdraw.

10:13 a.m. Hearing concludes.

FILED: Hearing Order

LATER:

LET THE RECORD REFLECT that the Court did not invoke the Brady Order due to the fact that it is still undetermined if Plaintiff is pregnant with Defendant's child.

All parties representing themselves must keep the Court updated with address changes. A form may be downloaded at:
http://www.superiorcourt.maricopa.gov/SuperiorCourt/LawLibraryResourceCenter/

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/3/2024 4:44:43 PM
Filing ID 17128213

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

and

CLAYTON ECHARD,

Respondent,

Case No.: **FC2023-052114**

RESPONDENT'S REPLY TO PETITIONER'S RESPONSE TO EXPEDITED MOTION TO EXTEND DISMISSAL DATE ON INACTIVE CALENDAR AND SCHEDULE AN EVIDENTIARY HEARING

(Assigned to The Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through undersigned counsel, hereby files his Reply to Petitioner's Response to Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing. As and for his Reply, Respondent states as follows:

1. **Whether or not Petitioner is currently pregnant does not divest this Court of subject matter jurisdiction.** As detailed in depth in Respondent's Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice, jurisdiction attached when Petitioner filed

her underlying Petition to Establish on August 1, 2023. *Fry v. Garcia*, 213 Ariz. 70 (noting subject matter is established "*at the time of filing of the lawsuit and cannot be ousted by subsequent actions or events*.") Nothing has occurred that would divest this Court of subject matter jurisdiction. There is (1) no statute that explicitly and clearly divests this Court of jurisdiction, (2) jurisdiction cannot be ousted by subsequent events, and (3) Arizona law presumes retention of jurisdiction unless divestiture is clearly and unambiguously found. *See Fry v. Garcia*, 213 Ariz. 70, 72-3 (Ariz. App. 2006).

2. **Respondent is seeking an extension so Petitioner can comply with her Rule 49 obligations and this Court has adequate time to adjudicate (in addition to his Motion for Sanctions and attorney's fees) that he is, and never was, the father of Petitioner's alleged fictitious twin fetuses.** This Court set a dismissal date for February 2, 2024, ostensibly because no proof of paternity had been filed. *See also* Minute Entry dated 11/29/23 (denying Petitioner's Request for Pre-Decree Mediation as premature "absent a finding that Respondent is the father of the unborn children"). To date, all Petitioner has provided as "proof" that she was pregnant are positive HCG tests and fabricated sonograms, both used to perpetuate fraud upon the court as Petitioner was never pregnant by Respondent. As explained in all of Respondent's recent filings, he is seeking an adjudication by this Court of **non-paternity**, as it is the only way to prevent Petitioner from continuing to perpetuate her false narrative that she *was* pregnant by Respondent.

3. **Respondent is entitled to his reasonable attorney's fees and costs incurred based on Petitioner's unreasonableness.** As detailed in Respondent's Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making,

Parenting Time and Child Support with Prejudice, the source of Respondent's attorney's fees is irrelevant and has no bearing on whether Respondent has acted unreasonably such that attorney's fees are warranted under A.R.S. § 25-324. (Note, the *Motion for Sanctions* is also pending and requires adjudication.)

Petitioner continues to cause Respondent to incur attorney's fees and costs due to her pervasive disconnect with the science of procreation. It is impossible for her to be pregnant by him after she only performed oral sex on him. At least two (2) fetal DNA tests have come back showing "*little to no DNA,"* Petitioner has been unable to produce any verifiable medical evidence that supports her claim, under oath, that she was "100%" "24 weeks" pregnant by Respondent and due on "February 14, 2024" on November 2, 2023. That Petitioner is suddenly admitting a partial truth – that she is not currently pregnant – does not absolve her of her unreasonable behavior in bringing this cause of action and forcing Respondent into court after he did not have sex with her and refused to date her.

This Court's subject matter jurisdiction is unaffected by Petitioner's admission that she is not pregnant (and attempt to avoid responsibility and participation in the properly Noticed deposition pursuant to Rules 52 and 57, ARFLP). As such, the underlying Motion to Dismiss is legally inappropriate.

As this Court has retained subject matter jurisdiction, a virtual thirty (30) minute evidentiary hearing on the residual issues including non-paternity, attorney's fees, and Rule 26 sanctions must be set.

WHEREFORE, Respondent respectfully requests this Court enter the following:

A. Issue an Order continuing the matter on the dismissal date for sixty (60) days;

B. Schedule a virtual evidentiary hearing on the issue of paternity/non-paternity, attorney's fees, and Rule 26 sanctions; and

C. Award Respondent his reasonable attorney's fees and costs incurred in this matter based on Petitioner's unreasonableness pursuant to A.R.S. § 25-324;

D. Any other Order this Court deems appropriate, including sanctions.

RESPECTFULLY SUBMITTED this 3rd day of January, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
this 3rd day of January, 2024 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document
delivered/emailed this 3rd day of January, 2024, to:

The Honorable Julie Mata
Maricopa County Superior Court

Alexis Lindvall
MODERN LAW
1744 S. Val Vista Drive, Suite 205
Mesa, Arizona 85204
Alexis.lindvall@mymodernlaw.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Respondent's Reply to Petitioner's Response to Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Jan 3, 2024 16:20 MST)

CLAYTON ECHARD

01/03/2024

Date

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/3/2024 1:00:21 PM
Filing ID 17124769

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

and

CLAYTON ECHARD,

Respondent,

Case No.: **FC2023-052114**

RESPONSE/OBJECTION TO PETITIONER'S MOTION TO DISMISS PETITION TO ESTABLISH PATERNITY, LEGAL DECISION-MAKING, PARENTING TIME, AND CHILD SUPPORT WITH PREJUDICE

(Assigned to The Honorable Julie Mata)

Respondent, CLAYTON ECHARD, by and through undersigned counsel, hereby responds and objects to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice. Petitioner's Motion **must be denied**, as a Motion alleging (without any proof that Petitioner was pregnant in the first place) that Petitioner is now without child is insufficient cause for a dismissal under Rule 29(a)(1). **Permitting Petitioner to bring this action, seek out media attention, force Respondent into court to Respond to baseless and malicious allegations (in three (3) different court cases before three (3) different Maricopa County Superior Court judges)**

to then absolve herself by suddenly claiming, without any evidence, that she is not pregnant would be a gross miscarriage of justice.

Petitioner continues to demonstrate that she is eager to utilize the media to support her fabricated pregnancy narrative and she will continue to claim that she was pregnant by Respondent unless this Court adjudicates this matter with a finding of non-paternity. **On or about January 2nd, 2024, Petitioner again contacted *The Sun* and stated she "firmly stands by everything" and "she had a positive pregnancy test at one point" that 'confirmed' her pregnancy" (Exhibit 1).** The *current* existence of her pregnancy, as explained below, is insufficient cause for a dismissal. An adjudication that she was never pregnant or, at least, that she was never pregnant by Respondent is what justice requires.

To the extent applicable, Respondent's pending Motion for Leave to Amend Respondent's Response to Petition to Establish Paternity, Notice of Filing Affidavit of Non-Paternity, and Expedited Motion to Extend Dismissal Date on Inactive Calendar (together, "Pending Pleadings") are incorporated herein by reference.

Petitioner's Motion (as well as all of Petitioner's filings in this matter) lacks evidentiary support, misstates well-established Arizona law and policy surrounding subject matter jurisdiction, and would deprive Respondent of basic access to justice *after* he was involuntarily dragged into court to defend himself. Put plainly, Petitioner's Motion cannot be granted and to do so, would be to commit grave and clear error. As and for his Response/Objection, Respondent provides as follows:

1. **A Motion stating that Petitioner "*is no longer pregnant*" creates evidentiary issues that must be resolved by this Court.** After repeatedly claiming and insisting that she

was "*100%*"[1] pregnant by Respondent in filings, under oath in various court hearings (FC2023-052771; CV2023-05392), and in hundreds of social media posts, Petitioner cannot be permitted to suddenly claim, without any evidence, that she is no longer pregnant.

Critically, Petitioner stated, under oath and without any medical evidence, that she was "***24 Weeks***" pregnant and due on "***February 14, 2024***" as of **November 2, 2023**.[2] Petitioner also appeared in Court before Judge Gialketsis via video on **October 24, 2023** with what appeared to be a pregnant stomach (which, upon information and belief, was actually a "moon bump" or a fake stomach to appear pregnant). At this time, Petitioner also requested Judge Gialketsis permit her to *show* Respondent her stomach to "verify" she was pregnant (which Judge Gialketsis denied).



[1] FTR at 2:55:07 for hearing Nov 2, 2023.
[2] FTR at 2:56:34 and 2:57:09 for hearing Nov 2, 2023.

If Petitioner is now alleging that she is no longer pregnant because of a miscarriage, a third trimester abortion or whatever she is claiming (her Motion to Dismiss curiously lacks any explanation), she **must** provide documentation to support the same. A miscarriage this late in an alleged pregnancy would require medical attention (if not full hospitalization) and there would be a fetal death certificates filed with Vital Records consistent with A.R.S. § 36-239 (requiring a fetal death certificate to be filed within seven (7) days of fetal death where the fetus is past twenty (20) weeks or 350 grams in weight). If she otherwise disposed of the twin fetuses, a criminal investigation would be warranted to locate the remains. **Petitioner must provide Respondent and this Court with evidence to support the existence and, now, nonexistence of a pregnancy.**

Petitioner's ability to provide this evidence, or any evidence that complies with Rule 2, is *highly dubious* and any testimony she provides should be carefully assessed, as Petitioner is entirely lacking in credibility. As outlined in Respondent's Pending Pleadings, Petitioner has **provided no verifiable medical evidence** to support her claim that she was ever pregnant (instead, Petitioner offered unverifiable screenshots of appointments, positive HCG tests, a sonogram video taken from a seven-year-old YouTube video, and a demonstratively fabricated sonogram). Out of three (3) fetal DNA tests, two (2) have come back showing "**little to no fetal DNA"** (one was allegedly lost in transit). A conclusive paternity determination has now been made impossible, as Petitioner refused to comply with the fourth test and ostensibly has determined that stating she is no longer pregnant will allow her to evade the paternity issue and continue to perpetuate the false narrative that she *was* pregnant by Respondent (*see* Petitioner's December 8th, 2023 Medium Article - **Exhibit 2**; *see also*

Respondent's Expedited Motion to Extend Dismissal Date). The Court must be provided with concrete and verifiable evidence to establish this critical fact (that Petitioner was pregnant by Respondent and is no longer pregnant with Respondent's twins) to determine whether there is cause to go forward.

Without belaboring the point, Petitioner has NOT provided: any Rule 49 disclosure, any verified sonogram reports, any fetal anatomy scans, any sonograms from weekly checks ups, any documentation to support her statement under oath that she was 24 weeks pregnant on November 2, 2023, or any medical records supporting the existence of pregnancy at all. She refuses to sign a simple HIPAA form to permit the release of records from the various medical professionals that *she claimed*, under oath on November 2, 2023, that she was being seen by for her "high risk pregnancy." She now seeks to have the action she filed dismissed by claiming that she "is no longer pregnant," still without providing *any* evidence to support the same. This cannot be permitted.

To properly resolve this action, Petitioner **must prove with evidence in compliance with Rule 2** (that Petitioner curiously invoked, despite never providing any verifiable evidence to *any* court)**:** (1) that she was pregnant due to conduct on May 20, 2023, (2) that she was pregnant with Respondent's twins (through records held by Ravgen, which Respondent is requesting this Court Order be released) AND (3) that she is no longer pregnant, with medical records confirming the date and week of gestation that the pregnancy terminated. Petitioner simply cannot evade her evidentiary burden, as Respondent is entitled to a resolution as to whether she was pregnant, whether she was pregnant with his twins, and if she was pregnant, what happened to the twin fetuses.

2. **This Court has subject matter jurisdiction, as such jurisdiction attaches at <u>date of filing</u> and subsequent acts by parties does not deprive the Court of jurisdiction.**

Subject matter jurisdiction is "established at the time of filing of the lawsuit and cannot be ousted by subsequent actions or events." *Fry v. Garcia,* 213 Ariz. 70 (Ariz. App. 2006), *Resolution Trust Corp. v. Foust,* 177 Ariz. 507, 517, 869 P.2d 183, 193 (App.1993) (citations omitted); *see also State v. Howell,* 107 Ariz. 300, 301, 486 P.2d 782, 783 (1971) ("Jurisdiction depends upon the state of affairs existing at the time it is invoked . . . and once having attached is not lost by subsequent events.") (citations omitted). "Ordinarily, a court that has acquired jurisdiction of a case cannot be deprived of jurisdiction by subsequent events in the course of its proceedings, even if those subsequent events would have prevented jurisdiction from attaching in the first place." 20 Am.Jur.2d *Courts* § 111 (1995) (internal footnotes omitted). Arizona public policy favors "retention of jurisdiction rather than divestiture." *Fry*, 213 Ariz. at 73; *see also Pritchard v. State,* 163 Ariz. 427, 430 ("[A] presumption exists in favor of retention of jurisdiction, and a divestiture of jurisdiction cannot be inferred but must be clearly and unambiguously found.").

That Petitioner is allegedly "*no longer pregnant*" does not divest the Court of jurisdiction. Subject matter jurisdiction attached when Petitioner she filed her verified Petition to Establish on **August 1st, 2023,** alleging that Respondent was the father of her unborn twins. Nothing has occurred that would divest this Court of jurisdiction over this matter. There is (1) no statute that explicitly and clearly divests this Court of jurisdiction, (2) jurisdiction cannot be ousted by subsequent events, and (3) Arizona law presumes retention of jurisdiction unless divestiture is clearly and unambiguously found. *See Fry*, 213 Ariz. at

72-3.

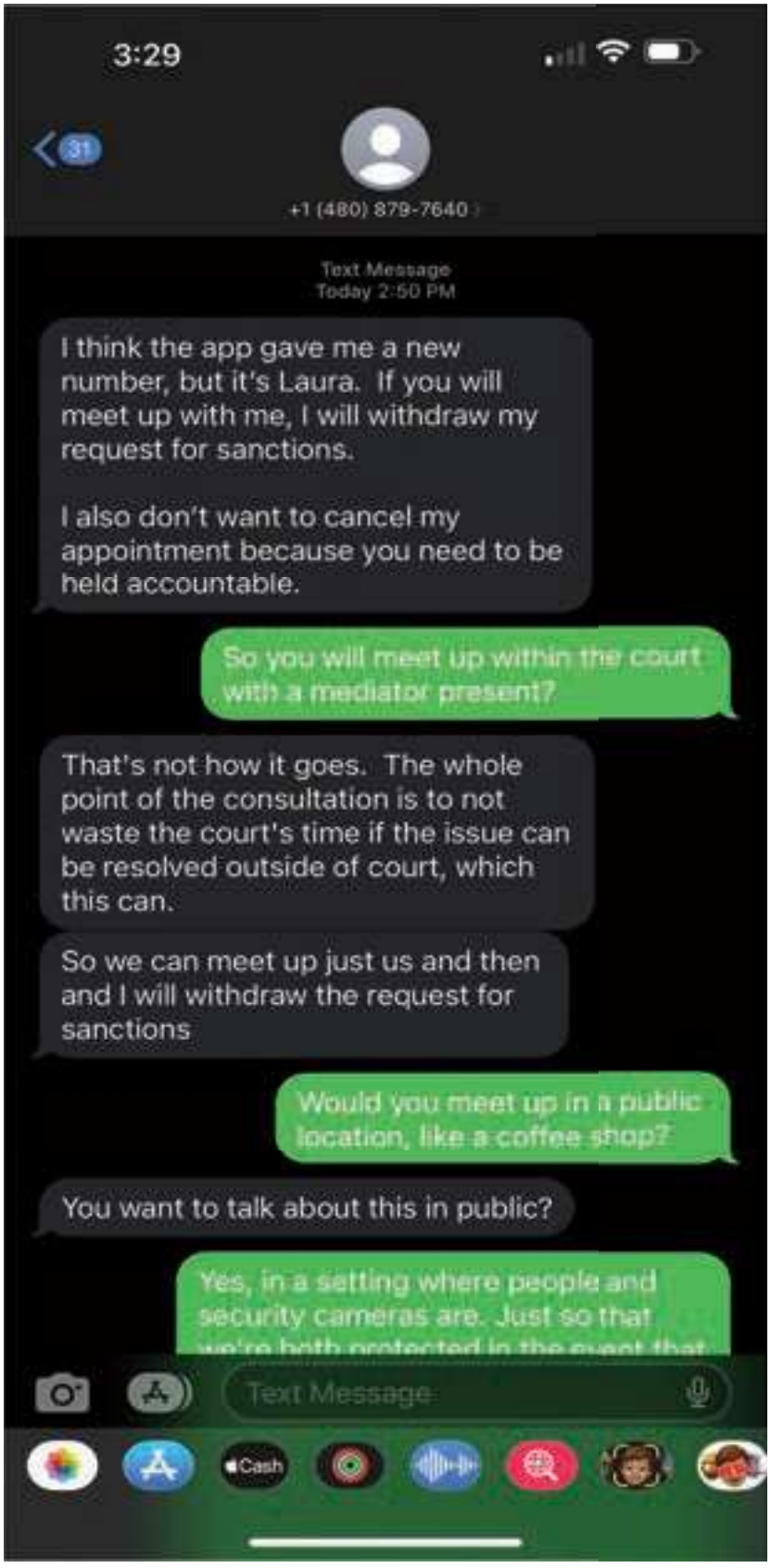
3. **The Rule 9(c) requirement for Rule 26 sanctions has been met or, if this Court determines it has not been met, compliance with Rule 9(c) would have been futile.**

Rule 9(c), *Arizona Rules of Family Law Procedure*, requires that parties "demonstrate that a party has made a good faith attempt to resolve the issue" and the "attempted consultation required by this rule must be in person or by telephone and not merely by letter or email." Here, Respondent sent Petitioner countless text messages reiterating his position that Petitioner's Petition to Establish was in bad faith as she could not have been pregnant by him after one encounter of oral sex. (*see* text messages inserted below)**.** Respondent thereafter blocked Petitioner's numbers (she created at least 13 different phone numbers), leading her to send over 500+ text messages and emails threatening to take Respondent to Court if he did not speak to her. Judge Gialketsis affirmed that these communications were harassment and served no legitimate purpose, as Respondent had made it clear that he did not want to engage in Petitioner, when she granted his Injunction Against Harassment against her (CV2023-05392).

Petitioner, despite knowing that Respondent vehemently denied she could be pregnant by him, filed a "Motion to Communicate" and "Motion for Contempt" (denied by this Court) to try to force Respondent to communicate with her. Put plainly, all of Respondent's attempts to resolve this issue by explaining to a harassing and emotionally volatile *pro per* that she cannot in good faith file a Petition to Establish as she was *not pregnant by him* went unrecognized. Respondent even offered to meet Petitioner in person with a mediator present at a public location, which Petitioner rejected (**insert below**).

Respondent paid for and engaged in three (3) different paternity tests to *further* disprove this possibility to Petitioner in the hopes that medical science would resolve the issue. Nothing would deter her, not even two (2) DNA tests showing "*little to no fetal DNA*." Respondent has more than complied with Rule 9(c).




3:29
31
+1 (480) 879-7640
Text Message
Today 2:50 PM
I think the app gave me a new number, but it's Laura. If you will meet up with me, I will withdraw my request for sanctions.
I also don't want to cancel my appointment because you need to be held accountable.
So you will meet up within the court with a mediator present?
That's not how it goes. The whole point of the consultation is to not waste the court's time if the issue can be resolved outside of court, which this can.
So we can meet up just us and then and I will withdraw the request for sanctions
Would you meet up in a public location, like a coffee shop?
You want to talk about this in public?
Yes, in a setting where people and security cameras are. Just so that
Text Message
Cash

Should this Court determine that Respondent's communications with Petitioner are insufficient under Rule 9(c), compliance would have been futile as both parties have restraining orders against one another. Petitioner has an Order of Protection against Respondent (FC2023-052771) and has allegedly attempted to get the police involved in this matter (**Exhibit 3).** Respondent has an Injunction Against Harassment against Petitioner (CV2023-05392). Although the parties are permitted to communicate regarding ongoing court proceedings, Petitioner's commitment to going to the media and harassing Respondent made all of Respondent's efforts to reason with Petitioner futile. Petitioner made it clear that she had no interest in dropping this action despite her knowledge that Respondent denied that she could be pregnant by him due to oral sex when she: posted "*I am the anonymous woman in the Clayton Echard scandal. Here's my story"* on Reddit and Medium.com, reached out directly to the media (*The Sun, People Magazine, Page Six, etc*), contacted Respondent's Father, she filed her "*Motion to Communicate*" and "*Motion to Compel"* to force Respondent to speak with her, etc. **Petitioner even went as far as to threaten to harm herself if Respondent did not communicate with her (Exhibit 4).**

Petitioner's relentless crusade to accuse Respondent of impregnating her, lash out at anyone who disagreed with her, made it impossible for Respondent to try to explain to her that she was not pregnant by him and could not be. Put plainly, Respondent could not guarantee his safety around Petitioner, which led him to seek an Injunction Against Harassment (which was granted). Therefore, Rule 9(c) either was met long ago or could not have been reasonably complied with.

Respondent's is entitled to an evidentiary hearing on his request for Rule 26

sanctions and attorney's fees. Petitioner's conduct is precisely the type of litigiousness and malicious prosecution that Rule 26 seeks to punish and a separate Motion for Rule 26 sanctions is being filed contemporaneously. This is not an "abstract question" that renders the matter moot, as Petitioner claims. Petitioner has been steadfast in her insistence that she is "100%" pregnant by Respondent, despite offering no verifiable medical evidence as oral sex does not result in pregnancy. That Petitioner is suddenly admitting that she is not pregnant, only after Respondent filed his amended response and Notice of Non-Paternity, does not address whether she was pregnant to begin with or whether she was pregnant with Respondent's twins. Respondent is entitled to, at **minimum**, compliance with discovery aimed at determining whether she was pregnant at all (and records from the doctors she testified to being seen by, under oath, on November 2, 2023) and an opportunity to be heard for his requested relief and redress for abuse of process and attorney's fees. Situations like these are precisely why Rule 36 requires that, once a Response is filed, dismissal can only be by agreement or court order. Petitioner cannot unilaterally decide this Court no longer has jurisdiction.

4. **Respondent is entitled to his reasonable attorney's fees, regardless of the source of the fees.** Petitioner has acted unreasonably from the very beginning of this action and continues to act unreasonably in her filings. Respondent has had to obtain community support to defend the allegations from Petitioner. Note, Petitioner has a history of fabricating pregnancies and reasons for why she all of the sudden is not pregnant (*see* CV2021-052893, where another man was accused of getting Petitioner pregnant with twins and she claimed she had an abortion as a result [again, without *any* medical evidence to support the same]).

Petitioner's motive to fabricate pregnancies to coerce relationships and then to somehow "terminate" the pregnancy if they capitulate to her demands to date her is disturbing. *See* Respondent's Motion for Leave to Amend ("***for a period of one week, while determining the best court [sic] of action for their pregnancy, Party A and Party B, will exclusively explore a relationship;" "I have offered to give you control over the outcome of the pregnancy if we date exclusively).***

Petitioner cites no law (as none exists) that makes the source of attorney's fees a defense to the Court ordering fees (and under separate cover sanctions) under A.R.S. § 25-324. In fact, Petitioner admits that Respondent has a viable claim to attorney's fees. While Petitioner can invent pregnancies, she cannot invent the law.

Petitioner has acted unreasonably if not diabolically by bringing this baseless Petition to Establish despite knowing she was not, and could not, be pregnant by Respondent and Respondent has incurred attorney's fees as a result. Again, this is a pattern of behavior that that occurred in prior litigation with other men (CV2021-052893) and Petitioner shows no sign of stopping. Here, Respondent has incurred thousands in attorney's fees and costs responding to Petitioner's relentless, malicious, and bad faith pleadings. Respondent has had to further incur more attorney's fees and costs attempting to get a resolution on this matter that will further deter and prevent Respondent from continuing to maintain the false narrative that she *was* pregnant by Petitioner. It is not Respondent who is inappropriately attempting to utilize the family court's resources.

As further demonstration of her unreasonableness and for the sole purposes of attorney's fees, Petitioner refused to sign a stipulation to dismiss this action as she claimed

that stating she was "*never pregnant by*" Respondent would be her committing **perjury (Exhibit 5)**. It is frankly astounding that Petitioner is now concerned with perjury, after repeatedly perjuring herself in three (3) different court cases and despite the only evidence of "paternity" showing "little to no fetal DNA."

> **12/27/23:** *This resolves, now or in court, with Ms. Owens admitting she was never pregnant by Clayton. Her exposure at the evidentiary hearing (which we will insist on) is testimony and evidence before the Court that she was never pregnant by anyone and that she fabricated medical documents (in addition to repeatedly lying under oath). I appreciate that your client wants to put an end to this. Due to her past behavior, we have legitimate concerns that this will become another situation where she runs to an outlet (TedTalk/Medium/etc) to clear her own image with a fabricated story after she brought this upon herself by filing her Petition and reaching out to social media. The proposed language in the Exhibit A will prevent her from doing this. As you are aware, your client has a history of lashing out against anyone who sees the world differently than she does (that appears to be most people). Be it the Bar complaints, allegations that I was somehow involved in coordinating a sexual assault on her, claiming under oath that Mr. Gillespie hacked into her email accounts and fabricated text messages, etc. She even lashed out at Clayton, contacted his family, slandered him impacting possible work opportunities, and overtly attempted to harm his reputation, all based on the most unhinged effort to preserve a relationship that never was. She can end this Title 25 matter by acknowledging she was never pregnant by Clayton.*
>
> **12/28/23 (Petitioner):** *Laura is not willing to commit perjury by signing the Affidavit you sent over. The Court will not be able to order her to sign it. She concedes she is not pregnant. There cannot be a finding of non-paternity for a non-existent child. Clayton's only viable claim at this point is for attorney's fees. If he insists on proceeding with a deposition when a motion to dismiss is pending, he's racking up needless fees.*

5. **WHEREFORE**, Respondent respectfully requests that this Court enter the following orders:

A. Deny Petitioner's Motion to Dismiss in its entirety;

B. Issue an Order declaring Respondent was not the father of any children carried by Petitioner or, in the alternative, that Petitioner was not pregnant due to conduct with

Respondent on May 20, 2023;

C. Issue an Order compelling Ravgen Inc to produce all records and documents related to the fetal DNA testing in this matter;

D. Issue an Order compelling Vital Records to produce all records and documents related to a fetal death certificate under A.R.S. § 36-239 for alleged twin fetuses born to Petitioner;

E. Schedule an evidentiary hearing on the issue of Rule 26 sanctions, attorney's fees, and to make factual findings consistent with the above;

F. For such other and further relief as the Court deems just and proper under these circumstances.

RESPECTFULLY SUBMITTED this 3rd day of January, 2024.

WOODNICK LAW, PLLC



Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 3rd day of January, 2024 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document delivered/emailed this 3rd day of January, 2024, to:

The Honorable Julie Mata
Maricopa County Superior Court

Alexis Lindvall
MODERN LAW
1744 S. Val Vista Drive, Suite 205

Mesa, Arizona 85204
Alexis.lindvall@mymodernlaw.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support With Prejudice* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Jan 3, 2024 07:00 MST)

CLAYTON ECHARD

01/03/2024

Date

EXHIBIT “1”



EXCLUSIVE

Entertainment TV

BABY BOMBSHELL Bachelor Clayton Echard's ex-fling claims she's 'no longer pregnant' after demanding he take paternity test in court

Diana Cooper

Published: 14:07 ET, Jan 2 2024 Updated: 21:33 ET, Jan 2 2024

Arizona court filing.



Clayton Echard's ex-fling has claimed she's no longer pregnant, according to court docs exclusively obtained by The U.S. Sun Credit: Getty



The Bachelor star was sued in August after an anonymous woman said she was pregnant with his twins Credit: Instagram/@claytonechard

On December 28, the former Bachelor's ex-fling filed a motion to dismiss with prejudice her petition that was initially filed in August to establish paternity, legal decision-making, parenting time, and child support.

With prejudice means the case can be dismissed permanently and not be brought back to court.

pregnant with Respondent's child, meaning there is no paternity to establish."

Advertisement



Advertisement · 11 sec

READ MORE ON CLAYTON ECHARD



ALL OK-CLAY Bachelor Clayton's ex defends him after he's accused of...



'TRUTH PREVAILS' Bachelor Clayton reveals paternity test results as...

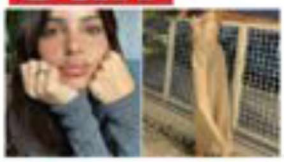
She continued: "There is nothing left for this Court to adjudicate, and this case should be dismissed."

The Petitioner further described her current state as "not now pregnant."

She initially said she expected to give birth to twins on February 14.

There was no explanation given as to what had happened

News Sport Lifestyle Entertainment Money Tech Motors Health



O-EM-G! Emily Ratajkowski suffers major wardrobe malfunction in sheer nightgown



FACE-OFF Ryan Seacrest fans alarmed by 'unrecognizable' face & slam 'trainwreck' NYE show



BIG BLAKE-UP? Gwen Stefani fans think she 'split' from Blake Shelton after spotting 'clue'



BEACH, PLEASE Heidi Klum, 50, goes topless and shows off her butt in tiny bikini on beach

attorney's fees and costs and a virtual evidentiary hearing to hash things out between her and Clayton through the court.

The U.S. Sun has reached out to the Petitioner for comment.

Clayton, for his part, told The U.S. Sun in a statement: "This filing by her was not a surprise to me, as not only is she 'no longer pregnant,' but she was never pregnant at any point in time with my children.

"My hope is that the judicial system will bring her to justice here soon through exposing the many false accusations that she has made."

After publication, the Petitioner told The U.S. Sun that she "firmly stands by everything" she had previously claimed and that she had a positive pregnancy test at one point, which was also documented in court docs, that "confirmed" her pregnancy and "was corroborated by a test at a medical facility."

MONEY TROUBLES

The anonymous woman has argued in the court docs that Clayton "crowd-sourced his attorney's fees through GoFundMe."

Clayton's goal on the GoFundMe page is $10,000.

The fundraiser was organized by a person named Dave Neal, who said that Clayton "can use the help of friends and family that want a fair legal battle."

He also noted that Clayton "never wanted to ask for a handout."

The exact amount of attorney's fees the Arizona realtor needs to pay has not been indicated online or in court docs.

CLAYTON FIGHTS BACK

Prior to the Petitioner filing her motion to dismiss, Clayton filed an expedited motion to extend the dismissal date on the inactive calendar since the case was set to be dismissed on February 2.

He requested in a December 13 filing, obtained by The U.S. Sun, that an evidentiary hearing be set since, at the time, he wanted proof from his ex-fling that she was pregnant since he had not received any proof to date.

He argued: "Petitioner has never provided Respondent with any substantive proof of her alleged pregnancy and all paternity tests have indicated there is 'little to no fetal DNA.'"

He then claimed that she provided a video of a sonogram that appeared to have been "borrowed" from a YouTube video from seven years ago.

He believed the video showed her "pregnant stomach," which he also believed was "edited and/or depicts Petitioner wearing a fake stomach."

The TV personality also claimed she "has not provided any verified sonogram reports, fetal anatomy scans (required at 18-22 weeks), sonogram images from various checkups showing the progression of the pregnancy, or any additional medical information that would be typical of the high-risk pregnancy with twins that Petitioner is claiming."

He also noted that she took three paternity tests, two of which showed little to no fetal DNA and one was reportedly lost in

In his affidavit, the Missouri native shared with the court details of his sexual encounter with the Petitioner.

"[Petitioner] and I had one sexual encounter on May 20, 2023 where she performed oral sex on me," he wrote.

"We never had sexual intercourse or engaged in conduct that could lead to conception."

He then went on to claim that she went to court after he "did not want to have any relationship with her, romantic or otherwise, after she performed oral sex on him on May 20, 2023."

Clayton claimed in his amended response filed December 12: "Petitioner drafted a 'contract' for Respondent to sign that promised 'for a period of one week, while determining the best court [sic] of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with 'intention'."

The ex-fling had reportedly wrote in the relationship contract: "I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for one another."

Clayton was granted an injunction against harassment during a hearing that took place on November 2 in Maricopa County.

This was ordered after Clayton had brought to the court's attention that the mystery woman had sent "over 500 messages from different phone numbers and email accounts."

He informed the court: "Upon information and belief, Petitioner suffers from mental health issues, and has caused Respondent to become concerned that she is stalking him."

Separately, the podcast host was given an order of protection against Clayton on October 6, according to court documents obtained by The U.S. Sun.

She claimed in the docs that Clayton had sent her threatening and harassing messages.

"All of this has led me to feel extreme anxiety and fear for my safety," she noted in the filing.

While the majority of Bachelor Nation has remained silent during the proceedings, Clayton's ex, Susie Evans, spoke out in an interview with The U.S. Sun.

"I've always known Clayton to be a very honest human being, a very good person, and I think that what he's going through is really unfortunate," Susie, 30, said back in November.

The Season 26 contestant is standing by Clayton, but does not know exactly what went down between him and the anonymous girl.

"At the end of day, yeah, you want to know what happened, but based on what I've been told from Clayton and then also what I've seen kind of publicly, I think it would be really hard to believe at this point that there's any reason to believe that he's the father," The Bachelor alum remarked.

The "friendly exes" have been in touch since announcing their breakup in a joint Instagram post in September 2022.

Despite living in different states - him in Arizona and her in California - the former couple catches up from time to time.

READ MORE ON THE US SUN

BIDEN HIS TIME **Joe Biden is likely to 'hand the ball to Gavin...**

MYSTERY MOTIVE **Chilling pictures show Kodak Center suspect days...**

Susie continued: "I think we went through something really traumatic together. And so I think he'll always have a place in my heart."

5

Clayton's nasty court battle has taken a turn after his ex-fling revealed she was not now pregnant Credit: Instagram/Clayton Echard

5

Clayton and the mystery woman are now battling over attorney's fees and costs Credit: Getty

5

Clatyon's ex Susie Evans told The U.S. Sun that what the reality star is going through is 'really unfortunate,' but she's standing by his side

Credit: Getty

Topics Exclusives The Bachelor

NEW STORIES ON THE SUN

Kanye West apologizes for wild rant about Hitler and Jesu party and says he didn't want to 'hurt or demean' a...



YOU MIGHT LIKE

IT'S OVER Bachelorette Rachel Lindsay's husband files for divorce after 4 years together

DOUBLE VISION Putin has 'at least three body doubles' who will all be 'killed' says Ukraine

STRANGER DANGER A stranger helped me when the ATM reader failed - a day later I had $5 left

TSAR SIGN 'AI Putin' gave New Year message, viewers convinced after 'telltale sign' spotted

FACE-OFF Ryan Seacrest fans alarmed by 'unrecognizable' face & slam 'trainwreck' NYE show

SPOT ON Acne sufferers say skin "improved dramatically" thanks to PMD's cleansing device

BOWL MADNESS ESPN make major broadcast change with Pat McAfee Show axed on New Year's Day

OH BABY? Halle Bailey fans fully convinced she 'gave birth' after spotting clue in video

SO SMOOTH The Victoria Beckham-approved skincare range you NEED to know about

THE SHAPE OF HIS HEART Get to know AJ McLean's estranged wife, Rochelle DeAnna

OH BABY? Kardashian fans think Kylie Jenner's inner circle member leaked pregnancy news

TAP OUT A Good Samaritan told me ATM was broken - I was left with $19, Chase said I ok'd it

© 2020 THE SUN, US, INC. ALL RIGHTS RESERVED | TERMS OF USE | PRIVACY | YOUR AD CHOICES | SITEMAP

EXHIBIT “2”

Open in app ↗

Sign up Sign in

Medium Search Write





Life's been a bit of a challenge lately... and that's putting it mildly.

Unveiling the Unbearable: My Battle Against Cyberbullying and Online Harassment



Laura Owens · Follow

10 min read · 4 days ago

70

> *It's incredibly hard to put this into words and share what's been going on. I've never asked my friends or family for emotional support, but I'm feeling truly shattered, defeated, mentally drained, and worthless due to the events of these past several months. I have been the subject of a smear campaign that I wouldn't wish on my worst enemy, and the target of cyberbullying, cyberharassment, and cyberstalking at a level that I truly think no one would believe was imaginable. My heart has been torn to shreds, and it seems like nobody beyond my family truly sees or understands who I am anymore. Maybe that's my fault, since the sheer embarrassment of it all has been so overwhelming that I've found myself hiding from the world.*

Since around mid-September, I've been noticeably absent from social media and pretty much detached from the life I used to lead. I can count on one hand the times I've stepped out of my home since then, but the number of times I've found myself in tears is beyond calculation. Earlier this morning, around 4:30, I found myself on the floor, overwhelmed with emotions,

feeling more bullied and alone than I've ever felt. It struck me that maybe it's time to stop concealing what I've desperately tried to keep under wraps for months now. I've come to understand that by not being public about what I'm struggling with, I've made this battle harder for myself. It's now abundantly clear that the only way to stand up to bullies is by confronting them directly.

I know that some of you caught wind of the rumors that I got pregnant by Clayton Echard, the star of The Bachelor's season 26. Clayton had briefly been my real estate agent, and during a May evening, our professional dealings turned into something more personal. Following three positive pregnancy tests — one taken at home, another at an urgent care center, and the final one done in Clayton's presence — it was evident that I was indeed expecting. Soon after, I discovered I was pregnant with twins, and I knew with 100% certainty that he was the father. Clayton went radio silent when it came time to take a paternity test, despite my persistent requests — twenty-nine times, to be exact — at a lab he had selected previously. When he finally responded, he dared me to reach out to the tabloids, a move I knew would compel him to comply with the test. Before the news hit the public, I pleaded with the media to keep my identity under wraps, and they agreed. However, their description of me as the "anonymous woman" contained enough details for those familiar with me to make connections and for strangers to track me down online.

Like many, I was familiar with Reddit before news about my pregnancy became public, but I had no grasp of the level of dedication its members had. Shortly after the initial articles surfaced, a friend reached out, informing me that self-proclaimed "sleuths" were actively discussing and mentioning me by name in "subreddits" centered around *The Bachelor.* There was a barrage of misinformation circulating, and initially, I wrote back to

correct those who were getting the facts twisted. However, these so-called 'keyboard warriors', shielded by anonymous usernames, only seemed to intensify their interest in my life once they knew I was engaging with them.

Things took a truly devastating turn when an abusive ex decided to reach out to Clayton, telling him that I had 'done this before'. He was referring to two prior pregnancies — a part of my life I've guarded fiercely, not just from the wider audience I'm speaking to now, but from everyone. Rather than having a private discussion with me about it, Clayton broke the news to his hundreds of thousands of followers, and Redditors, like relentless detectives, latched onto this snippet of my personal history. They dove deep into my life, tearing through layers I desperately wanted to keep hidden and, truth be told, deservedly so. My life was becoming a mere public spectacle, and it caught the eye of a *Bachelor* content creator named Dave Neal, a major figure on Reddit, who has completely turned my world upside down.

Dave has blatantly victim-shamed me for my reproductive decisions, stating that my life would hold no interest for him if it weren't for two prior abortions. The source of the misinformation he's spreading traces back to two men I'd been pregnant by before. Their animosity against me, triggered by the restraining orders I have against them, is the driving force behind the distorted tales being circulated about me, and ones they have shared with Dave. They supplied him with court documents containing entirely baseless, never-seriously-considered-by-a-judge claims about me, which Dave has disseminated as if they were factual. Although their accusations were unequivocally untrue, they were mortifyingly embarrassing and not something I wanted anyone to know. My decision to stay silent inadvertently bolstered Dave's platform, giving him free rein to harass me without facing any consequences.

The allegations they had previously made against me in response to cases I filed against them were horrendous, alleging that I falsified my pregnancies, tampered with records regarding my past pregnancies, and fabricated the severity of the injuries I sustained due to abuse. In a desperate effort to get him to stop spreading false and extremely damaging information about me, I offered to sign a release to have my previous pregnancy records sent directly to him from my providers. I sent him proof that I was one of only 630 patients accepted into the Domestic Violence Brain Injury Program at Barrow Neurological Institute, the only one of its kind in the nation, as a result of "multiple strangulation injuries" resulting in me developing epilepsy. However, he ignored my offers, revealing that he cared little for the truth.

Dave's motivation in continuing to create content about me has been the massive surge in viewers and listeners on his monetized platforms by peddling sensationalized, entirely untrue tales about my life. He claims that he "doesn't take a shit without monetizing it", and so his motivation is clearly financial. Dave puts out so much content that it feels like doing damage control is a full time job: he posts three shows, usually one about me, to YouTube and two podcasts a day. Each time, it sparks a fresh wave of discussions that only add more fuel to this never-ending fire.

Dave's enormous following on Reddit has made my life incredibly difficult. They've created countless threads in Bachelor-related subreddits, and in the ultimate showing of targeted harassment, one person even went as far as creating a subreddit in my name just to bully me. I was taken aback when I read a post purported to be from a high school peer with outrageously far-fetched and blatantly false allegations, claiming that during that time, I was pregnant by multiple men, including a special needs student and fathers of my peers. One fabricated story claimed that my father offered one student

$6000 to buy new speakers for his car if he would date me for a month. The reality was quite different — I was extremely introverted throughout high school, never attended a party, and had my first kiss during the week of graduation. These claims hold no resemblance to reality, yet they've left me feeling utterly powerless and deeply ashamed. It feels as though the reputation I painstakingly built and every achievement I've held dear have been ruthlessly torn apart and relentlessly mocked in profoundly disheartening posts.

The comments said about me have been brutal, such as, "I hope she's an organ donor so something good can come out of her pathetic existence", and that I am "a complete waste of skin and bones". I've been told to kill myself, with comments suggesting it might help my family move past the supposed disgrace they claim I've brought upon them. My dad's Wikipedia has even been edited several times by trolls to state that he only has one daughter, my sister.

Dave claims to have only referred to me by "Jane Doe", but my name has appeared in his content many times, and his fixation on me has reached the level of an obsession. Since September, he's churned out over fifty videos about me, boldly claiming that the count might escalate to "more than one hundred and forty" as he continues to probe into my life. Moreover, he's generated well over a hundred hours of podcast content solely focused on me and actively pursued opportunities to appear on any podcasts, offering to fly anywhere in the country to do so, because he is so eager to discuss my life through his lens of lies.

I would be lying if I said I wasn't afraid of Dave. During one of his live streams, he inadvertently displayed a map leading to my home. In an interview just this week, his comments became even more alarming as he

said he wished I had been a passenger on the missing Malaysian flight 370. Adding insult to injury, he shamelessly exhibited a picture of me in a bra with an exposed pregnant belly during one of his episodes. When I requested its removal, he callously dismissed my concerns, laughing as he told his audience, "Bra or no bra, who cares?". He's joked about me having a miscarriage, which is something that is not remotely funny.

As a last resort, I filed for an Injunction Against Harassment against Dave due to his obsessive interest in me and his flat out refusal to stop making videos and podcasts about me when asked. However, when I informed him that he would be served by a process server, he turned the tables. Deceptively, he began painting himself as fearful of me. His followers swiftly joined in, spreading these unfounded notions that I might pose a threat. I've been called "unhinged" an innumerable amount of times and his followers have posted countless times that I need to be institutionalized. It's been outrageous, entirely unwarranted, and incredibly upsetting.

My physical appearance has been a relentless subject of mockery. Multiple memes have been created, emphasizing my looks and targeting me with hurtful comments about my looks. People claimed to be stunned that Clayton chose to be intimate with me for just one night after having numerous beautiful women to select from during his time as The Bachelor. Clayton himself mentioned I didn't look as pretty as I appeared in some Instagram photos he scrolled through.

I thought that maybe if I were able to change my identity on the outside, I might get back to feeling like myself on the inside. After a lot of thought, I decided to file for a legal name change, which was discovered by Dave the day after I filed the petition with the court, and my new identity as Emily

Wilson was disclosed to his audience, making it obsolete. I felt like I had run out of ideas to escape the relentless nightmare I was living in.

My integrity means everything to me. I've never lied about being pregnant nor the extent to which I've been abused, and I have medical records to back both of those things up. However, I won't be sharing updates regarding the status of my pregnancy with Clayton. *I kindly ask not to receive congratulations or engage in discussions about Clayton and my pregnancy.* This post is not intended for that purpose. What I can confirm is that I sought an order of protection against him. Despite my only sending him pregnancy updates, interestingly, a month later, he obtained an Injunction Against Harassment against me.

Dave's followers have chosen to write my full name on Reddit and in the comments sections on his YouTube videos because they say that in doing so, they will alter the SEO algorithm so that these blatant lies about me are shown at the top of Google search results. He has incited hatred, harassment, and threats against me, and I am just exhausted from it.

Over the last few months, I've often questioned: What is the allure of a 33-year-old woman, confirmed to be pregnant three times, to him and his audience? How much more content can he create, and how much more can I take? Although I would be more than entitled to file a defamation lawsuit against Dave, I have no desire to have my life drained by the legal system and simply want him to stop and remove the videos. **If you want to watch how cruelly, and flat-out bizarrely, Dave has spoken to and about me, you can watch this video.**

I'm sure this post will spark more hateful content from Dave, and he will incite his followers to make more cruel comments about me. Despite

outwardly claiming to my family that I've become desensitized to anything that can be said to me at this point, Dave's videos still deeply affect me, as do the words of his supporters. While I *know* I will advocate against cyberbullying in the future, right now, I just wish for this torment to stop. His relentless bullying has pushed me to the brink, causing moments where I've felt close to the edge of despair. I've even expressed to him that the blood would be on his hands if I harmed myself due to his relentless harassment, but it had no impact on him. It just provided him with something else to talk about on his shows. And why would he stop talking about me? Spreading misinformation generates profit for him, and that appears to be his sole concern. It's an ongoing struggle to try to rise above this situation.

My life has changed after witnessing how cruel people can be, and while I'm a changed person after all of this (how could I not be?), I still want to be Laura Owens, not Emily Wilson. I'm anxious about how people might perceive me once I share my story, but holding all of this inside hurts. **In the face of relentless cyberbullying, I yearn for the torment to cease, hoping that someday, my story will speak louder than the falsehoods, and the strength I find within will reclaim the identity they sought to shatter.**

Cyberharassment Cyberbully Struggle Overcoming Obstacles Empowerment



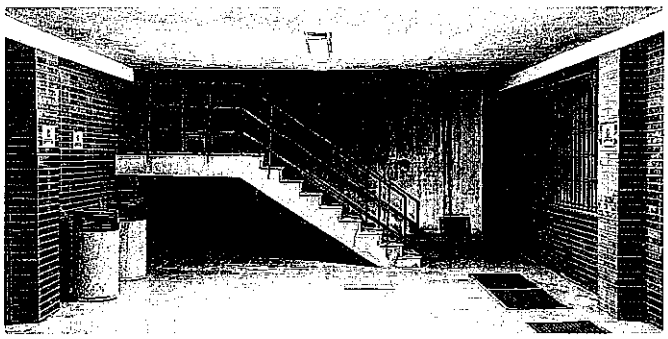
Written by Laura Owens

Follow

9 Followers

Sharing my story isn't about seeking sympathy; it's about reclaiming power, standing up against online abuse, and empowering others along the way.

Recommended from Medium



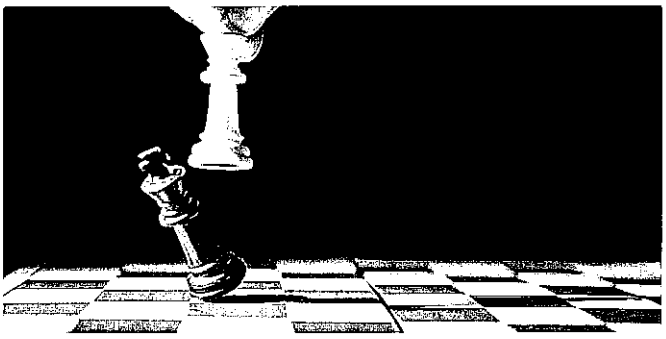
TrueAlreadyHappenedStories

When I was a kid, my dad kept a second family in our basement.

Growing up, I thought everyone had a second family in their basement. In retrospect, I...

· 12 min read · Nov 23

5K 81



Alexandru Lazar in ILLUMINATION

Ten Habits that will get you ahead of 99% of People

Improve your life and get ahead of your peers in 10 simple steps

9 min read · Nov 18

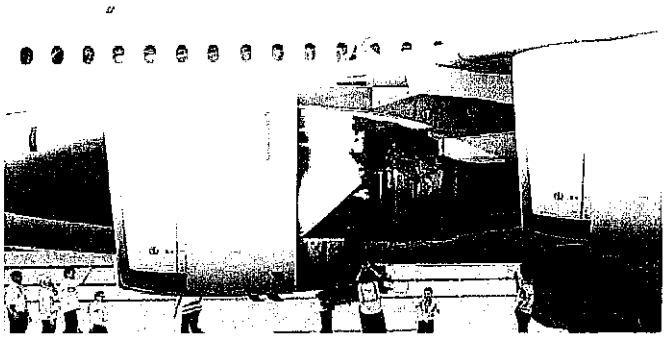
8.8K 157

Lists



Staff Picks

531 stories · 517 saves



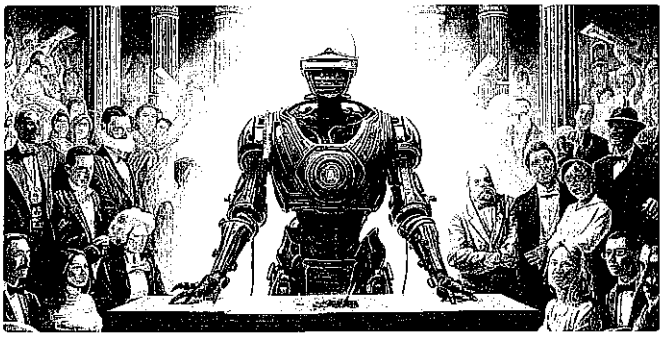
Admiral Cloudberg

A Matter of Millimeters: The story of Qantas flight 32

How a mistake of less than half a millimeter in a single part nearly brought down the world'...

42 min read · 3 days ago

1.92K 28



Lessig

ChatGPT, or: How I Learned to Stop Worrying and Love AI

In my first book, Code and Other Laws of Cyberspace (1999), I told the story of why I...

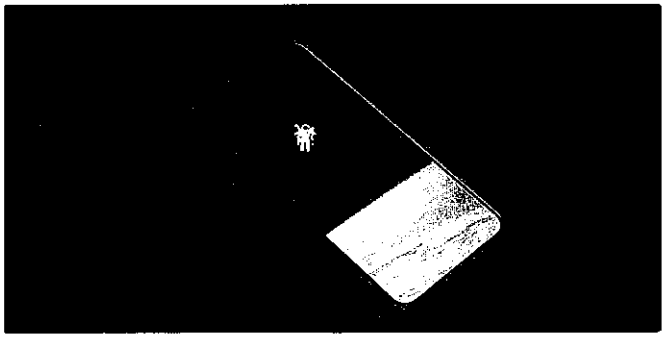
7 min read · Nov 28

4.8K 122



Maevyn Frey in Fourth Wave

The Gender Divide, Holiday Workload Edition



Kiera Bolden in Human Parts

TikTok Diagnosed Me With Autism

The controversial social media algorithm has been the answer to my identity crisis

I'm throwing out the old model and proposing something new

· 9 min read · 3 days ago

938 18

· 9 min read · 4 days ago

877 9

See more recommendations

EXHIBIT “3”

EXHIBIT 4

To: Scottsdale Police Department

Report prepared by: Laura Owens

Subject: Threats, intimidation, verbal abuse, endangerment and extortion from Clayton Echard

Date: July 31, 2023

To Whom It May Concern:

Clayton Echard is the father of my unborn twins. When I told him I was pregnant, he started writing erratic, illogical and threatening messages. He has been clear that being a father has not been in his life plan and would get in the way of his dating and professional life. These would be followed by periods of silence and him blocking me, then unblocking me to demand alternative forms of proof of pregnancy beyond the medical report I had provided him from Banner Health Urgent Care confirming it.

Clayton has said he would file legal charges (criminal fraud) against me for stating that he is the father of my unborn twins. Extortion is a crime under ARS 13-1804. He alleges I am being untruthful; however, I have even done a test in front of him that he purchased himself. It was positive. In addition, he has been provided with medical test results, recorded phone calls with doctor's offices confirming the viability of the pregnancy, and screenshots of my patient portals. I also agreed to take a prenatal paternity test through a lab he found called Ravgen, but he has now gone MIA and will not allow me to schedule the test, which would prove to him once and for all that the twins are his. Finally, I told him that I would sign a HIPAA release to allow him to speak to any and all of my medical providers regarding the validity of the pregnancy.

I have included written correspondence with Clayton to date that clearly demonstrate his potentially violent, threatening and intimidating behavior. I have invited him to attend a doctor's appointment on August 7th at Scottsdale Perinatal Associates with Dr. Makhoul for a consultation and ultrasound. His paranoia extends to the level that he believes I will have hired someone to pretend to be a doctor and who will confirm the pregnancy. He simply refuses to believe that I am pregnant, despite seeing a test with his own eyes, and that he is the father, despite my willingness to take a paternity test.

Clayton also demanded contact information for my abusive ex, whose attempts to kill me I did a TEDx talk about, and which Clayton linked to in the message for his request. I have a CLETS restraining order against the man he wanted to speak to, and engaging him in communication would put me in a vulnerable position. Endangerment is a crime under ARS 13-1201.

I am very concerned about my safety and I don't know what actions Clayton will take because he is so volatile, controlling, demeaning and hateful. I have asked him on many occasions to reassure me that he will not hurt me or our unborn babies, and he will not respond to that simple question. I told him I would file a police report if he didn't. I have proof that Clayton has read

those messages, which I am attaching. Crimes of intimidation and threats, by word or conduct, are listed as a criminal offense under ARS 13-3601.

A domestic violence offense against a pregnant person is a felony offense under ARS 13-3601. For all of the reasons above, I am concerned that Clayton will cause physical harm/injury to me. Please enter all attached documents and recordings into evidence and include them with this report.

Thank you,

Laura Owens

EXHIBIT “4”

JO **Jan Black Owens** 10:39 AM

Re: Interaction with Your Daughter

To: Clayton Echard

Hi Clayton,

Have you heard from Laura today? She was supposed to be at the barn for an early appointment with one of the horses, but the vet called me to say she didn't show up for it. I checked my email and saw that I missed one she sent very early this morning after I went to bed. The content is private, but given the circumstances, I think it's important that you read it:

> Mom, you've always said one of the best and worst things about me is that I look to what's ten steps ahead than enjoy what's right in front of me. The future has always given me hope and been something I look forward to, but that's not the case anymore. You know that initially, I only saw the pregnancy as holding me back in life, but with your help, I began to see it as something unexpected, but not unwanted. I thought that Clayton would come around to see it in that same light, but he hasn't, so as I try to picture what my life will look like next February and beyond, I feel a sense of panic. Sarah has emphasized how she feels like she couldn't raise Gavin without Christian's help, so how can I manage to raise two without Clayton's? I have pushed and pushed him to give me some sort of answer as to whether or not he will do joint custody or provide child support, but he won't get back to me. I thought that if we did paternity testing, he would step up to the plate so we could organize what the future would look like, but now, he doesn't even want to get back to me to schedule it. It's not like I am trying to hide anything from him or that I am refusing a test, so I don't understand why he is treating me like I am trying to trap him. I am terrified that I won't know what role, if any, he will play until they are born and that is making me dread the next eighteen years.
>
> I have asked Clayton to "explore things" with me for a week or two so many times that the phrase has become cliche. It embarrassed me to ask him from day one, but it didn't feel right to never even give things a try considering the situation we found ourselves in. He doesn't know me well enough to know that I didn't seek him out and that he isn't a standout compared to my exes. He's not a billionaire like Garrett, not a famous singer like Dean [Lewis], and not an Olympian like Jeremy [Bloom], and if I ever told him, he'd never believe that I didn't seek them out, nor that I was the one to end it with each of them. He doesn't get that I wouldn't care if he were a garbageman as long as he was the father: that's what I care about. He doesn't care to know that I wasn't born with a silver spoon in my mouth just because of who dad is, nor that I had to start the horse business at sixteen to try to help the family make up for his gambling losses. Instead of asking me to hear more about what happened with Mike, he wants to ask him, as if he even has a side. He won't give me the time of day to explain what Andrew did to me and why the FBI's involvement meant I literally couldn't be with anyone until him and why the babies couldn't be anyone else's.
>
> Clayton thinks I am an ugly girl who isn't worth his time, and I know that the babies will mean I won't be worth anyone else's. Who wants to date a single mom of twins whose dad probably won't even take them for a weekend here and there? I will spend years trying to explain to them why their dad couldn't try for a week to make things work with their mom when I will never understand it myself. I will spend their whole lives trying to explain to them why their dad wants nothing to do with them and I know they will feel guilty about that and have issues forever because of it.
>
> I have given Clayton "outs". I have offered to have an abortion so many times because I don't want to interrupt his life. I know you've told me not to, and your reasoning isn't wrong, but I have told him so many times that I would go to the press if I didn't get in communication with him to game plan the future. I have meant it each time, but chickened out every single time because I know the impact that would have on him. I hate myself for threatening him with this, but I am desperate to know what next year and beyond holds and he refuses to give me clarity. I haven't wanted to tell you, but I have told him the two times I have felt borderline suicidal, which includes right now. He used the first time against me in his response to the court, saying that I had mental issues, and I'm sure he'd say that again, even though my reasoning is because of how unsure of the future I feel because of him. I have told him I would take back the complaint I submitted to the real estate board, even though I know it was justified, if he will just communicate with me. He'd rather get fired or lose his license than have to talk to me. He'd rather have the press know about the pregnancy than speak to me. Do you know how that feels?
>
> You had dad when you had me and Sarah. Sarah had Christian when she had Gavin. I am having two and I have no one. I've reached out to his family and they haven't gotten back to me, and they probably think I'm nuts too, even though again, all I want is to know what the future holds. Clayton won't even respect the court and that he is required to communicate with me.
>
> Who wants to feel like they are so worthless that they have to beg a man to give them a week of their time when they are pregnant with his children? Even with begging, he won't do it. Trust me, I wouldn't be desperate to date him if we weren't in this situation -- he has treated me like shit. But if he got to know me and I got to know him, maybe things would be different. If they weren't, then the possibility of us being together would no longer be an issue and we could focus on being the best co-parents that we could be! Doesn't Clayton realize that we could have eliminated the possibility of this months ago if he'd just given it a week? Or maybe he would have surprised himself and he actually would have liked me. You know that I am loyal and that I could have made him better, but he won't give me the chance to. That will never happen, and the eternal optimist in me has slowly become a pessimist.
>
> I've come to realize that Clayton will always view me and the pregnancy as being the worst things to happen to him. Me having the twins would be his downfall. He supposedly has a mission to help those with mental health, and although he has proven that he doesn't care about mine, I would hate to be the reason that other people don't benefit from whatever message he has to spread. Despite the fact that I know he thinks I don't care about him, he's the father of my kids, and I do; I would hate it if we mean that he doesn't find the happiness he is looking for. Clearly, he can't picture a future with the twins in it, and I can't live in the present not knowing what the future with the twins holds (if that makes any sense). The anxiety I feel of not knowing what role he would play in their lives, if any, is crippling, because that would obviously impact any time I would have for my own hopes and dreams in the future. As a last ditch attempt to save both of us from this, I even offered him a late term abortion (now), but he didn't respond. Now, I just give up.
>
> I emailed him shortly before I wrote this, saw he read the email, and didn't respond, so I know he doesn't care. His life would be better without me and the twins in it, and if he has the ability to feel any guilt for what he has done to us, I hope he does. If something happens to me, please find the nerve I didn't and share this with the world so they know I didn't suffer from any major mental health issues, but rather that I did everything I could to get Clayton to tell me what he saw the future with our kids looking like and that he refused to tell me. At the end of the day, it really is his fault.

I have called her several times and checked her house, but she's not there. My texts are getting delivered, but she isn't responding to me or her sister. I even called the police, who said you need to wait a much longer time before filing a missing person's report. Can you please text her? I think you would be the only one who would get her to answer if she is reachable and we are panicking. Regardless, please email me to let me know you received this.

Thank you,

EXHIBIT “5”

From: Alexis Lindvall
Sent: Thursday, December 28, 2023 12:57 PM
To: Isabel Ranney <isabel@woodnicklaw.com>
Cc: Gregg Woodnick <Gregg@woodnicklaw.com>; Tiffany Benz ; Sarah Saxon

Subject: Re: Owens/Echard

Isabel,

By now you have probably seen the motions that we filed earlier today. Is your client willing to postpone the deposition until we have a ruling on the dismissal? If not, I will be filing an expedited Motion to Quash the deposition sometime tomorrow. Even if it is not quashed, I am not available on 1/12 at 9:00 a.m. I have a hearing in a dependency matter scheduled for 10:45 a.m. (I am assuming you plan to depose my client for a while).

Laura is not willing to commit perjury by signing the Affidavit you sent over. The Court will not be able to order her to sign it. She concedes she is not pregnant. There cannot be a finding of non-paternity for a non-existent child. Clayton's only viable claim at this point is for attorney's fees. If he insists on proceeding with a deposition when a motion to dismiss is pending, he's racking up needless fees.

Please let me know whether you will agree to postpone the deposition as soon as possible. If I don't hear from you or if you don't agree, I will proceed with filing the Motion to Quash.

Thank you,

Lexi Lindvall, Esq.
Attorney | **Modern Law**

Mesa | Peoria | Scottsdale
www.mymodernlaw.com

Modern law is a paperless office and hard copies of documents will not be mailed unless requested.

This email contains confidential, legal information. If you realize this email was not intended for you, please ignore the content, immediately notify me that you received it, then delete it. Otherwise bad legal stuff could happen.

Please be advised, this communication does not constitute an agreement pursuant to Rule 69, Arizona Rules of Family Law Procedure. Any statement concerning settlement is made pursuant to Rule 408, Arizona Rules of Evidence, and shall be considered protected from use in any future litigation.

On Thu, Dec 28, 2023 at 12:56 PM Isabel Ranney <isabel@woodnicklaw.com> wrote:

Lexi,

Please see the attached Notice of Deposition for your client at our office on **January 12, 2024 at 9:00 a.m.** If this time does not work for you, we are also available on January 17th at 9:00 a.m. or 1 p.m. I am more than happy to reschedule it to better accommodate your schedule, but our preference is sooner rather than later.

You will also find attached Exhibit A, consistent with Rule 57(b)(2), *Arizona Rules of Family Law Procedure*. This was initially sent to your client weeks ago, so she is well aware of her Rule 49 disclosure obligations as well as her duty to produce the documents requested. If you need me to send along a blank HIPAA release for your client to sign, I am happy to do so (one was included in our December 12th email to her).

Thank you,

Isabel Ranney

ISABEL RANNEY

Attorney

WL | WOODNICK LAW PLLC

1747 E. Morten Ave., #205

Phoenix, Arizona 85020

Phone: 602-449-7980

Fax: 602-396-5850

www.woodnicklaw.com

Email: isabel@woodnicklaw.com

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

From: Isabel Ranney
Sent: Wednesday, December 27, 2023 3:58 PM
To: Alexis Lindvall
Cc: Gregg Woodnick <Gregg@woodnicklaw.com>; Tiffany Benz · : Sarah Saxon

Subject: Owens/Echard

Lexi,

I am glad you are involved in this case, and I am happy that Laura found another attorney. As you are aware, there has been a parade of counsel with the collateral (and malignant) litigation here, but I am confident that this chapter could end with your help. As we discussed, I am attaching the draft Stipulation with an Affidavit for Laura to sign confirming that she was never pregnant by Clayton.

Laura's behavior has been in the realm of abominable. It is publicly known that my office represented Mr. Gillespie who dealt with nearly *identical* allegations (yes, Laura attempted to secure that relationship with a similar fake twin pregnancy).

What we are not going to have here is a situation where Laura attempts to spin this into her saying she was bullied into a "miscarriage" (which appears to be her plan, given her December 8th Medium article and recent Facebook videos [available online]). Your client has used her public social media platform before (her January TedTalk, the Medium article, her Reddit and public Facebook posts). While Clayton cannot stop Laura from fabricating nonsense for another TedTalk, Clayton can insist that this Title 25 court make appropriate findings and address attorney's fees based on a malignant filing.

To be clear, you client has already, under oath (it is public in video), claimed that she was 24 weeks pregnant (in addition to the verified Petition she signed, Medium.com article she wrote, and press releases to the *Sun, Daily Mail,* and whomever else she reached out to). Frankly, we do not believe she was EVER pregnant, and certainly not by

Clayton. We also do not believe she had a miscarriage (impossible to have without a pregnancy). Additionally, though your client may claim that she *was* pregnant at some point (or whatever she is claiming), she did state under oath in **November** that she was being seen by various pregnancy specialists (Dr. Makhoul, Dr. Higley, Dr. Jones, and Tamara Lister, NP).

At an evidentiary hearing, we would demand documentation that would show (or not show) that she informed these doctors that she had miscarried (or otherwise lost the pregnancy) in her second or third trimester. And, of course, medical records with verifiable medical documentation to support the same as a miscarriage at 24 weeks would require comprehensive medical attention, if not full hospitalization. (*See* https://www.mayoclinic.org/diseases-conditions/pregnancy-loss-miscarriage/diagnosis-treatment/drc-20354304; D&C Procedure After a Miscarriage: Risks & Complications (americanpregnancy.org)). Arizona law also requires a fetal death certificate to be filed within 7 days of fetal death where the fetus is past twenty (20) weeks or 350 grams in weight. A.R.S. 36-239.

To be clear, a letter from a care provider that states she had a miscarriage will not suffice – we will request all medical records from every provider she testified to being seen by under oath in the injunction hearing in November. Recall, there is a history here of providing correspondence that the authors deny having written. We will not accept an arts and crafts project from your client, as Clayton is entitled to all of the relevant records from the source.

This resolves, now or in court, with Ms. Owens admitting she was never pregnant by Clayton. Her exposure at the evidentiary hearing (which we will insist on) is testimony and evidence before the Court that she was never pregnant by anyone and that she fabricated medical documents (in addition to repeatedly lying under oath).

I appreciate that your client wants to put an end to this. Due to her past behavior, we have legitimate concerns that this will become another situation where she runs to an outlet (TedTalk/Medium/etc) to clear her own image with a fabricated story *after she brought this upon herself* by filing her Petition and reaching out to social media. The proposed language in the Exhibit A will prevent her from doing this. As you are aware, your client has a history of lashing out against anyone who sees the world differently than she does (that appears to be most people). Be it the Bar complaints, allegations that I was somehow involved in coordinating a sexual assault on her, claiming under oath that Mr. Gillespie hacked into her email accounts and fabricated text messages, etc.

She even lashed out at Clayton, contacted his family, slandered him impacting possible work opportunities, and overtly attempted to harm his reputation, all based on the most unhinged effort to preserve a relationship that never was. She can end this Title 25 matter by acknowledging **she was never pregnant by Clayton.** If she has any desire to hang onto this myth that babies can arise from non-intercourse, then she is going to have to file her Motion to Dismiss with Judge Mata and we will respond demanding our evidentiary hearing and pursuing this for attorney's fees and a finding of non-paternity.

I do not know what motivated Laura here. Be it serious mental health issues or a con gone rogue to persuade men into staying in relationships with her, what we do know is that it was never predicated on evolutionary biology or the

science of reproduction. If she wants to move on from this family court matter in Maricopa County Superior Court, she needs to fully acknowledge that she was never pregnant by Clayton.

No, Clayton will not agree that this be under seal or to limit his own ability to address the reputational damage caused by your client's behavior.

DICTATED

Gregg Woodnick

ISABEL RANNEY

Attorney

WL | WOODNICK LAW PLLC

1747 E. Morten Ave., #205

Phoenix, Arizona 85020

Phone: 602-449-7980

Fax: 602-396-5850

www.woodnicklaw.com

Email: isabel@woodnicklaw.com

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

AFFIDAVIT

I, LAURA OWENS, being duly sworn upon my oath under penalty of perjury, depose, and say:

1. I was never pregnant with Clayton Echard's child or children.

2. Consistent with this affidavit, in Family Court in Maricopa County under cause number FC2023-052114, I am asking the Court to dismiss my Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with prejudice.

_____
Laura Owens

STATE OF ARIZONA)
)ss.
County of Maricopa

SUBSCRIBED AND SWORN to me before this _____ day of _____, 2023, by Laura Owens.

My Commission Expires: _____

_____
Notary Public

Clerk of the Superior Court
*** Electronically Filed ***
T. Hays, Deputy
1/4/2024 3:28:02 PM
Filing ID 17135073

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, and **CLAYTON ECHARD,** Respondent,	Case No.: **FC2023-052114** **RESPONDENT'S RESPONSE/OBJECTION TO PETITIONER'S EXPEDITED MOTION TO QUASH DEPOSITION OF PETITIONER** (Assigned to The Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through undersigned counsel, hereby responds and objects to Petitioner's Expedited Motion to Quash Deposition of Petitioner. Petitioner's Motion must be denied as she has failed to allege a credible reason that she should not be subjected to a deposition consistent with Rule 52(e), *Arizona Rules of Family Law Procedure* (ARFLP) As and for his Response/Objection, Respondent states as follows:

1. Petitioner initiated the underlying action when she filed her Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support on August 1, 2023.

Respondent timely filed his Response denying that Petitioner could be pregnant by him on August 23, 2023.

2. On December 28, 2023, Respondent notified Petitioner that it intended to depose her by providing Notice pursuant to Rule 57.

3. Petitioner and her counsel indicated they were available for a deposition on January 17, 2024. *See* Petitioner's Expedited Motion to Quash Deposition of Petitioner

4. On December 28, 2023, Petitioner, through counsel, filed a Motion to Dismiss, alleging, among other things, that this Court lacked subject matter jurisdiction because Petitioner was "no longer pregnant."

5. On January 3, 2024, Respondent filed his Response/Objection to Petitioner's Motion to Dismiss, clarifying that this Court had not been divested of its subject matter jurisdiction and there were matters that still needed to be adjudicated.

6. On January 4, 2024, Petitioner's counsel confirmed that the deposition was still scheduled for January 17th at 1:00 p.m. (**Exhibit 1).** Respondent affirmed, noting that the deposition would be videotaped.

7. **Rule 52(e), ARFLP, governs when this Court may properly quash a deposition**. A deposition must be quashed under 52(e)(2)(A) where it fails to allow a reasonable time to comply, requires a person who is not a party to travel a far distance (e.g., out of county), requires disclosure of privileged information or subjects a person to an undue burden. A deposition may be quashed under Rule 52(e)(2)(B) if it requires disclosure of trade secrets, an unretained expert's opinion, requires a nonparty to travel a far distance (e.g., out of county), or if justice so requires.

8. **Petitioner failed to meet her burden of proving why she should not participate in the properly Noticed Deposition.** The person contesting the deposition bears the burden of proving why they should not be subjected to it. *Helge v. Druke*, 136 Ariz. 434 (Ariz. App. 1983). Rule 52(e), ARFLP, as detailed above, provides both mandatory and permissive reasons for why a party should not be subjected to a deposition. Petitioner alleges none of the above reasons in her Motion to Quash, other than claiming this Court does not have subject matter jurisdiction over the matter (it does, as explained below and in depth in Respondent's Response/Objection to Petitioner's Motion to Dismiss).

None of the mandatory or permissive considerations set forth in Rule 52(e) for quashing a deposition exist. Petitioner is a party to this matter (which she initiated in August of 2023). The deposition is scheduled to take place in two (2) weeks, giving her ample time to comply, and it is to take place at Respondent's attorney's office, which is within the same county as Petitioner. Petitioner is merely being asked to appear to be deposed about the matter she instigated and continues to insist was in good faith. There is simply no legal reason provided by Petitioner for why she should not be deposed to answer questions about a case that she initiated.

Moreover, justice requires Petitioner be deposed to answer questions, under oath, about the veracity of the allegations she has made before this Court and the two (2) other judges who have been exposed to her version of truth. Petitioner scientifically could not have become pregnant by Respondent, with whom she performed only oral sex. She continued to perpetuate fraud upon the Court by claiming, under oath, that she was "*24 weeks pregnant*" and due on "*February 14, 2024*," despite at least two (2) fetal DNA tests showing "*little to no fetal DNA.*"

Petitioner even went as far as attempting to submit a fabricated sonogram into evidence. Petitioner's claim that she *was* pregnant by Respondent (despite no verifiable scientific evidence) but is *no longer pregnant* does not absolve her of disclosure and discovery obligations.

9. **This Court has subject matter jurisdiction, regardless of whether Petitioner is pregnant or not.** Subject matter jurisdiction attached when Petitioner filed her underlying Petition to Establish on August 1, 2023. *Fry v. Garcia*, 213 Ariz. 70 (noting subject matter is established "*at the time of filing of the lawsuit and cannot be ousted by subsequent actions or events*.") Nothing has occurred that would divest this Court of subject matter jurisdiction. There is (1) no statute that explicitly and clearly divests this Court of jurisdiction, (2) jurisdiction cannot be ousted by subsequent events, and (3) Arizona law presumes retention of jurisdiction unless divestiture is clearly and unambiguously found. *See Fry v. Garcia*, 213 Ariz. 70, 72-3 (Ariz. App. 2006). *See also* Respondent's his Response/Objection to Petitioner's Motion to Dismiss; Respondent's Reply to Petitioner's Response to Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing (both filed January 3, 2024).

10. **Several issues, including non-paternity, Rule 26 sanctions, and attorney's fees remain pending adjudication by this Court.** As explained in Respondent's Response/Objection to Petitioner's Motion to Dismiss and collateral filings, this case cannot be dismissed without an adjudication of the outstanding issues. Moreover, Respondent's Notice of a Deposition on January 17th, 2024 is not untimely, as the matter is currently scheduled to be dismissed on February 2, 2024.

11. **Respondent is entitled to his reasonable attorney's fees and costs incurred in responding to this unreasonable filing by Petitioner.** Petitioner's claim that she should be permitted to avoid being deposed because the Court no longer has jurisdiction lacks legal basis (and Petitioner does not cite to any to support this contention). Petitioner initiated this action, which triggered her obligations to comply with discovery and disclosure requests. She cannot be permitted to now evade these requirements (after not providing even an iota of Rule 49 disclosure) because she admits she is not pregnant.

WHEREFORE, Respondent respectfully requests this Court enter the following:

A. Deny Petitioner's Expedited Motion to Quash in its entirety;

B. Award Respondent his reasonable attorney's fees and costs incurred in this matter based on Petitioner's unreasonableness pursuant to A.R.S. § 25-324;

C. Any other Order this Court deems appropriate.

RESPECTFULLY SUBMITTED this 4th day of January, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
this 4th day of January, 2024 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document
delivered/emailed this 4th day of January, 2024, to:

The Honorable Julie Mata

Maricopa County Superior Court

Alexis Lindvall
MODERN LAW
1744 S. Val Vista Drive, Suite 205
Mesa, Arizona 85204
Alexis.lindvall@mymodernlaw.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Respondent's Response/Objection to Petitioner's Expedited Motion to Quash Deposition of Petitioner* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Jan 4, 2024 14:35 MST)

CLAYTON ECHARD

01/04/2024

Date

EXHIBIT “1”

From: Isabel Ranney
To: Alexis Lindvall
Cc: Gregg Woodnick; Tiffany Benz; Sarah Saxon
Subject: RE: Owens/Echard
Date: Thursday, January 4, 2024 11:28:00 AM
Attachments: Notice of Depo - 1.17.24.pdf
image001.png

Lexi,

Yes. I have attached a new Notice of Deposition clarifying the deposition on January 17th, 2024 at 1:00 p.m. will be video recorded.

Thank you,

Isabel Ranney

ISABEL RANNEY
Attorney
WL | WOODNICK LAW PLLC
1747 E. Morten Ave., #205
Phoenix, Arizona 85020
Phone: 602-449-7980
Fax: 602-396-5850
www.woodnicklaw.com
Email: isabel@woodnicklaw.com

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

From: Alexis Lindvall <[redacted]>
Sent: Thursday, January 4, 2024 11:25 AM
To: Isabel Ranney <isabel@woodnicklaw.com>
Cc: Gregg Woodnick <Gregg@woodnicklaw.com>; Tiffany Benz <t[redacted]>; Sarah Saxon [redacted]>
Subject: Re: Owens/Echard

I know my withdrawal is pending, but I want to make sure my client is aware of all pending deadlines, etc. Can you please confirm the deposition is currently scheduled for 1 p.m. on January 17th? I know we had this email exchange, but the last notice we have is for 9:00 a.m.

Thank you,

Lexi Lindvall, Esq.
Attorney | **Modern Law**
[redacted]
Mesa | Peoria | Scottsdale
www.mymodernlaw.com

Modern law is a paperless office and hard copies of documents will not be mailed unless requested.

This email contains confidential, legal information. If you realize this email was not intended for you, please ignore the content, immediately notify me that you received it, then delete it. Otherwise bad legal stuff could happen.

Please be advised, this communication does not constitute an agreement pursuant to Rule 69, Arizona Rules of Family Law Procedure. Any statement concerning settlement is made pursuant to Rule 408, Arizona Rules of Evidence, and shall be considered protected from use in any future litigation.

On Thu, Dec 28, 2023 at 1:14 PM Isabel Ranney <isabel@woodnicklaw.com> wrote:

> Lexi,
>
> Of course, just let me know when you are able. I will place it on our calendar for the 17th at 1:00 pm, pending your client's confirmation.
>
> Thank you,
>
> Isabel Ranney
>
> ISABEL RANNEY
> Attorney
> WL | WOODNICK LAW PLLC
> 1747 E. Morten Ave., #205
> Phoenix, Arizona 85020
> Phone: 602-449-7980
> Fax: 602-396-5850
> www.woodnicklaw.com
> Email: isabel@woodnicklaw.com
>
> **CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of**

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/10/2024 3:04:40 PM
Filing ID 17166166

Alexis Lindvall, Esq. #034734
MODERN LAW
1744 S. Val Vista Drive, Suite 205
Mesa, Arizona 85204
(480) 649-2905 Phone
Alexis.lindvall@mymodernlaw.com
Attorney for Petitioner

IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

and

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

PETITIONER'S REPLY IN SUPPORT OF MOTION TO DISMISS WITH PREJUDICE

(The Honorable Julie Mata)

Petitioner asks this Court to grant her Motion to Dismiss and to dismiss the underlying case against Respondent with prejudice. The main argument from Petitioner's Motion to Dismiss is worth repeating. This is a paternity establishment case. Petitioner is no longer pregnant with Respondent's child. There is nothing left to adjudicate. In asking this Court to deny Petitioner's Motion to Dismiss, Respondent makes three main arguments: (1) there are "evidentiary issues that must be resolved by this Court;" (2) that this Court *does* have jurisdiction to hear a paternity establishment case that does not involve minor children; and (3) the family court should keep the case open to allow Respondent to seek sanctions and attorney's fees from Petitioner. As further explained below, these three arguments are insufficient to deny Petitioner's Motion to Dismiss her own establishment petition now that she is no longer pregnant with Respondent's children.

I. LEGAL ARGUMENT

a. There are no evidentiary issues remaining in this case.

This is a paternity establishment case. Petitioner is no longer pregnant with Respondent's children. This crucial fact is undisputed by both parties. In his August 21, 2023 Response to the Petition to Establish, Respondent clearly stated that he believed the "entire petition is made up by [Petitioner]," and that he denied paternity. *Response* at 3-4. He requested that the Court issue an order declaring that he is not the natural father of the alleged minor children. *Id.* at 7. Similarly, in his proposed Amended Response, filed as Exhibit A to his December 12, 2023 Motion for Leave to Amend his Response, Respondent asks this Court to "[i]ssue an order declaring that Respondent is not the natural father of any children born to Petitioner." *Proposed Amended Response* at 7. Respondent has already obtained his requested relief; Petitioner is no longer pregnant. There are no children for this Court to establish—or disestablish—paternity for. Both parties are in complete agreement regarding the nonpaternity of any alleged minor children, as it is undisputed that such children no longer exist. There are no evidentiary issues remaining for this Court to resolve, Respondent has already obtained his requested relief, and this case must be dismissed.

b. This Court does not have jurisdiction to resolve a paternity establishment matter that does not involve minor children.

Respondent argues that the Court has jurisdiction to hear this case because it *had* jurisdiction at the time Petitioner filed her Petition. In making this assertion, Respondent relies on *Fry v. Garcia*, 213 Ariz. 70 (Ariz. App. 2006). *Fry* was a grandparent's rights case. The issue in *Fry* was "whether the superior court loses authority to rule on grandparent visitation petitions when such authority is based on the child being born out of wedlock." *Id.* In *Fry,* the grandparents filed a Petition for Visitation before the parents were married. Mother and Father then married. After the parents married, the parties attended mediation and reached an agreement regarding the grandparent visitation

schedule. Mother then filed to set aside the Court's visitation order arguing, in part, that the parents' marriage divested the court of jurisdiction in a grandparent's rights matter.

Fry differs from this case in a few important ways. First, there was a minor child in *Fry.* Here, it is undisputed by both parties that there is no minor child between them. While the family court has a duty to address disputes regarding minor children, this is not one of those disputes. Second, there was already a final visitation order in *Fry* when Mother argued the Court should be divested of jurisdiction. The issue was whether that final order should be set aside. Not only was there already an order, but the order was agreed upon by the parties in mediation. Here, there is no final order or agreement between the parties. Petitioner is not asking the Court to set aside a judgment but asking that the Court not to utilize its resources to enter one. Again, this is not a matter of undoing what was already done but putting a stop to the litigation entirely. Lastly, the requested relief in *Fry* was substantiative (i.e., a grandparent visitation schedule for a minor child). Here, the only potentially viable claims for relief are Respondent's claims for attorney's fees and sanctions against Petitioner. Respondent did not even file for sanctions until after Petitioner requested dismissal. These claims are not stand-alone claims but are based on a parties' actions/positions regarding substantive claims. Such substantive claim (i.e., the paternity, legal decision-making, parenting time, etc.) relating to Petitioner's unborn children no longer exists. The resultant monetary claims cannot survive on their own.

Even if this Court agrees with Respondent that it cannot be divested of jurisdiction, Respondent failed to sufficiently address Petitioner's mootness argument. Respondent argues that his remaining potential claims for attorney's fees and sanctions are not "an abstract question that renders the matter moot." *Respondent's Response* at 11 (internal quotations omitted). As noted above, Respondent's claims for attorney's fees and costs were born out of Petitioner's pregnancy. Such pregnancy no longer exists, and the resultant claims cannot survive on their own. The case is moot and must be dismissed.

c. Respondent's potential claim for attorney's fees is a self-fulfilling prophecy because he would not have had any more attorney's fees had he allowed this case to be dismissed.

Petitioner last took affirmative action in this case on October 18, 2023. On December 4, 2023, this Court placed the case on the inactive calendar until February 2, 2024. Petitioner believed that the case would be dismissed on that date if she did not take any action, so she did nothing. On December 12th, two months after Petitioner's last filing, Respondent's counsel filed their Notice of Appearance, Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing,[1] and Motion for Leave to Amend Respondent's Response to Petitioner to Establish Paternity.

On December 27, 2023, Petitioner's counsel sent Respondent's counsel a draft Stipulated Motion to Dismiss and corresponding proposed order. Even though both parties agree that they do not share minor children, Respondent refuses to dismiss the case and instead has incurred substantial attorney's fees since the requested dismissal. In fact, since Petitioner asked to dismiss her own case against Respondent, Respondent has filed:

- January 3, 2024 Reply to Petitioner's Response to Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing.
- January 3, 2024 Motion for Sanctions Pursuant to Rule 26.
- January 3, 2024 Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support with Prejudice.
- January 4, 2024 Response/Objection to Petitioner's Expedited Motion to Quash Deposition of Petitioner.

[1] It is unclear why Respondent felt this Motion needed to be heard on an expedited basis, when it was filed almost two months before the applicable dismissal deadline.

On December 28th, Respondent noticed Petitioner's deposition. Petitioner was forced to file an Expedited Motion to Quash the deposition, presently scheduled for January 17, 2024, after Respondent refused to postpone the deposition until after the Motion to Dismiss was adjudicated. Since being notified of the requested dismissal, Respondent's counsel has also sent multiple lengthy emails to Petitioner's counsel.

Respondent claims he is entitled to attorney's fees because "Petitioner has acted unreasonably if not diabolically by bringing this baseless Petition to Establish despite knowing she was not, and could not, be pregnant by Respondent and Respondent has incurred attorney's fees as a result." *Response* at 12. Petitioner, however, *was* pregnant with Respondent's children at the time she filed her Petition. The fact that there were no children born of the pregnancy does not mean that Petitioner was never pregnant to begin with. Petitioner took no affirmative steps to litigate this action once she learned the pregnancy had terminated. The action would have been dismissed without either party incurring attorney's fees but for Respondent's December request to continue the case on the inactive calendar and various other filings. Petitioner brought and now seeks to dismiss this action in good faith.

Any attorney's fees incurred by Respondent are a result of his unreasonable refusal to allow this case to be dismissed. Respondent further insists on proceeding with an unnecessary deposition while a Motion to Dismiss is pending and without an evidentiary hearing on the horizon, further racking up unnecessary fees. At this point, it appears Respondent is doing everything he can to blackboard more attorney's fees so that he can turn to the Court and claim he has an exorbitant amount of attorney's fees. This litigation for the sake of litigating should not be rewarded.

WHEREFORE, Petitioner respectfully requests that this Court dismiss her Petition to Establish with prejudice and deny all Respondent's requested relief in connection with this matter.

RESPECTFULLY SUBMITTED this 10th day of January 2024.

MODERN LAW

By: /s/ Alexis Lindvall
Attorney for Petitioner

ORIGINAL of the foregoing eFiled this 10th day of January 2024 with:

Clerk of the Superior Court
Maricopa County Superior Court

COPIES of the foregoing delivered this 10th day of January 2024 to:

Honorable Julie Mata
Maricopa County Superior Court

Gregg Woodnick, Esq.
WOODNICK LAW, PLLC
office@woodnicklaw.com
Attorney for Respondent

Laura Owens
laura@lauramichelleowens.com
Petitioner
**Motion to Withdraw with Consent Pending, filed January 2, 2024*

THE VALLEY LAW GROUP, PLLC
Cory B. Keith – SBN 035209
3101 N. Central Avenue, Suite 1470
Phoenix, Arizona 85012
Phone: (480) 300-6012
Fax: (480) 781-0722
Cory@thevalleylawgroup.com
Attorneys for Petitioner

Clerk of the Superior Court
*** Electronically Filed ***
C. Diaz, Deputy
1/17/2024 9:58:26 PM
Filing ID 17201988

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter Of: **LAURA OWENS,** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No. FC2023-052114 **MOTION FOR CONFIDENTIALITY AND PRELIMINARY PROTECTIVE ORDER** (Assigned to the Hon. Julie Mata)

Petitioner, **LAURA OWENS** (hereinafter "Petitioner"), by and through undersigned counsel, hereby files this Motion for Confidentiality and Preliminary Protective Order pursuant to Rule 53, *Arizona Rules of Family Law Procedure, ("ARFLP")*. Petitioner requests the Court sign and adopt the proposed Protective Order (*attached hereto as "Exhibit 1"*) as a formal Order of this Court or to issue its own protective order as deemed suitable by the Court.

I. STATEMENT OF FACTS

1. On August 1, 2023, Petitioner filed her Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support (hereinafter "The Petition").

2. On August 21, 2023, Respondent filed his Response to the Petition.

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

3. On December 28, 2023, Petitioner filed a Motion to Dismiss requesting that the Court dismiss the Petition.

4. On January 4, 2024, Respondent issued a Notice of Deposition summoning her to attend a deposition scheduled for January 17, 2024.

5. On January 11, 2024, undersigned counsel filed his Notice of Appearance on behalf of Petitioner.

6. On January 16, 2024, undersigned counsel emailed legal counsel representing Respondent ("Opposing Counsel") asking if Respondent would agree to a preliminary protective order with relation to the deposition. Respondent declined. *See "Exhibit 2"*.

7. Following the referenced January 16, 2024, email exchange, undersigned duly notified Opposing Counsel of his intent to submit this Motion. It was also conveyed that Petitioner would seek the Court's issuance of a protective order prior to her deposition. *Id.*

II. LAW AND ARGUMENT

Rule 53(a), *ARFLP* allows the court for good cause to enter an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense, including one or more of the following:

(1) forbidding the discovery;

(2) specifying terms and conditions, including time and place, for the discovery;

(3) prescribing a discovery method other than the one selected by the party seeking discovery;

(4) forbidding inquiry into certain matters, or limiting the scope of discovery to certain matters;

(5) designating the persons who may be present while the discovery is conducted;

(6) requiring that a deposition be sealed and opened only on court order;

(7) requiring that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way; and

(8) requiring that the parties simultaneously file specified documents or information in sealed envelopes, to be opened as the court directs.

Furthermore, Rule 53 (d) also allows the Court to enter an order that limits a party from disclosing information or materials produced in the action to a person who is not a party to the action:

(A) the party seeking confidentiality must show why a confidentiality order should be entered or continued; and

(B) the party opposing confidentiality must show why a confidentiality order should be denied in whole or in part, modified, or vacated. The burden of showing good cause for an order remains with the party seeking confidentiality.

Additionally, Rule 53 (2) requires that the court make findings of fact concerning any relevant factors, including but not limited to:

(A) any party's or person's need to maintain the confidentiality of such information or materials;

(B) any nonparty's or intervenor's need to obtain access to such information or materials; and

(C) (C) any possible risk to the public health, safety, or financial welfare that such information or materials may relate to or reveal.

Case law directly citing Rule 53, *ARFLP* is sparse. However, as the Commentary for Rule 53 states, Rule 53 is based on Rule 26 (c) of the Arizona Rules of Civil Procedure which provides additional insight and case law on the subject. Rule 26 (c)(l) similarity provides that upon good cause shown, court may make various protective orders that justice requires to protect a party or person from annoyance, embarrassment, oppression,

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

or undue burden or expense. Rule 26(c)(l) Ariz. Rule Civ. Procedure. *See, e.g., Arpaio v. Figueroa,* 229 Ariz. 444, 276 P.3d 51 (2012) *MacMillan v. Schwartz,* 250 P.3d 1213, 1220-21 (Ariz. Ct. App. 2011).

The text of Rule 53 (a), *ARFLP* provides the Court with no fewer than eight separate and non-inclusive means by which it might ensure that a party is not subjected to annoyance embarrassment, oppression, and undue burden or expense. In other words, the rule provides the Court with broad discretion in fashioning orders for parties or information entitled to protection.

Petitioner's proposed Protective Order, attached hereto and incorporated by reference, requests that relevant discoverable information which either party designates as confidential remains confidential and is not disseminated to anyone other than the parties and their respective counsel–including if one party objects to the confidentiality designation and until said designation is removed by the Court. The Protective Order also seeks that any party depositions in this matter, if deemed appropriate by the Court, are designated as confidential until either party requests that the Court make an evaluation into whether parts of the deposition, or the deposition in its entirety, should have the confidential designation.

1. *Respondent's Requested and Anticipated Discovery will Further Annoy, Embarrass, and Oppress Petitioner*.

Respondent's anticipated discovery is sensitive in nature and should be protected. Respondent intends to depose Petitioner or is seeking discovery relating to several sensitive and potentially privileged topics including her previous sexual relations, specifics regarding the sexual encounter with Respondent, previous pregnancies, discussions surrounding potential adoption or abortions, her privileged medical records, her miscarriage, and other

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

topics. While Petitioner concedes that certain discovery may be necessary in this matter to appropriately litigate unresolved issues - including the issue of attorney fees - this limited issue does not warrant the dissemination of sensitive information to non-parties to this case.

Petitioner has already been annoyed, embarrassed, and oppressed by Respondent's actions and has concerns that this will only worsen as discovery continues. Respondent is consistently using his social media platforms to control the narrative of this case. Respondent is an American television personality best known for his appearance on two seasons of the Bachelor/Bachelorette. Respondent has approximately 360,000 social media followers across Instagram and TikTok alone. *See Exhibit 3*. Respondent has also made appearances on multiple interviews or podcasts throughout this case where he has discussed this case/situation.

As a result, Petitioner has been the subject of disparaging comments, harassment, annoyance, and undue scrutiny from tens of thousands of individuals online.[1] This deliberate effort to shape public opinion has created an environment that is not only emotionally distressing for Petitioner but also poses a potential threat to the fairness of the legal proceedings. Petitioner desires to litigate this case on the merits, free from ongoing concerns that she will receive further annoyance and embarrassment from the public should aspects of the disclosures and/or her deposition testimony be freely disseminated to the public.

[1] Counsel notes that specific instances of online disparaging of Petitioner are not included in this Motion as counsel believes this would only encourage the conduct for the people following this case. To the extent that this Court deems it appropriate or necessary, counsel will provide the Court with specific instances of the public comments which are annoying and embarrassing Petitioner across social media and online platforms. However, any such disclosure(s) should be protected under seal or revealed via "in camera review" with only the Judge and attorneys present to avoid worsening the continued impact of this case to Petitioner.

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

While Petitioner concedes that she also made comments to organizations, these efforts were in attempt to clear up the many false narratives circling publicly.

2. The Court Should Limit the Method of Respondent's Discovery Abilities.

The only issue remaining in this action is the issue of sanctions or attorney fees. It is undisputed that the parties do not share a child in common and that Petitioner is not presently pregnant. A deposition is unnecessary to seek the information Respondent would require to properly litigate the sole remaining issue of attorney fees. Respondent refused to agree to enter into any preliminary protective order prior, causing necessity for filing of this Motion. Given Respondent's mainstream history of divulging information related to this case to the mases, without issuance of a protective order Petitioner anticipates portions of and/or her deposition as a whole will be discussed and/or disseminated publicly, thus subjecting her to additional annoyance or embarrassment.[2]

Petitioner believes discovery can be completed sufficiently through alternative means including the use of uniform and non-uniform interrogatories, the request for production of documents, a written deposition, cross examination, or other means.

3. If the Court does not Preclude the Parties from Conducting Depositions of the Opposing Parties, the Court Should Limit the Scope of the Depositions to the Present Matter.

In the event the Court does not outright deny the parties' abilities to depose the other, the Court should limit the deposition to the issues narrowly involved in the present litigation. Petitioner believes this should initiate with the party's act or alleged act of sexual

[2] Counsel notes that in his limited time on this case, substantial amounts of information have leaked to the public or media within hours or days of the information being transmitted. This includes not only things like Motions, but also emails between counsel and other details surrounding the case as well.

intercourse. In an email exchange between counsel, Respondent Counsel has expressed intent to depose Petitioner regarding her previous relationships which are entirely unrelated to this matter. *See "Exhibit 2"*.

4. *The Court Should Issue an Order Designating Confidentially Deemed Discovery as Protected and Confidential.*

The present case is unique. This Court is aware of the constant struggle within Arizona courts and laws weighing the best interests of a child against the privileges designed to protect communications with certain professionals. While this case is still labeled as a Family Court case, the parties do not share a minor child in common and therefore, there is no obligation for Petitioner to share protected or privileged information. Almost all the requested discovery to date seeks otherwise privileged information from Petitioner. While Petitioner concedes that disclosure of certain medical records may become necessary to support her claims, she is uncomfortable disclosing such personal and private information without a protective order in place. Even then, Petitioner should only be required to produce evidence establishing the viability of her claims instead of all medical records or HIPPA releases as Respondent has and will likely continue to request.

III. CONCLUSION

For the reasons set forth, issuance of a protective order is necessary and can be accomplished without any material prejudice to either party. As such, Petitioner asks this Court to sign the Proposed form of Preliminary Protective Order attached hereto as "Exhibit 1". Doing so will protect the parties from additional embarrassment and annoyance, while allowing this case to be decided on the merits.

//

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

RESPECTFULLY submitted this 17th day of January 2024.

THE VALLEY LAW GROUP, PLLC

/s/ Cory Keith

Cory B. Keith
Attorney for Petitioner

ORIGINAL of the foregoing e-filed
this 17th day of January 2024, with:

Clerk of the Superior Court
Maricopa County Superior Court

COPY presumed delivered even date to:
The Honorable Julie Mata

COPY emailed even date to:
Gregg Woodnick
Woodnick Law, PLLC
1747 E. Morten Ave. Ste 205
Phoenix, Arizona 85020
office@WoodnickLaw.com
Attorney for Respondent

By: ILS

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

EXHIBIT 1

THE VALLEY LAW GROUP, PLLC
Cory B. Keith – SBN 035209
3101 N. Central Avenue, Suite 1470
Phoenix, Arizona 85012
Phone: (480) 300-6012
Fax: (480) 781-0722
Cory@thevalleylawgroup.com
Attorneys for Petitioner

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter Of: **LAURA OWENS,** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No. FC2023-052114 **PROTECTIVE ORDER** (Assigned to the Hon. Julie Mata)

Pursuant to Rule 53(B), *ARFLP* and to provide for the protection of documents, information, and things that may be produced containing non-public proprietary information, including, without limitation personal information which may be subject to the confidentiality obligations of the parties:

IT IS HEREBY ORDERED THAT the following procedures shall control all discovery and disclosure in these proceedings:

1. In this Protective Order, the words set forth below shall have the following meanings:
    a. "Proceeding" means the above-entitled proceeding in the Arizona Superior Court for the County of Maricopa.

b. "Court" means the judge to which this Proceeding may be assigned, including Court staff participating in such proceedings.

c. "Confidential" means any information that belong to a designating party who believes in good faith that the Disclosure of such information to another party or non-party would create a substantial risk of financial, personal, or other injury.

d. "Confidential Materials' means any documents, testimony, or information, as defined below, designated as "Confidential" pursuant to the provisions of this Protective Order.

e. "Highly Confidential" means any information that belongs to a Designating Party who believes in good faith that the disclosure of such information to another party or non-party would create a substantial risk of serious financial or other injury that cannot be avoided by less restrictive means.

f. "Highly Confidential Materials" means any documents, testimony, or information, as defined below, designated as "Highly Confidential" pursuant to the provisions of this Protective Order.

g. "Designated Party" means the Party that designates documents, testimony, or information, as defined below, as "Confidential" or "Highly Confidential."

h. "Disclosure" or "Disclosed" or "Disclosures" means to reveal, divulge, give, or make available materials, or any part thereof, or any information contained therein.

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

i. "Documents" means (i) any "Writing," "Original," and "Duplicate" as those terms are defined by Rule 1001 of the Arizona Rule of Evidence, which have been produced in discovery in this Proceeding by any person or entity, and (ii) any copies, reproductions, or summaries of all or any party of the foregoing.

j. "Deposition" means any sworn testimony outside of the courtroom with attorneys or clients questioning a Party or witness to the case.

☐ If this box is checked, the Court is not authorizing the use of depositions in the remaining proceedings in this matter.

k. "Information" means the content of documents or testimony.

l. "Testimony" means all depositions, declarations, or other testimony taken or used in this Proceeding.

2. The Designating Party shall have the right to designate as "Confidential" only the non-public or privileged Documents, Testimony, or Information that the Designating Party in good faith believes would create a substantial risk of injury if disclosed to another party or non-party.

3. The Designating party shall have the right to designate as "Highly Confidential" only the non-public or privileged Documents, Testimony, or Information that the Designating Party in good faith believes would create a substantial risk of serious injury if disclosed to another party or non-party., and that such high risk cannot be avoided by less restrictive means.

4. "Highly Confidential" documents will include medical records where only relevant information for purposes of this Proceeding will be disclosed by the Designating

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

Party. Any irrelevant and immaterial items contained within these Documents will be redacted from the Information. The relevant and material Information will be "attorney eyes only."

5. "Attorney eyes only" means that only the designated counsel for the Proceeding, his/her immediate staff assigned to this Proceeding, and any expert witness will have access to this Information.

6. The entry of this Protective Order does not alter, waive, modify, or abridge any right, privilege, or protection otherwise available to any Party with respect to the discovery of matters, including but not limited to any Party's right to assert the attorney-client privilege, the attorney work product doctrine, or other privileges or any Party's right to contest any such assertion.

7. Any Documents, Testimony, or Information to be designated as "Confidential" or "Highly Confidential" must be clearly so designated before the Document, Testimony, or Information is Disclosed or produced. The "Confidential" or "Highly Confidential" designation should not obscure or interfere with the legibility of the designated Information.

    a. For Documents, the Designating Party must affix the legend "Confidential" or "Highly Confidential" on each page of any Document containing such designated material.

    b. Deposition exhibits or transcripts, or any portion thereof, may be designated as "Confidential" or "Highly Confidential" by making such a designation on the record at the deposition or by making such a designation in writing within

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

30 days of receipt of the deposition transcript by the Designating Party. Until 30 days after receipt by the Designating Party of the deposition transcript, the entire transcript and all exhibits shall be treated as Confidential Materials. The Party conducting the deposition shall bear the burden of ensuring that the cover page and any designated portions of the original transcript or any copies of the transcript bear, in substance, the legend "CONFIDENTIAL OR HIGHLY CONFIDENTIAL – subject to Protective Order."

c. For Information produced in some form other than Documents, and for any other tangible items, including, without limitation, compact discs or DVD's, the Designating Party must affix in a prominent place on the exterior of the container or containers in which the Information or item is stored the legend "Confidential" or "Highly Confidential." If only portions of the Information or item warrant protection, the Designating Party, to the extent practicable, shall identify the "Confidential" or "Highly Confidential" portions.

8. The inadvertent production by any of the undersigned Parties or non-Parties to the Proceedings of any Document, Testimony, or Information during discovery in this Proceeding without a "Confidential" or "Highly Confidential" designation, shall be without prejudice to any claim that such items is "Confidential" or "Highly Confidential" and such Party shall not be held to have waived any rights by such inadvertent production. In the event that any Document, Testimony, or Information that is subject to a "Confidential" or "Highly Confidential" designation is inadvertently produced without such designation, the Party that inadvertently

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

produced the document shall give written notice of such inadvertent production within twenty (20) days of discovery of the inadvertent production, together with a copy of the subject Document, Testimony, or Information designated as "Confidential" or "Highly Confidential" (the "Inadvertent Production Notice"). Upon receipt of such Inadvertent Production Notice, the Party that received the inadvertently produced Document, Testimony, or Information shall promptly destroy the inadvertently produced Document, Testimony, or Information and all copies thereof, or, a the expense of the producing Party, return such together with all copies of such Document, Testimony or Information to counsel for the producing party and shall retain only the "Confidential" or "Highly Confidential" materials. Should the receiving Party choose to destroy such inadvertently produced Document, Testimony, or Information, the receiving Party shall notify the producing Party in writing of such destruction within ten (10) days of receipt of written notice of the inadvertent production. This provision is not intended to apply to any inadvertent production of any Document, Testimony, or Information protected by attorney-client or work product privileges. If this provision conflicts with any applicable laws regarding waiver of confidentiality through the inadvertent production of Documents, Testimony, or Information, such law shall govern.

In the event that counsel for a Party received Documents, Testimony or Information in discovery designated as "Confidential" or "Highly Confidential" objects to such designation with respect to any or all such items, said counsel shall advise counsel for the Designating Party, in writing, of such objections, the specific Documents, Testimony or

Information to which each objection pertains, and the specific reasons and support for such objections (the "Designation Objections"). Counsel for the Designating Party shall have ten (10) court days from receipt of the written Designation Objections to either (a) agree in writing to de-designate Documents, Testimony, or Information pursuant to any or all the Designation Objections and/or (b) in accordance with the Family Court Discovery Dispute Protocol to seek the determination of the Court whether or not to uphold any or all designations on Documents, Testimony, or Information addressed by the Designation Objections the "Discovery Dispute". Pending a resolution of the Discovery Dispute by the Court, all existing designations on the Documents, Testimony, or information at issue in the Discovery Dispute shall remain in place. The Designating Party shall have the burden of establishing the applicability of its "Confidential" designation. If the Designation Objections are neither timely agreed to nor timely addressed in the "Discovery Dispute," then such Documents, Testimony, or Information shall be de-designated in accordance with the Designation Objection applicable to such material.

9. Access to and/or Disclosure of Confidential Materials shall be permitted only to the following persons or entities:

    a. the Court.

    b. Attorneys of record in the Proceeding and their affiliated attorneys, paralegals, clerical and secretarial staff employed by such attorneys who are actively involved in the Proceeding and are not employees of any Party. Provided, however, that each non-lawyer given access to Confidential Materials or Highly Confidential Materials shall be advised that such materials are being

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

Disclosed pursuant to, and are subject to, the terms of this Protective Order and that they may not be Disclosed other than pursuant to its terms.

c. Those officers, directors, partners, members, employees and agents of all non-designating Parties that counsel for such Parties deems necessary to aid counsel in the prosecution and defense of this Proceeding; provide, however, that prior to the Disclosure of Confidential Materials of Highly Confidential Materials to any such officer, director, partner, member, employee or agent, counsel for the Party making the Disclosure shall deliver a copy of this Protective Order to such person, shall explain that such person is bound to follow the terms of such Order, and shall secure the signature of such person on a statement in the form attached hereto as Exhibit A.

d. Court reporters in this Proceeding (whether at depositions, hearings, or any other proceeding).

e. Any deposition, trial, or hearing witness in the Proceeding who previously has had access to the Confidential Materials or Highly Confidential Materials, or who is currently or was previously an officer, director, partner, member, employee or agent of an entity that has had access to the Confidential Materials or Highly Confidential Materials.

f. Any deposition or non-trial hearing witness in the Proceeding who previously did not have access to the Confidential Materials or Highly Confidential Materials; provided, however, that each such witness given access to Confidential Materials shall be advised that such materials are being Disclosed

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

pursuant to, and are subject to, the terms of this Protective Order and that they may not be Disclosed other than pursuant to its terms.

g. Outside experts or expert consultants consulted by the undersigned Parties or their counsel in connection with this proceeding, whether or not retained to testify at any oral hearing; provided, however, that prior to the disclosure of confidential materials or highly confidential materials to any such expert or expert consultant, counsel for the Party making the Disclosure shall deliver a copy of this Protective Order to such person, shall explain its terms to such person, and shall secure the signature of such person on a statement in the form attached hereto as Exhibit A. It shall be the obligation of counsel or the party, upon learning of any breach or threatened breach of this Protective Order by any such expert or expert consultant, to promptly notify counsel for the Designating Party of such breach or threatened breach.

h. Outside photocopying, database service providers, trial support firms, litigation support services, and translators engaged by the Parties during this Proceeding to whom disclosure is reasonably necessary in connection with the Proceeding, provided, however, that prior to the Disclosure of Confidential Materials or Highly Confidential Materials to any such person, counsel for the Party making the Disclosure shall deliver a copy of this Protective Order to such person, shall explain its terms to such person, and shall secure the signature of such person on a statement in the form attached hereto as Exhibit A. It shall be the obligation of counsel, upon learning of any breach or

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

threatened breach of this Protective Order by any such person, to promptly notify counsel for the Designating Party of such breach or threatened breach.

i. Any mediator, Judge *Pro Tempore* or arbitrator engaged by the Parties in connection with this Proceeding provided, however, that prior to the Disclosure of Confidential Materials or Highly Confidential Materials to any such person, counsel of Confidential Materials to any such person, counsel for the Party making the Disclosure shall deliver a copy of this Protective Order to such person, shall explain its terms to such person, and shall secure the signature of such person on a statement in the form attached hereto as Exhibit A. It shall be the obligation of counsel, upon learning of any breach or threatened breach of this Protective Order by any such person, to promptly notify counsel for the Designating Party of such breach or threatened breach.

j. Any other person or entity that Designating Party agrees to in writing.

10. Confidential Materials or Highly Confidential Materials shall be used by the persons or entities receiving them only for the purposes of preparing for, conducting, participating in the conduct of, and/or prosecuting and/or defending the Proceeding, and not for any business, personal, or other purpose whatsoever.

11. Any Party to the Proceeding (or other person subject to the terms of this Protective Order) may ask the court, after appropriate notice to the other Parties to the Proceeding, to modify or grant relief from any provision of this Protective Order.

12. Complying with the terms of Protective Order shall not prejudice in any way the right of any Party (or any other person subject to the terms of this Protective Order):

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

i. to seek a determination by the Court of whether any particular Confidential Materials or Highly Confidential Materials should be subject to protection under the terms of this Protective Order; or

ii. to seek relief from the Court on appropriate notice to all other Parties to the Proceeding from any provision(s) of this Protective Order, either generally or as to any particular Document, Material or Information.

13. Any Information that may be produced by a non-Party witness in discovery in the Proceeding pursuant to subpoena or otherwise may be designated by such non-Party as "Confidential" or "Highly Confidential" under the terms of this Protective Order.

14. If any person subject to this Protective Order who has custody of any Confidential Materials or Highly Confidential Materials receives a subpoena or other process ("Subpoena") from any government or other person or entity demanding production of such materials, the recipient of the Subpoena shall promptly give notice of the same by electronic mail transmission, followed by either express mail or overnight delivery to counsel of record for the Designating Party, and shall furnish such counsel with a copy of the Subpoena. Upon receipt of this notice, the Designating Party may, in its sole discretion and at its own cost, move to quash or limit the Subpoena, otherwise oppose production of the Confidential Materials or Highly Confidential Materials, and/or seek to obtain confidential treatment of such materials from the subpoenaing person or entity to the fullest extent available under law. The recipient of the Subpoena may not produce any Confidential Materials or Highly Confidential

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

Materials pursuant to the Subpoena prior to the date specified for production of the Subpoena.

15. Nothing in this Protective Order shall be construed to preclude either Party from asserting in good faith that certain Confidential Materials or Highly Confidential Materials require additional protection. The Parties shall meet and confer to agree upon the terms of such additional protection.

16. If, after execution of this Protective Order, any Confidential Materials or Highly Confidential Materials submitted by a Designating Party under the terms of this Protective Order is Disclosed by a non-Designating Party to any person other than in the manner authorized by this Protective Order, the non-Designating Party responsible for the Disclosure shall bring all pertinent facts relating to the Disclosure of such Confidential Materials or Highly Confidential Materials to the immediate attention of the Designating Party.

17. This Protective Order is entered without prejudice as to the right of the Designating Party to knowingly waive the applicability of this Protective Order to any Confidential Materials or Highly Confidential Materials designated by that Party. If the Designating Party uses Confidential Materials or Highly Confidential Materials in a non-Confidential manner, then the Designating Party shall advise that the designation no longer applies.

18. Nothing is this Protective Order shall affect the admissibility into evidence of Confidential Materials or Highly Confidential Materials or abridge the rights of any person to seek judicial review or to pursue other appropriate judicial action with

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

respect to any ruling made by the court concerning the issue of the status of any Confidential Materials or Highly Confidential Materials.

19. This Protective Order shall continue to be binding after the conclusion of the Proceedings and all subsequent proceedings arising from the Proceeding, except that a Party may seek the written permission of the Designating Party or may move the Court for relief from provisions of this Protective Order. To the extent permitted by law, the Court shall retain jurisdiction to enforce, modify, or reconsider this Protective Order, even after the Proceeding is terminated.

20. Within thirty (30) days of the conclusion of this Proceeding, including any appeals, each Party shall, through its counsel, provide written confirmation to the Designating party that the Party has destroyed or returned any and all Confidential Materials or Highly Confidential Materials, provided that counsel of record for each Party may keep a copy of all pleadings and correspondence in the Proceeding and any attorney work-product, and further provided that all retained Confidential Materials or Highly Confidential Materials shall be treated in accordance with the terms of the Protective Order.

21. This Protective Order shall survive the final disposition of this Proceeding by judgement, dismissal, settlement, appeal, or otherwise.

DATED this _____ day of _____, 2024

_____
Honorable Julie Mata
Maricopa County Superior Court

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

EXHIBIT 2

From: Cory Keith <cory@thevalleylawgroup.com>
Sent: Tuesday, January 16, 2024 4:08 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: FC2023-052114; Owens vs. Echard

Gregg,

I appreciate your understanding of the interesting situation I walked into in this case. I know you and I are in opposition on this one, but I hope we can represent our clients with the understanding that we are both simply representing our clients and not take issue with each other for doing so. Let's hope our next case together isn't so contentious.

After speaking with my client, we will be filing a Motion for a Protective Order relating to both parties' depositions of each other. I will have this filed by the time of the deposition tomorrow. My client will be awaiting further Order from the Court with relation to this before subjecting herself to Mr. Echard's deposition of her and she will not be present for the deposition tomorrow. To be clear, this is not my client saying she does not *want* to be deposed - I believe her Motion to Quash adequately stated and put Mr. Echard on notice of this - but instead that the deposition should be confidential to avoid continued embarrassment and annoyance as she has undergone thus far in and outside of these proceedings. In order to allow the Court to weigh in on this deposition and request for confidentiality appropriately, Ms. Owens must seek this leave prior to the deposition.

Thank you,

-

Please include my paralegal Isabel Sissel on all emails and correspondence. Her email is isabel@thevalleylawgroup.com.
Cory Keith
Managing Attorney
The Valley Law Group, PLLC.
3101 N. Central Avenue, Ste. 1470
Phoenix, AZ 85012
Phone: 480-300-6012
Fax: 480-781-0722
Email: Cory@thevalleylawgroup.com

Confidentiality Notice:

This electronic message and all contents contain information from The Valley Law Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Tuesday, January 16, 2024 2:06 PM
To: Cory Keith <cory@thevalleylawgroup.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: FC2023-052114; Owens vs. Echard

Cory,

1. Clayton will not be agreeing to a Protective Order or filing this case under seal. Your client went to *The Sun*, People magazine, TMZ, Reddit, Medium etc and *continues* to post and contact the media to date. Also, it is highly *doubtful* that you will be able to meet the high burden to have a case sealed. (Note, your client already tried this and was denied relief).

2. As you are aware from the pleadings, we will absolutely be addressing the malignancy of her allegations including her historic prior allegations as they are directly relevant to her bad faith motivation to file this matter. Note, your client also repeatedly refers to her prior "pregnancies" in her emails and text messages to Clayton, which we disclosed. Moreover, her prior allegations are entirely relevant to our Motion for Sanctions, as she has a history of fabrications and her playbook in this underlying matter is almost identical (some of texts read like they are cut and paste) from the Gillespie matter. We appreciate that subject matter of fabricating pregnancies is embarrassing, but her responses to the questions are absolutely relevant to the pending action in the court.

3. Your objections at deposition are obviously limited by law. If Laura attempts to terminate deposition because we are asking questions that are directly related to her sanctionable actions, that is obviously your choice. I am fairly confident that Judge Mata is *not* going to agree with you and she will be exposed to consequences including attorney's fees and paying for the reporter costs for yet another deposition so that the discovery process can be completed.

4. I have zero intention of asking questions that do not serve a legitimate purpose. Much of our time is going to be spent confirming foundation issues because your client (after she claimed

she was no longer pregnant) insisted on exercising Rule 2.

5. Last, No matter what questions we ask, your client will claim they are meant to harass. I assure you that is *not* the case.

6. I trust Laura told you that she had the opportunity to avoid this by acknowledging that she was never pregnant by Clayton. That offer still stands.

Last, this deposition was properly set 3 weeks ago and I have spoken to two (2) other lawyers for Laura in that window. If Laura is *now* refusing to participate without her demands being met, it is not only an unreasonable request (based on the history here and her publications) but a late one.

You are more than welcome to call me to discuss. I appreciate you are in a difficult situation having taken this case in this posture.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Cory Keith <cory@thevalleylawgroup.com>
Sent: Tuesday, January 16, 2024 12:22 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: FC2023-052114; Owens vs. Echard

Mr. Woodnick,

Thank you for your email.

After reviewing this case more thoroughly, I am writing to request your position on both parties signing a Protective Order under Rule 53 with relation to the deposition. Specifically, we will be requesting that the deposition transcript, testimony, and any supporting video is documented as highly confidential and kept under seal. We will also request that the deposition scope is limited to matters relevant to this proceeding. Assuming your client does not intend to annoy, embarrass, oppress, harass, or leak the information, I am hopeful that they would be able to sign this agreement for same and move forward with the deposition

tomorrow. Please let me know your client's position as soon as possible. If we are unable to reach an agreement, I will be seeking court intervention prior to my client being present for any deposition.

Thank you,

-

Please include my paralegal Isabel Sissel on all emails and correspondence. Her email is isabel@thevalleylawgroup.com.

Cory Keith
Managing Attorney
The Valley Law Group, PLLC.
3101 N. Central Avenue, Ste. 1470
Phoenix, AZ 85012
Phone: 480-300-6012
Fax: 480-781-0722
Email: Cory@thevalleylawgroup.com

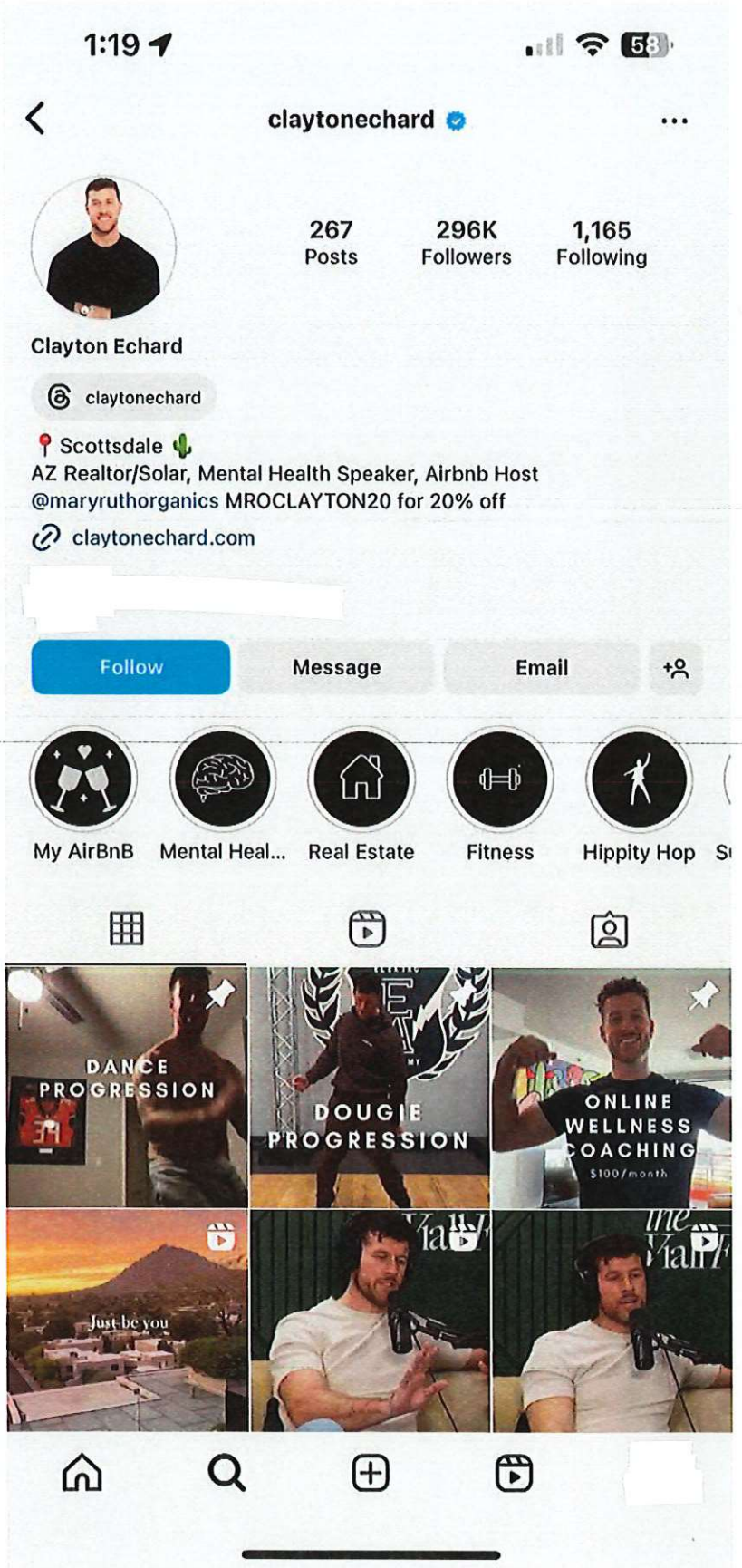
Confidentiality Notice:
This electronic message and all contents contain information from The Valley Law Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Tuesday, January 16, 2024 11:37 AM
To: Cory Keith <cory@thevalleylawgroup.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: FC2023-052114; Owens vs. Echard

Cory,

As a professional courtesy, I wanted to let you know (as I am sure Laura is expecting) there may be a police presence at my office tomorrow for the deposition.

EXHIBIT 3


1:19
claytonechard
267
Posts
296K
Followers
1,165
Following
Clayton Echard
claytonechard
Scottsdale
AZ Realtor/Solar, Mental Health Speaker, Airbnb Host
@maryruthorganics MROCLAYTON20 for 20% off
claytonechard.com
Follow
Message
Email
My AirBnB
Mental Heal...
Real Estate
Fitness
Hippity Hop
DANCE PROGRESSION
DOUGIE PROGRESSION
ONLINE WELLNESS COACHING
$100/month
Just be you

1:20

Clayton Echard



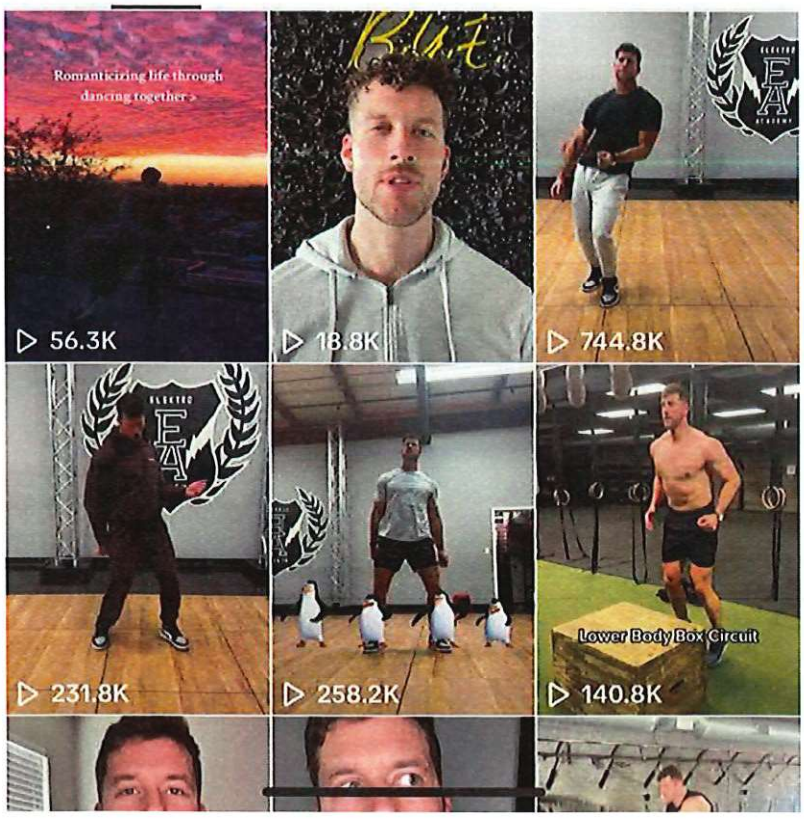
@clayton.echard

21	61.1K	410.0K
Following	Followers	Likes

Follow | Message

🌹#26
📍Scottsdale
⬇️Order my New book, 180 Degrees, Below⬇️
Claytonechard.com

Instagram | Add Yours



Clerk of the Superior Court
*** Electronically Filed ***
M. Cain, Deputy
1/17/2024 3:24:42 PM
Filing ID 17200151

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, and **CLAYTON ECHARD,** Respondent,	Case No.: **FC2023-052114** **NOTICE OF NON-APPEARANCE AT DEPOSITION PURSUANT TO RULE 57(g)** (Assigned to The Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through undersigned counsel and pursuant to Rule 57(g), *Arizona Rules of Family Law Procedure*, hereby notifies this Court that Petitioner, **LAURA OWENS**, failed to appear at the properly noticed deposition scheduled for January 17, 2024 at 1:00 p.m.

Counsel conducting the deposition was notified the day prior to the deposition that Petitioner was not going to attend. Petitioner (and her former counsels) were previously Noticed and agreed to the date of the deposition on or about December 28, 2023. Notably, when

Petitioner obtained new counsel, she did not request an extension of time or otherwise indicate she would not be prepared for the deposition.

It should also be noted that Petitioner, through her prior counsel, filed a *Motion to Quash the Deposition* (filed 1/2/24), which is still pending before the Court. Respondent provided his Response/Objection on January 4th, 2023. No Reply was timely filed and no court order restricted this properly noticed deposition. Still, Petitioner willfully (see attached) failed to attend.

The reasons provided by Petitioner's new counsel for not attending the property noticed deposition fail to comport with Rule 57, *Arizona Rules of Family Law Procedure*. As a result of Petitioner's failure to attend and failure to adequate provide notice of her non-attendance, Respondent has incurred attorney's fees and costs, which he is entitled to under Rule 57(g).

Petitioner's counsel indicated that he will be filing for some sort of request for protective order. As Petitioner's most recent counsel was advised in the correspondence attached, this is not valid cause to fail to attend a deposition and does not comply with the Rules. (The communications regarding the deposition are attached heretofore as **Exhibit A**.)

The Court currently has a Motion for Sanctions pending. Respondent intends to reference this Notice in advancing the consistent arguments regarding appropriate consequences for Petitioner's continued noncompliance with the Rules, including legal fees and other relief available per law.

//

//

//

RESPECTFULLY SUBMITTED this 17th day of January, 2024.

WOODNICK LAW, PLLC



Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
This 17th day of January, 2024 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document
delivered/emailed this 17th day of January, 2024, to:

The Honorable Julie Mata
Maricopa County Superior Court

Cory Keith
The Valley Law Group, PLLC
3101 N. Central Ave, Ste 1470
Pheonix, AZ 85012
cory@thevalleylawgroup.com
Attorney for Petitioner

By: */s/ MB*

Exhibit “A”

From:	Gregg Woodnick
To:	Cory Keith
Cc:	Isabel Ranney; Isabel Sissel; Maribeth Burroughs
Subject:	FC2023-052114; Owens vs. Echard
Date:	Wednesday, January 17, 2024 10:54:39 AM
Attachments:	image001.png image002.png Laura Owens - Blank HIPAA.pdf application-certificate-death.pdf

Cory,

I appreciate you letting us know that Laura is not planning on showing up to the Noticed deposition this afternoon. That said, and as I am sure you advised her in a CYA letter, she is not allowed to simply ignore a properly noticed deposition. In light of her actions, and exercising efforts to save Clayton costs, we are canceling the court reporter. We will include the anticipated cancellation fees required by the service in our cost statement and append it to the anticipated *China Doll Affidavit*. Note, we will prepare an affidavit confirming her non-appearance and send you the same after 1:00pm.

The matter has been set for trial. Laura needs to comply with Rule 49 (she has provided zero disclosure notwithstanding you being the third attorney I have communicated with about this FC case).

I am sending you again the fetal death certificate form I provided to you yesterday and submitting for the 3rd time HIPAA forms (attached) for each of the following providers: Dr. Zieman, Tamara Lister, NP, Dr. Makhoul, Dr. Higley, and PPC, so we can get the records directly from the source and consistent with her testimony in Court already. As I explained to Lexi before she quit the case, we will not accept any "records" from your client that are not given to us from the providers *directly*. There is an arts-and-crafts history here. Fortunately, Laura herself invoked Rule 2 so she should be more than cooperative with signing releases so we can get the records from the source.

I am disappointed but certainly not surprised that the deposition is not proceeding today.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Cory Keith <cory@thevalleylawgroup.com>
Sent: Tuesday, January 16, 2024 4:08 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: FC2023-052114; Owens vs. Echard

Gregg,

I appreciate your understanding of the interesting situation I walked into in this case. I know you and I are in opposition on this one, but I hope we can represent our clients with the understanding that we are both simply representing our clients and not take issue with each other for doing so. Let's hope our next case together isn't so contentious.

After speaking with my client, we will be filing a Motion for a Protective Order relating to both parties' depositions of each other. I will have this filed by the time of the deposition tomorrow. My client will be awaiting further Order from the Court with relation to this before subjecting herself to Mr. Echard's deposition of her and she will not be present for the deposition tomorrow. To be clear, this is not my client saying she does not *want* to be deposed - I believe her Motion to Quash adequately stated and put Mr. Echard on notice of this - but instead that the deposition should be confidential to avoid continued embarrassment and annoyance as she has undergone thus far in and outside of these proceedings. In order to allow the Court to weigh in on this deposition and request for confidentiality appropriately, Ms. Owens must seek this leave prior to the deposition.

Thank you,

-

Please include my paralegal Isabel Sissel on all emails and correspondence. Her email is isabel@thevalleylawgroup.com.
Cory Keith
Managing Attorney
The Valley Law Group, PLLC.
3101 N. Central Avenue, Ste. 1470
Phoenix, AZ 85012
Phone: 480-300-6012
Fax: 480-781-0722
Email: Cory@thevalleylawgroup.com

Confidentiality Notice:

This electronic message and all contents contain information from The Valley Law Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Tuesday, January 16, 2024 2:06 PM
To: Cory Keith <cory@thevalleylawgroup.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: FC2023-052114; Owens vs. Echard

Cory,

1. Clayton will not be agreeing to a Protective Order or filing this case under seal. Your client went to *The Sun*, People magazine, TMZ, Reddit, Medium etc and *continues* to post and contact the media to date. Also, it is highly *doubtful* that you will be able to meet the high burden to have a case sealed. (Note, your client already tried this and was denied relief).

2. As you are aware from the pleadings, we will absolutely be addressing the malignancy of her allegations including her historic prior allegations as they are directly relevant to her bad faith motivation to file this matter. Note, your client also repeatedly refers to her prior "pregnancies" in her emails and text messages to Clayton, which we disclosed. Moreover, her prior allegations are entirely relevant to our Motion for Sanctions, as she has a history of fabrications and her playbook in this underlying matter is almost identical (some of texts read like they are cut and paste) from the Gillespie matter. We appreciate that subject matter of fabricating pregnancies is embarrassing, but her responses to the questions are absolutely relevant to the pending action in the court.

3. Your objections at deposition are obviously limited by law. If Laura attempts to terminate deposition because we are asking questions that are directly related to her sanctionable actions, that is obviously your choice. I am fairly confident that Judge Mata is *not* going to agree with you and she will be exposed to consequences including attorney's fees and paying for the reporter costs for yet another deposition so that the discovery process can be completed.

4. I have zero intention of asking questions that do not serve a legitimate purpose. Much of our time is going to be spent confirming foundation issues because your client (after she claimed

she was no longer pregnant) insisted on exercising Rule 2.

5. Last, No matter what questions we ask, your client will claim they are meant to harass. I assure you that is *not* the case.

6. I trust Laura told you that she had the opportunity to avoid this by acknowledging that she was never pregnant by Clayton. That offer still stands.

Last, this deposition was properly set 3 weeks ago and I have spoken to two (2) other lawyers for Laura in that window. If Laura is *now* refusing to participate without her demands being met, it is not only an unreasonable request (based on the history here and her publications) but a late one.

You are more than welcome to call me to discuss. I appreciate you are in a difficult situation having taken this case in this posture.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Cory Keith <cory@thevalleylawgroup.com>
Sent: Tuesday, January 16, 2024 12:22 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: RE: FC2023-052114; Owens vs. Echard

Mr. Woodnick,

Thank you for your email.

After reviewing this case more thoroughly, I am writing to request your position on both parties signing a Protective Order under Rule 53 with relation to the deposition. Specifically, we will be requesting that the deposition transcript, testimony, and any supporting video is documented as highly confidential and kept under seal. We will also request that the deposition scope is limited to matters relevant to this proceeding. Assuming your client does not intend to annoy, embarrass, oppress, harass, or leak the information, I am hopeful that they would be able to sign this agreement for same and move forward with the deposition

tomorrow. Please let me know your client's position as soon as possible. If we are unable to reach an agreement, I will be seeking court intervention prior to my client being present for any deposition.

Thank you,

-

Please include my paralegal Isabel Sissel on all emails and correspondence. Her email is isabel@thevalleylawgroup.com.

Cory Keith
Managing Attorney
The Valley Law Group, PLLC.
3101 N. Central Avenue, Ste. 1470
Phoenix, AZ 85012
Phone: 480-300-6012
Fax: 480-781-0722
Email: Cory@thevalleylawgroup.com

Confidentiality Notice:
This electronic message and all contents contain information from The Valley Law Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Tuesday, January 16, 2024 11:37 AM
To: Cory Keith <cory@thevalleylawgroup.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Isabel Sissel <isabel@thevalleylawgroup.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: FC2023-052114; Owens vs. Echard

Cory,

As a professional courtesy, I wanted to let you know (as I am sure Laura is expecting) there may be a police presence at my office tomorrow for the deposition.

I am also attaching the Vital Records form for a fetal death certificate. Please encourage Laura to populate and bring to the deposition (my staff can notarize it for her here). She also needs to bring her Rule 49 and Exhibit A (per Rule 62).

The depo-videographer is not inexpensive and we just confirmed with John. Laura needs to be here at 1:00p for a prompt start. I do anticipate needing *most* of the 4 hours.

We look forward to meeting you both in person tomorrow.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Monday, January 15, 2024 1:19 PM
To: cory@thevalleylawgroup.com
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>; isabel@thevalleylawgroup.com
Subject: FC2023-052114; Owens vs. Echard

Cory,

I am a bit confused as we were contacted by a different firm indicating they would be taking over as representation of Laura. Under normal circumstances I would have brushed that off as maybe wires being crossed, but I think you will be the 12th or 13th lawyer in this melee, so I want to make sure you are not *already* withdrawing (it has been a pattern here.)

Regardless, I am just happy Laura has counsel, as it will keep our deposition on Wednesday productive. As a reminder, Laura is remiss in her discovery obligations (to date, she has provided none). Per Rule 62, she needs to bring the requested documents to the deposition (attached as Exhibit A along with the Notice). I am also happy to resend blank HIPAA releases (they were ignored previously) for her to execute.

Also as to your date request to depose Clayton, of course we can make that work…and yes we are available on Groundhog Day (2/2). I am just glad to hear Laura agrees that further discovery is critical, so we welcome the formal Notice (please dispatch) for the record. I am requesting that we start a bit earlier (8:00 a.m. at your office) because it is on a Friday and I have other commitments in the afternoon. Isabel (copied) will be there with me as, in light of your client's history, we don't

engage with her without witnesses.

Happy to talk off-line today if you have a few minutes.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Cory Keith <cory@thevalleylawgroup.com>
Sent: Friday, January 12, 2024 5:00 PM
To: GRW Office <Office@woodnicklaw.com>
Cc: Isabel Sissel <isabel@thevalleylawgroup.com>
Subject: RE: FC2023-052114; Owens vs. Echard

Mr. Woodnick,

I intend to depose Mr. Echard at my office. Please let me know yours and your client's availability on the following dates:

February 1, 2024 @ 1:00pm
February 2, 2024 @ 9:00am
February 8, 2024 @ 9:00am

Thank you,

-

Please include my paralegal Isabel Sissel on all emails and correspondence. Her email is isabel@thevalleylawgroup.com.
Cory Keith
Managing Attorney

The Valley Law Group, PLLC.
3101 N. Central Avenue, Ste. 1470
Phoenix, AZ 85012
Phone: 480-300-6012
Fax: 480-781-0722
Email: Cory@thevalleylawgroup.com

Confidentiality Notice:
This electronic message and all contents contain information from The Valley Law Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

From: Isabel Sissel <isabel@thevalleylawgroup.com>
Sent: Thursday, January 11, 2024 2:41 PM
To: office@woodnicklaw.com
Cc: Cory Keith <cory@thevalleylawgroup.com>
Subject: FC2023-052114; Owens vs. Echard

Good Afternoon,

In regard to the above referenced matter, please see the attached Notice of Appearance that has been filed on behalf of Petitioner, Ms. Owens. A physical copy will not follow unless otherwise requested.

Sincerely,

Isabel Sissel

Paralegal

The Valley Law Group, PLLC
3101 N. Central Ave., Suite 1470

Phoenix, Arizona, 85012
Phone: (480) 300-6012
Fax: 480-781-0722
Email: isabel@thevalleylawgroup.com

Confidentiality Notice:
This electronic message and all contents contain information from The Valley Law Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected

from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

Clerk of the Superior Court
*** Electronically Filed ***
C. Diaz, Deputy
1/19/2024 3:37:40 PM
Filing ID 17213308

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

and

CLAYTON ECHARD,

Respondent,

Case No.: **FC2023-052114**

RESPONSE/OBJECTION TO PETITIONER'S MOTION FOR CONFIDENTIALITY AND PRELIMINARY PROTECTIVE ORDER

(Assigned to The Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through undersigned counsel, hereby provides his Response and objects to Petitioner's unverified Motion for Confidentiality and Preliminary Protective Order. As a threshold matter, Petitioner's requested relief under Rule 53 constitutes an impermissible prior restraint of protected speech. Beyond that, it also represents tremendous overreach in the use of Rule 53 to diminish Respondent's rights as a litigant.

Apparently, Petitioner feels she is entitled to what is essentially a backdoor *Motion to Seal* after this Court already **denied** her attempt. *See Minute Entry dated 10/19/2023. Why?*

Because *after* she contacted tabloids and the media to disparage Respondent, the publicity she initiated backfired when it was exposed that she had engaged in previous pregnancy fabrications and that her "medical evidence" was lacking in science. The entire underpinning of her Petition to Establish Paternity was predicated upon a con/scam and fraud upon this court.

Petitioner has furthered her noxious agenda by failing to appear at a properly Noticed Deposition (*see Notice filed January 17, 2024*). This occurred notwithstanding three (3) different attorneys in a matter of weeks having discussed the deposition and ongoing discovery issues (**Exhibit 1**, for example). Meanwhile, she continues to advance meritless lawsuits against the media for questioning the narrative *she* shared with *The Sun* while simultaneously contacting the media. Now Petitioner has the chutzpah to flout Court Rules and suggest this Court *ignore* the First Amendment, while in the same breath arguing that *she* is entitled to protection by the Court.

To the extent applicable, Respondent incorporates his pending filings. As and for his Response/Objection, Respondent states as follows:

1. Currently pending before the Court are:

   a. Respondent's *Motion for Leave to Amend Respondent's Response to Petition to Establish* (filed December 12, 2023);

   b. Petitioner's *Motion to Dismiss* (filed December 28, 2023), Respondent's *Response/Objection* to the same, and Petitioner's *Reply* (ostensibly, this matter has been ruled on, as the docket reflects an evidentiary hearing set for February 27, 2024);

c. Respondent's *Expedited Motion to Extend Dismissal Date on Inactive Calendar and Schedule an Evidentiary Hearing* (filed December 13, 2023) and Petitioner's *Response*, and Respondent's *Reply* to the same (also ostensibly addressed by this Court setting the matter for an evidentiary hearing);

d. Petitioner's *Expedited Motion to Quash Deposition of Petitioner* (filed January 1, 2024) and Respondent's *Response/Objection* to the same;

e. Respondent's *Motion for Sanctions Pursuant to Rule 26* (filed January 3, 2024).

2. **The Court must begin with the presumption that prior restraint on protected speech is dubious and subject to the highest scrutiny**. Petitioner does not address, or even attempt to explain, *why* prohibiting Respondent from speaking about the issues *she* brought in this action would withstand Constitutional scrutiny. This is not the least restrictive means to accomplish the ends stated, nor do the concerns Petitioner express outweigh the substantial interests of Respondent's freedom of expression, freedom of the press, the public's interest in open legal proceedings, etc.

Petitioner's demand would trigger a woefully unnecessary and inappropriate procedure overtly designed to thwart disclosure. Recall, she has entirely failed to comply with Rules 49, Rule 62 and Rule 57, *Arizona Rules of Family Law Procedure*. Petitioner has not shown good cause for deviating from the ordinary process for petitioning the Court for confidentiality or sealing documents when the Court deems it appropriate. Here, she seeks to hide behind Rule 57 as a justification for willfully failing to attend a properly noticed deposition and for continuing to fail to provide *any* disclosure going on eight (8) months. Meanwhile, initiating contact with the media, publishing articles and otherwise soliciting media attention.

3. **The fact that discovery may annoy or embarrass Petitioner does not mean that sealing and confidentiality are appropriate remedies**. Petitioner not only brought this action in bad faith, but also, she shared it with the media and even wrote a *de facto* Op-Ed furthering her fictious narrative and painting herself as a "*victim*."

Absent from Petitioner's *Motion* is that *Petitioner* filed the underlying action, *Petitioner* threatened repeatedly to bring her alleged "pregnancy" to the media, *Petitioner* reached out directly to the media with her unsupported allegations (*The Sun*, People Magazine, TMZ, Reddit, Medium) (*see* **Exhibit 2)**, and *Petitioner* published information (including her alleged medical records) about the case online. *Petitioner* now continues to contact the media to advance her fictitious narrative while simultaneously asking this Court for special accommodations for confidentiality? This, *after* the Court already denied her Motion to Seal. (Parenthetically, Petitioner's efforts to seal the other case with nearly identical claims of being pregnant with "twins" and with similarly doctored sonograms was also denied seal protection. *See generally,* CV2021-052893). Her conduct and legal positions simply do not align.

Petitioner is not special. Respondent does not doubt that Petitioner will be annoyed or embarrassed by examination by oral deposition, but if that were the legal standard to oppose a deposition, the exception would swallow the rule. *Every* litigant is uncomfortable being examined under oath. That is inherent to the adversarial system that Petitioner triggered with her filing. It is only when those burdens are undue, or the discovery process is abused that those concerns become sufficient grounds to prohibit discovery mechanisms. All litigants are entitled to use discovery for legitimate purposes, which includes gathering information, testing the deponent's knowledge and truthfulness, exploring patterns of past behavior (including other

fictitious pregnancies, appearances under oath in Court with a fake pregnant stomach, collateral proceedings, etc.) and other acts relevant for impeachment and/or to show that the underlying cause was malignantly filed. Moreover, Petitioner cannot now evade deposition (critical for establishing evidentiary foundations) after *she* invoked Rule 2.

The fact that Petitioner finds participating in the litigation embarrassing is no different from the experience of anyone else, except that in this case, *she* brought the petition, *she* made sensational allegations, and *she* threatened to (and did) bring media attention to the case in an attempt to control Respondent's behavior (and disturbingly, to get him to sign a dating *contract* and coerce him to "*explore intimacy"* with her (*see* **Exhibit 2**)).

Not only is Respondent entitled to the information and discovery necessary to defend against her claims, but he also has a fundamental Constitutional right to discuss the nature of those claims (just like any other litigant). Petitioner is requesting an order that would prohibit Respondent from defending his character in public view despite the fact that *she* made his character a matter of public interest and that she *self-identifies* as a public figure. The toothpaste cannot be put back in the tube. Moreover, that the public is interested in the case only adds weight to maintaining transparency, not limiting it, even if Petitioner now finds that interest uncomfortable after *she* invited it.

4. **Respondent has the right to depose Petitioner pursuant to Rule 57, Arizona Rules of Family Law Procedure.** This is not in dispute. Petitioner has provided zero Rule 49 disclosure to date and now files this unverified motion alleging, for the first time, that *she had a miscarriage*? Petitioner appeared on video during trial on October 24, 2023 wearing what appeared to be a moon bump (a device used to appear pregnant) and asked the Court if she

could show Respondent her "*pregnant stomach*" (which Judge Gialketsis promptly denied). (Note, the Motion for Protective order was filed *after* Petitioner was copied with a Spoliation Notice to Amazon.com, Inc. to preserve records confirming the purchase of said moon bump and to affirm that babies come from intercourse, not Amazon.com **(Exhibit 3)**).

On November 2, 2023 Petitioner testified that she was "*100%*" and "*24 weeks*" pregnant by Respondent and that she was due "*February 14, 2024*." Petitioner specifically testified that she was having a *high-risk* pregnancy (due to her alleged epilepsy) and that she was being seen by "*Dr. Makhoul*" and "*Dr. Higley*." To date, Petitioner has provided no verifiable information that supports these allegations (other than doctored sonograms ostensibly from Etsy, a borrowed YouTube video of an *actual* sonogram, and positive HCG tests).

Petitioner then filed a *Motion to Dismiss* claiming, for the first time, that she was "*no longer pregnant*" but still refused to provide *any* information whatsoever about what happened to the alleged twin fetuses. Now, for the first time she alleges that she "*miscarried.*" That is a salient fact in dispute because Respondent does not believe that Petitioner was *ever* pregnant (and certainly not by him as they did not have intercourse). Moreover, if Petitioner did miscarry that late into a pregnancy, a fetal death certificate would be produced and there would be corroborating medical records. *See* A.R.S. § 36-329. Respondent has repeatedly asked for this death certificate and even provided the vital records request forms to Petitioner. *See* "Exhibit A" to *Respondent's Notice of Non-Appearance as Deposition Pursuant to Rule 57(g)* (filed January 17, 2024).

Due to Petitioner's historic refusal to provide *any* medically verifiable information to support her allegations and her history of arts and crafts "*medical*" evidence, written discovery

is not sufficient. **She does not get to dictate which discovery rules apply to her.** A deposition is the most efficient and least burdensome way to ascertain the validity of Petitioner's claims under oath. Her fear of inculpating herself criminally (perjury, filing false police reports, etc) is the *antithesis* of good cause. Limiting Respondent to the "*alternative means*" of discovery referenced on page 6 of Petitioner's *Motion* would incapacitate Respondent's ability to obtain relevant and necessary evidence. Ironically, Petitioner also requested Respondent's deposition immediately upon hiring her current attorney (i.e., before taking any other action to address the supposedly burdensome discovery, Petitioner first retaliated by scheduling Respondent's deposition). Petitioner cannot have her cake and eat it too.

5. **Respondent is entitled to depose Petitioner about all relevant matters, including similar false pregnancy allegations made against past putative fathers and inconsistent statements admissible for impeachment purposes**. Not only do those allegations speak to her credibility, but they also establish an overt and escalating pattern of fraudulent behavior and abuse of legal process. Respondent cannot properly bring his counterclaims of non-paternity, sanctions, and attorney's fees without deposing Petitioner and receiving definitive statements under oath about her past actions. The scope of inquiry *absolutely* includes:

- Relevant questions about past relationships that resulted in similar threats and legal actions (brought by Petitioner, in writing and in prior litigation);
- Emails and text messages she sent to other men with nearly identical verbiage;
- Prior doctored "evidence;"

- Factually similar matters about which Petitioner authored editorials, TEDx Talks, podcasts;
- Petitioner's medical and associated health conditions.

After discovery, nothing prevents Petitioner from seeking confidentiality or other appropriate protective orders as to limited portions of the deposition if the Court were to then determine they exceeded legal scope. However, preventing those questions from being asked in the first place would improperly limit Respondent's ability to defend himself and stymie this Court's ability to make findings pursuant to the law.

In addition to the misuse of court procedure, there are significant First Amendment concerns here. Prior restraint against relevant discovery is an extraordinary remedy that is not remotely warranted in this matter. Petitioner has not shown good cause to override Respondent's legal rights, the public's interest in transparent proceedings, and this Court's legal and equitable duties. Petitioner's prospective concerns (after willfully failing to comply with Court Rules for eight (8) months) are nothing more than an opaque attempt to thwart this Court's ability to make findings. Petitioner cannot simply seek generalized and speculative relief as a means to justify a blanket restriction *prior* to providing *any* discovery/participating in a deposition. Moreover, her objections are not valid grounds for a willful failure to appear for a validly noticed deposition. *See Respondent's Notice of Non-Appearance.*

6. It is premature to designate as confidential documents, recordings, or records that do not exist and have not yet been produced. To the extent a response to this assertion is warranted, there is nothing to be designated confidential. No deposition has occurred (due to Petitioner's willful failure to appear). Petitioner has not provided *any* Rule 49

disclosure, and there are no exhibits or sensitive documents in the Court record that could be designated confidential, even if Petitioner had shown good cause. Simply put, Petitioner's request is impossibly premature, and the discovery being sought is relevant (including the "*HIPPA"* [*sic*] releases referenced in her *Motion*). Further, and contrary to Petitioner's assertions, discovery cannot be conducted *during trial*.

7. Respondent is entitled to his reasonable attorney's fees and costs incurred responding to this Motion pursuant to A.R.S. § 25-324. After properly noticing Petitioner of his intent to depose her and agreeing to a date and time, Petitioner willfully failed to appear. Instead, Petitioner filed this *Motion*, which alleges speculative relief that cannot be granted, seeks Unconstitutional prior restraints on protected speech, and lacks good cause.

Petitioner's unreasonableness in this matter only persists as she continues to seek out new ways to evade the disclosure and discovery obligations for the action *she* filed. Petitioner has a history of being creative in coming up with ways to avoid legal accountability. She previously made abhorrent allegations in prior proceedings involving similar false twin pregnancy allegations against an officer of the Court to evade Court appearances (fortunately foiled by Judge Bachus, whose Judicial Assistant intercepted Petitioner's *ex parte* effort, which was subsequently addressed in proceedings.). As a result of Petitioner's behavior, Respondent continues to incur attorney's costs and fees having to defend his right to exercise the discovery tools available to all litigants. Respondent requests this Court permit him to file a *China Doll Affidavit*.

WHEREFORE, Respondent respectfully requests that this Court enter the following Orders:

A. Deny Petitioner's Motion for Confidentiality and Preliminary Protective Order in its entirety;

B. Award Respondent his reasonable attorney's fees and costs incurred due to Petitioner's unreasonableness pursuant to A.R.S. § 25-324;

C. For such other and further relief as this Court deems just and proper under these circumstances.

RESPECTFULLY SUBMITTED this 19th day of January, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
This 19th day of January, 2024 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document
delivered/emailed this 19th day of January, 2024, to:

The Honorable Julie Mata
Maricopa County Superior Court

Cory Keith
The Valley Law Group, PLLC
3101 N. Central Ave, Ste 1470
Pheonix, AZ 85012
cory@thevalleylawgroup.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Response/Objection To Petitioner's Motion For Confidentiality And Preliminary Protective Order* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Jan 19, 2024 12:38 MST)

CLAYTON ECHARD

01/19/2024

Date

EXHIBIT “1”

From:	Gregg Woodnick
To:	Alexis Lindvall; Sarah Saxon; Tiffany Benz
Cc:	Maribeth Burroughs; Isabel Ranney
Subject:	Owens v. Echard - Pending Motions and Withdrawal
Date:	Friday, January 5, 2024 12:32:47 PM
Attachments:	Exhibit 15-Threat to Sue and Kill Herself ADMITTED.pdf Exhibit 19-Email of Youtube Ultrasound copy ADMITTED.pdf Exhibit #6-Laura Blocked #5 ADMITTED.pdf Exhibit 14-Threat to go to the Media ADMITTED.pdf

Lexi,

You filed to withdraw with Laura's consent. Had you indicated that you were withdrawing under E.R. 1.16(b)(2), (3), and (4) (or even simply ER 3.3) I would, *without hesitation*, agree to courtesy extend time. But, you filed a lot of the pleadings that you must still reply to on the same day you withdrew (keeping in mind that Replies are not even required). I will also point out that ***if*** Laura chose to cut ties with your office (evidenced by her consent) she is accepting responsibility for her case. She can file the Reply *pro per*. As such, her request for an extension is respectfully denied.

Laura is well experienced in hiring attorneys and having them withdraw. What is inevitably going to happen is she is going to surface with yet another attorney, who is going to ask for more time because they are "*new*" to the case. They, too, will be ill informed by Laura about what has happened and will walk themselves into what has become a pattern of withdrawals from counsel navigating a client whose behavior requires an E.R. 1.16(b)(2), (3), and (4) withdrawal. Ultimately (as I suspect was the case with Modern Law), they will offer consent as an option to avoid having to address the elephant in the room (the extreme fraud and perjury).

The real issue here is that your client is not seeing the obvious exit ramp, as there is a very easy way for her to end this situation. You previously said she would not sign the affidavit because it would be perjury. The perjury already happened when she filed the most bizarre paternity case and submitted a parenting plan for imagined zygotes with no verifiable proof of pregnancy (still none) and then continued to make statements under oath (including in her *verified* response).

The best advice any lawyer, friend, or her parent could tell Laura is that she needs to come clean. I appreciate she is scared of perjury charges under A.R.S. 13-2702. I also know she will have to invoke her 5th Amendment Rights for many questions during the video deposition on the 17th (and this Court will make negative inferences from that) and that she will have to arrive with the information requested (nonexistent medical records) in Exhibit A (the RFP) of our Notice of Deposition.

Laura's exit here is to admit that she has made some horrible choices and allegations that were not predicated on fact or science. Perhaps it is her head injury (assuming that is actually factual) or mental health issues and that she is humbly sorry for what she put Clayton through, as she was not (and could not have been) pregnant by Clayton.

She then needs to get into treatment to address whatever has caused her to live a life enmeshed in delusion. She needs to come clean and say ***I did exactly what I have been caught doing and am committed to getting healthy.*** (The alternative is that her behavior has been entirely predicated on toxicity and maliciousness and she is the hook for attorney's fees?).

The result will be:

1. Clayton is a mental health advocate. He will probably be the first to accept the apology and be supportive of her embracing help.
2. The narrative about these two public figures (and yes, Laura is a public figure and she started this entire mess by not only going to the press, but bizarrely admitting her agenda including threats in emails) ends.
3. Laura can control how this saga resolves. She started this with the media, Reddit, and The Sun…then double, triple and the quadrupled down with the lies that are and will continue to be exposed before the Court. (Per the news, she was emailing Reality Steve just yesterday!)
4. She can make this into a story of redemption (hers) when she admits she cannot control herself regarding this pathology and that she apologizes for the harm she has caused.
5. And…I bet the world loves that. Her next Ted Talk and Medium article would be *epic* as she humbly shows that change is possible. And, you know who would likely be the first to say congratulations? Clayton Echard.

The alternative is that we continue to go down this route. The list of Gillespies, Marraccini's, Garrett's, Lewis', Bloom's, the Professor and Mary Ann…and all those who have received Bar, Board, Secretary of State complaints only grows as the media attention she sought is now relentlessly digging for more content. They are going to find it. Now is the time for her to admit she lied, get the help that she needs, and commit to change.

I am attaching more evidence of your client's bizarre and harassing behavior (yes, there is much more data).

You may also want to peruse her Reddit comment history – which is all archived and is further evidence of her malignant behavior (*see https://ihsoyct.github.io/index.html?mode=comments&subreddit=&sort_type=created_utc&sort=desc&limit=100&after=&before=&author=Strict_Schedule2441&score=&num_comments=&q=; https://ihsoyct.github.io/index.html?mode=submissions&subreddit=&author=Strict_Schedule2441*).

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Alexis Lindvall <alexis.lindvall@mymodernlaw.com>
Sent: Thursday, January 04, 2024 7:47 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>; Isabel Ranney <isabel@woodnicklaw.com>; Sarah Saxon <sarah.saxon@mymodernlaw.com>; Tiffany Benz <tiffany@mymodernlaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: Owens v. Echard - Pending Motions and Withdrawal

Gregg and Isabel,

As you know, I filed my Motion to Withdraw on Tuesday. We still don't have the order granting my withdrawal despite following up with the division via email this morning. They are also not answering the phone. The Reply in Support of the Motion to Dismiss is due Wednesday and the Reply in Support of the Motion to Quash is due Thursday. This puts me and my client in an interesting predicament. Would you be willing to agree to toll the reply deadlines until 5 judicial days after my withdrawal is granted?

Thank you,

Lexi Lindvall, Esq.
Attorney | **Modern Law**
Call/Text: (602) 730-7343
Mesa | Peoria | Scottsdale
www.mymodernlaw.com

Modern law is a paperless office and hard copies of documents will not be mailed unless requested.

This email contains confidential, legal information. If you realize this email was not intended for you, please ignore the content, immediately notify me that you received it, then delete it. Otherwise bad legal stuff could happen.

Please be advised, this communication does not constitute an agreement pursuant to Rule 69, Arizona Rules of Family Law Procedure. Any statement concerning settlement is made pursuant to Rule 408, Arizona Rules of Evidence, and shall be considered protected from use in any future litigation.

EXHIBIT “2”

LO **Laura Owens**
The final opportunity to consider abortion
To: Clayton Echard

Trash - iCloud July 1, 2023 at 4:02 PM

Clayton,

I've prayed that this email will have an impact on you, unlike my others. It's truly the last one you will get from me where abortion is a possibility.

I have taken time to reflect on what I have been going through with our pregnancy and how you have acted towards me. You've shown no compassion or empathy, while I have been endlessly patient with you and provided you with an absurd amount of evidence that I'm pregnant. I've been completely honest with you, as displayed by my willingness to send you anything you've needed at any time, and proven to you that based on when my pregnancy test became positive that there isn't a doubt that you are the father. I understand that you and of course the court want a paternity test and I've proactively been trying to schedule that with **three different labs**. I've contacted Choice DNA, ArcPoint Labs, and Any Lab Test Now to see when is the soonest we can do it. **If I weren't pregnant with your kid, wouldn't I be avoiding that at all costs?** You also of course know that I was accepted as a patient at Scottsdale Perinatal Associates. **If I weren't pregnant, why would a high-risk specialty practice that only accepts clients based on records that verify their pregnancy and their condition take me as a client?** You've also been provided with **recordings of two phone calls with the staff at Scottsdale Perinatal Associates that confirm their receipt of the ultrasound from Planned Parenthood and verify the pregnancy, along with acknowledge the fact that we will speak about the possibility of twins with the doctor on July 24th**. In addition, you asked for photos "within the hour" of abortion pills to verify that I had gone. **How would I have been able to send photos of and with the pills with my name on them if I hadn't actually gotten them?** In addition, **why did I offer to take a pregnancy test immediately when I got to your apartment...and why would it have been positive if I wasn't pregnant?**

No person in their right mind would think that there was a chance that my pregnancy wasn't real, so your lack of belief in it makes no sense. We are coming up on two weeks of me -- the mother of your child -- being blocked on text messaging and every platform, after you said that it was immature of you to have done that before and that you would not do it again. You promised to support me. It's been humiliating to have to rely on emails to communicate with you that have mostly been unresponded to, and when they have, you haven't been kindhearted. I have poured my heart out to you as I've explained why this decision is so difficult for me because my father is dying right now. I've explained that the circumstances feel all-too-personal because my grandmother was almost aborted. At this point, I look stupid for continuing to respond to your endless requests for evidence when you have been provided with so much more than you needed. It was humiliating to pee on a stick in front of you, yet I did it, and when the test came back positive, you still didn't believe it? Do you really think anyone would agree with the amount of you have questioned me despite all the documentation you have been given?

I never would have threatened to go to the media if you hadn't told me at the start of this that you would do just that if the pregnancy wasn't real because "people like you need to be held accountable". Your behavior after discovering that I wasn't lying has been selfish. You haven't stepped up as a thirty year old man would to be there for the mother of the child when you are half responsible for the situation, which is cowardly. I have told you why mental health matters so much to me because of what I have gone through, and opened up about a dark family secret -- that my grandma committed suicide -- and how it impacted my dad. You didn't even have the decency to respond to me. Given your behavior, I have absolutely no issue going to the media anonymously after the paternity test and "leaking" what I have attached in the Dropbox file. I don't even need to explain the story because your words and treatment of me say it all. If this is how you choose to treat me, I have absolutely no allegiance or loyalty to you, and would be fully convinced that your mission was an attempt to stay in the public eye, which kills me to say because I really think that deep down, you do care. I have been praying and praying for you to show me who you really are. God keeps telling me that you are a good person and someone whose life I can enhance, so I don't know why things have been as they are. I honestly wish He would be telling me differently because it's hard to keep believing in someone who is so demeaning in these circumstances. If the man you have been is who you are, you deserve to be held accountable, but my God I don't want to do that.

You can't say you haven't been given a voice when I have told you that I will have an abortion if we try things out for a few weeks and have a good reason for aborting a child. So far, it seems like you want to terminate the pregnancy because you don't want to grow up and because it would impact your dating life. Those are not good enough reasons to end a life. These words feel menacing because you know I like you and want to try things out with you. I don't deserve to feel hurt at this point in my life and my pregnancy when I haven't done anything to deserve it.

I have no desire for money because I have more than enough. I have no desire for fame because I experienced what that was for the entire time I was in San Francisco. I completely understand why you would be suspicious of women being after you for being *The Bachelor*, but that is **so** not me, and in fact, I think that's the least interesting thing about you. I have never felt more empowered in my life than when we were doing real estate together and crave feeling that confidence again. That was because of you. There is so, so, so much about you that I find admirable, inspiring, and sexy, and attractive. You're smarter than you think, charismatic, and capable of doing so much good in the world. I know that if you and I tried things out, we would end up elevating each other to new heights in our careers. Like I've said over and over again, you don't like me because I'm pregnant with your kid, not because of who I am. You haven't gotten to know me and it's been your loss. I've shown you qualities that no other woman would during this process, and that includes being brave enough to stand up to you and hold you accountable for your actions.

I know I've said that it was your last chance to make a decision a lot, but this time, I really mean it. I am completely at peace with the likely outcome that I will have your child. I do see a lot of hard times ahead if that's what we choose without considering an abortion, but if that's what meant to be, it will be.

You wouldn't be "obliging" to make the decision to date exclusively before deciding whether or not we have an abortion. I know how valuable I am as a partner and it really would be your loss not to see that for yourself. I know I could get any man on the dating apps or the bars, so I'm by no means desperate. I also know that you are sexually attracted to me, despite the fact that we only hooked up one time while you were very, very high. You obviously enjoyed it even though you can't really have seen if we were a match based on your mental status at the time. Being with me would be a major win for you, so you wouldn't be doing me a favor by being with me. I would feel the same way if someone else was the father of my child; I would want to try to be together like most religious people do (and in fact, as you know, marriage was the likely outcome of an unexpected pregnancy...so I'm not asking for a lot) and make the decision together. Maybe we would decide to keep him or her, which would be a beautiful thing. If we decide not to, maybe we would work towards having that in the future. I know that we were brought together for a reason and it's too bad that you've seen that reason as God just using me to guide you to another level.

I come home tomorrow afternoon, so if you want us to consider an abortion, this really is our last chance because of timing and the fact that neither of us would want to end the pregnancy one there is a heartbeat. **I would like to get together tomorrow night to talk and explore intimacy**. It's time for you to make an effort if that is something we are considering. Obviously, I would love to have sex in the future and feel like I am the safest person you could have sex with since I'm pregnant, but if you really think that like you said yesterday, my goal was to date and *get pregnant* during this time, we can absolutely hold off on it. However, it occurred to me that you might believe me more about paternity if you were inside of me and felt how tight I would be after not having sex in more than a year. Maybe then you'd believe I hadn't been sleeping around, and again, you wouldn't be doing me any big favor...having sex with me is a privilege and not something I have done for a long time.

If you either don't get back to me tonight or if you give me the final word that you don't want to date and choose the outcome of the pregnancy, we are 100% having the child and there is no going back. I mean it, and I am at peace either way. My mental health and wellbeing is affecting our child's and I would blame you if we have a special needs kid and discover that my stress hormones and blood pressure caused that. I just need you to make a decision. Clearly, given the evidence I have given throughout the process that I have put together in the attached Dropox file, I am pregnant. I have proactively worked to arrange prenatal paternity tests myself, which should prove to you that I know you're the father. There really are only these two outcomes so if you want to keep believing there's not a pregnancy or that you're not the father, you will be sorely mistaken and it will be too late for us to consider an abortion. I would have no issue going to the media after the prenatal paternity test to explore your horrible treatment of me during this time and lack of compassion despite your mission.

If you would stay with me for a few weeks to get me to have an abortion and then block me and go MIA as you have in the past, please don't make that decision. I am talking about *really* giving things a shot in a different way than either of us have in the past since this is a unique circumstance. If you wouldn't be excited, don't make that choice. If you're truly not into me, I would rather stick with my morals and have the child. I am *only* considering an abortion because I know that's what you want, so if that alone doesn't make me stand out from other women, good luck finding one who would care that much to sacrifice their own values and morals because they believe in your mission. **I would trust and respect you enough for you to make the decision on your own as to whether or not we have the abortion.** Do you realize how big of a deal that is for me to offer?! I would LOVE to be a mom and want that in the future more than anything in the world. But God (and you, depending on what you decide) are responsible for deciding when that is. If it's now, I would be thrilled. But, *I really* do believe in you and the message you want to spread, so please show me that my faith in you isn't misplaced. I would also be so appreciative of the consideration you would be showing for my feelings and why it would be important for me that I would promise to keep everything that happened between us. You need to understand that allowing you to make the decision would be the biggest leap of faith and sacrifice of my life, so if you don't appreciate that, go find someone else and we will move forward with having the child.

If you don't respond, I know you will end up regretting because I am offering to give you not just "a" say, but "THE" say in the outcome of our pregnancy. In my heart, I think we will both regret not exploring the abortion option because there will be no going back after this. Please let me know your decision and regardless, please be kind. Hope we are on the same page and in that case, hope to see you tomorrow. If not, I genuinely mean it when I say "congrats" on being a dad.

Laura

Pregnancy evidence for Clayton Echard.zip

LO **Laura Owens** Yesterday at 2:23 PM

Only open this if you want option A and will unblock me. Seriously.

To: Clayton Echard

...and if you want option A, I will not post this. I am just looking for support during this incredibly overwhelming time.

Final email regarding this, but I wanted to give you the courtesy of showing you the post. I'm attaching the photo I'm going to use. I'm over being treated like shit and at least if this is public, you'll have to give a statement to the media. Not sure when I will put it up.

The caption is:

> *Surprise! I can't wait for the arrival of these two next Valentine's Day!*
>
> *On a more serious note, their father, @claytonechard, has said he "wants nothing to do with this process". He has blocked me from messaging him, refuses to see me and his growing babies, and says he will continue to ignore me. He doesn't want to have anything to do with them when they're born and thinks they will negatively impact his dating life. Tag him and let him know what you think.*

Please note the following legal waiver:
If, after proof of opening is obtained, I choose not to respond to this email, I am confirming that its content is true. This includes my acknowledgment of paternity. In addition, by not responding, I am giving my approval to Laura Owens to post the above content on social media.

Clayton, this is a situation you can't run and hide from -- you will need to take accountability for your actions which created twins. If I can't get you to do it, then maybe the public can convince you to.

All the best,



Laura Owens
Nobody Told Me!™ | Quartet Farms | TEDx talk
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

Pregnancy announcement

The Wayback Machine - https://web.archive.org/web/20230922030934/https://anonymouswoman1.medium.com…

Search Medium

I am the anonymous woman in the Clayton Echard scandal. Here's my story.

Anonymous · Follow

3 hours ago





I am the anonymous woman who has been labeled Clayton Echard's "ex-fling". I am accomplished in my own right and have no desire to gain notoriety from this, which is why I chose not to be named. I was very clear that I had no desire for money from him. All I wanted from him was communication to figure out a parenting plan for our unborn twins. He has refused to talk to me for a long time, with the exception of the occasional hurtful email. I told him many times that if he did not figure this out with me privately, I would go to the media because I thought that would get him to step up to the plate.

I am coming forward simply because there has been confusion over whether or not Clayton sent the cruel text messages and emails that he did. I've chosen to publish them here and will put my entire reputation on the line by saying that he sent every one of those messages. If anyone wants to claim these were doctored, I have the phone and email records to prove it. He knows better than to sue me for libel because the truth is a complete defense to defamation, and I am telling the truth.

I first met Clayton on the night of May 20th, which is when we unexpectedly hooked up. I was not on birth control because a) I hadn't been sexually active since March of 2022, and b) my anti-seizure medication interfered with it. In the days after, I told Clayton that I had been considering taking Plan B because I wasn't on birth control. In the end, I didn't.

On May 31st, I had a pregnancy test done prior to a medical test. It was negative. I was still concerned I was pregnant since again, I wasn't on birth control, and bought a pregnancy test the next day. On June 1st, I tested positive. I knew Clayton wouldn't believe me, so I decided to go to urgent care to get a test done. I figured he would believe it if there was official medical documentation. Contrary to what many have said, it was not on that day that I learned I was having twins; all that happened was that I discovered I was pregnant.

I sent Clayton an email with a timeline and all of the evidence. I got this in response, which is proof that Clayton very much knew and believed that I was pregnant after we hooked up:



We did not communicate much after that for several days, but I did get this message from him:



He also spewed the following insults at me, and for those who doubt that he did, I have records to prove it.

I don't believe you for a second and it's honestly sad this is what you've resorted to

you're embarrassing yourself at this point.

You need to seek professional help and I hope you will do so to take a deep dive into addressing all this trauma.

I hope you understand how sick this is of you to try and pull on me. You want me to stress about wondering if I impregnated you for weeks.

Laura, ask yourself why you're doing this. Please, reflect now. Why are you subjecting another human being to this?

You're trying to destroy my mental state.

But that pain you feel....don't place it upon someone else.

But to try and bring someone else into it all is just cruel.

I legitimately hate you right now.

You've made my life so stressful since I've known you and if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.

my hatred will only grow if you decide to put me through all of this.

My animosity would last for a lifetime and that's not something either of us want to subject ourselves to.

Even if a kid was present…I would not say a word to you. I would not acknowledge you.

One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever

I am the victim!!! You are acting so irrational that it's scary!!! You can stop every last one of these consequences and you're choosing not to because you have lost touch with reality!

I mean, it's fucking hysterical how sad this is. And I'm pissed for allowing myself to even be bothered by it.

You have lost your mind and I hope YOU think about how terrible this is that you would subject me to this.

My hate is toward you and you only.

I have decided I will no longer be in contact with you, unless your mom takes a phone call with me. If she will not, that's ok, but then all communication will be cut off.

God is telling me this man will provide me with the clarity I need, as I have many questions and those questions have turned into beliefs…ones that have led to animosity and a complete lack of trust toward you. (God told you my abusive ex who caused me to get epilepsy would be a better resource than me? And you could trust him more than me?)

I believe this is some sick game you play for attention.

You better be serious about being pregnant because if you're not, I'm bringing this all to light. People like you need to be held accountable. You can back off now if this is all a game and I'll let it go, but if you continue any longer and it's all a lie, I won't hesitate to reveal the truth.

My personal hell would be having to have you be a part of my life

The desperation is something I hope you can address.

I'm living in the fear of having to be associated with you for my lifetime.

You will bring nothing, but pain and misfortune into my life.

You're manipulative, obsessive and display narcissistic behaviors.

But I don't have any empathy for those that attack the mental health of others through manipulation and then try and play the victim card.

Individuals like you that play with people's emotions are the worst kind of person. I've met many, been taken advantage of by many and am sick and tired of playing nice with them.

You don't deserve my empathy.

You're obsessed with the idea of being adjacent to me.

After his litany of insults, I was surprised to receive these messages from him on June 19th:

If you decide to have the kid, then that is your decision and I will respect it. However, one of us will have 100% custody...there will be no joint custody. I feel strongly about this and that decision is also final.

I feel we need to have a face to face discussion. It's too easy to get upset via text. But in-person, conversations are more caring and cordial. I believe this is exactly what we need, as texting hasn't been working well.

So, let's plan on 7:30?

I feel God is telling me we should meet up tonight, so yes, I'd like to do that. We should have been talking in-person for most of this anyways. Texting isn't meant for meaningful/impactful/life-changing conversations and I've know and learned that plenty of times.

I'll text you when I'm heading back home tonight, but around 7:30pm should work.

On that night, Clayton purchased a pregnancy test and had me take it in front of him. It was positive. We sat down for a couple of hours and talked. He explained to me that he had a dream about his future wife and son. The woman was blonde, and not me. He said he was attracted to ethnic women, not petite brunettes like me. He said that he always swiped left on women with children, and his biggest argument to end the pregnancy was that women would swipe left on him. He worried that it would impact his dating life. Despite this, we had a decent conversation and decided we would consider giving dating a try for the sake of the baby (we didn't know we were having twins then). He promised to be supportive and said that he would check on me every day. That lasted one day.

On June 20th, I received these messages:

I'm sorry you're feeling sick.

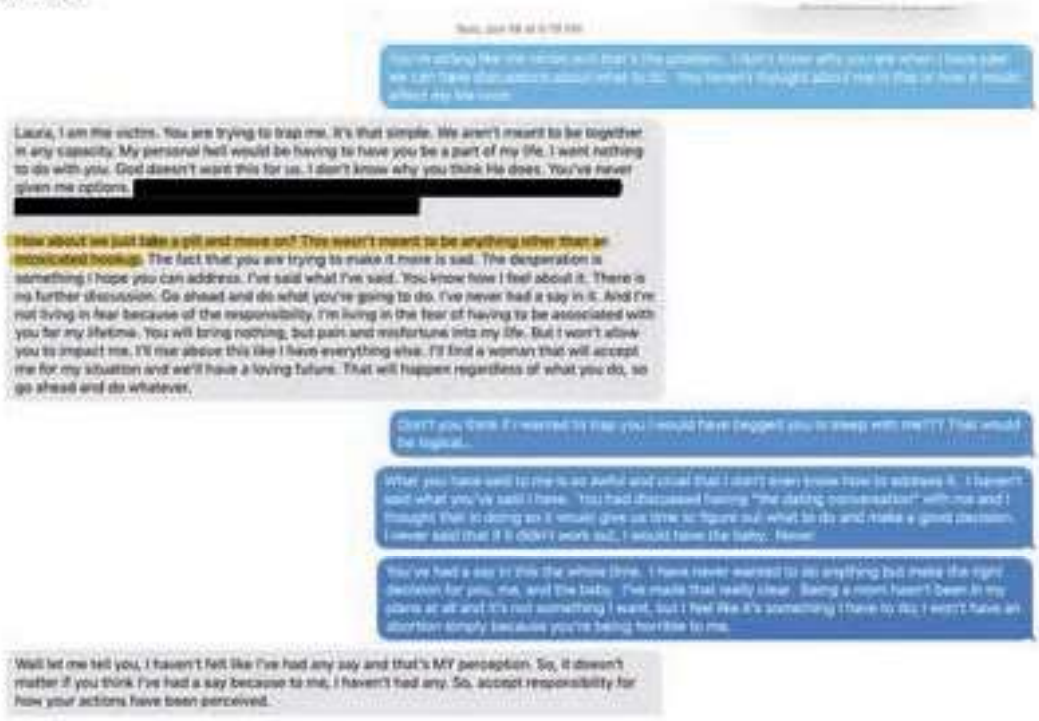
I'm going to try and give us a chance this week. I'm keeping an open mind and maybe this weekend we can meet back up and see if it's a possibility to be intimate. I'm really trying to have you feel seen and heard so I want to give it a chance your way. At least at the end of it, I'll know I tried everything I could.

An hour later. Clayton changed his mind, but this text confirms he knew that the test was positive:

To: Clayton Echard

I'm sorry this made it harder. I wanted you to come over to confirm what I was doubting. And it did confirm that. So, I don't see you as a liar anymore. But, that doesn't change how I feel about proceeding forward. I can believe you're telling the truth, but still stand firm in not wanting to pursue anything further with you. That is what I'm choosing to do.

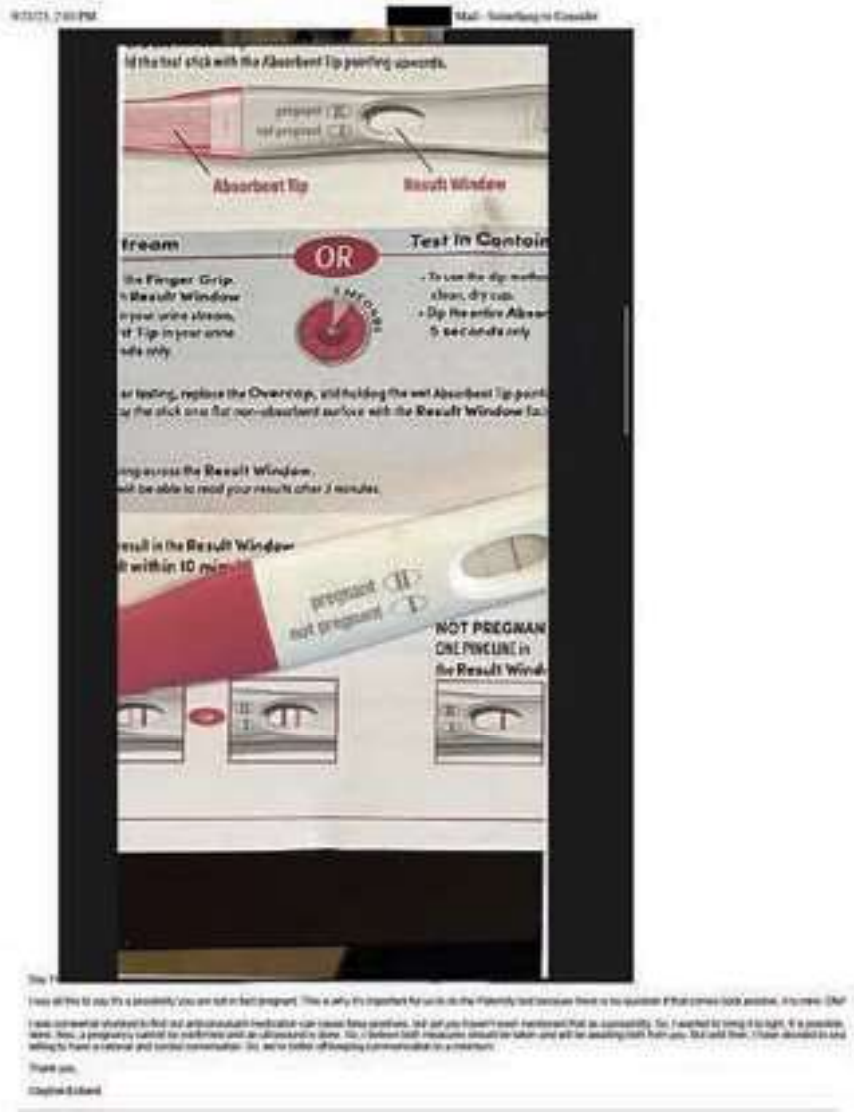
On the very same day, he went from wanting to be intimate to this, confirming that we did indeed hookup:



On June 21st, I received an email from Clayton with a theory that my anti-epileptic medications caused me to test positive. I disproved this theory, which you can view below. You can also see that the positive pregnancy test I took at his house is on the counter:




pregnant
not pregnant


Absorbent Tip
Result Window
OR
5 seconds
pregnant
not pregnant
NOT PREGNAN
ONE PINKLINE in
the Result Windo

[redacted]

I say all this to say it's a possibility you are not in fact pregnant. This is why it's important for us to do the Paternity test because there is no question if that comes back positive. It is done. Else

I was somewhat shocked to find out antisocial/cold medication can cause false positives, but yet you haven't even mentioned that as a possibility. So, I wanted to bring it to light. It is possible, done. Plus, a pregnancy claimed me confirmed (with an ultrasound) is done. So, I believe both maneuvers should be taken and will be awaiting both from you. That said then, I have decided to not waiting to have a rational and mature conversation. So, we're better off keeping communications to a minimum.

Thank you,

Clayton Echard

---

http://mail.google.com/mail/u/0/?ik=4961d2888b&view=pt&search=all&permthid=thread-f:1760329731616469597 2&simpl=msg-f:1760329731616469597 2&simpl=... 4/5

9/25/23, 2:19 PM [redacted] Mail - Something to Consider

[redacted] Wed, Jun 21, 2023 at 9:37 AM

Hi Clayton,

Thanks for the email. I can diagnose both females easily.

First of all, I was unaware that any antidepressant drug could cause a false positive, but yourself a quick call to my doctor, who said that but is absolutely NOT a possibility at no none

1) She said it's statistically rare to happen at all and has only heard of with a drug called clomipramine, which it's not on and never have been. She said even with that one, it's extremely rare and if that were to happen, it would be when someone just started it.

2) I've been on the same dose of the epilepsy drug Lamictal for almost 2017, which again is not associated with false positives, and have had my urine tested many times since without a false positive before.

3) I also wouldn't have the side effects I am having from the pregnancy if it was a false positive.

Finally, here is the time stamp and cropped photo that I sent you that day (received not without using iPhone's auto-enhance feature, which I did to show the line, which was obviously there. Just not as visible on a camera as it was in the naked eye. You may tell it is much more faint. Plus, my doctor said that tends to pool on the latex and state you take the fluid and even on the inside, and that it's somewhat of a subjective as to how the line looks based on this here or the pregnancy.



In regards to ceasing communication, that is something that you promised me you would not do once I confirmed the pregnancy to you. Keep in mind that a doctor has also confirmed it using a different test as well, so there's no question on to whether or not I am pregnant, and you seemed to be satisfied with that result after performing your own test.

My "threats" last night were after you had made threats to contact the media about me if I was lying about being pregnant (which I wasn't) and to contact my absolute ex-boyfriend. Still, I was fine having a rational and civilized conversation with you despite those. My point was to show you that you wouldn't be proud of your communications if this public found out, which you said you were worried about. Despite my telling you that I wanted to be on your side and figure this out together, I'm stunned that you have once again chosen to leave me in the dark here.

Just as I told you I would take a pregnancy test anytime, I will be happy to do this same with a paternity test as soon as I am able to, and know with the same amount of certainty that you are the father. I was very upfront with you about what I would need from you to feel comfortable terminating this pregnancy and said that it wouldn't be comfortable doing it otherwise, so – that this was my time I would be okay going through with it if that was what we decided even if it was there as early as possible. Still, you seem to be very confident with whom you stated.

[redacted]

[redacted]

[redacted]

[Quoted text hidden]

On June 24th, Clayton emailed me saying that **he would pay for the paternity test**, despite telling the press that he has said that I would be responsible for the full amount. I told him that I already knew that he was the father, and if he needed reassurance he needed to pay: While Clayton claimed that he told me that I needed to pay for the paternity test, you can see that was not the case:

[redacted] **EXHIBIT 7**

Gmail **Petitioner's messages to Respondent regarding taking prenatal paternity test** [redacted]

Paternity test, etc.

Clayton Echard <claytonechard@[redacted]> Sat, Jun 24, 2023 at 4:32 PM
To: [redacted]

I will pay for 100% of it. You have my word. Let this message serve as the proof. Just schedule it and let me know where you scheduled and I'll pay.

Thanks,

Clayton Echard

On June 28th, I received this:

Gmail [redacted]

[redacted]

Clayton Echard <claytonechard@gmail.com> Wed, Jun 28, 2023 at 8:38 PM
To: [redacted]

[redacted]

[redacted] I will find someone else to love and share my life with. I may honestly move to the east coast at this point as well. We'll see. I can do whatever I want with my life, but what I won't do is allow you to hold me back. And don't try to explain to me that I can't move out of the state and away from you. I absolutely can. All I have to do is either take 100% custody of the child or allow you to have 100% custody. Joint isn't an option and is never mandated. That's common sense. Besides, I will fight until I have no fight left in me to not have you be a part of my life. The courts can't force someone to stay with someone else. That's unheard of and has never been done. Just remember, there is no scenario in which we raise the child together, if you even have a child, which I'm still not convinced. But if you do and it is somehow miraculously mine, like I said, I'll take care of the child if that's what it comes to, but I WILL NOT UNDER ANY CIRCUMSTANCE co-parent with you. Just want to make that clear. I would rather co-parent with literally anybody else besides you, as you have shown me you don't respect my opinion. [redacted]

[redacted]

Clayton Echard

I reached out to Clayton's parents several times, but received no response. On July 2nd, I even invited them to an ultrasound, since he had not gotten back to me about attending my doctor's appointment:



Gmail [redacted]

Proof provided to Clayton & your family's invitation to ultrasound

[redacted] Sun, Jul 2, 2023 at 9:57 AM
to: [redacted]

Hi Mr. and Mrs. Echard,

On Thursday, Clayton said that if I provided him with additional information, such as the date and time of my next ultrasound, he would be able to be cordial. I gave it to him and invited him, but have not heard back. I was lucky enough to get accepted to see a high-risk specialist, [redacted] on July 24th at 9am for an ultrasound and an hour long consultation. I told Clayton that he was welcome to go and that I wanted him to, and even offered to change the date and time if it didn't work for him. I explained to him that it's a referral based practice that does not accept patients without medical records, including verification of the pregnancy and test results/notes from a specialist to prove that there is a condition that requires a high-risk obstetrician (my neurologist about my generalized epilepsy in my case). I understood his need for extra proof, so I sent him screenshots from my patient portal to show him proof of the appointment and the records they received. [redacted]

Even though I have gone above and beyond to prove to Clayton that the pregnancy is real, nothing is enough for him to be civil to me, even though he claimed weeks ago that the test I took in front of him that was positive was sufficient. I've taken the initiative to contact three different labs to organize a prenatal pregnancy test at the one that can do it the soonest and that will be acceptable by the court so that I can establish paternity as soon as possible and so that we can make a parenting plan as we are required to do. I am very financially stable and want absolutely no money from him except what is required by law. All I want is the support he promised to provide me with. I'm under an immense amount of stress and have developed high blood pressure and have explained that this could cause the baby to be born with developmental issues, which I know we don't want. [redacted]

With all of that being said, the purpose of this email is twofold:

1. I wanted to show you how much information Clayton has been provided with by me to verify the pregnancy. This is what he asked for, all of which was given. There was so much that it wouldn't all fit in a single email, so I had to make a Dropbox file of it. You can access all of the proof by clicking here here.

Based on how he has treated me, I don't want him present at the ultrasound and appointment on July 24th. Hearing the heartbeat for the first time is sacred to me but I know it means nothing to him since he has not had the courtesy to respond to my invitation to be there or even change the date and time. Either or both of you, or your other sons, are welcome to be at the appointment if you would like to be. I know it's an important event and I want people there who feel the same. I just didn't want you guys to not feel included just because Clayton is no longer welcome unless he drastically changes his behavior and shows some respect. If he does, of course he can come.

There's no need to respond if you don't want to, but please know that your family is most definitely welcome to be there and I would change the day and time for you guys too if the current date didn't work out.

Thank you for reading this and hope you are having a great weekend!

I discovered I was having twins after that. In mid-July, I decided to hire an attorney to act as a middleman, since Clayton would not communicate directly with me. He told the lawyer that he thought I was on weight loss drugs or fertility drugs that made me test positive. I offered for him to attend an ultrasound appointment, which the lawyer conveyed to him His response was this:


Gmail [redacted]

[redacted] v. Echard

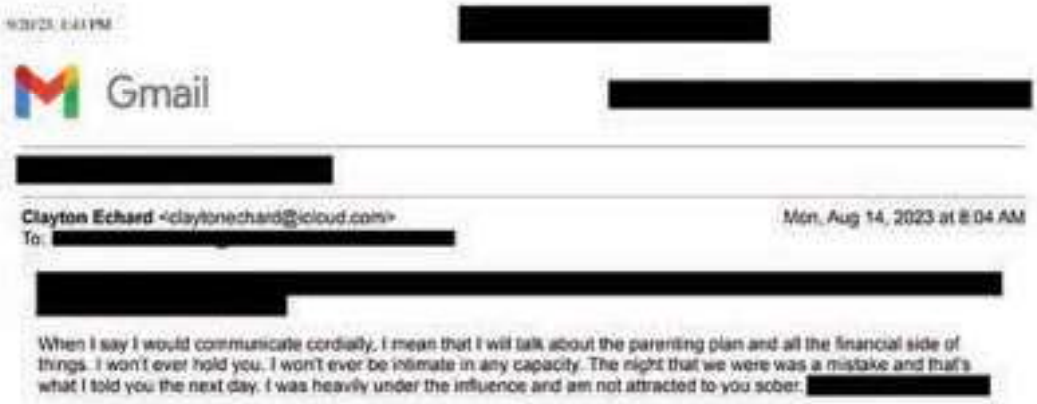
[redacted] Wed, Jul 19, 2023 at 7:17 PM

To: [redacted]

Yes I will tell him. I also proposed if he didn't want to see you in person but wanted to talk to your doctor, what about being on the phone or by FaceTime? His response was how would he know you weren't just in some random place with someone impersonating a doctor. Sadly, that is how far his doubt/paranoia goes. And he acknowledges he is paranoid but he believes it is justified. As I said it may be the only way he's able to process this at the moment.

Yes your best bet is to enjoy this process with your "village" of people who will celebrate in the joy with you and who love and support you.

On August 14th, Clayton sent me this and then went dark on me for days. Telling me that he was "heavily under the influence" and "not attracted to [me] sober" hurt:


[redacted]

Gmail [redacted]

[redacted]

Clayton Echard <claytonechard@icloud.com> Mon, Aug 14, 2023 at 8:04 AM

To: [redacted]

[redacted]

When I say I would communicate cordially, I mean that I will talk about the parenting plan and all the financial side of things. I won't ever hold you. I won't ever be intimate in any capacity. The night that we were was a mistake and that's what I told you the next day. I was heavily under the influence and am not attracted to you sober. [redacted]

All along, I told Clayton I wanted to do a paternity test at any point at the lab of his choosing; in fact, I offered more than fifty times to take it in email and have the messages to prove it. Finally, he agreed to testing. I paid $725 as a deposit and scheduled it for August 23rd, which he said worked well for him. However, he never called to schedule his portion, so I was forced to cancel the test:



Gmail

Re: Canceling NIPP test on August 23rd

Good morning [redacted]

We have canceled the test and refunded the $725 back to the card. It should take 3-4 days for the payment to post. Let us know if you have any questions or concerns.

Thanks,

[redacted]

From: [redacted]
Sent: [redacted]
To: [redacted]
Subject: Canceling NIPP test on August 23rd

Hi,

Unfortunately, Clayton Echard has refused to take the prenatal paternity test that I had scheduled at Exam One in Phoenix on Wednesday, August 23rd. Can you please cancel it and refund the $725 back to my card? Please let me know if you have any questions.

Thank you for your help scheduling it. I'm very disappointed to have to cancel.

All the best,

[redacted]

Clayton's behavior caused me to be borderline-suicidal twice, simply because I have felt panicked about raising twins on my own. All I have wanted is communication and a plan. I explained this in emails to him, which I will not post due to the very personal nature of them. I presumed that as a 'suicide prevention advocate' (and the father of our unborn children), he would be able to help me. I needed reassurance that he would help care for them and he could not provide it. Clayton knew that if I took my own life, I would be ending the lives of our unborn twins. I truly believe that is what he wanted, as it would solve all of his problems.

Clayton was also supposed to meet up with me five days prior to our Early Resolution Conference on September 28th, but he has not responded to my emails trying to organize this.

Clayton claimed I was "obsessed" with dating him, which is not true. I emailed him to clarify this after The Sun article came out, saying: "I. DO. NOT. WANT. TO. DATE. YOU." I had not seen *The Bachelor*, and if I had, I never would have chosen him as my realtor, let alone as someone I would be intimate with. I have told him many times that I would take a lie detector test to prove that I had not seen his season. After he started to display deceptive behavior in a real estate transaction, I finally searched for him on YouTube and watched three clips of him sending Susie, Gabby, and Rachel home. To date, that is all I have seen.

If I am missing anything, or if someone doubts these messages from Clayton, I am happy to provide any records needed to prove that I am indeed telling the truth. I will put my entire reputation on it.

Finally, Clayton wrote on his Response to Establish Paternity that he did not want to give the children his last name or be put on their birth certificates if he is found to be the natural father.

REQUESTS TO THE COURT:

1. **FOR ORDER OF PATERNITY:**

Issue order declaring that ☐ **Party A** or ☒ **Party B** **claimed to be the father, (named below)**

Clayton Echard

☐ **IS** (OR) ☒ **IS NOT** **the natural father of the minor child(ren),**

IN THE EVENT THE COURT ORDERS THAT ABOVE-NAMED PARTY IS THE NATURAL FATHER, THEN THE COURT SHOULD ALSO ORDER AS FOLLOWS:

A. BIRTH CERTIFICATE: (check the box and complete if this is desired)

☐ **Order that the name of the father as appears on his birth certificate or other legal document should be added to each minor child's birth certificate as the father;**

B. LAST NAME: (check the box and complete if this this is desired)

☐ **Order that each minor child's last name be changed to the last name of:**

Bachelor | Clayton Echard | The Bachelor

CE0059

Written by Anonymous

Follow

0 Followers

The anonymous woman in the Clayton Echard pregnancy scandal

Recommended from Medium



AL Anany

The ChatGPT Hype Is Over—Now Watch How Google Will Kill...

It never happens instantly. The business game is longer than you know.

6 min read · Sep 1

-- 252



Sean Kernan

How Your Personality Is Revealed By Your Choice of Words

Use deliberate listening and empathy to better understand people.

5 min read · 6 days ago

-- 67

Sign in

Search the web

Discover Following | News US News World News ... Personalize

Ad
COUPON CODES AVAILABLE GET CODES
Ad

The Messenger Follow

'Bachelor' Alum Clayton Echard Allegedly Told Woman Who Claims to Be Pregnant With His Twins to Get an Abortion: Report

Story by Daniel Trainor • 2mo

'Bachelor' Alum Clayton Echard Allegedly Told Woman Who Claims to Be Pregnant With His Twins to Get an Abortion: Report

Echard is accused of impregnating a former fling earlier this year, though he allegedly told her via text message, 'I will not be raising it in any capacity'

Published | Updated
Daniel Trainor



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

Clayton Echard Jon Kopaloff/WireImage
© Jon Kopaloff/WireImage

Clayton Echard is being accused of texting a woman who claims to be pregnant with his twins to undergo an abortion.

According to documents obtained Tuesday by Page Six, the former *Bachelor* star also allegedly refuted paternity in text messages.

"I would like for you to get an abortion (if you are pregnant with my child, which I still don't believe, but it doesn't really matter either way)," Echard allegedly texted the woman, according to the court docs. "If you do not, that's your choice."

Arizona Will Cover Cost to Install Solar Panels in These Zip Codes



Ad EasySolar

The woman, a 33-year-old podcast host from Scottsdale, Ariz., who wishes to remain anonymous, claims she and Echard had a one-night stand in May that resulted in the pregnancy.

"Then, in that case, if it ends up being my child, I have decided that either you'll take 100% custody of the child, or it will be put up for adoption," Echard's alleged text continued. "I will not be raising it in any capacity."

The text was just one in a flurry of allegedly "erratic, illogical and threatening messages" said to be sent by Echard.

The woman submitted screenshots of the messages, which included, "I don't believe you for a second"; "I legitimately hate you right now"; and "You have lost your mind and I hope YOU think about how terrible this is that you would subject me to this."

Echard also allegedly wrote, "My personal hell would be having to have you be a part of my life."

29+ Coolest Gifts Nobody Would Think Of



Ad Trending Gifts

In response, Echard accused the woman of "harassing" him because she is "obsessed" with him. He also denies they ever had sexual intercourse. Echard told *The Sun*, who was the first to obtain the documents, that he plans to sue the woman.

The Messenger reached out to a representative for Echard, who Page Six reports is now scheduled to take a paternity test Sept. 26, two days before the parties meet in court.

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback



Jennifer Aniston (left with Reese Witherspoon) gives her first interview since the death of Matthew Perry to Variety magazine - Dan Doperalski for Variety
© Provided by The Telegraph

It was Aniston’s first interview since her American-Canadian co-star’s death at the age of 54. Perry’s cause of death has not been officially determined.

“He was happy. He was healthy. He had quit smoking. He was getting in shape. He was happy – that’s all I know,” she added.

“I want people to know he was really healthy, and getting healthy. He was on a pursuit. He worked so hard. He really was dealt a tough one.

“I miss him dearly. We all do. Boy, he made us laugh really hard.”



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback



Jennifer Aniston and Reese Witherspoon front VARIETY'S Emmy Edition and speak with Hollywood's most iconic entertainment magazine about 'The Morning Show', Aniston texting with Matthew Perry on the day of his passing, intimacy coordinators, if the show is camp, and more.
© Provided by The Telegraph

Perry played Chandler in all 234 episodes of the sitcom, which ran for 10 series from 1994 to 2004.

The sitcom catapulted him, Aniston and their four co-stars to household fame and by its final series the group were paid more than £800,000 ($1 million) per episode.

But Perry struggled with drug and alcohol addiction for much of his adult life.

In a 2021 memoir he said he had attended 6,000 Alcoholics Anonymous meetings, been to rehab 15 times and had 14 stomach surgeries.

He added that his alcoholism meant drinking 14 triple vodka shots was not enough to get him drunk.

“Not only do I have the disease, but I also have it bad,” he wrote.

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

"I have it as bad as you can have it, in fact. It's back-to-the-wall time all the time. It's going to kill me."

Aniston said the outpouring of tributes to Perry in the wake of his death was "so beautiful".

"I hope he can know that he was loved in a way he never thought he was," she said.

%n

Sign up to the Front Page newsletter for free: Your essential guide to the day's agenda from The Telegraph - direct to your inbox seven days a week.

Sponsored Content

More for You

SUBSCRIBE

ENTERTAINMENT > TV

'The Bachelor' Alum Clayton Echard Declares the 'Truth Will Always Set You Free' amid Paternity Scandal

A woman that Echard allegedly slept with once reportedly claimed in a new lawsuit that he refused to take a paternity test after she became pregnant with twins

By **Esther Kang** | Published on September 21, 2023 10:54PM EDT

SUBSCRIBE



Clayton Echard. PHOTO: ABC/PAMELA LITTKY

The Bachelor alum Clayton Echard is setting the record straight.

On Thursday, the 30-year-old reality star posted a screenshot of a receipt for a paternity test in order to clear the air after he was named in a paternity lawsuit in August by an unidentified woman.

In the lawsuit, the woman alleged that Echard got her pregnant after the two met for a one-night stand. Since filing the suit, the woman has requested Echard take a test to find out the paternity of her unborn twins before she gives birth in February. The 33-year-old woman, who has chosen to remain anonymous, has recently claimed that the former Bachelor wasn't complying with her requests for a test.

"This is the timeline. The truth will always set you free," Echard wrote over the email receipt in a post to his Instagram Story. Per his screenshot, the television personality paid $725 to schedule an appointment with a paternity clinic.

SUBSCRIBE

"Results will then take about a week to get back. I believe we're all on the same page now."

PEOPLE has reached out to Echard's reps for comment.

SUBSCRIBE

that he refused to take a test and that she had to pay a $725 deposit for it, but Echard called her accusations "baseless" and "lacking in merit."

In court documents obtained by PEOPLE, the woman stated that Echard refused to believe she was pregnant when she originally informed him back in June.

"I wanted you to come over to confirm what I was doubting. And you did confirm that. So, I don't see you as a liar anymore," he allegedly texted the unidentified woman.

RELATED: Clayton Echard and Rachel Recchia Poke Fun at 'Reality TV Trauma' as They Reunite Beside 'Bachelor' Pals

After the two parties take the paternity test, they are scheduled for an early resolution conference and will appear in court immediately on Sept. 28.

Echard's alleged paternity scandal comes nearly one year after he and Susie Evans announced their decision to split. The former couple met on his season of *The Bachelor* and lived together for less than a year before going long distance and eventually parting ways.

SUBSCRIBE

Susie Evans and Clayton Echard. PHOTO: CRAIG SJODIN/ABC

RELATED: Clayton Echard Says He's Focusing on Himself After Susie Evans Split: 'I'm Not Mentally Healed'

"With incredibly heavy hearts, we wanted to share that we have decided to go our separate ways," Echard and Evans wrote in a joint Instagram statement at the time. "For anyone who has ever loved, knows this was a painful decision to make and not one taken lightly."

"We understand that there will likely be a lot of questions about this decision — social media is definitely a highlight reel and much of our experiences together we have kept private as I'm sure most can understand. But we will share this — although this last year together has brought us so much joy and so many laughs, there has also been a significant amount of pain," they continued. "We know no healthy relationship comes without its struggles, but we've realized that we were not prepared for the external forces that hindered our ability to not only heal as individuals but also as a couple."

I am the anonymous woman i...

reddit.com/r/thebachelor/comments/16cown3/i_am_the_anonymous_woman_in_the_clayton_scandal/?rdt=44347

reddit

r/thebachelor

Search in r/thebachelor

Get app

Log In

Home

Popular

TOPICS

Gaming

Sports

Business

Crypto

Television

Celebrity

See more

RESOURCES

About Reddit

Advertise

Help

Blog

Careers

Press

See more

POPULAR POSTS

r/thebachelor • 3 mo. ago
[deleted]

I am the anonymous woman in the Clayton scandal. Here's the proof. Here's my story:

As a side note, for those who are questioning whether I want attention/followers, please remember I am anonymous in this case. I deactivated my Instagram earlier this week, accidentally logged into that account again, and Instagram will not let me deactivate my account again for a week. I have tried. I don't want money from Clayton. All I have asked for is communication to figure out a parenting plan.

https://anonymouswoman1.medium.com/i-am-the-anonymous-woman-in-the-clayton-echard-scandal-heres-my-story-97e48532fa9d

Please remember that Clayton has not denied that he sent any of these messages.

He has been warned that if he does not take down his second story, he will be sued. He is trying to spread false information about me. The two other cases that I have in family court are restraining orders against a man from 2021 and 2022. I have told him that putting me out to the wolves like that regarding cases where I have a restraining order against a man is not okay. It feels unfair and cruel, and for a man who is a mental health/suicide prevention advocate, it crushes me that he won't take it down.

Locked post. New comments cannot be posted.

1.7K

1.6K

Share

Sort by: New

bachbachbaby • 2 mo. ago • Stickied comment

Additional, conflicting information keeps coming in regarding this issue, and we are not able to verify or keep up in a meaningful or reliable way — this is way above our pay grade. We are no longer allowing discussion on the topic until a resolution is reached.

1

Share

r/thebachelor

Join

The Bachelor

r/thebachelor is a subreddit dedicated to thoughtful discussion about The Bachelor franchise, the lives of contestants, and how...

Show more

313K Members

1.8K Online

Top 1% Rank by size

Related | The Bachelor | The Bachelor (franch...

r/tonxayne

For any who has ever been harassed by the legal system, here's your proof that it's not you that's...

77 upvotes · 39 comments

r/BachelorNation

Dave Neal's response to the new Medium article



103 upvotes · 115 comments

r/Degrassi

Jordy Todosey does personality test as Adam Torres (hi its me later<3)



130 upvotes · 18 comments

r/Scams

I suspect this eviction note to be false.

1 upvote · 5 comments

r/LegalAdviceUK

Open in app ↗

Sign up Sign in

Medium Search Write



CE0097



Life's been a bit of a challenge lately... and that's putting it mildly.

Unveiling the Unbearable: My Battle Against Cyberbullying and Online Harassment



Laura Owens · Follow
10 min read · 4 days ago

70

> *It's incredibly hard to put this into words and share what's been going on. I've never asked my friends or family for emotional support, but I'm feeling truly shattered, defeated, mentally drained, and worthless due to the events of these past several months. I have been the subject of a smear campaign that I wouldn't wish on my worst enemy, and the target of cyberbullying, cyberharassment, and cyberstalking at a level that I truly think no one would believe was imaginable. My heart has been torn to shreds, and it seems like nobody beyond my family truly sees or understands who I am anymore. Maybe that's my fault, since the sheer embarrassment of it all has been so overwhelming that I've found myself hiding from the world.*

Since around mid-September, I've been noticeably absent from social media and pretty much detached from the life I used to lead. I can count on one hand the times I've stepped out of my home since then, but the number of times I've found myself in tears is beyond calculation. Earlier this morning, around 4:30, I found myself on the floor, overwhelmed with emotions,

feeling more bullied and alone than I've ever felt. It struck me that maybe it's time to stop concealing what I've desperately tried to keep under wraps for months now. I've come to understand that by not being public about what I'm struggling with, I've made this battle harder for myself. It's now abundantly clear that the only way to stand up to bullies is by confronting them directly.

I know that some of you caught wind of the rumors that I got pregnant by Clayton Echard, the star of The Bachelor's season 26. Clayton had briefly been my real estate agent, and during a May evening, our professional dealings turned into something more personal. Following three positive pregnancy tests — one taken at home, another at an urgent care center, and the final one done in Clayton's presence — it was evident that I was indeed expecting. Soon after, I discovered I was pregnant with twins, and I knew with 100% certainty that he was the father. Clayton went radio silent when it came time to take a paternity test, despite my persistent requests — twenty-nine times, to be exact — at a lab he had selected previously. When he finally responded, he dared me to reach out to the tabloids, a move I knew would compel him to comply with the test. Before the news hit the public, I pleaded with the media to keep my identity under wraps, and they agreed. However, their description of me as the "anonymous woman" contained enough details for those familiar with me to make connections and for strangers to track me down online.

Like many, I was familiar with Reddit before news about my pregnancy became public, but I had no grasp of the level of dedication its members had. Shortly after the initial articles surfaced, a friend reached out, informing me that self-proclaimed "sleuths" were actively discussing and mentioning me by name in "subreddits" centered around *The Bachelor.* There was a barrage of misinformation circulating, and initially, I wrote back to

correct those who were getting the facts twisted. However, these so-called 'keyboard warriors', shielded by anonymous usernames, only seemed to intensify their interest in my life once they knew I was engaging with them.

Things took a truly devastating turn when an abusive ex decided to reach out to Clayton, telling him that I had 'done this before'. He was referring to two prior pregnancies — a part of my life I've guarded fiercely, not just from the wider audience I'm speaking to now, but from everyone. Rather than having a private discussion with me about it, Clayton broke the news to his hundreds of thousands of followers, and Redditors, like relentless detectives, latched onto this snippet of my personal history. They dove deep into my life, tearing through layers I desperately wanted to keep hidden and, truth be told, deservedly so. My life was becoming a mere public spectacle, and it caught the eye of a *Bachelor* content creator named Dave Neal, a major figure on Reddit, who has completely turned my world upside down.

Dave has blatantly victim-shamed me for my reproductive decisions, stating that my life would hold no interest for him if it weren't for two prior abortions. The source of the misinformation he's spreading traces back to two men I'd been pregnant by before. Their animosity against me, triggered by the restraining orders I have against them, is the driving force behind the distorted tales being circulated about me, and ones they have shared with Dave. They supplied him with court documents containing entirely baseless, never-seriously-considered-by-a-judge claims about me, which Dave has disseminated as if they were factual. Although their accusations were unequivocally untrue, they were mortifyingly embarrassing and not something I wanted anyone to know. My decision to stay silent inadvertently bolstered Dave's platform, giving him free rein to harass me without facing any consequences.

The allegations they had previously made against me in response to cases I filed against them were horrendous, alleging that I falsified my pregnancies, tampered with records regarding my past pregnancies, and fabricated the severity of the injuries I sustained due to abuse. In a desperate effort to get him to stop spreading false and extremely damaging information about me, I offered to sign a release to have my previous pregnancy records sent directly to him from my providers. I sent him proof that I was one of only 630 patients accepted into the Domestic Violence Brain Injury Program at Barrow Neurological Institute, the only one of its kind in the nation, as a result of "multiple strangulation injuries" resulting in me developing epilepsy. However, he ignored my offers, revealing that he cared little for the truth.

Dave's motivation in continuing to create content about me has been the massive surge in viewers and listeners on his monetized platforms by peddling sensationalized, entirely untrue tales about my life. He claims that he "doesn't take a shit without monetizing it", and so his motivation is clearly financial. Dave puts out so much content that it feels like doing damage control is a full time job: he posts three shows, usually one about me, to YouTube and two podcasts a day. Each time, it sparks a fresh wave of discussions that only add more fuel to this never-ending fire.

Dave's enormous following on Reddit has made my life incredibly difficult. They've created countless threads in Bachelor-related subreddits, and in the ultimate showing of targeted harassment, one person even went as far as creating a subreddit in my name just to bully me. I was taken aback when I read a post purported to be from a high school peer with outrageously far-fetched and blatantly false allegations, claiming that during that time, I was pregnant by multiple men, including a special needs student and fathers of my peers. One fabricated story claimed that my father offered one student

$6000 to buy new speakers for his car if he would date me for a month. The reality was quite different — I was extremely introverted throughout high school, never attended a party, and had my first kiss during the week of graduation. These claims hold no resemblance to reality, yet they've left me feeling utterly powerless and deeply ashamed. It feels as though the reputation I painstakingly built and every achievement I've held dear have been ruthlessly torn apart and relentlessly mocked in profoundly disheartening posts.

The comments said about me have been brutal, such as, "I hope she's an organ donor so something good can come out of her pathetic existence", and that I am "a complete waste of skin and bones". I've been told to kill myself, with comments suggesting it might help my family move past the supposed disgrace they claim I've brought upon them. My dad's Wikipedia has even been edited several times by trolls to state that he only has one daughter, my sister.

Dave claims to have only referred to me by "Jane Doe", but my name has appeared in his content many times, and his fixation on me has reached the level of an obsession. Since September, he's churned out over fifty videos about me, boldly claiming that the count might escalate to "more than one hundred and forty" as he continues to probe into my life. Moreover, he's generated well over a hundred hours of podcast content solely focused on me and actively pursued opportunities to appear on any podcasts, offering to fly anywhere in the country to do so, because he is so eager to discuss my life through his lens of lies.

I would be lying if I said I wasn't afraid of Dave. During one of his live streams, he inadvertently displayed a map leading to my home. In an interview just this week, his comments became even more alarming as he

said he wished I had been a passenger on the missing Malaysian flight 370. Adding insult to injury, he shamelessly exhibited a picture of me in a bra with an exposed pregnant belly during one of his episodes. When I requested its removal, he callously dismissed my concerns, laughing as he told his audience, "Bra or no bra, who cares?". He's joked about me having a miscarriage, which is something that is not remotely funny.

As a last resort, I filed for an Injunction Against Harassment against Dave due to his obsessive interest in me and his flat out refusal to stop making videos and podcasts about me when asked. However, when I informed him that he would be served by a process server, he turned the tables. Deceptively, he began painting himself as fearful of me. His followers swiftly joined in, spreading these unfounded notions that I might pose a threat. I've been called "unhinged" an innumerable amount of times and his followers have posted countless times that I need to be institutionalized. It's been outrageous, entirely unwarranted, and incredibly upsetting.

My physical appearance has been a relentless subject of mockery. Multiple memes have been created, emphasizing my looks and targeting me with hurtful comments about my looks. People claimed to be stunned that Clayton chose to be intimate with me for just one night after having numerous beautiful women to select from during his time as The Bachelor. Clayton himself mentioned I didn't look as pretty as I appeared in some Instagram photos he scrolled through.

I thought that maybe if I were able to change my identity on the outside, I might get back to feeling like myself on the inside. After a lot of thought, I decided to file for a legal name change, which was discovered by Dave the day after I filed the petition with the court, and my new identity as Emily

Wilson was disclosed to his audience, making it obsolete. I felt like I had run out of ideas to escape the relentless nightmare I was living in.

My integrity means everything to me. I've never lied about being pregnant nor the extent to which I've been abused, and I have medical records to back both of those things up. However, I won't be sharing updates regarding the status of my pregnancy with Clayton. *I kindly ask not to receive congratulations or engage in discussions about Clayton and my pregnancy.* This post is not intended for that purpose. What I can confirm is that I sought an order of protection against him. Despite my only sending him pregnancy updates, interestingly, a month later, he obtained an Injunction Against Harassment against me.

Dave's followers have chosen to write my full name on Reddit and in the comments sections on his YouTube videos because they say that in doing so, they will alter the SEO algorithm so that these blatant lies about me are shown at the top of Google search results. He has incited hatred, harassment, and threats against me, and I am just exhausted from it.

Over the last few months, I've often questioned: What is the allure of a 33-year-old woman, confirmed to be pregnant three times, to him and his audience? How much more content can he create, and how much more can I take? Although I would be more than entitled to file a defamation lawsuit against Dave, I have no desire to have my life drained by the legal system and simply want him to stop and remove the videos. **If you want to watch how cruelly, and flat-out bizarrely, Dave has spoken to and about me, you can watch this video.**

I'm sure this post will spark more hateful content from Dave, and he will incite his followers to make more cruel comments about me. Despite

outwardly claiming to my family that I've become desensitized to anything that can be said to me at this point, Dave's videos still deeply affect me, as do the words of his supporters. While I *know* I will advocate against cyberbullying in the future, right now, I just wish for this torment to stop. His relentless bullying has pushed me to the brink, causing moments where I've felt close to the edge of despair. I've even expressed to him that the blood would be on his hands if I harmed myself due to his relentless harassment, but it had no impact on him. It just provided him with something else to talk about on his shows. And why would he stop talking about me? Spreading misinformation generates profit for him, and that appears to be his sole concern. It's an ongoing struggle to try to rise above this situation.

My life has changed after witnessing how cruel people can be, and while I'm a changed person after all of this (how could I not be?), I still want to be Laura Owens, not Emily Wilson. I'm anxious about how people might perceive me once I share my story, but holding all of this inside hurts. **In the face of relentless cyberbullying, I yearn for the torment to cease, hoping that someday, my story will speak louder than the falsehoods, and the strength I find within will reclaim the identity they sought to shatter.**

Cyberharassment Cyberbully Struggle Overcoming Obstacles Empowerment



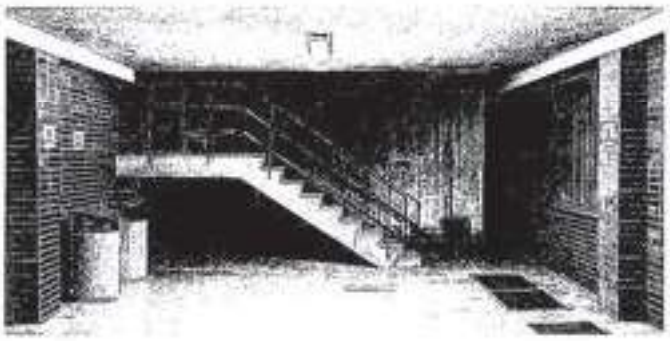
Written by Laura Owens

Follow

9 Followers

Sharing my story isn't about seeking sympathy; it's about reclaiming power, standing up against online abuse, and empowering others along the way.

Recommended from Medium



TrueAlreadyHappenedStories

When I was a kid, my dad kept a second family in our basement.

Growing up, I thought everyone had a second family in their basement. In retrospect, I...

· 12 min read · Nov 23

5K 81



Alexandru Lazar in ILLUMINATION

Ten Habits that will get you ahead of 99% of People

Improve your life and get ahead of your peers in 10 simple steps

9 min read · Nov 18

8.8K 157

LO **Laura Owens**
Your choice
To: Clayton Echard

Trash - iCloud August 3, 2023 at 12:36 PM

Clayton,

This is actually the last email. Davis said that you're "not interested in resolving this amicably at all" and that nothing will change your mind. I know that there's one thing that will get you to take a paternity test and communicate: going to the media. I wanted to give you a heads up of what I am going to be submitting as a tip to Page Six and NY Post. I have my read receipts turned on, so if you read this and I don't hear back, I will go ahead and submit it. If for some reason this changes your mind, let me know. Regardless, you will have to acknowledge the situation very soon, so it's just your choice as to whether it's with the public involved or just me.

All the best,



Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

Tip submission (1).pdf

Clayton being nice.pdf

6-20-23 email to Clayton listing his insul...

Extortion threats.pdf

Establish_Paternity_Redacted.pdf

Borderline suicidal letter to Clayton - 7-...

'The Last Email' to Clayton - 8-2-23.pdf

Declaration of Service - 8-2-23.pdf



CE0116

LO **Laura Owens**
Clayton Echard as a HOPE Conference speaker
To: Clayton Echard, arizonaspc@gmail.com

Trash - iCloud August 3, 2023 at 6:29 PM

Hi,

My name is Laura Owens and I am hesitant to send this email, but felt like I needed to so that I can have a clear conscience. I would ask that you please keep this information confidential.

I learned that Clayton Echard is a speaker at the HOPE Conference. I am pregnant with his unborn twins and have filed to establish paternity with the court. Clayton has gone dark on me, despite the fact that I provided him with an abundance of evidence of the pregnancy. I even took a test in front of him that he purchased, which came back positive. Now, he is refusing to take a paternity test. I was raped, assaulted, and left for dead in March of 2022, and up until my encounter with Clayton, I was not with anyone else. I haven't been since either. He is 100% the father. You can click the links below, including my TEDx talk, to see that I have credibility.

To say that I have been overwhelmed since I found out that I was pregnant would be an understatement. The thought of raising one unexpected child was a lot to handle, but the thought of bringing two into the world really put me over the edge with anxiety. Clayton had promised to support me after I took the positive pregnancy test in front of him, but like I mentioned, he has decided to ignore me. He has said mainly that he wants me to have full custody, but said twice that he wanted full custody and would move to another state with the kids. They are due in February 2024 and I have no idea what to expect of Clayton when they are born.

I have been very scared of the future and lonely, and confided to Clayton on July 30th that I was feeling borderline suicidal. He chose to ignore me, knowing that if I hurt myself, it would kill his unborn twins. I still have not received a response. The only reason I have felt this way is because of him and how he has treated me throughout the process. He has acted like I was ugly and not worth his time or effort to try to date despite our situation. He has dehumanized me, been extremely demeaning, and has gaslit me throughout the process. I have wanted no money from Clayton; all I want is his support because this is a very scary time for me. I wish I had the option to just block someone and forget the pregnancy existed, but I obviously don't have that choice

I wanted to pass this information on in case you wanted to reconsider Clayton's role as a speaker at the conference. Based on how he has treated me, he is the last person who is qualified to give a speach about suicide prevention and intervention when he doesn't even care if the mother of his children took that final action. I'm sure he will try to portray me as crazy if you speak to him about this, but I assure you that Clayton is the father of the children and he knows it, which is why he is refusing the prenatal paternity test that I offered to pay for. I am attaching my letter to him regarding feeling borderline suicidal as well as the court papers that were served on him to prove that we are indeed part of a paternity case. I have plenty of other evidence that the pregnancy is real should you need to see it.

If Clayton can provide value to people despite this, then by all means I support him being a speaker and I apologize for even sending this email. I just wanted you to know that he may not be speaking for the right reasons since he clearly doesn't care about the cause as much as I hoped he did. I am putting him on this email as I have nothing to hide and he knew I would be sending this.

Thank you for your time!

All the best,



Laura Owens
Nobody Told Me"| *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul
Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

Borderline suicidal letter to Clayton - 7-...

Email to Clayton - 8-2-23.pdf

Establish_Paternity_Redacted.pdf

Pregnancy Proof.pdf

CE0117

EXHIBIT “3”

1747 East Morten Avenue, Suite 205
Phoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WOODNICK LAW PLLC

January 17, 2024

URGENT - VIA EMAIL AND FIRST-CLASS MAIL
Amazon.com, Inc – Headquarters
Attn: Legal Department
410 Terry Avenue
North Seattle, WA 98109

Amazon.com, Inc
P.O. Box 81266
Seattle, WA 98108
Legal@amazon.com

Re: Owens v. Echard – Maricopa County Superior Court (FC2023-052114; CV2023-05392) – SPOLIATION NOTICE

Dear Amazon Legal Department:

Our firm represents Clayton Echard in a court proceeding currently pending before Judge Mata in Maricopa County, Arizona (FC2023-052114). Our firm also represented Mr. Echard in a civil proceeding under CV2023-05392. We are requesting that Amazon preserve what may be critical evidence in both causes.. Specifically, order and purchase history related to Laura Michelle Owens.

Spoliation Notice: This letter demands that Amazon preserve and not alter any evidence relating to this matter, including, but not limited to orders/purchases associated with the following identifying information:

- The purchase history of any Amazon account associated with any of the following email addresses:
  - [redacted]@lauramichelleowens.com
  - [redacted]@nobodytoldmeshow.com
  - [redacted]@gmail.com
  - [redacted]@lauraowensmusic.com
  - [redacted]@gmail.com
  - [redacted]@aol.com
  - [redacted]@gmail.com
  - [redacted]@gmail.com

- The itemized list of all products purchased from any of the above accounts made from May 1st – December 31st, 2023.

- All records of deliveries made to Laura Michelle Owens or any occupant at 11440 N 69th Street, Scottsdale, AZ 85254, from May 1st – December 31st, 2023.

- Any other information, real evidence, or documents that may be relevant to this matter.

Please **immediately** take steps to preserve this digital data and anything else related to this matter. In addition, please do not alter or destroy any related materials.

We will be proceeding by subpoena for the same under separate cover, but wanted to notify you of this in advance to assure the information is preserved.

Very truly yours,
WOODNICK LAW, PLLC

Gregg R. Woodnick

GRW/mb
CC: Cory Keith (attorney for Ms. Owens);
Clayton Echard (via email)

THE VALLEY LAW GROUP, PLLC
Cory B. Keith – SBN 035209
3101 N. Central Avenue, Suite 1470
Phoenix, Arizona 85012
Phone: (480) 300-6012
Fax: (480) 781-0722
Cory@thevalleylawgroup.com
Attorneys for Petitioner

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/23/2024 6:54:47 PM
Filing ID 17232602

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter Of: **LAURA OWENS,** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No. FC2023-052114 **PETITIONER'S RESPONSE TO MOTION FOR SANCTIONS PURSUANT TO RULE 26** (Assigned: Hon. Julie Mata)

Petitioner, **LAURA OWENS** (hereinafter "Petitioner"), by and through undersigned counsel, hereby files this Response to Respondent's Motion for Sanctions Pursuant to Rule 26, *Arizona Rules of Family Law Procedure, ("ARFLP*") (hereinafter "the Motion"). Petitioner asks the Court to deny the Motion. Alternatively, Petitioner asks that the Court issue an order that attorney fees and sanctions abide trial. As a precursor, counsel notes that this Motion is not ripe for litigation as the pleadings and history of this case demonstrate that discovery, and requested protections of the discovery, are still ongoing.

//

//

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

I. LAW AND ARGUMENT

Rule 26(b), *ARFLP* states that the attorney or party signing or filing a motion certify that to the best of the person's knowledge, information, and belief formed after reasonable inquiry the following:

> (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
>
> (2) the claims, defenses, and other legal contentions are warranted by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law or for establishing new law;
>
> (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
>
> (4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

1. *Since Respondent's Motion does not Comply with the Requirements Outlined by Rule 26, it Should be Denied.*

Rule 26(c), *ARFLP* allows the Court to impose appropriate sanctions, including an order to pay to the other party the amount of the reasonable costs or attorney fees, when a party files a Petition or Motion in violation of the Rule. Rule 26 further sets forth that prior to filing a Motion for Sanctions:

> A. "[the party seeking sanctions must] attempt to resolve the matter by good faith consultation as provided in Rule 9(c); and
>
> B. if the matter is not satisfactorily resolved by consultation, provide the opposing party with written notice of the specific conduct that allegedly violates section (b). If the opposing party does not withdraw or appropriately correct the alleged violation(s) within 10 days after the written notice is served, the moving party may file a motion under subpart (c)(3)."

//

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

Additionally, to comply with Rule 26, *ARFLP*, the Motion must:

A. be made separately from any other motion;
B. describe the specific conduct that allegedly violates section (b);
C. be accompanied by a Rule 9(c) good faith consultation certificate; and
D. *attach a copy of the written notice provided to the opposing party under subpart (c)(2)(B)*.

Counsel for Respondent certified that he met and conferred with Petitioner on August 16, 2023, and with Petitioner's previous counsel, Alexis Lindvall, on December 27, 2023. However, Respondent's Motion did not include evidence demonstrating that Petitioner, or Petitioner's previous counsel were provided *written notice* of specific conduct alleged to have violated Rule 26(b), *ARFLP*. Written notice is required under subpart (c)(2)(B) of Rule 26, *ARFLP*. Without such written notice, Petitioner was not afforded time to cure any alleged deficiencies prior the filing of Respondent's Motion.

2. *Petitioner's Initial Pleading and Subsequent Motions do not Violate Rule 26.*

Petitioner and Respondent engaged in sexual intercourse on May 20, 2023. Thereafter, Petitioner became pregnant. Petitioner believed Respondent to be the father of the unborn child (now known to have been twins). It is uncontroverted that Respondent purchased a pregnancy test, asked Petitioner to submit to the pregnancy test in his presence, and that the pregnancy test came back positive. Petitioner subsequently filed her Petition to Establish Paternity. Respondent now claims he and Petitioner never engaged in sexual intercourse and therefore could not have been the biological father.

Despite Respondent's assertions to the contrary, the petitioner filed her Petition to Establish to initiate establishing Respondent's paternity rights. Petitioner did not file to harass Respondent and certainly did not attempt to delay any proceedings.

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

Respondent's assertions that Petitioner's claims are not supported by evidence are disingenuous at best. The petitioner's claims and pleadings have evidentiary support. Respondent's actions have limited Petitioner's ability to provide supporting evidence. Petitioner should not be required to provide evidence pertaining to her privileged medical records without accepting that the evidence will be immediately shared with the public and Petitioner will be further harassed and embarrassed online. In fact, the petitioner has attempted to procure witnesses to testify to the merit of her claims. Unfortunately, these witnesses fear coming forward without confidentiality as they do not want to be subjected to the same embarrassment and harassment as Petitioner. The issue of confidentiality and protective orders relating to discovery are pending. As such, Respondent's claim is meritless and premature.

3. *Respondent's Motion is Filed in Bad Faith and Petitioner Should be Awarded her Reasonable Attorney Fees for Filing her Response.*

Respondent filed the Motion in bad faith and the Court should award Petitioner her attorney fees for having to file a response. Respondent is leaking information to the media causing a constant public barrage of Petitioner online, and then is attacking her by filing frivolous requests for sanctions because Petitioner cannot send her privileged medical records to prove her allegations without the cover of confidentiality or a protective order. All the while, Respondent is causing Petitioner to incur additional attorney fees while Respondent continues to crowd-source his attorney fees through GoFundMe. *See Exhibit A*.

This case is no longer about a child–this has turned into Respondent abusing the Family Court as his own publicity stunt. Respondent is using this case to attempt to increase his popularity by using his followers and his public image to control the narrative. This intent

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

is clear when evaluating the tone and constant stream of degrading statements being made in Respondent's pleadings and his attorney's emails (which are coincidentally almost all referenced as exhibits in Respondent's public pleadings). This is further supported by each of Respondent's pleadings being made public online before many of them even appear on the Electronic Court Record after being processed by the Clerk of Court. Petitioner, who originally filed the Petition to encourage the person she believed to be the father of her child(ren) to be an active and involved father, has now been made out to be a crazed woman who fabricated a pregnancy for her own publicity when this narrative is far from the truth.

II. CONCLUSION

The Court should deny Respondent's Motion for Sanctions and should allow Petitioner to file a China Doll affidavit requesting reimbursement of her attorney fees for having to file a response. Respondent failed to comply with Rule 26(c)(3)(d) while filing a request for sanctions claiming that Petitioner should be sanctioned for failing to comply with Rule 26.

RESPECTFULLY submitted this 23rd day of January 2024.

THE VALLEY LAW GROUP, PLLC

/s/ Cory Keith

Cory B. Keith
Attorney for Petitioner

//

//

//

//

ORIGINAL of the foregoing e-filed
this 23rd day of January 2024, with:

Clerk of the Superior Court
Maricopa County Superior Court

COPY presumed delivered even date to:
The Honorable Julie Mata

COPY emailed even date to:
Gregg Woodnick
Woodnick Law, PLLC
1747 E. Morten Ave. Ste 205
Phoenix, Arizona 85020
office@WoodnickLaw.com
Attorney for Respondent

By: ILS

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

EXHIBIT A

10:39

gofundme



Clayton Echard Legal Fund

$9,514 raised of $14,000 goal • 393 donations

Share

Donate now

Dave Neal is organizing this fundraiser on behalf of Clayton Echard.

Clayton Echard is facing several legal battles within the Arizona court system and could use a hand in hiring a lawyer to properly represent him in court. I have spoken personally with Clayton and while he never wanted to ask for a handout, it is evident that he can use the help

AA gofundme.com

10:39 86

Dave Neal is organizing this fundraiser on behalf of Clayton Echard.

Clayton Echard is facing several legal battles within the Arizona court system and could use a hand in hiring a lawyer to properly represent him in court. I have spoken personally with Clayton and while he never wanted to ask for a handout, it is evident that he can use the help of friends and family that want a fair legal battle.

Clayton is the sole beneficiary of this fund. The funds will go directly to his account from here. Thanks for all the generosity!

Donate | Share

Donations (393)

See top

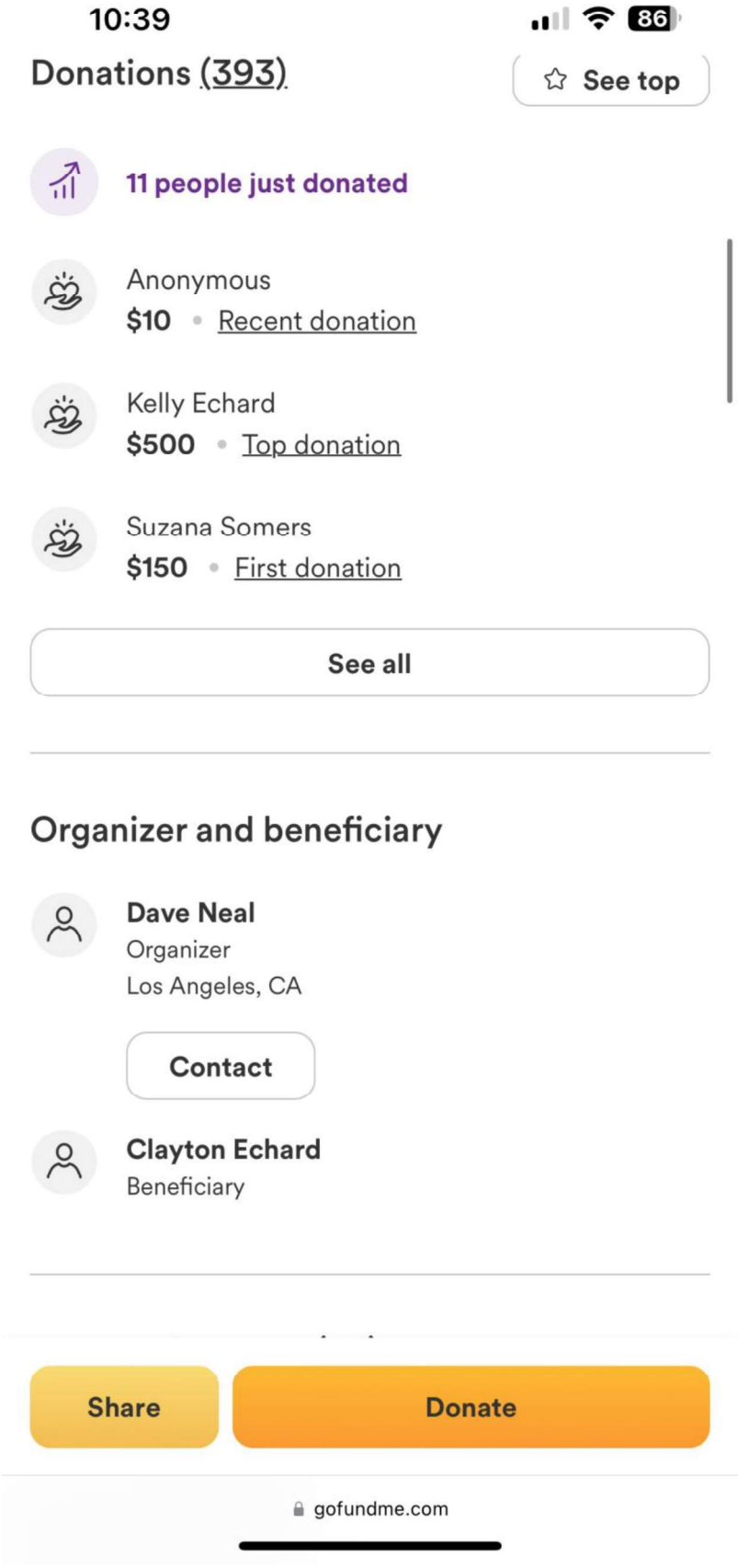
11 people just donated

Anonymous
$10 • Recent donation

Kelly Echard
$500 • Top donation

Share | Donate

gofundme.com


10:39
86
Donations (393)
See top
11 people just donated
Anonymous
$10 • Recent donation
Kelly Echard
$500 • Top donation
Suzana Somers
$150 • First donation
See all
Organizer and beneficiary
Dave Neal
Organizer
Los Angeles, CA
Contact
Clayton Echard
Beneficiary
Share
Donate
gofundme.com

10:39

Words of support (38)

Please donate to share words of support.

Giver Receiver
$5 • 2 d

I am just curious... who stops at 2 bj's? Like how did it not progress to penetration? I have never gotten a bj never mind 2 and not want/give more. Please explain this. It has really driven me crazy. Are you now waiting for marriage or something?! PLEASE ANSWER ;-)

GreggWoodnick FanClub
$10 • 18 d

YOU ARE THE LAWYER AMERICA NEEDED! Get em! We love you!



ArtsandCrafts Fund
$10 • 18 d

Greg R Woodnickk for life!!!!!!! BEST LAWYER EVER!

Share | Donate

gofundme.com

10:40

GreggWoodnick FanClub
$10 • 18 d

YOU ARE THE LAWYER AMERICA NEEDED!
Get em! We love you!



ArtsandCrafts Fund
$10 • 18 d

Greg R Woodnickk for life!!!!!!!! BEST LAWYER EVER!

Brianne wilson
$20 • 18 d

Clayton, I'm glad you are fighting. Hope you are doing okay.

Anonymous .
$15 • 24 d

I hope you can continue to fight for your rightly deserved justice. In no world should anyone get a chance to just walk away from ruining lives while facing no real lasting consequences. I'm sorry for judging you when this all first came

Share | Donate

gofundme.com

10:40 85

Anonymous .
$15 • 24 d

I hope you can continue to fight for your rightly deserved justice. In no world should anyone get a chance to just walk away from ruining lives while facing no real lasting consequences. I'm sorry for judging you when this all first came out, like many others I judged you before I knew all of the situation.

Rachael Lurker
$20 • 1 mo

Everyone deserves to have professional council.

Tonsil Twins
$139 • 3 mos

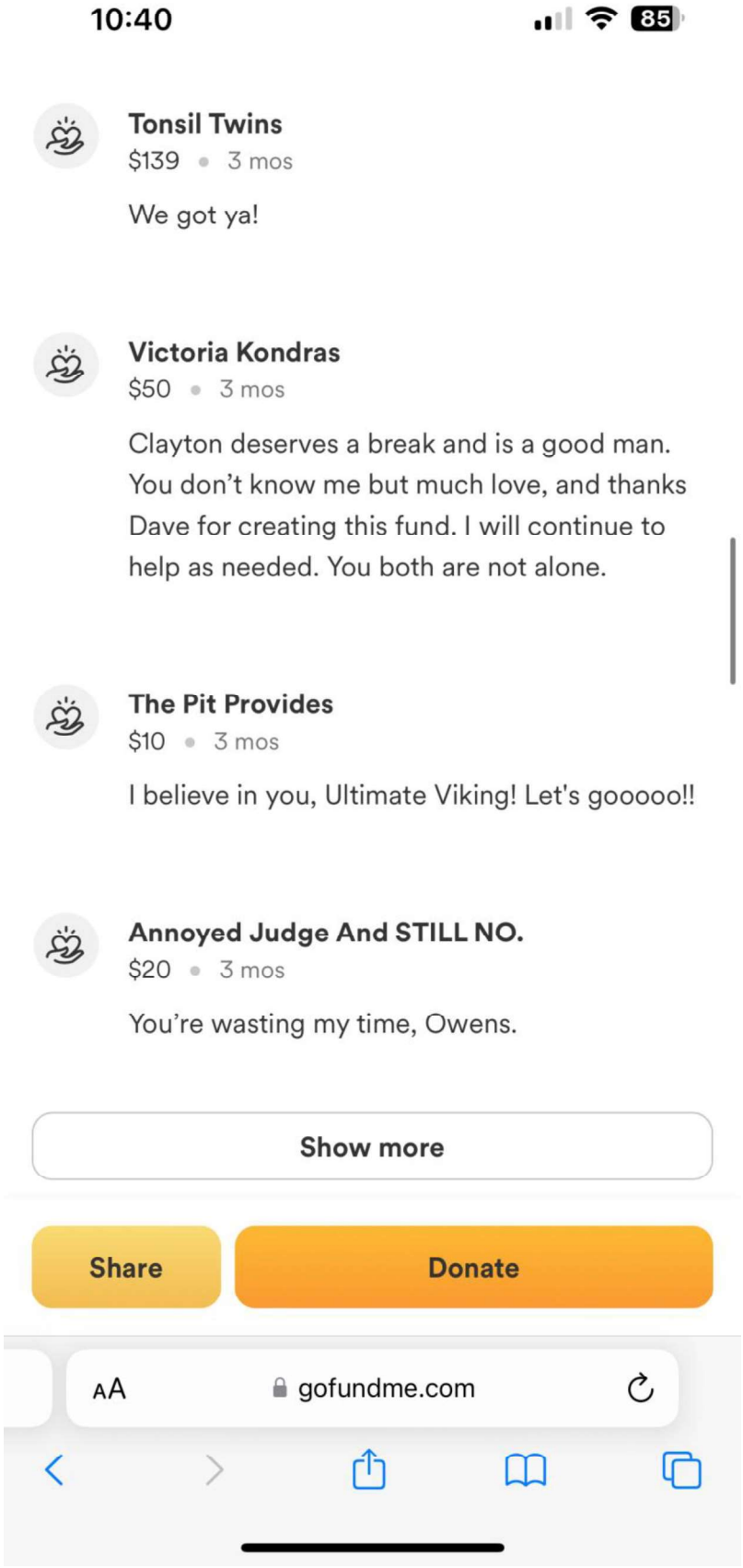
We got ya!

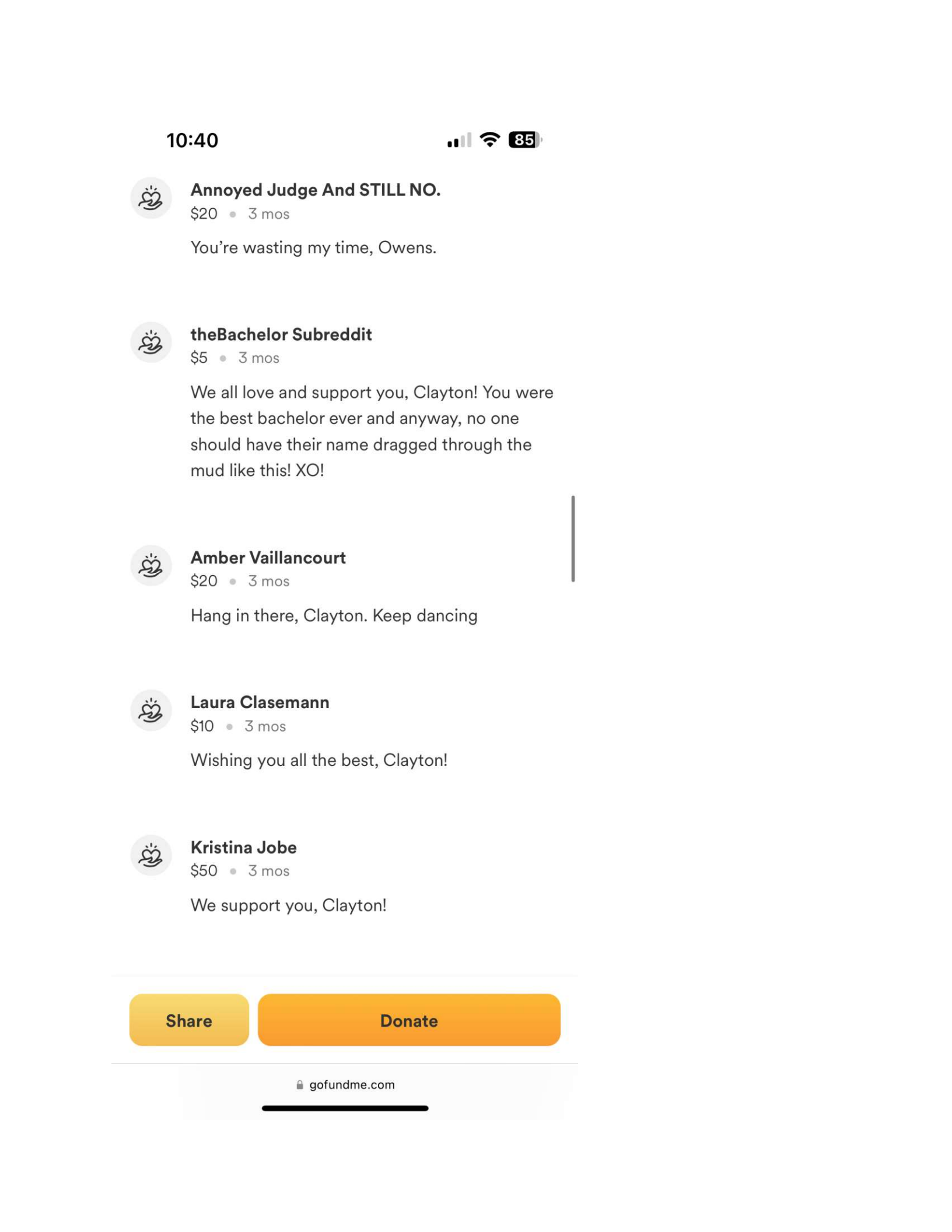
Victoria Kondras
$50 • 3 mos

Clayton deserves a break and is a good man. You don't know me but much love, and thanks Dave for creating this fund. I will continue to help as needed. You both are not alone.

Share Donate

gofundme.com


10:40
85
Tonsil Twins
$139 • 3 mos
We got ya!
Victoria Kondras
$50 • 3 mos
Clayton deserves a break and is a good man. You don't know me but much love, and thanks Dave for creating this fund. I will continue to help as needed. You both are not alone.
The Pit Provides
$10 • 3 mos
I believe in you, Ultimate Viking! Let's gooooo!!
Annoyed Judge And STILL NO.
$20 • 3 mos
You're wasting my time, Owens.
Show more
Share
Donate
AA
gofundme.com


10:40
85
Annoyed Judge And STILL NO.
$20 • 3 mos
You're wasting my time, Owens.
theBachelor Subreddit
$5 • 3 mos
We all love and support you, Clayton! You were the best bachelor ever and anyway, no one should have their name dragged through the mud like this! XO!
Amber Vaillancourt
$20 • 3 mos
Hang in there, Clayton. Keep dancing
Laura Clasemann
$10 • 3 mos
Wishing you all the best, Clayton!
Kristina Jobe
$50 • 3 mos
We support you, Clayton!
Share
Donate
gofundme.com

10:40 85

aimee rhoden
$30 • 3 mos

I support Clayton in fighting against the harassment he has endured. I am donating from a country that does not have free speech and I fully support Dave Neal who has also become a victim in all of this. Every podcaster should be alarmed at this... Read more

ulooksexcinur courtglasses
$5 • 3 mos

tbh the whole fit was a snack

Who's your Daddy?
$10 • 3 mos

This is crazier than a Lifetime movie! Hope that truth prevails!

Blowie Bebes
$25 • 3 mos

Clayton for the win. Shut Laura M. Owens down.

The Pit

Share Donate

gofundme.com

10:40 85

Who's your Daddy?
$10 • 3 mos

This is crazier than a Lifetime movie! Hope that truth prevails!

Blowie Bebes
$25 • 3 mos

Clayton for the win. Shut Laura M. Owens down.

The Pit
$5 • 3 mos

Good job, Clayton

Pheetal D Ennay
$20 • 3 mos

You got this Clayton! They'll never find me!

Show more

October 24th, 2023 • Other

Share Donate

gofundme.com

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/25/2024 10:21:57 AM
Filing ID 17241618

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, and **CLAYTON ECHARD,** Respondent,	Case No.: **FC2023-052114** **REPLY TO PETITIONER'S RESPONSE TO MOTION FOR SANCTIONS PURSUANT TO RULE 26** (Assigned to The Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through undersigned counsel, hereby replies to Petitioner's Response to Motion for Sanctions Pursuant to Rule 26. Petitioner *continues* to cause Respondent to incur unnecessary attorney's fees and costs delaying discovery.

The very crux of this frivolous litigation is easily resolved by Petitioner disclosing nonconfidential and uncontroversial evidence of her claimed "*miscarriage*" as well as the statutorily required fetal death certificate affirming the same. That Petitioner continues to refuse to provide this easily obtainable evidence (*after* she invoked Rule 2) begs the question that this

entire pregnancy narrative was nothing more than a fraudulent ruse to coerce Respondent into dating Petitioner.

To the extent applicable, Respondent incorporates all his pending filings. As and for his Reply, Respondent states as follows:

1. **The requirements of Rule 9(c) have been met and/or were impossible to meet due to Petitioner's refusal to acknowledge Respondent could not have made her pregnant**.

As fully detailed in Respondent's *Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support With Prejudice* (filed January 3, 2024), Respondent clearly informed Petitioner in writing that she could not be pregnant by him as they only had oral sex. Respondent even offered to meet in person with Petitioner (with witnesses present in light of her concerning behavior) to discuss these rudimentary facts. Petitioner refused to meet with him if he did not agree to her bizarre request to date and "*explore intimacy*" with her (*see* Exhibit 2, Respondent's *Response/Objection to Petitioner's Motion for Confidentiality and Preliminary Protective Order*).

Petitioner bringing this *entire* action knowing that she was not and could not be pregnant by Respondent is the conduct that violates Rule 26(b). That Petitioner is now claiming that she was somehow not given notice of her sanctionable conduct is patently absurd. As conveyed to her directly by Respondent, through Respondent's granted Injunction Against Harassment (CV2023-053952), through three (3) paternity tests and through counsel, Petitioner's filing was based on fiction. This is not an instance where Petitioner may have mistakenly alleged something that needed to be corrected through an amended filing. This is a uniquely disturbing

case where Petitioner expended judicial resources to fabricate a pregnancy narrative to force Respondent into a relationship with her, invited media attention, and is now desperately grasping at procedural straws to evade providing simple and uncontroversial disclosure like a government certificate confirming the alleged miscarriage.

2. **All of Petitioner's filings arguably violate Rule 26(b).** Petitioner's underlying Petition to Establish was filed without merit and for the sole purpose of coercing Respondent into dating Petitioner, as Petitioner was not and could not have been pregnant by Respondent after oral sex. Without belaboring the point, every single filing in this action since by Petitioner has been presented for an "*improper purpose[], such as to harass, cause unnecessary delay, or needlessly increase the costs of litigation*," includes claims that are frivolous and unwarranted by existing law, is entirely lacking in evidentiary support, and contains factual contentions that are unwarranted based on the evidence. *See* Rule 26(b) (1) – (4). *See also* Respondent's *Motion for Sanctions Pursuant to Rule 26(b).* As has been the crux of Respondent's filings, Petitioner **could not have been pregnant by Respondent** as they did not have sexual intercourse and she has provided no verifiable medical evidence to support her claims, ostensibly because none exists. (Notably, Petitioner again reasserts in her unverified Response that she was pregnant with "*twins*" despite providing *no evidence to support this claim*, other than a sonogram stolen from a seven (7) year old YouTube video and positive hCG tests, which are discussed below).

Put simply, Petitioner's filings are predicated on bad faith and contain allegations that cannot be supported by verifiable medical evidence that complies with Rule 2. That Petitioner now claims she has "witnesses" to support her claims that allegedly "fear coming forward" is illogical and irrelevant. All Petitioner needs to do is sign basic HIPAA forms to allow

Respondent to obtain her medical records and sign the form provided by Respondent to permit Arizona Vital Records to release a fetal death certificate to confirm twin fetuses miscarried. Petitioner's refusal to follow basic procedural Rules for the litigation *she* initiated is the sole reason this litigation continues. Petitioner cannot now claim that discovery is "*ongoing*" while simultaneously failing to comply with *any* discovery (including a willful failure to appear at a properly noticed deposition). Sanctions consistent with Rule 26(c) are clearly warranted and necessary.

3. **Petitioner wanting to be pregnant and being pregnant are two (2) different things.** Despite her repeated assertions, positive hCG tests are not verifiable medical evidence of pregnancy. (Parenthetically, per the Office on Women's Health, a blood test, which Petitioner ostensibly never underwent, is the best way for a doctor to confirm pregnancy).[1] Causes other than pregnancy can trigger false positives for hCG, including fertility treatments and various medications (especially those associated with epilepsy and infertility)[2] (*see also* **Exhibit 1**). Moreover, according to the American Pregnancy Association, the presence of hCG is only a "*sign*" of pregnancy. Ultimately, that Petitioner was ostensibly able to produce a positive urine HCG test is not conclusive because, to date, Petitioner has provided no Rule 49 disclosure to support her claims that she was pregnant by Respondent, pregnant with twins, pregnant at "*24 weeks*" on November 2, 2023, pregnant with a boy and a girl, due on "*February 14, 2024*," being treated for a "*high risk*" pregnancy by "*Dr. Makhoul"* and "*Dr. Higley*" or

[1] https://www.womenshealth.gov/a-z-topics/pregnancy-tests.

[2] *See generally Id.; https://health.clevelandclinic.org/false-positive-pregnancy-test; https://www.clearblue.com/pregnancy-tests/false-positive-results#cause-false-positive.* Further, Petitioner testified under oath that she was being treated for a high-risk pregnancy by Dr. Higley at Women's Care, which provides fertility treatments (*see https://www.womenscareobgyn.com/services*).

that she ultimately had a miscarriage. Petitioner's hCG tests prove nothing, and her reliance on them when she could provide simple and basic evidence to dissolve the claim that she wrongfully filed this action begs many questions about her credibility and motivations.

4. **Petitioner's behavior in this litigation is unreasonable and predicated on bad faith, such that Respondent should be entitled to his reasonable attorney's fees and costs pursuant to A.R.S. § 25-324.** Petitioner's baseless allegations that Respondent is using the Court as a "publicity stunt" and that he is *leaking information* serve no purpose other than to deflect from her own culpable actions. As detailed extensively in Respondent's *Response/Objection to Petitioner's Motion for Confidentiality and Preliminary Protective Order* (filed 1/19/24), Petitioner initiated this action, reached out to the media, publicly shared a Dropbox of her personal "medical" information, and *continues* to harass/sue media personalities who do not share her "side" of the story. Respondent has had to come forward to respond to Petitioner's public claims to protect his image and reputation and to rectify the damage she has done.

Rather than comply with simple discovery requests (or provide even an *iota* of Rule 49 disclosure), willfully ignore Deposition Notices, continues to file meritless motions and force Respondent back into Court. Respondent has had to rely on community support to defend himself against Petitioner's meritless claims and to prevent her from making another TEDx talk to claim that she was somehow "*cyberbullied*" into a miscarriage. Respondent continues to incur significant attorney's fees and costs because Petitioner's unreasonable conduct. As such, he should be awarded his reasonable costs and fees in having to file this Reply consistent with A.R.S. § 25-324(A).

5. **This entire action by Petitioner is predicated on fraud upon the Court**. Petitioner continues to seek out media attention and exhaust all her procedural remedies to evade basic discovery and disclosure obligations. Perhaps if Petitioner provided the statutorily required fetal death certificate and verifiable medical records to support that she was *ever* pregnant with twins, she would look less like, as stated by Petitioner's attorney, "a crazed woman who fabricated a pregnancy."

WHEREFORE, Respondent respectfully requests that this Court enter the following Orders:

A. Grant *Respondent's Motion for Sanctions Pursuant to Rule 26(b)*;

B. Impose appropriate sanctions against Petitioner, including but not limited to awarding Respondent his reasonable attorney's fees and costs;

C. Award Respondent his reasonable attorney's fees and costs incurred due to Petitioner's unreasonableness pursuant to A.R.S. § 25-324;

D. For such other and further relief as this Court deems just and proper under these circumstances.

RESPECTFULLY SUBMITTED this 25th day of January, 2024.

WOODNICK LAW, PLLC



Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
This 25th day of January, 2024 with:

Clerk of Court
Maricopa County Superior Court

COPY of the foregoing document
delivered/emailed this 25th day of January, 2024, to:

The Honorable Julie Mata
Maricopa County Superior Court

Cory Keith
The Valley Law Group, PLLC
3101 N. Central Ave, Ste 1470
Pheonix, AZ 85012
cory@thevalleylawgroup.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Reply To Petitioner's Response To Motion For Sanctions Pursuant To Rule 26* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

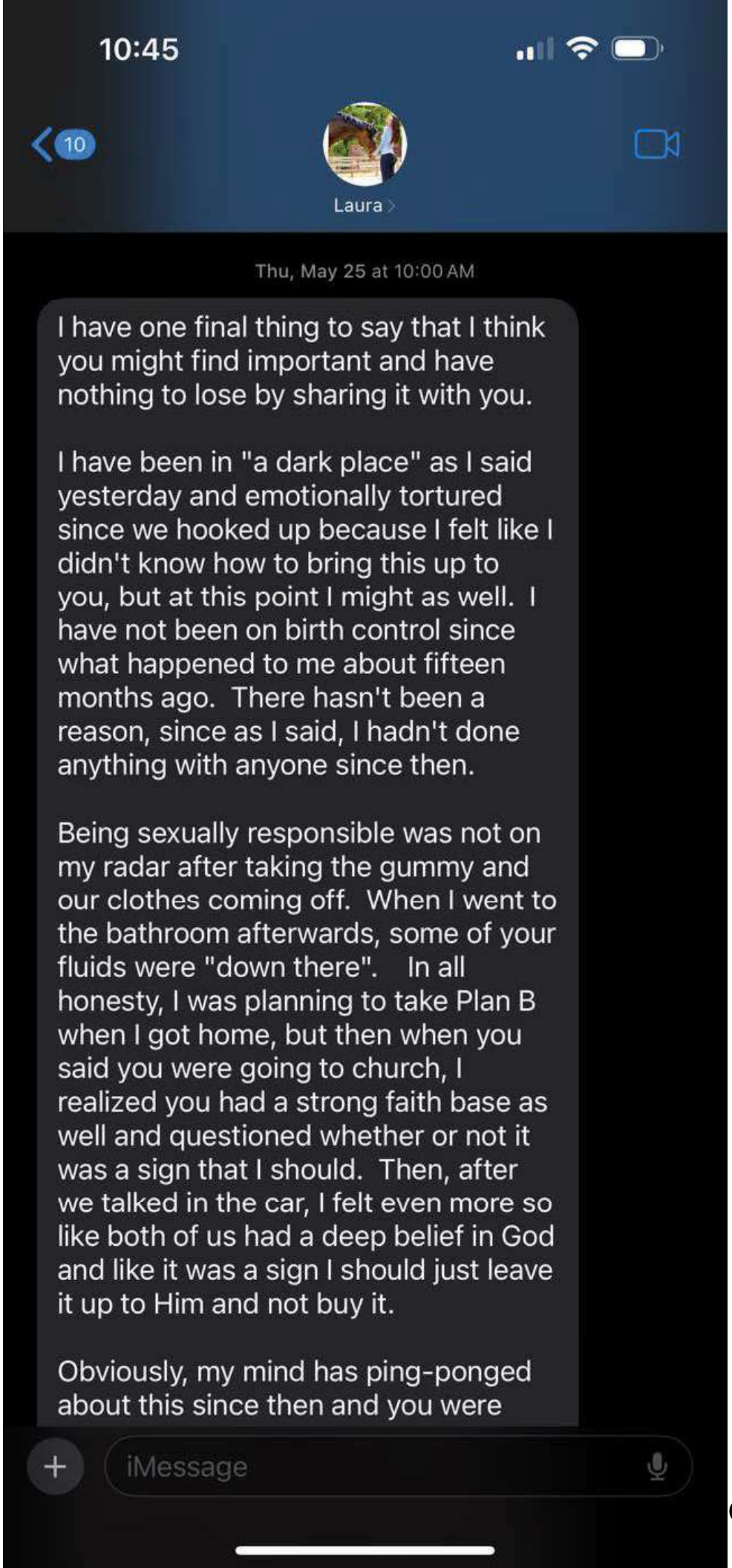
Clayton Echard (Jan 25, 2024 08:27 MST)

CLAYTON ECHARD

01/25/2024

Date

EXHIBIT “1”


10:45
10
Laura
Thu, May 25 at 10:00 AM
I have one final thing to say that I think you might find important and have nothing to lose by sharing it with you.
I have been in "a dark place" as I said yesterday and emotionally tortured since we hooked up because I felt like I didn't know how to bring this up to you, but at this point I might as well. I have not been on birth control since what happened to me about fifteen months ago. There hasn't been a reason, since as I said, I hadn't done anything with anyone since then.
Being sexually responsible was not on my radar after taking the gummy and our clothes coming off. When I went to the bathroom afterwards, some of your fluids were "down there". In all honesty, I was planning to take Plan B when I got home, but then when you said you were going to church, I realized you had a strong faith base as well and questioned whether or not it was a sign that I should. Then, after we talked in the car, I felt even more so like both of us had a deep belief in God and like it was a sign I should just leave it up to Him and not buy it.
Obviously, my mind has ping-ponged about this since then and you were
iMessage

CE0013

10:45

10



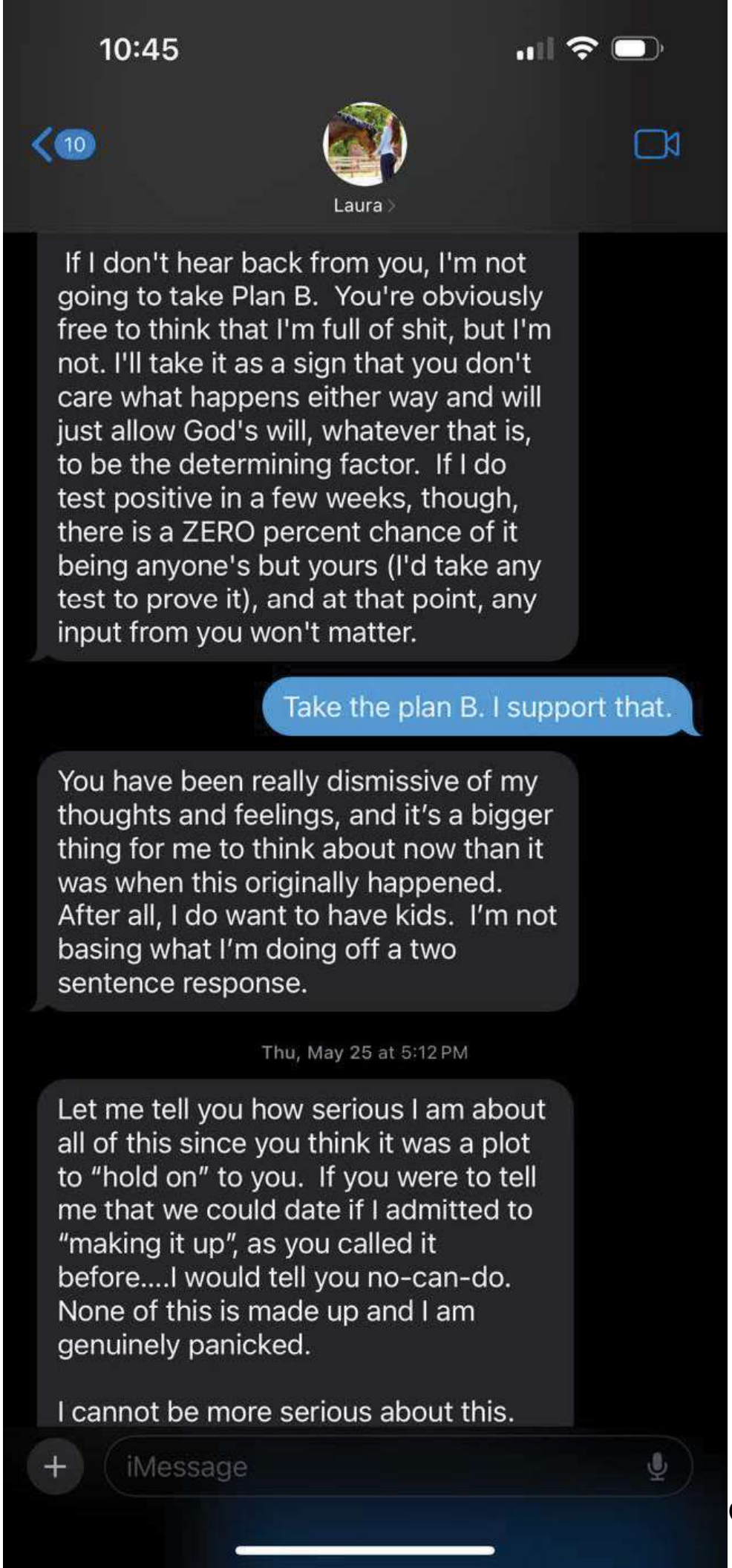
Laura

Obviously, my mind has ping-ponged about this since then and you were emphatic about me not bringing up anything that wasn't professional or friend-like, of which this situation is neither. I desperately wanted to figure out how to bring it up to you and thought that if we could just get together and talk openly, we could, but you didn't want that until a deal closed, which would be too late to take it. I wanted to ask you how you felt about me taking it from a religious standpoint, but we didn't get a chance to. Clearly, I was factoring in things that you weren't that made me panic and led to a total breakdown in communication.

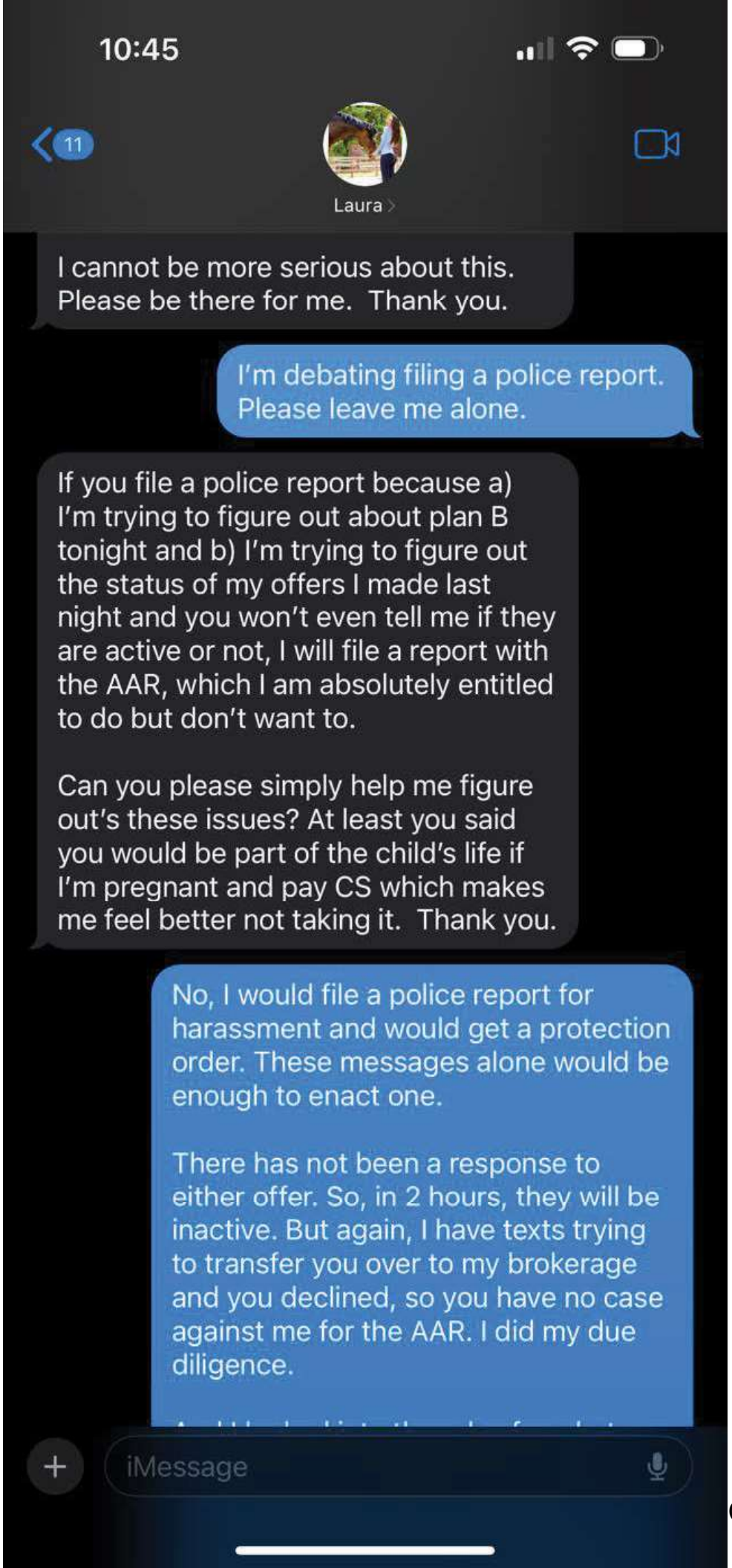
My podcast had a fertility-test kit as a sponsor, and so yes, I know I am fertile. At this point, from my overwhelming research on Plan B since Sunday, it's most effective three days after but can still work five days out, meaning this is the last day I could take it and have a hope of it working if it needs to. If you have any thoughts about this, I'm open to hearing you out if and only if you are kind and respectful. This has been extremely stressful on me.

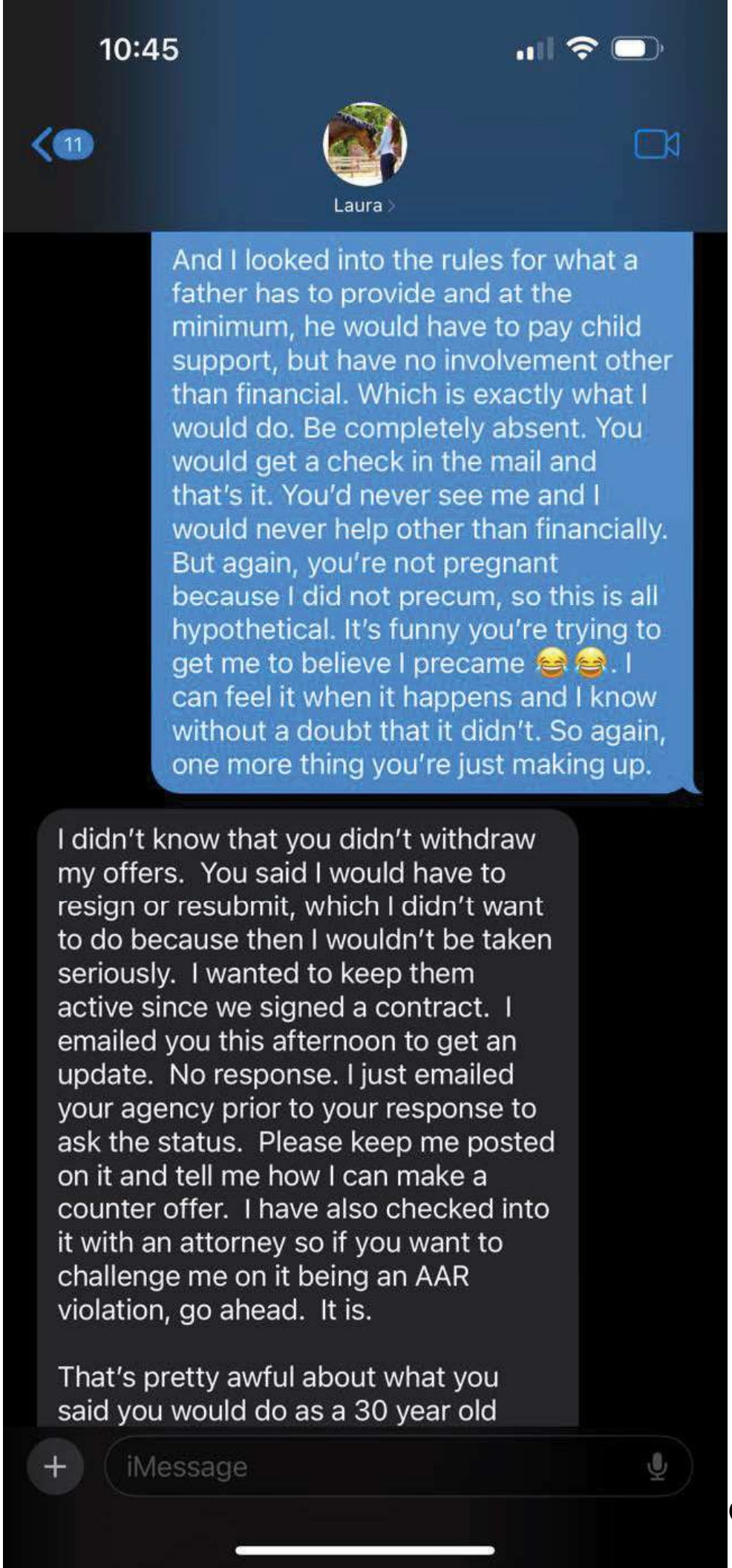
If I don't hear back from you, I'm not going to take Plan B. You're obviously free to think that I'm full of shit, but I'm not. I'll take it as a sign that you don't

iMessage


10:45
10
Laura
If I don't hear back from you, I'm not going to take Plan B. You're obviously free to think that I'm full of shit, but I'm not. I'll take it as a sign that you don't care what happens either way and will just allow God's will, whatever that is, to be the determining factor. If I do test positive in a few weeks, though, there is a ZERO percent chance of it being anyone's but yours (I'd take any test to prove it), and at that point, any input from you won't matter.
Take the plan B. I support that.
You have been really dismissive of my thoughts and feelings, and it's a bigger thing for me to think about now than it was when this originally happened. After all, I do want to have kids. I'm not basing what I'm doing off a two sentence response.
Thu, May 25 at 5:12 PM
Let me tell you how serious I am about all of this since you think it was a plot to "hold on" to you. If you were to tell me that we could date if I admitted to "making it up", as you called it before....I would tell you no-can-do. None of this is made up and I am genuinely panicked.
I cannot be more serious about this.
iMessage

CE0015


10:45
11
Laura
I cannot be more serious about this. Please be there for me. Thank you.
I'm debating filing a police report. Please leave me alone.
If you file a police report because a) I'm trying to figure out about plan B tonight and b) I'm trying to figure out the status of my offers I made last night and you won't even tell me if they are active or not, I will file a report with the AAR, which I am absolutely entitled to do but don't want to.
Can you please simply help me figure out's these issues? At least you said you would be part of the child's life if I'm pregnant and pay CS which makes me feel better not taking it. Thank you.
No, I would file a police report for harassment and would get a protection order. These messages alone would be enough to enact one.
There has not been a response to either offer. So, in 2 hours, they will be inactive. But again, I have texts trying to transfer you over to my brokerage and you declined, so you have no case against me for the AAR. I did my due diligence.
iMessage


10:45
11
Laura
And I looked into the rules for what a father has to provide and at the minimum, he would have to pay child support, but have no involvement other than financial. Which is exactly what I would do. Be completely absent. You would get a check in the mail and that's it. You'd never see me and I would never help other than financially. But again, you're not pregnant because I did not precum, so this is all hypothetical. It's funny you're trying to get me to believe I precame 😂😂. I can feel it when it happens and I know without a doubt that it didn't. So again, one more thing you're just making up.
I didn't know that you didn't withdraw my offers. You said I would have to resign or resubmit, which I didn't want to do because then I wouldn't be taken seriously. I wanted to keep them active since we signed a contract. I emailed you this afternoon to get an update. No response. I just emailed your agency prior to your response to ask the status. Please keep me posted on it and tell me how I can make a counter offer. I have also checked into it with an attorney so if you want to challenge me on it being an AAR violation, go ahead. It is.
That's pretty awful about what you said you would do as a 30 year old
iMessage

CE0017

10:46

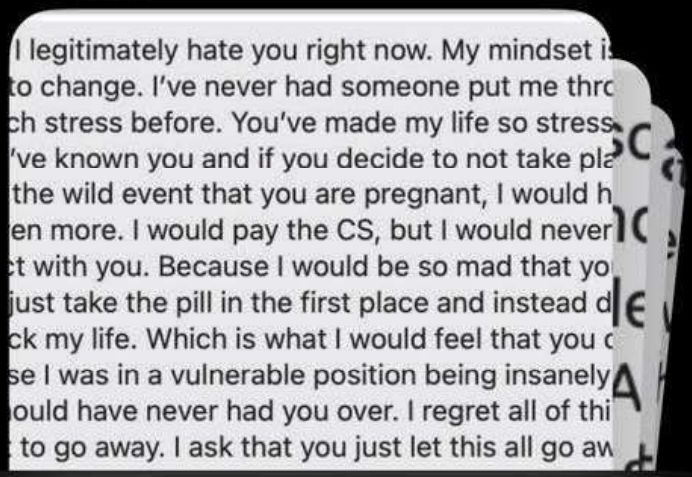
11

Laura

That's pretty awful about what you said you would do as a 30 year old man to an innocent child, especially since I know your reputation is important to you. Mine is too and I would be a great mom. All I have asked you for is kindness as I figure it out tonight. And it was cum of some sort. I don't know the difference between types of cum, but I know what I felt years ago when I was on the pill and my ex came inside me and it felt like that to me. I know the what I felt in and around my vagina, which would be the ultimate landing spot for it. Don't try to portray me as some nut job just because it makes you feel better.

I understand that we are both fired up because this is a highly emotional topic, but this doesn't need to be a nasty fight. We can talk civilly about this.

4 Photos



iMessage

CE0018

10:46

11



Laura

I would not do it unless you filed something against me, but if anyone had right to file for an order of protection/had reason for worry, it would be me. You are being nothing but cruel. You were saying that if I said I made this all up, fine, but if I said I actually was worried about being pregnant, you would block me. And then you're telling me you would be this horrible father to try to convince me to not take Plan B. All while you're still technically my realtor for another 45 min and I doubt you'd even tell me if my offer was accepted.

I watched about half an hour of clips today from The Bachelor for the first time. I didn't know that you had such a cold side until today and was truly stunned at what I saw and experienced firsthand. You can turn this around and be nice. If you saw my message, I said I likely have until tomorrow if you want to sleep on it. I'm not taking it unless it is for good reason and don't even have it to trade tonight. Does that sound reasonable?

Thu, May 25 at 8:37 PM

And can you also please tell me what happened with my offers? I see that N 76th is sale pending at $425k....couldn't that be our offer? If

iMessage

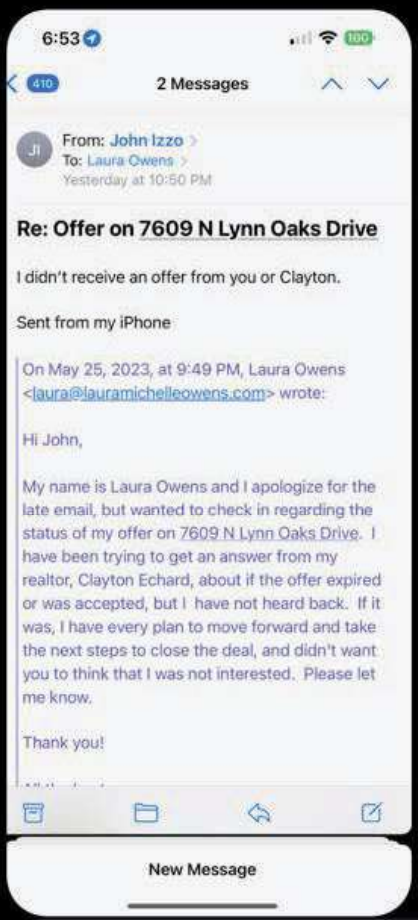
10:46

11

Laura

I'll wait until 9:30 to be sure because I don't want to email them if it makes you look bad, but the EMD lender is on me now to let him know if he needs to send money. I want to close on these houses if I got them and need to know how to do that if you're not willing to help. I emailed your agency a few hours ago and have not gotten a response.

Fri, May 26 at 6:54 AM



Can you please explain what he's talking about? You never sent in the

iMessage

CE0020

10:46

11



Laura

Fri, May 26 at 9:18 AM

Clayton, if you can't answer me on 7609 N Lynn Oaks, please connect me with your broker to ask him what happened and what the status is.

Fri, May 26 at 3:55 PM

You might want to check your email regarding what I was told about Saturday night. Told you I wasn't crazy. No, I have not taken Plan B. Not responding won't change whether or not I'm pregnant and there are more public avenues to alert you to it if I am, which I don't want to use. I would rather deal with it just between us.

Re. The properties...I don't even know what to say, honestly. I feel like this whole week has been a nonstop panic attack. You are so damn talented and smart with real estate, so it crushes me to see that you self-sabotaged here when you could have done $1.124m in deals in a week. I've had everything ready to go and you dropped the ball.

I don't want to see this happen to someone else and will report you to the AAR and your company unless you give me an explanation as to why you a) didn't submit an offer on 7609 N Lynn Oaks after you claimed you did, b) didn't tell me that you had spoken to

iMessage

CE0021

10:46

11



Laura

b) didn't tell me that you had spoken to the realtor on N 76th Street about being a backup, c) left me in the lurch about whether or not you had withdrawn my offers or were representing me in the first place, and d) refused to respond to my requests for your broker's info so I could get on top of these days.

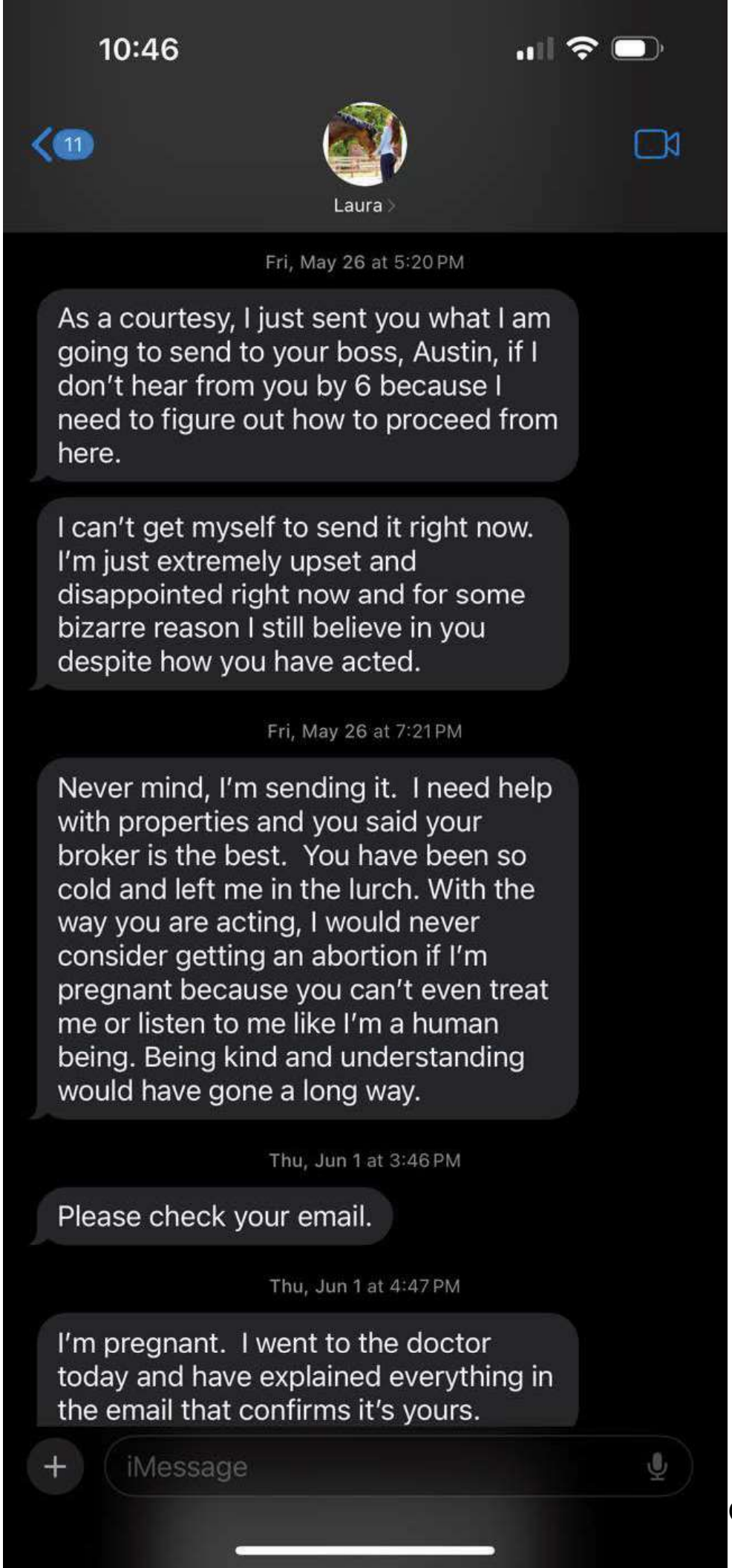
I made offers based on your input and now I don't know even know what to do. I think I will pull out if I am going to be repped by the seller's agent and need to make a decision right now. This is just all too much.

The last thing I want to do is make you look bad and report you as a realtor, but I would be a bad human not to try to help others who want their dream home in case you decide to sabotage them as well. You tried to work against me. I know you are going through a tough time and I will listen if you want to explain why you acted as you did because despite your personal issues with me, I was owed duties from my realtor that were not provided. If you choose to ignore me, that's fine, but know that I will be taking action.

Fri, May 26 at 5:20 PM

As a courtesy, I just sent you what I am going to send to your boss. Austin, if I

iMessage

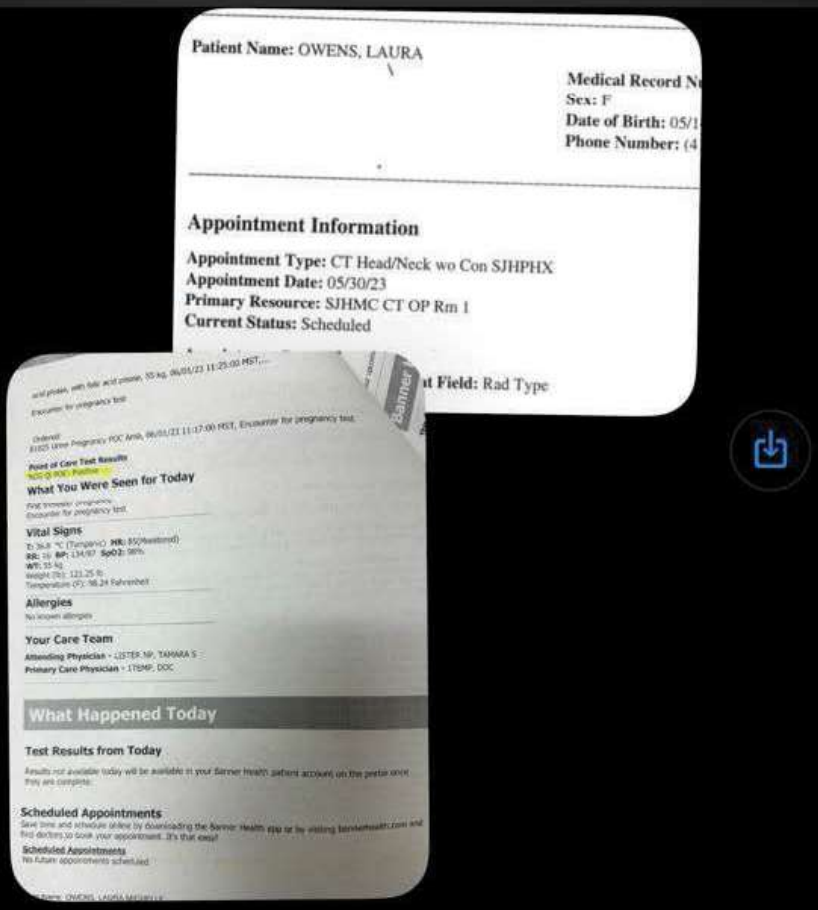

10:46
11
Laura
Fri, May 26 at 5:20 PM
As a courtesy, I just sent you what I am going to send to your boss, Austin, if I don't hear from you by 6 because I need to figure out how to proceed from here.
I can't get myself to send it right now. I'm just extremely upset and disappointed right now and for some bizarre reason I still believe in you despite how you have acted.
Fri, May 26 at 7:21 PM
Never mind, I'm sending it. I need help with properties and you said your broker is the best. You have been so cold and left me in the lurch. With the way you are acting, I would never consider getting an abortion if I'm pregnant because you can't even treat me or listen to me like I'm a human being. Being kind and understanding would have gone a long way.
Thu, Jun 1 at 3:46 PM
Please check your email.
Thu, Jun 1 at 4:47 PM
I'm pregnant. I went to the doctor today and have explained everything in the email that confirms it's yours.
iMessage

CE0023

10:46

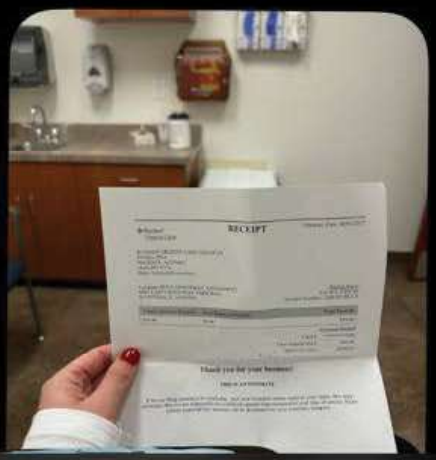
11

Laura



As you can see, I wasn't two days ago, but was today.

Thu, Jun 1 at 9:18 PM



iMessage

CE0024

Clerk of the Superior Court
*** Electronically Filed ***
C. Brown, Deputy
1/26/2024 11:19:36 AM
Filing ID 17250195

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
Office@WoodnickLaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No.: FC2023-052114 **AMENDED RESPONSE TO PETITION TO ESTABLISH PATERNITY** (Assigned to the Honorable Julie Mata)

Respondent, CLAYTON ECHARD, by and through undersigned counsel, hereby submits his **Amended** Response to Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support and states the following:

I. **BACKGROUND**

1. Petitioner has not provided any verifiable scientific evidence that she is pregnant, and all DNA tests have come back showing "little to no fetal DNA." The testing company, Ravgen Inc, has indicated that it will not release records of the testing without a Court Order.

2. Petitioner filed her Petition only *after* Respondent indicated that he did not want to have <u>any</u> relationship with her, romantic or otherwise, after she performed oral sex on him on May 20, 2023.

3. Prior to and following her filing, Petitioner repeatedly threatened to go to the media about her "pregnancy" and sent Respondent over 500 messages from different phone numbers and email accounts. Judge Gialketsis found these messages and Petitioner's conduct to constitute harassment when she granted Respondent's Injunction Against Harassment on November 2, 2023 (Exhibit 1).

4. A sampling of Petitioner's efforts to force Respondent into a relationship are documented, in part, below:

a. Petitioner drafted a "contract" for Respondent to sign that promised "*for a period of one week, while determining the best court [sic] of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with "intention" […] There is no obligation to engage in intercourse if either Party is uncomfortable with the act.*" (Exhibit 2 – *Initial Response Exhibit 1*)

b. 6/28/23: "*I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for one another […] I need to know your decision tonight because I am getting rid of the abortion pills it it's a no or if I don't hear back from you.*" (Exhibit 3).

c. Petitioner threatened to post on her public Instagram account that she was pregnant with Respondent's children if he did not "unblock" her and

said "*if I can't get you to do it, then maybe the public can convince you to.*" (Exhibit 4)

d. Petitioner contacted Respondent's Father, ostensibly to convince him to force his son, Respondent, to speak with her ("*I have not heard back from Clayton and presume he has still blocked me.*") (Exhibit 5).

5. While this Family case was pending, Petitioner posted an "anonymous" blog post on Medium.com (which she later deleted) (Exhibit 6), contacted the news media, and made multiple postings on Reddit.com claiming that she was pregnant with Respondent's children and including a Dropbox of doctored "medical" documents. (Exhibit 7).

6. Despite two (2) fetal DNA tests indicating "little to no fetal DNA" (and one (1) test lost in transit), Petitioner posted another Medium.com article identifying herself as the "anonymous woman" on December 8, 2023. In the article, Petitioner continues to maintain she is pregnant with twins by Respondent. (Exhibit 8).

II. RESPONSE TO PETITIONER'S PETITION TO ESTABLISH

7. Respondent affirmatively alleges that Petitioner is fabricating pregnancy, as well as refusing a paternity test.

8. Respondent affirmatively alleges that neither pregnancy nor paternity has been proven.

9. Respondent contests that Petitioner is pregnant by him and therefore venue is not relevant.

10. Respondent contests that Petitioner is pregnant by him and since Petitioner is unwilling to participate in a **fourth** paternity test, paternity and the jurisdiction for determining

its validity are unable to be proven/determined.

11. Respondent contests that Petitioner is pregnant by him and affirmatively alleges that Petitioner has neither proven pregnancy nor Respondent's paternity.

12. Respondent contests that Petitioner is pregnant by him and therefore there is no legal parenthood to establish. Respondent alleges that only oral sex was performed between the parties. Respondent further alleges that despite multiple requests to do so, Petitioner has refused to take a paternity test. Petitioner responded to Respondent's request via email stating that she would only take a paternity test if the parties were to date exclusively **(Exhibit 1).** Petitioner has threatened that she will write defamatory comments about this matter and release it to the press **(Exhibit 1)**. Petitioner has not established proof of paternity. Upon information and belief, Petitioner suffers from mental health issues, and has caused Respondent to become concerned that she is stalking him.

13. Petitioner was not married at the time the minor child(ren) were born or conceived or at least 10 months before minor child(ren) were born or conceived.

14. Respondent contests that Petitioner is pregnant by him and therefore legal decision-making and parenting time are not relevant.

15. Respondent does not have any information regarding any court action in this state involving the minor child(ren) in question that could affect this case including court cases for enforcement and relating to domestic violence, protective orders, termination of parental rights and adoptions.

16. Respondent does not know a person other than Petitioner who has physical custody or who claims legal decision-making (legal custody) or parenting time rights to any of

the minor children in question.

17. Respondent contests that Petitioner is pregnant by him and therefore unreimbursed medical expenses incurred by Petitioner are not relevant.

18. Respondent contests that Petitioner is pregnant by him and therefore unreimbursed other expenses are not relevant.

19. Respondent contests that Petitioner is pregnant by him and therefore the Parent Information Program is not relevant.

20. Respondent affirmatively alleges that domestic violence has not occurred in this relationship.

21. Respondent affirmatively alleges that to his knowledge, neither party has been convicted for a drug offense or driving under the influence of drugs or alcohol in the last twelve (12) months.

22. Respondent contests that Petitioner is pregnant by him and therefore child support orders for either party are not relevant.

23. Respondent denies any allegations not specifically admitted herein.

24. Respondent is entitled to an adjudication of non-paternity. Petitioner's relentless and harassing behavior through the media will only continue if this matter is not resolved by this Court finding Respondent is <u>not</u> the father of any alleged (and believed to be fictitious) children.

25. Rule 26 sanctions are appropriate. Petitioner has violated Rule 26(b), *Arizona Rules of Family Law Procedure*, and sanctions under Rule 26(c) are appropriate. Petitioner filed this action for the purposes of harassing Respondent and forcing him to

communicate with her. Despite Respondent's repeated requests, Petitioner has provided Respondent with no verified scientific evidence proving she is or was pregnant. Further, *after* filing her Petition, Petitioner filed a "Motion to Communicate," threatening to take her "pregnancy" to the media if Respondent did not communicate with her. This Motion was denied. *See* Petitioner's Motion to Communicate, filed August 8, 2023. Petitioner also filed a "Motion for Contempt," which this Court also denied, which requested this Court hold Respondent in contempt for not communicating with her. *See* Petitioner's Motion for Contempt filed August 23, 2023 (also denied by this Court). As such, Petitioner's Petition lacks evidentiary support, is being presented for the improper purpose, to harass Respondent into communicating with her, and to cause Respondent to incur fees.

26. The requirement of Rule 9(c) have been met in so far as there has been excessive communication regarding these issues, not limited to Petitioner's recent Medium article and the 500+ texts and emails that predicate Judge Gialketsis' granting of the Injunction Against Harassment.

27. Respondent is entitled to his reasonable attorney's fees and costs incurred based on Petitioner's unreasonableness pursuant to A.R.S. § 25-324. Petitioner initiated this filing based on a pregnancy that could not have occurred from oral sex. Despite this, Petitioner repeatedly harassed Respondent, filed numerous bad faith pleadings with this Court in an effort to force Respondent to communicate with her, went to the media when Respondent would not unblock her, and fabricated medical documents. Petitioner's behavior is the very definition of unreasonableness.

WHEREFORE, based upon all of the foregoing, Respondent respectfully requests the

Court enter the following Orders:

A. Issue an order declaring that Respondent is not the natural father of ~~the minor children;~~ **any children born to Petitioner;**

~~**B. Order that both parties be ordered to submit to such blood and tissue tests as may be necessary by this Court to establish paternity, and Petitioner be ordered to pay all costs and expenses of this lawsuit under Arizona law, A.R.S. 25-809.**~~

C. Issue an Order compelling Ravgen Inc produce all records and documents related to the fetal DNA testing in this matter;

D. That this Court sanction Petitioner pursuant to Rule 26;

E. That this Court award Respondent his reasonable attorney's fees and costs based on Petitioner's unreasonableness, pursuant to A.R.S. § 25-324;

~~**F. Enter appropriate orders regarding costs and attorneys' fees herein; and**~~

G. For such other and further relief as the Court deems just and proper under these circumstances.

RESPECTFULLY SUBMITTED this 26th day of January, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 25th day of January, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

Cory Keith
The Valley Law Group, PLLC
3101 N. Central Ave, Ste 1470
Pheonix, AZ 85012
cory@thevalleylawgroup.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Amended Response To Petition To Establish Paternity* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Jan 25, 2024 21:10 MST)

CLAYTON ECHARD

01/25/2024

Date

EXHIBIT “1”

COPY ELECTRONICALLY RECORDED

CLERK OF THE SUPERIOR COURT
FILED
11-2-2023 2:02 PM

C. Curley
DEPUTY CLERK

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY
Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032
Monday-Friday 8:00-5:00

Injunction Against Harassment

[ ] Amended Order

[ ] Sexual violence—no service fee

Case No. CV2023-053952

Court ORI No. AZ007035J

County Maricopa State AZ

PLAINTIFF

Clayton		Echard
First	Middle	Last

PLAINTIFF IDENTIFIERS

4/29/1993
Plaintiff's Date of Birth

And on behalf of any minor family member or other Protected Person listed below:

V.

DEFENDANT

Laura		Owens
First	Middle	Last

DEFENDANT IDENTIFIERS

SEX	RACE	DOB	HT	WT
Female	Unknown	5/14/1990	Unknown	Unknown
EYES	HAIR	***Arizona Prohibits Release of Social Security Numbers***		
Unknown	Unknown			
DRIVER'S LICENSE #		STATE	EXP DATE	
			1/1/1900	

[ ] Estimated Date of Birth

Defendant/Plaintiff Relationship: The Defendant and I are dating or have dated and have not had a romantic or sexual relationship.

Defendant's Address:
11440 N 69TH ST, Scottsdale, AZ 85254

CAUTION: [ ] Weapon Alleged in Petition

WARNINGS TO DEFENDANT: This injunction shall be enforced, even without registration, by the courts of any state, the District of Columbia, any U.S. Territory, and may be enforced by Tribal Lands (18 U.S.C. § 2265). Crossing state, territorial or tribal boundaries to violate this injunction may result in federal imprisonment (18 U.S.C. § 2262).
Only the Court, in writing, can change this injunction.

This order is effective for one year from date of service.

THE COURT HEREBY FINDS THAT:
It has jurisdiction over the parties and subject matter.
[ ] **Defendant received actual notice of this Hearing and had an opportunity to participate.**
THE COURT, finding reasonable evidence of harassment or that great or irreparable harm would result if this injunction is not granted before Defendant can be heard in opposition, and there are specific facts attesting to efforts to give notice to Defendant or there are reasons why notice should not be given, **HEREBY ORDERS:**

NO CRIMES. Defendant shall not commit any act of harassment (A.R.S. § 12-1809(T)) or sexual violence (A.R.S. § 23-371) against Plaintiff or Protected Persons.

[x] **NO CONTACT.** Defendant shall have no contact with **Plaintiff** except through attorneys, legal process, court hearings, and as checked: [ ] Phone [ ] Electronic (email, text, etc.) [ ] Mail [ ] Other:

THE COURT FURTHER ORDERS:
PROTECTED LOCATIONS. Defendant shall not go to or near Plaintiff's or other Protected Person's:

[x] Residence (confidential)
[ ] Workplace:
[ ] School:
[ ] Other:

[ ] **ARIZONA FIREARMS LAW.** Under Arizona Rules of Protective Order Procedure Rule 25(g), the court finds that Defendant poses a credible threat to the physical safety of Plaintiff or Protected Persons. Therefore, Defendant shall not possess, receive, or purchase firearms and shall surrender same within 24 hours of service to the Maricopa County Sheriff's Office or other local law enforcement agency.

OTHER ORDERS:
The Court finds reasonable evidence of harassment of the Plaintiff by the Defendant or that great or irreparable harm would result to the Plaintiff if the Injunction is not granted before the Defendant can be heard in opposition, and that there are specific facts attesting to the efforts to give notice to the Defendant or that there are reasons why notice should not be given. Defendant is not to have contact with Plaintiff or the protected party[ies] at any time by any means, including but not limited to any in-person, physical, verbal, nonverbal, telephonic (text, email, apps), internet (social media, instant messaging, apps) or third-party contact. Defendant shall not record by video or audio Plaintiff or the protected party[ies] using any device, including but not limited to cell phones, cameras or other recording devices. Defendant shall not approach Plaintiff or the protected party[ies] at their residence, workplace, school or vehicle. The Maricopa County Superior Court does not give specific distance instructions in its injunctive orders. However, Plaintiff and or protected party may make a report to law enforcement if Defendant is close enough to cause concern or make contact. Defendant shall not be near Plaintiff and/or any protected party. Defendant shall not approach Plaintiff or a protected party in public places.



11/2/2023		Cynthia Gialketsis
Date	Judicial Officer	Printed Name

WARNING: This is an official court order. If you disobey this order, you may be arrested and prosecuted for the crime of interfering with judicial proceedings and any other crime you may have committed in disobeying this order.

NOTICE: If you disagree with this injunction, you have the right to request a hearing, which will be held within 10 business days after your written request has been filed in the court that issued this injunction. Violations of this injunction should be reported to a law enforcement agency, not the court.

ADDITIONAL WARNINGS TO DEFENDANT: Nothing the plaintiff does can stop, change, or undo this Injunction without the court's written approval. You must appear in court to ask a judge to change (modify) or dismiss (quash) this Injunction.

EXHIBIT “2”

Laura Owens

Clayton,

I was going to ask if you wanted to read the article I wrote before submitting it to the Huffington Post, but I know you won't respond so I'll take it that I have your permission to send it in as is. Before I do that and prior to your work getting involved with withholding income for child support, I wanted to ask one last time about the agreement. **I added a few things to it that are in bold.** Here it is:

Version 4 - Relationship Non-Disclosure Ag...

I also contacted another abortion pill company who said we could still do it at this point if we wanted to. You haven't and aren't putting pressure on me to do that, but it is *really* important that we talk about this if you don't want to have the twins with me. Your behavior leads me to believe that would be your preference, so you need to say something if it is. I will not hold it against you whatsoever if you sign the agreement. If you don't, that's fine, but we are having them.

I just want to have a fresh start and remove all of this animosity from the picture. We need to be making smart decisions right now, not ones driven by emotions. Neither one of us wanted this, but it's happened, and we need to make smart choices. If I don't hear back, then fine, we can continue like this and I will submit my piece to Huff Post, but your unresponsiveness is getting you nowhere with me and will get you in trouble with the court.

Please simply consider the agreement with modifications. It is written entirely in your favor, not mine.

All the best,

Laura Owens
Nobody Told Me! | *Quartet Farms* | *TEDx talk*
Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604
Email lauraowens@nobodytoldmeshow.com

Laura Owens

Here are the changes:

IV. Terms of the agreement.

The Couple agrees that:

1. For a period of one week, while determining the best court of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with "intention", meaning with the goal of it turning into something long-lasting and meaningful. There is no obligation to engage in intercourse if either Party is uncomfortable with the act.

2. From the date that this agreement is signed until one week after, no action whatsoever will be taken in FC2023-052114 or in any family, civil, or criminal court case.

3. Party A and Party B agree to take a paternity test with the lab of Party A's choice, Ravgen, and will schedule it within 24 hours of when this agreement is signed.

4. After the paternity test results come back providing Party A to be the father of Party B's twins, then Party B will execute a HIPAA release for Party B to discuss the pregnancy with any of Party A's providers from the date of conception (May 20th) through the end of the pregnancy in February 2024.

5. If a joint decision is made to terminate the pregnancy, then Party A and Party B will stipulate to dismiss FC2023-052114 once the pregnancy is confirmed by a doctor to no longer be viable. Party B will pay Party A's legal fees to date.

6. During the one week period, if the decision is made to continue the pregnancy, then Party A and Party B will discuss what would make the best situation for the children, whether that be raising them together or apart. The goal would be to keep the case out of the court and to avoid accruing continued legal fees. FC2023-052114 will remain active until an agreement is made outside of court, then the parties will stipulate to dismiss it.

7. There is no obligation for the relationship to work out beyond the one weeks, however if it is apparent that this agreement was entered into for the wrong reasons, evidenced by abuse of any kind (verbal, emotional, or physical), it is null and void.

8. At the end of the one week period, provided the terms have been met, then Party A and Party B are forever barred from bringing charges against each other for any reason up to that date.

EXHIBIT “3”

Laura Owens June 28, 2023 at 8:11 PM

Having the baby if I don't hear back tonight.

To: Clayton Echard

I'm physically and emotionally exhausted from the pregnancy and all of this. I just need clarity as to what we are doing. I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for each other. I bring a lot to the table and feel like I could really make you a better person. Yes, I've called out your BS a lot, but it's because I know you are better than how you act sometimes. I get your anxiety because I've been there and truly believe in your mission despite the fact that you haven't shown me kindness when clearly I have been emotionally struggling through all of this.

I couldn't give a shit that you were The Bachelor and still know nothing about you other than the clips I saw of you with two girls when I was angry at you. I want to get to know you and be a great partner for you. I would feel exactly the same way if I was in this situation with any man; I need to care about someone and trust them to consider ending a human life when I want nothing more than to be a mom someday. Don't you understand that?

In regards to intimacy -- I know it's important to you and it is to me as well. If you think about it, having sex with me is the safest thing you can do at this point. I'm already pregnant and if we choose to go this route (and trust each other enough to have sex), then we are at the point where I would be taking abortion pills...so there's no risk. Also, under no circumstances would I have an abortion if you want to be on dating apps or seeing other women while we are figuring this out. I would want to date with intention.

I know what I bring to the table as a partner and I'm well aware that you don't want to become a father right now. It's a win-win situation for you, but a huge leap of faith for me. You haven't been trustworthy to this point, so I'm the one taking a gamble on the outcome of this. You could be leading me on, but I would take your word that you're not because for whatever reason, despite how you've treated me, I believe in you. We're both hard headed as hell, but I think we can make a very good team. If I didn't think so, I would just go ahead and have the kid since like I said, I want to be a mom more than anything in the world.

I need to know your decision tonight because I am getting rid of the abortion pills if it's a no or if I don't hear back from you. I really do need to adjust my seizure medication and take other precautions for my health and the wellbeing of our baby if we are going to have a kid. You're the father -- there's no two ways about it -- so saying no here is a guarantee you will be a dad.

Laura

Found in Sent - Google Mailbox



Clayton Echard June 28, 2023 at 8:36 PM

Re: Having the baby if I don't hear back tonight.

To: Laura Owens

I will not date you in any capacity, as I do not have any interest in you. So, you can proceed however you'd like.

I will be awaiting the ultrasound on the 8th week and then will do a paternity test as soon as I'm able to.

You have told me a million times now that you'll give me "one more chance" to move forward with dating you, but I'm 100% not going to do that, so please just stop communicating with me from this point forward. I will find someone else to love and share my life with. I may honestly move to the east coast at this point as well. We'll see. I can do whatever I want with my life, but what I won't do is allow you to hold me back. And don't try to explain to me that I can't move out of the state and away from you. I absolutely can. All I have to do is either take 100% custody of the child or allow you to have 100% custody. Joint isn't an option and is never mandated. That's common sense. Besides, I will fight until I have no fight left in me to not have you be a part of my life. The courts can't force someone to stay with someone else. That's unheard of and has never been done. Just remember, there is no scenario in which we raise the child together, if you even have a child, which I'm still not convinced. But if you do and it is somehow miraculously mine, like I said, I'll take care of the child if that's what it comes to, but I WILL NOT UNDER ANY CIRCUMSTANCE co-parent with you. Just want to make that clear. I would rather co-parent with literally anybody else besides you, as you have shown me you don't respect my opinion. You just force what you want onto people to get your way and it is gross.

That's my two-cents. Take it or leave it. Again, there's no more need for conversation and no more need for you to pester me each day until the 8th week. I tell you to stop sending me messages and you just have zero respect and keep sending them regardless. So, I suppose I'll just continue to receive them and not respond, as my days are much better when I don't interact with you.

Clayton Echard

EXHIBIT “4”

LO **Laura Owens** Yesterday at 2:23 PM

Only open this if you want option A and will unblock me. Seriously.

To: Clayton Echard

...and if you want option A, I will not post this. I am just looking for support during this incredibly overwhelming time.

Final email regarding this, but I wanted to give you the courtesy of showing you the post. I'm attaching the photo I'm going to use. I'm over being treated like shit and at least if this is public, you'll have to give a statement to the media. Not sure when I will put it up.

The caption is:

> *Surprise! I can't wait for the arrival of these two next Valentine's Day!*
>
> *On a more serious note, their father, @claytonechard, has said he "wants nothing to do with this process". He has blocked me from messaging him, refuses to see me and his growing babies, and says he will continue to ignore me. He doesn't want to have anything to do with them when they're born and thinks they will negatively impact his dating life. Tag him and let him know what you think.*

Please note the following legal waiver:
If, after proof of opening is obtained, I choose not to respond to this email, I am confirming that its content is true. This includes my acknowledgment of paternity. In addition, by not responding, I am giving my approval to Laura Owens to post the above content on social media.

Clayton, this is a situation you can't run and hide from -- you will need to take accountability for your actions which created twins. If I can't get you to do it, then maybe the public can convince you to.

All the best,



Laura Owens

Nobody Told Me! | *Quartet Farms* | *TEDx talk*

Now available! Read my story in the 30th Anniversary Edition of Chicken Soup for the Soul

Phone 415-810-0604

Email lauraowens@nobodytoldmeshow.com

Pregnancy announcement

EXHIBIT “5”

LO **Laura Owens** Trash - iCloud 8:49 AM

Pregnancy confirmation via ultrasound & next steps

To: bechard@powermotionsales.com, Clayton Echard

Good morning,

I wanted to give an update on where things stand as I have not heard back from Clayton and presume he has still blocked me, which he told me before he does when he doesn't want to deal with a situation. If only I had the opportunity to do the same (!), but obviously, my body isn't allowing me to forget that I am pregnant. Rather than continuing to send him several emails a day, I hope that we can meet in person to discuss what is going on, because as Clayton said last week, "I feel we need to have a face to face discussion. It's too easy to get upset via text. But in-person, conversations are more caring and cordial. I believe this is exactly what we need, as texting hasn't been working well," and, "We should have been talking in-person for most of this anyways. Texting isn't meant for meaningful/impactful/life-changing conversations and I've known and learned that plenty of times."

I told Clayton last week that I was going to be going to California for the weekend and that if I was going to get abortion pills, it would be much easier to do so there in California for many reasons, and less traumatic because there isn't a law there like there is in Arizona that the mother has to view the ultrasound. He has told me that he wants me to take the pills, but understands that his preference for me doing so (because it would impact his ability to date other women in the future) is not enough of a reason for me to end a human life. I am attaching a screenshot of my chart after my visit on Sunday to Planned Parenthood in Orange County, which confirms that I had an ultrasound that was consistent with the conception date of 5/20 when I was with Clayton (and like I've said, he's the only person I've been with since March of 2022), that there *was* a gestational sac meaning a viable pregnancy, and that I refused to view the ultrasound and take the abortion pills at the clinic. They don't typically allow you to take them home, but since I live out of state and was as conflicted as I was, they allowed me to.

Now that we know we have a viable pregnancy, things seem all the more urgent. I'll continue to say until I'm blue in the face that Clayton is the father and that there is *zero* percent chance that it is anyone else. I told him that he needs to pay for the prenatal paternity test because it is not providing me with any information that I don't know, but that I will gladly reimburse him for the full amount if I'm wrong. He agreed to that. I am eager to get it done and have contacted multiple companies about the timing of it. The consensus is that while it can be performed at seven weeks, there is a chance that there is not enough fetal DNA present at that point, in which case you would have to repeat the $1500 test. It seems like we would be safest doing it at eight weeks, although ArcPoint Labs based in Scottsdale said twelve weeks was their minimum. The results will come back in 7-10 business days.

It was explained to me at Planned Parenthood that medication abortions are most successful early on in the pregnancy and that as the weeks go on, they become less effective. By the time the results are back from the prenatal paternity test, I would need to do a surgical abortion, which I will not do under *any* circumstances. I only mention this because once the prenatal paternity test is taken, it's a done deal that I am having the child and there will not be an option for an abortion once the results come back. My preference has been to have the baby all along, so that's obviously not an issue for me, but if it is for Clayton, he needs to know that. I haven't lied about one thing so far, despite his doubts; he himself had me take a pregnancy test, which turned out positive, and now, a doctor has confirmed the pregnancy on an ultrasound and said that it was the very small size it should be based on the date I was intimate with him. If he doesn't trust me, that's fine, and I am more than happy to prove him wrong again. I just know how high the stakes are right now and want to be clear that this really is the last time that I will consider an abortion.

The last thing I would want if I were in Clayton's position is to feel like I didn't have an opinion on something so important, but it seems like his reaction to the stakes getting higher is to withdraw even further. However, there are several factors at play that he needs to consider regarding my health and its impact on the baby if we decide to carry it to term. First of all, my stress levels have a major impact on the fetus's development in the womb and not having any emotional support from Clayton like he promised has been extremely difficult on me. Most importantly, though, my neurologist has emphasized that I need to change my dose of epilepsy medication significantly because I'm at a higher risk of a seizure during pregnancy and having one could have a terrible impact on the baby. I've delayed going up on it because I haven't known what we are doing, but I really need to make a decision. I don't think that either Clayton nor I could forgive ourselves if the child ends up having a lifelong condition that could have been preventable.

On a personal level, I wanted to share that a big reason I am against terminating the pregnancy is because of the impact *not* having an abortion had on my family. My great-grandma was fourteen when she gave birth to my grandma, who she gave up for adoption. If she had an abortion, I wouldn't be here. It's impossible for me to think about terminating the pregnancy without thinking of that, even though in many ways, not having the baby would be an easier option. I'm also getting feedback from my sister, whose baby was born a month early on May 24th, and who says that it is the greatest thing she's ever experienced, but that it is also the hardest and she can't imagine how she could do it without a partner. On the other hand, my mom has been my main source of support on this and has asked me to think about what I would regret more when I'm ninety years old and on my deathbed: having had an abortion or having had the child? When I think of it that way, the idea of giving up the child feels implausible, even though Clayton has told me many times that he would not want any custody nor to have anything to do with him or her. I imagine that would change at some point once he saw the baby. I would absolutely expect him to share custody and parenting time with me.

I apologize for yet another email, but I feel really helpless in terms of communicating with Clayton, and as the father of the child, he's the only person whose support and input really matter to me. Obviously, having a child would completely change the course of our lives and I want to figure out what we are doing together. I know that many women would make their own decision without regard for the baby's father's opinion, but that's not me and I need him to understand that. I really care about Clayton's feelings, but can't take them into consideration if he is treating me like this. If we are going forward with it, that's great and I want to be able to get excited about it! But right now, it feels like there's tension in the air about what is happening and the silence is deafening. If there's anything you can do to talk to him, I would really appreciate it.

Thank you so much for your time!

All the best,



Laura Owens

Nobody Told Me! | *Quartet Farms* | *TEDx talk*

Phone 415-810-0604

Email lauraowens@nobodytoldmeshow.com

EXHIBIT “6”

The Wayback Machine - https://web.archive.org/web/20230922030934/https://anonymouswoman1.medium.com…

Search Medium

I am the anonymous woman in the Clayton Echard scandal. Here's my story.

Anonymous · Follow
3 hours ago

--

I am the anonymous woman who has been labeled Clayton Echard's "ex-fling". I am accomplished in my own right and have no desire to gain notoriety from this, which is why I chose not to be named. I was very clear that I had no desire for money from him. All I wanted from him was communication to figure out a parenting plan for our unborn twins. He has refused to talk to me for a long time, with the exception of the occasional hurtful email. I told him many times that if he did not figure this out with me privately, I would go to the media because I thought that would get him to step up to the plate.

I am coming forward simply because there has been confusion over whether or not Clayton sent the cruel text messages and emails that he did. I've chosen to publish them here and will put my entire reputation on the line by saying that he sent every one of those messages. If anyone wants to claim these were doctored, I have the phone and email records to prove it. He knows better than to sue me for libel because the truth is a complete defense to defamation, and I am telling the truth.

I first met Clayton on the night of May 20th, which is when we unexpectedly hooked up. I was not on birth control because a) I hadn't been sexually active since March of 2022, and b) my anti-seizure medication interfered with it. In the days after, I told Clayton that I had been considering taking Plan B because I wasn't on birth control. In the end, I didn't.

On May 31st, I had a pregnancy test done prior to a medical test. It was negative. I was still concerned I was pregnant since again, I wasn't on birth control, and bought a pregnancy test the next day. On June 1st, I tested positive. I knew Clayton wouldn't believe me, so I decided to go to urgent care to get a test done. I figured he would believe it if there was official medical documentation. Contrary to what many have said, it was not on that day that I learned I was having twins; all that happened was that I discovered I was pregnant.

I sent Clayton an email with a timeline and all of the evidence. I got this in response, which is proof that Clayton very much knew and believed that I was pregnant after we hooked up:



We did not communicate much after that for several days, but I did get this message from him:



He also spewed the following insults at me, and for those who doubt that he did, I have records to prove it.

I don't believe you for a second and it's honestly sad this is what you've resorted to

you're embarrassing yourself at this point.

You need to seek professional help and I hope you will do so to take a deep dive into addressing all this trauma.

I hope you understand how sick this is of you to try and pull on me. You want me to stress about wondering if I impregnated you for weeks.

Laura, ask yourself why you're doing this. Please, reflect now. Why are you subjecting another human being to this?

You're trying to destroy my mental state.

But that pain you feel....don't place it upon someone else.

But to try and bring someone else into it all is just cruel.

I legitimately hate you right now.

You've made my life so stressful since I've known you and if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.

my hatred will only grow if you decide to put me through all of this.

My animosity would last for a lifetime and that's not something either of us want to subject ourselves to.

Even if a kid was present…I would not say a word to you. I would not acknowledge you.

One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever

I am the victim!!! You are acting so irrational that it's scary!!! You can stop every last one of these consequences and you're choosing not to because you have lost touch with reality!

I mean, it's fucking hysterical how sad this is. And I'm pissed for allowing myself to even be bothered by it.

You have lost your mind and I hope YOU think about how terrible this is that you would subject me to this.

My hate is toward you and you only.

I have decided I will no longer be in contact with you, unless your mom takes a phone call with me. If she will not, that's ok, but then all communication will be cut off.

God is telling me this man will provide me with the clarity I need, as I have many questions and those questions have turned into beliefs…ones that have led to animosity and a complete lack of trust toward you. (God told you my abusive ex who caused me to get epilepsy would be a better resource than me? And you could trust him more than me?)

I believe this is some sick game you play for attention.

You better be serious about being pregnant because if you're not, I'm bringing this all to light. People like you need to be held accountable. You can back off now if this is all a game and I'll let it go, but if you continue any longer and it's all a lie, I won't hesitate to reveal the truth.

My personal hell would be having to have you be a part of my life

The desperation is something I hope you can address.

I'm living in the fear of having to be associated with you for my lifetime.

You will bring nothing, but pain and misfortune into my life.

You're manipulative, obsessive and display narcissistic behaviors.

But I don't have any empathy for those that attack the mental health of others through manipulation and then try and play the victim card.

Individuals like you that play with people's emotions are the worst kind of person. I've met many, been taken advantage of by many and am sick and tired of playing nice with them.

You don't deserve my empathy.

You're obsessed with the idea of being adjacent to me.

After his litany of insults, I was surprised to receive these messages from him on June 19th:

If you decide to have the kid, then that is your decision and I will respect it. However, one of us will have 100% custody...there will be no joint custody. I feel strongly about this and that decision is also final.

I feel we need to have a face to face discussion. It's too easy to get upset via text. But in-person, conversations are more caring and cordial. I believe this is exactly what we need, as texting hasn't been working well.

So, let's plan on 7:30?

I feel God is telling me we should meet up tonight, so yes, I'd like to do that. We should have been talking in-person for most of this anyways. Texting isn't meant for meaningful/impactful/life-changing conversations and I've know and learned that plenty of times.

I'll text you when I'm heading back home tonight, but around 7:30pm should work.

On that night, Clayton purchased a pregnancy test and had me take it in front of him. It was positive. We sat down for a couple of hours and talked. He explained to me that he had a dream about his future wife and son. The woman was blonde, and not me. He said he was attracted to ethnic women, not petite brunettes like me. He said that he always swiped left on women with children, and his biggest argument to end the pregnancy was that women would swipe left on him. He worried that it would impact his dating life. Despite this, we had a decent conversation and decided we would consider giving dating a try for the sake of the baby (we didn't know we were having twins then). He promised to be supportive and said that he would check on me every day. That lasted one day.

On June 20th, I received these messages:

I'm sorry you're feeling sick.

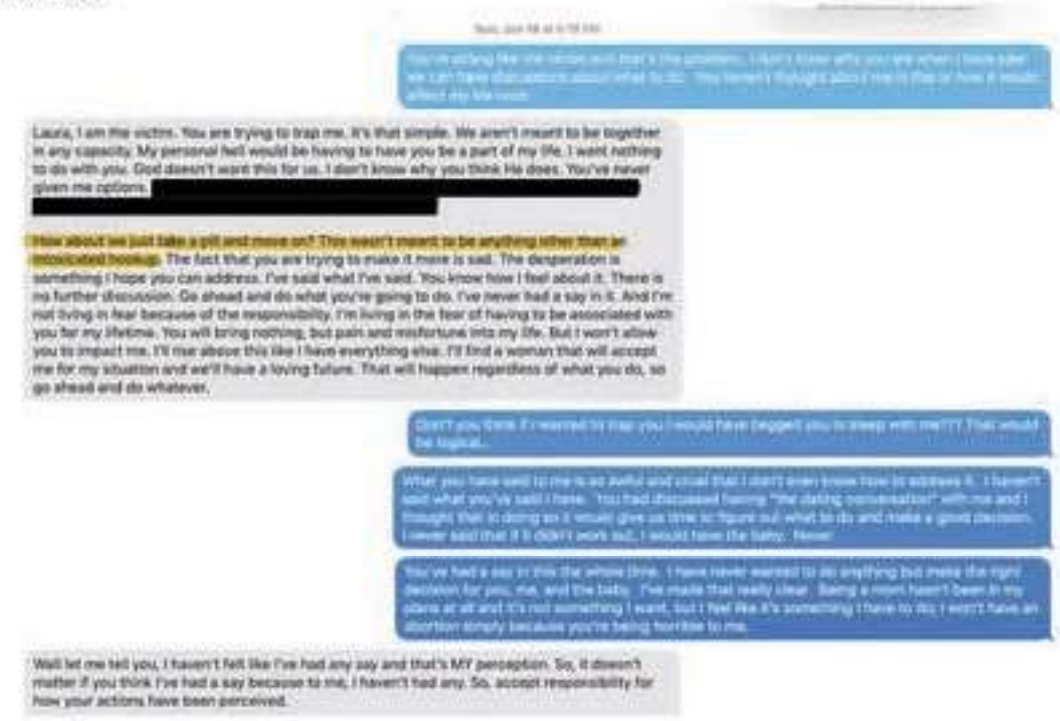
I'm going to try and give us a chance this week. I'm keeping an open mind and maybe this weekend we can meet back up and see if it's a possibility to be intimate. I'm really trying to have you feel seen and heard so I want to give it a chance your way. At least at the end of it, I'll know I tried everything I could.

An hour later. Clayton changed his mind, but this text confirms he knew that the test was positive:

To: Clayton Echard

I'm sorry this made it harder. I wanted you to come over to confirm what I was doubting. And it did confirm that. So, I don't see you as a liar anymore. But, that doesn't change how I feel about proceeding forward. I can believe you're telling the truth, but still stand firm in not wanting to pursue anything further with you. That is what I'm choosing to do.

On the very same day, he went from wanting to be intimate to this, confirming that we did indeed hookup:



On June 21st, I received an email from Clayton with a theory that my anti-epileptic medications caused me to test positive. I disproved this theory, which you can view below. You can also see that the positive pregnancy test I took at his house is on the counter:




pregnant
not pregnant


Absorbent Tip
Result Window
OR
pregnant
not pregnant
NOT PREGNAN
ONE PINK LINE in
the Result Windo



[redacted]

I say all this to say it's a possibility you are not in fact pregnant. This is why it's important for us to do the Paternity test because there is no question if that comes back positive. It is done. Else

I was somewhat shocked to find out antisocial/cold medication can cause false positives, but yet you haven't even mentioned that as a possibility. So, I wanted to bring it to light. It is possible, done. Plus, a pregnancy claimed me confirmed with an ultrasound is, done. So, I believe both maneuvers should be taken and will be awaiting both from you. That said then, I have decided to not waiting to have a rational and mature conversation. So, we're better off keeping communications to a minimum.

Thank you,

Clayton Echard

[redacted] Mail - Something to Consider

[redacted]

Hi Clayton,

Thanks for the email. I can diagnose both females easily.

First of all, I was unaware that any at-home/urinalysis drug could expose a false positive, but yourself a quick call to my doctor, who said that but is absolutely NOT a possibility at any case

1) She said it's extremely rare to happen at all and has only been heard of with a drug called cetrorelix, which it's not on and never have been. She said even with that one, it's extremely rare and if that were to happen, it would be when someone just started it

2) I've been on the same dose of the ophgyny drug I am on since 2017, which again is not associated with false positives, and have had my urine tested many times since without a false positive before

3) I also wouldn't have the side effects I am having from the pregnancy if it was a false positive

Finally, here is the term dated and stamped photo that I sent you that day (zoomed out without using iPhone's auto-enhance feature, which I did to show the line, which was obviously there. Just not as visible on a camera as it was in the naked eye. You may tell it is much more faint. Plus, my doctor said that tends that fade typical on the latter and state you take the fluid and even on the month, and that it's somewhat of a coincidence as to how the line looks based on this here in the pregnancy.

In regards to ceasing communication, that is something that you promised me you would not do once I confirmed the pregnancy to you. Keep in mind that a doctor has also confirmed it using a different test as well, so there's no question on to whether or not I am pregnant, and you seemed to be satisfied with that result after performing your own test.

My "threats" last night were after you had made threats to contact the media about me if I was lying about being pregnant (which I wasn't) and to contact my absolute ex-boyfriend. Still, I was fine having a rational and civilized conversation with you despite those. My point was to show you that you wouldn't be proud of your communications if this public found out, which you said you were worried about. Despite my telling you that I wanted to be on your side and figure this out together, I'm stunned that you have once again chosen to leave me in the dark here.

Just as I told you I would take a pregnancy test anytime, I will be happy to do this same with a paternity test as soon as I am able to, and know with the same amount of certainty that you are the father. I was very upfront with you about what I would need from you to look comfortable terminating this pregnancy and said that it wouldn't be comfortable doing it later on — that this was the only time I would be okay going through with it if that was what we decided even if it was done as early as possible. Still, you seem to be very confident with whom you claim

[redacted]

[redacted]

[redacted]

On June 24th, Clayton emailed me saying that **he would pay for the paternity test**, despite telling the press that he has said that I would be responsible for the full amount. I told him that I already knew that he was the father, and if he needed reassurance he needed to pay: While Clayton claimed that he told me that I needed to pay for the paternity test, you can see that was not the case:

[redacted] **EXHIBIT 7**

Gmail **Petitioner's messages to Respondent regarding taking prenatal paternity test** [redacted]

Paternity test, etc.

Clayton Echard <claytonechard@[redacted]> Sat, Jun 24, 2023 at 4:32 PM
To: [redacted]

I will pay for 100% of it. You have my word. Let this message serve as the proof. Just schedule it and let me know where you scheduled and I'll pay.

Thanks,

Clayton Echard

On June 28th, I received this:

Gmail [redacted]

[redacted]

Clayton Echard <claytonechard@gmail.com> Wed, Jun 28, 2023 at 8:38 PM
To: [redacted]

[redacted]

[redacted] I will find someone else to love and share my life with. I may honestly move to the east coast at this point as well. We'll see. I can do whatever I want with my life, but what I won't do is allow you to hold me back. And don't try to explain to me that I can't move out of the state and away from you. I absolutely can. All I have to do is either take 100% custody of the child or allow you to have 100% custody. Joint isn't an option and is never mandated. That's common sense. Besides, I will fight until I have no fight left in me to not have you be a part of my life. The courts can't force someone to stay with someone else. That's unheard of and has never been done. Just remember, there is no scenario in which we raise the child together, if you even have a child, which I'm still not convinced. But if you do and it is somehow miraculously mine, like I said, I'll take care of the child if that's what it comes to, but I WILL NOT UNDER ANY CIRCUMSTANCE co-parent with you. Just want to make that clear. I would rather co-parent with literally anybody else besides you, as you have shown me you don't respect my opinion. [redacted]

[redacted]

Clayton Echard

I reached out to Clayton's parents several times, but received no response. On July 2nd, I even invited them to an ultrasound, since he had not gotten back to me about attending my doctor's appointment:



Gmail [redacted]

Proof provided to Clayton & your family's invitation to ultrasound

[redacted] Sun, Jul 2, 2023 at 9:57 AM

To: [redacted]

Hi Mr. and Mrs. Echard,

On Thursday, Clayton said that if I provided him with additional information, such as the date and time of my next ultrasound, he would be able to be cordial. I gave it to him and invited him, but have not heard back. I was lucky enough to get accepted to see a high-risk specialist, [redacted] on July 24th at 9am for an ultrasound and an hour long consultation. I told Clayton that he was welcome to go and that I wanted him to, and even offered to change the date and time if it didn't work for him. I explained to him that it's a referral based practice that does not accept patients without medical records, including verification of the pregnancy and test results/notes from a specialist to prove that there is a condition that requires a high-risk obstetrician (my neurologist about my generalized epilepsy in my case). I understood his need for extra proof, so I sent him screenshots from my patient portal to show him proof of the appointment and the records they received. [redacted]

Even though I have gone above and beyond to prove to Clayton that the pregnancy is real, nothing is enough for him to be civil to me, even though he claimed weeks ago that the test I took in front of him that was positive was sufficient. I've taken the initiative to contact three different labs to organize a prenatal pregnancy test at the one that can do it the soonest and that will be acceptable by the court so that I can establish paternity as soon as possible and so that we can make a parenting plan as we are required to do. I am very financially stable and want absolutely no money from him except what is required by law. All I want is the support he promised to provide me with. I'm under an immense amount of stress and have developed high blood pressure and have explained that this could cause the baby to be born with developmental issues, which I know we don't want.

[redacted]

With all of that being said, the purpose of this email is twofold:

1. I wanted to show you how much information Clayton has been provided with by me to verify the pregnancy. This is what he asked for, all of which was given. There was so much that it wouldn't all fit in a single email, so I had to make a Dropbox file of it. You can access all of the proof by clicking here here.

Based on how he has treated me, I don't want him present at the ultrasound and appointment on July 24th. Hearing the heartbeat for the first time is sacred to me but I know it means nothing to him since he has not had the courtesy to respond to my invitation to be there or even change the date and time. Either or both of you, or your other sons, are welcome to be at the appointment if you would like to be. I know it's an important event and I want people there who feel the same. I just didn't want you guys to not feel included just because Clayton is no longer welcome unless he drastically changes his behavior and shows some respect. If he does, of course he can come.

There's no need to respond if you don't want to, but please know that your family is most definitely welcome to be there and I would change the day and time for you guys too if the current date didn't work out.

Thank you for reading this and hope you are having a great weekend!

I discovered I was having twins after that. In mid-July, I decided to hire an attorney to act as a middleman, since Clayton would not communicate directly with me. He told the lawyer that he thought I was on weight loss drugs or fertility drugs that made me test positive. I offered for him to attend an ultrasound appointment, which the lawyer conveyed to him His response was this:


Gmail [redacted]

[redacted] v. Echard

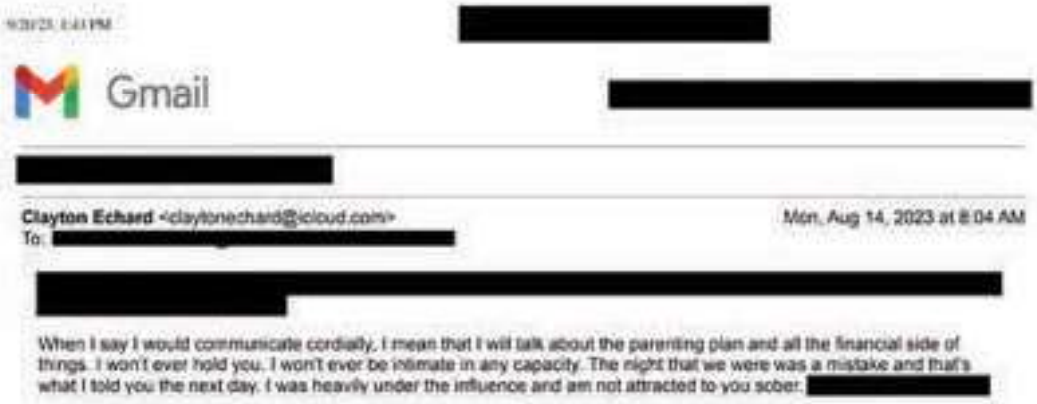
[redacted] Wed, Jul 19, 2023 at 7:17 PM

To [redacted]

Yes I will tell him. I also proposed if he didn't want to see you in person but wanted to talk to your doctor, what about being on the phone or by FaceTime? His response was how would he know you weren't just in some random place with someone impersonating a doctor. Sadly, that is how far his doubt/paranoia goes. And he acknowledges he is paranoid but he believes it is justified. As I said it may be the only way he's able to process this at the moment.

Yes your best bet is to enjoy this process with your "village" of people who will celebrate in the joy with you and who love and support you.

On August 14th, Clayton sent me this and then went dark on me for days. Telling me that he was "heavily under the influence" and "not attracted to [me] sober" hurt:


[redacted]

Gmail [redacted]

[redacted]

Clayton Echard <claytonechard@icloud.com> Mon, Aug 14, 2023 at 8:04 AM

To: [redacted]

[redacted]

When I say I would communicate cordially, I mean that I will talk about the parenting plan and all the financial side of things. I won't ever hold you. I won't ever be intimate in any capacity. The night that we were was a mistake and that's what I told you the next day. I was heavily under the influence and am not attracted to you sober. [redacted]

All along, I told Clayton I wanted to do a paternity test at any point at the lab of his choosing; in fact, I offered more than fifty times to take it in email and have the messages to prove it. Finally, he agreed to testing. I paid $725 as a deposit and scheduled it for August 23rd, which he said worked well for him. However, he never called to schedule his portion, so I was forced to cancel the test:



Gmail

Re: Canceling NIPP test on August 23rd

Good morning [redacted]

We have canceled the test and refunded the $725 back to the card. It should take 3-4 days for the payment to post. Let us know if you have any questions or concerns.

Thanks,

[redacted]

From: [redacted]
Sent: [redacted]
To: [redacted]
Subject: Canceling NIPP test on August 23rd

Hi,

Unfortunately, Clayton Echard has refused to take the prenatal paternity test that I had scheduled at Exam One in Phoenix on Wednesday, August 23rd. Can you please cancel it and refund the $725 back to my card? Please let me know if you have any questions.

Thank you for your help scheduling it. I'm very disappointed to have to cancel.

All the best,

[redacted]

Clayton's behavior caused me to be borderline-suicidal twice, simply because I have felt panicked about raising twins on my own. All I have wanted is communication and a plan. I explained this in emails to him, which I will not post due to the very personal nature of them. I presumed that as a 'suicide prevention advocate' (and the father of our unborn children), he would be able to help me. I needed reassurance that he would help care for them and he could not provide it. Clayton knew that if I took my own life, I would be ending the lives of our unborn twins. I truly believe that is what he wanted, as it would solve all of his problems.

Clayton was also supposed to meet up with me five days prior to our Early Resolution Conference on September 28th, but he has not responded to my emails trying to organize this.

Clayton claimed I was "obsessed" with dating him, which is not true. I emailed him to clarify this after The Sun article came out, saying: "I. DO. NOT. WANT. TO. DATE. YOU." I had not seen *The Bachelor*, and if I had, I never would have chosen him as my realtor, let alone as someone I would be intimate with. I have told him many times that I would take a lie detector test to prove that I had not seen his season. After he started to display deceptive behavior in a real estate transaction, I finally searched for him on YouTube and watched three clips of him sending Susie, Gabby, and Rachel home. To date, that is all I have seen.

If I am missing anything, or if someone doubts these messages from Clayton, I am happy to provide any records needed to prove that I am indeed telling the truth. I will put my entire reputation on it.

Finally, Clayton wrote on his Response to Establish Paternity that he did not want to give the children his last name or be put on their birth certificates if he is found to be the natural father.

REQUESTS TO THE COURT:

1. **FOR ORDER OF PATERNITY:**

Issue order declaring that ☐ **Party A or** ☒ **Party B claimed to be the father, (named below)**

Clayton Echard

☐ **IS (OR)** ☒ **IS NOT the natural father of the minor child(ren),**

IN THE EVENT THE COURT ORDERS THAT ABOVE-NAMED PARTY IS THE NATURAL FATHER, THEN THE COURT SHOULD ALSO ORDER AS FOLLOWS:

A. BIRTH CERTIFICATE: (check the box and complete if this is desired)

☐ **Order that the name of the father as appears on his birth certificate or other legal document should be added to each minor child's birth certificate as the father;**

B. LAST NAME: (check the box and complete if this this is desired)

☐ **Order that each minor child's last name be changed to the last name of:**

Bachelor | Clayton Echard | The Bachelor

Written by Anonymous

Follow

0 Followers

The anonymous woman in the Clayton Echard pregnancy scandal

Recommended from Medium



AL Anany

The ChatGPT Hype Is Over—Now Watch How Google Will Kill...

It never happens instantly. The business game is longer than you know.

6 min read · Sep 1

-- 252



Sean Kernan

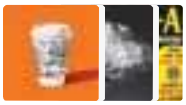
How Your Personality Is Revealed By Your Choice of Words

Use deliberate listening and empathy to better understand people.

5 min read · 6 days ago

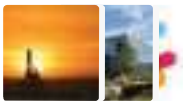
-- 67

Lists



Staff Picks

449 stories · 292 saves



Stories to Help You Level-Up at Work

19 stories · 219 saves



Self-Improvement 101

20 stories · 588 saves



Productivity 101

20 stories · 549 saves



Unbecoming

10 Seconds That Ended My 20 Year Marriage

It's August in Northern Virginia, hot and humid. I still haven't showered from my...

✨ · 4 min read · Feb 16, 2022

-- 937



Wil Wheaton

i was nine years-old when i had my first crush

Her name was Candice, and she went by Candi. She was my first—and biggest—...

15 min read · 5 days ago

-- 117



Nick Hilton



Jano le Roux in ILLUMINATION

The End of the Subscription Era is Coming

You're overpaying for your porn (and journalism)

10 min read · Aug 30

-- 194

Scientists Gave Homeless People $7,500, Here's How They Spent It

What is the best way to give back?

✦ · 5 min read · Sep 5

-- 233

See more recommendations

EXHIBIT “7”

Sign in

Search the web

Discover Following | News US News World News ... Personalize

Ad
COUPON CODES AVAILABLE GET CODES
Ad

The Messenger Follow

'Bachelor' Alum Clayton Echard Allegedly Told Woman Who Claims to Be Pregnant With His Twins to Get an Abortion: Report

Story by Daniel Trainor • 2mo

'Bachelor' Alum Clayton Echard Allegedly Told Woman Who Claims to Be Pregnant With His Twins to Get an Abortion: Report

Echard is accused of impregnating a former fling earlier this year, though he allegedly told her via text message, 'I will not be raising it in any capacity'

Published | Updated
Daniel Trainor



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

Clayton Echard Jon Kopaloff/WireImage
© Jon Kopaloff/WireImage

Clayton Echard is being accused of texting a woman who claims to be pregnant with his twins to undergo an abortion.

According to documents obtained Tuesday by Page Six, the former *Bachelor* star also allegedly refuted paternity in text messages.

"I would like for you to get an abortion (if you are pregnant with my child, which I still don't believe, but it doesn't really matter either way)," Echard allegedly texted the woman, according to the court docs. "If you do not, that's your choice."

Arizona Will Cover Cost to Install Solar Panels in These Zip Codes



Ad EasySolar

The woman, a 33-year-old podcast host from Scottsdale, Ariz., who wishes to remain anonymous, claims she and Echard had a one-night stand in May that resulted in the pregnancy.

"Then, in that case, if it ends up being my child, I have decided that either you'll take 100% custody of the child, or it will be put up for adoption," Echard's alleged text continued. "I will not be raising it in any capacity."

The text was just one in a flurry of allegedly "erratic, illogical and threatening messages" said to be sent by Echard.

The woman submitted screenshots of the messages, which included, "I don't believe you for a second"; "I legitimately hate you right now"; and "You have lost your mind and I hope YOU think about how terrible this is that you would subject me to this."

Echard also allegedly wrote, "My personal hell would be having to have you be a part of my life."

29+ Coolest Gifts Nobody Would Think Of



Ad Trending Gifts

In response, Echard accused the woman of "harassing" him because she is "obsessed" with him. He also denies they ever had sexual intercourse. Echard told *The Sun*, who was the first to obtain the documents, that he plans to sue the woman.

The Messenger reached out to a representative for Echard, who Page Six reports is now scheduled to take a paternity test Sept. 26, two days before the parties meet in court.

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

Sponsored Content



SmartAsset

Vanguard vs. Fidelity vs. Schwab

Ad



Top Consumer Guide

Here Are 23 Of The Coolest Gifts For Christmas 2023

Ad

More for You



SmartAsset

7 Secrets Comfortable Retirees Know About Hiring a Financial Advisor

Ad



Women's Health

Taylor Swift Just Clarified The Timeline For Her And Travis Kelce's Relationship

17 1

USA TODAY

'Bachelor in Paradise' couple Kylee, Aven break up days after the show's season finale

"Bachelor in Paradise" couple Kylee Russell and Aven Jones. Russell shared that the relationship dissolved due to "multiple...

1



NBC News

UNLV gunman res tenured professor making sexual co

150 52



The Messenger

Pregnant Woman in Kentucky Abortion Lawsuit Learns Embryo No Longer...



ABC News

Suspect jailed on $2 million bail in fatal stabbing of teen cheerleader

1k



Online Shopping Tools

Arizona Shoppers Should Think Twice Before Buying from These 2 Stores

Ad



SmartAsset

Vanguard vs. Fide Schwab

Ad



Arizona Republic

In Utah, 2 children say they were abused. A trial will determine if the accused



Evening Standard

Britney Spears says it's 'weird' being single as she opens up on Sam Asghari

FOX News

Missing Wyoming woman's estranged boyfrien 'suspect in a homicide case': court

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

28

2

The Telegraph Follow

Jennifer Aniston reveals she and Matthew Perry exchanged messages on day he died

Story by Timothy Sigsworth • 5h



Aniston with Perry in 1995 at an NBC event in New York - RON DAVIS/GETTY IMAGES
© Provided by The Telegraph

Jennifer Aniston has revealed she texted a "happy and healthy" Matthew Perry on the morning of the Friends star's death.

Perry, who shot to worldwide fame for his role in the cult American television series, was found dead at his Los Angeles home in late October.

"I was literally texting with him that morning, funny Matty," Aniston told Variety magazine.

"He was not in pain. He wasn't struggling. He was happy."



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback



Jennifer Aniston (left with Reese Witherspoon) gives her first interview since the death of Matthew Perry to Variety magazine - Dan Doperalski for Variety
© Provided by The Telegraph

It was Aniston’s first interview since her American-Canadian co-star’s death at the age of 54. Perry’s cause of death has not been officially determined.

“He was happy. He was healthy. He had quit smoking. He was getting in shape. He was happy – that’s all I know,” she added.

“I want people to know he was really healthy, and getting healthy. He was on a pursuit. He worked so hard. He really was dealt a tough one.

“I miss him dearly. We all do. Boy, he made us laugh really hard.”



© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback



Jennifer Aniston and Reese Witherspoon front VARIETY'S Emmy Edition and speak with Hollywood's most iconic entertainment magazine about 'The Morning Show', Aniston texting with Matthew Perry on the day of his passing, intimacy coordinators, if the show is camp, and more.
© Provided by The Telegraph

Perry played Chandler in all 234 episodes of the sitcom, which ran for 10 series from 1994 to 2004.

The sitcom catapulted him, Aniston and their four co-stars to household fame and by its final series the group were paid more than £800,000 ($1 million) per episode.

But Perry struggled with drug and alcohol addiction for much of his adult life.

In a 2021 memoir he said he had attended 6,000 Alcoholics Anonymous meetings, been to rehab 15 times and had 14 stomach surgeries.

He added that his alcoholism meant drinking 14 triple vodka shots was not enough to get him drunk.

“Not only do I have the disease, but I also have it bad,” he wrote.

© 2023 Microsoft Your Privacy Choices Privacy & Cookies Terms of use Advertise Feedback

"I have it as bad as you can have it, in fact. It's back-to-the-wall time all the time. It's going to kill me."

Aniston said the outpouring of tributes to Perry in the wake of his death was "so beautiful".

"I hope he can know that he was loved in a way he never thought he was," she said.

%n

Sign up to the Front Page newsletter for free: Your essential guide to the day's agenda from The Telegraph - direct to your inbox seven days a week.

Sponsored Content

More for You

SUBSCRIBE

ENTERTAINMENT > TV

'The Bachelor' Alum Clayton Echard Declares the 'Truth Will Always Set You Free' amid Paternity Scandal

A woman that Echard allegedly slept with once reportedly claimed in a new lawsuit that he refused to take a paternity test after she became pregnant with twins

By **Esther Kang** | Published on September 21, 2023 10:54PM EDT

SUBSCRIBE



Clayton Echard. PHOTO: ABC/PAMELA LITTKY

The Bachelor alum Clayton Echard is setting the record straight.

On Thursday, the 30-year-old reality star posted a screenshot of a receipt for a paternity test in order to clear the air after he was named in a paternity lawsuit in August by an unidentified woman.

In the lawsuit, the woman alleged that Echard got her pregnant after the two met for a one-night stand. Since filing the suit, the woman has requested Echard take a test to find out the paternity of her unborn twins before she gives birth in February. The 33-year-old woman, who has chosen to remain anonymous, has recently claimed that the former Bachelor wasn't complying with her requests for a test.

"This is the timeline. The truth will always set you free," Echard wrote over the email receipt in a post to his Instagram Story. Per his screenshot, the television personality paid $725 to schedule an appointment with a paternity clinic.

SUBSCRIBE

"Results will then take about a week to get back. I believe we're all on the same page now."

PEOPLE has reached out to Echard's reps for comment.

SUBSCRIBE

Clayton Echard's Instagram Story. PHOTO: CLAYTON ECHARD/INSTAGRAM

SUBSCRIBE

that he refused to take a test and that she had to pay a $725 deposit for it, but Echard called her accusations "baseless" and "lacking in merit."

In court documents obtained by PEOPLE, the woman stated that Echard refused to believe she was pregnant when she originally informed him back in June.

"I wanted you to come over to confirm what I was doubting. And you did confirm that. So, I don't see you as a liar anymore," he allegedly texted the unidentified woman.

RELATED: Clayton Echard and Rachel Recchia Poke Fun at 'Reality TV Trauma' as They Reunite Beside 'Bachelor' Pals

After the two parties take the paternity test, they are scheduled for an early resolution conference and will appear in court immediately on Sept. 28.

Echard's alleged paternity scandal comes nearly one year after he and Susie Evans announced their decision to split. The former couple met on his season of *The Bachelor* and lived together for less than a year before going long distance and eventually parting ways.

SUBSCRIBE

Susie Evans and Clayton Echard. PHOTO: CRAIG SJODIN/ABC

RELATED: Clayton Echard Says He's Focusing on Himself After Susie Evans Split: 'I'm Not Mentally Healed'

"With incredibly heavy hearts, we wanted to share that we have decided to go our separate ways," Echard and Evans wrote in a joint Instagram statement at the time. "For anyone who has ever loved, knows this was a painful decision to make and not one taken lightly."

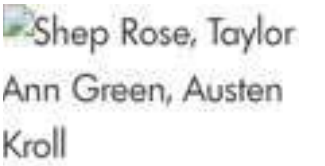
"We understand that there will likely be a lot of questions about this decision — social media is definitely a highlight reel and much of our experiences together we have kept private as I'm sure most can understand. But we will share this — although this last year together has brought us so much joy and so many laughs, there has also been a significant amount of pain," they continued. "We know no healthy relationship comes without its struggles, but we've realized that we were not prepared for the external forces that hindered our ability to not only heal as individuals but also as a couple."

SUBSCRIBE

news to compelling human interest stories.

The former couple said they would be "focused on continuing to work on ourselves, so we can be the best version of ourselves" going forward.

Related Articles



TV

Shep Rose Starts to Suspect Chemistry Between Ex Taylor Ann Green and Austen Kroll: 'I Would Not Be Surprised'

By Dana Rose Falcone



TV

'America's Got Talent' Announces New 'Fantasy League' Spinoff — and Mel B Is Returning to Judge!

By Kelly Martinez

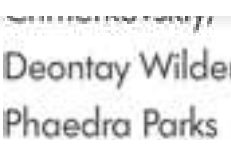


WEDDINGS

Madison Prewett Defends Quick Journey to the Altar: 'We Took the Time That We Felt We Needed' (Exclusive)

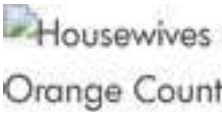
By Dory Jackson and Amy Rosner

SUBSCRIBE



Chmerkovskiy, Deontay Wilder and Phaedra Parks Among 21 Stars Competing

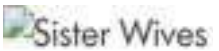
By Dave Quinn



TV

'RHOC': The Hits Keep Coming as 1 Woman Says She's a 'Punching Bag' and Another Feels Socked 'in the Stomach'

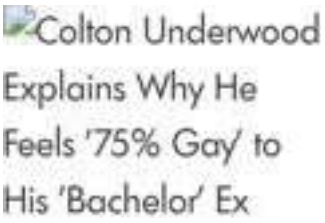
By Esther Kang



TV

Sister Wives' Kody and Janelle Reveal 2-3 Prior Separations as She Disavows His Digs at Christine (Exclusive)

By Charna Flam



TV

Colton Underwood Explains Why He Feels '75% Gay' to His 'Bachelor' Ex Hannah Brown

By Alexis Jones

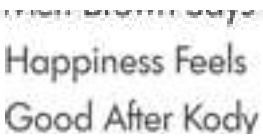


TV

'Bachelorette' Alums Brayden Bowers and Aaron Schwartzman Rescued from Sinking Fishing Boat

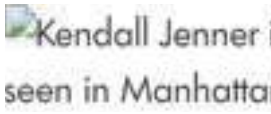
By Stephanie Wenger

SUBSCRIBE



Being 'Willing to Eat Alone Until You Find the Right Table'

By Erin Clack



STYLE

Kendall Jenner Styles Oversized Pinstripe Work Shirt as Dress While Out in New York City

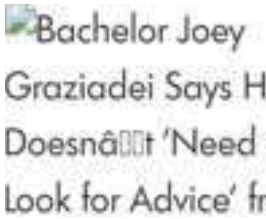
By Kimberlee Speakman



TV

Watch 'Surviving Paradise' Contestants Swing Between Sheer Luxury and 'Fyre Festival' Deprivation (Exclusive)

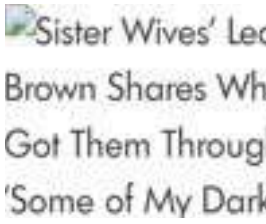
By Esther Kang



TV

Bachelor Joey Graziadei Says He Doesn't 'Need to Look for Advice' from Ben Higgins and Arie Luyendyk Jr.

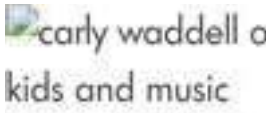
By Stephanie Wenger



TV

Sister Wives' Leon Brown Shares What Got Them Through 'Some of My Darkest Days'

By Esther Kang



PARENTS

Carly Waddell Says She's 'Rocking' Being a Single Mom to Her Two Kids: 'Every Day Got Easier' (Exclusive)

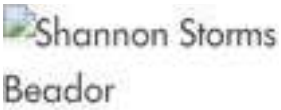
By Hannah Sacks

SUBSCRIBE



Meredith to Melt Down and Threaten Househusband Dirt

By Maggie Kreienberg



TV

Shannon Beador Is 'Extremely Apologetic' and 'Prepared to Accept Full Responsibility' After DUI Crash: Lawyer

By Esther Kang

People

NEWSLETTER

People Magazine Subscription Image

Follow Us

NEWS ENTERTAINMENT

ROYALS LIFESTYLE

STYLEWATCH SHOPPING

People SUBSCRIBE

Privacy Policy
Terms of Service
Your Privacy Choices
Contact Us
Advertise

Dotdash meredith

PEOPLE is part of the Dotdash Meredith publishing family.

Please review our updated Terms of Service.

Home
Popular

TOPICS
Gaming
Sports
Business
Crypto
Television
Celebrity
See more

RESOURCES
About Reddit
Advertise
Help
Blog
Careers
Press
See more

POPULAR POSTS

r/thebachelor • 3 mo. ago
[deleted]

I am the anonymous woman in the Clayton scandal. Here's the proof. Here's my story:

CLAYTON STREET

As a side note, for those who are questioning whether I want attention/followers, please remember I am anonymous in this case. I deactivated my Instagram earlier this week, accidentally logged into that account again, and Instagram will not let me deactivate my account again for a week. I have tried. I don't want money from Clayton. All I have asked for is communication to figure out a parenting plan.

https://anonymouswoman1.medium.com/i-am-the-anonymous-woman-in-the-clayton-echard-scandal-heres-my-story-97e48632fa9d

Please remember that Clayton has not denied that he sent any of these messages.

He has been warned that if he does not take down his second story, he will be sued. He is trying to spread false information about me. The two other cases that I have in family court are restraining orders against a man from 2021 and 2022. I have told him that putting me out to the wolves like that regarding cases where I have a restraining order against a man is not okay. It feels unfair and cruel, and for a man who is a mental health/suicide prevention advocate, it crushes me that he won't take it down.

Locked post. New comments cannot be posted.

1.7K 1.6K Share

Sort by: New

bachbachbaby • 2 mo. ago • Stickied comment

Additional, conflicting information keeps coming in regarding this issue, and we are not able to verify or keep up in a meaningful or reliable way — this is way above our pay grade. We are no longer allowing discussion on the topic until a resolution is reached.

1 Share

r/thebachelor

Join

The Bachelor

r/thebachelor is a subreddit dedicated to thoughtful discussion about The Bachelor franchise, the lives of contestants, and how...

Show more

313K	1.8K	Top 1%
Members	Online	Rank by size

Related | The Bachelor | The Bachelor (franch

r/fortwayne
For any who has ever been harassed by the legal system, here's your proof that it's not you that's...
77 upvotes · 59 comments

r/BachelorNation
Dave Neal's response to the new Medium article


103 upvotes · 115 comments

r/Degrassi
Jordy Todosey does personality test as Adam Torres (hi its me btw<3)


130 upvotes · 16 comments

r/Scams
I suspect this eviction note to be false.
1 upvote · 5 comments

r/LegalAdviceUK

EXHIBIT “8”

Open in app ↗

Sign up Sign in

Medium Search Write





Life's been a bit of a challenge lately... and that's putting it mildly.

Unveiling the Unbearable: My Battle Against Cyberbullying and Online Harassment



Laura Owens · Follow

10 min read · 4 days ago

70

> *It's incredibly hard to put this into words and share what's been going on. I've never asked my friends or family for emotional support, but I'm feeling truly shattered, defeated, mentally drained, and worthless due to the events of these past several months. I have been the subject of a smear campaign that I wouldn't wish on my worst enemy, and the target of cyberbullying, cyberharassment, and cyberstalking at a level that I truly think no one would believe was imaginable. My heart has been torn to shreds, and it seems like nobody beyond my family truly sees or understands who I am anymore. Maybe that's my fault, since the sheer embarrassment of it all has been so overwhelming that I've found myself hiding from the world.*

Since around mid-September, I've been noticeably absent from social media and pretty much detached from the life I used to lead. I can count on one hand the times I've stepped out of my home since then, but the number of times I've found myself in tears is beyond calculation. Earlier this morning, around 4:30, I found myself on the floor, overwhelmed with emotions,

feeling more bullied and alone than I've ever felt. It struck me that maybe it's time to stop concealing what I've desperately tried to keep under wraps for months now. I've come to understand that by not being public about what I'm struggling with, I've made this battle harder for myself. It's now abundantly clear that the only way to stand up to bullies is by confronting them directly.

I know that some of you caught wind of the rumors that I got pregnant by Clayton Echard, the star of The Bachelor's season 26. Clayton had briefly been my real estate agent, and during a May evening, our professional dealings turned into something more personal. Following three positive pregnancy tests — one taken at home, another at an urgent care center, and the final one done in Clayton's presence — it was evident that I was indeed expecting. Soon after, I discovered I was pregnant with twins, and I knew with 100% certainty that he was the father. Clayton went radio silent when it came time to take a paternity test, despite my persistent requests — twenty-nine times, to be exact — at a lab he had selected previously. When he finally responded, he dared me to reach out to the tabloids, a move I knew would compel him to comply with the test. Before the news hit the public, I pleaded with the media to keep my identity under wraps, and they agreed. However, their description of me as the "anonymous woman" contained enough details for those familiar with me to make connections and for strangers to track me down online.

Like many, I was familiar with Reddit before news about my pregnancy became public, but I had no grasp of the level of dedication its members had. Shortly after the initial articles surfaced, a friend reached out, informing me that self-proclaimed "sleuths" were actively discussing and mentioning me by name in "subreddits" centered around *The Bachelor.* There was a barrage of misinformation circulating, and initially, I wrote back to

correct those who were getting the facts twisted. However, these so-called 'keyboard warriors', shielded by anonymous usernames, only seemed to intensify their interest in my life once they knew I was engaging with them.

Things took a truly devastating turn when an abusive ex decided to reach out to Clayton, telling him that I had 'done this before'. He was referring to two prior pregnancies — a part of my life I've guarded fiercely, not just from the wider audience I'm speaking to now, but from everyone. Rather than having a private discussion with me about it, Clayton broke the news to his hundreds of thousands of followers, and Redditors, like relentless detectives, latched onto this snippet of my personal history. They dove deep into my life, tearing through layers I desperately wanted to keep hidden and, truth be told, deservedly so. My life was becoming a mere public spectacle, and it caught the eye of a *Bachelor* content creator named Dave Neal, a major figure on Reddit, who has completely turned my world upside down.

Dave has blatantly victim-shamed me for my reproductive decisions, stating that my life would hold no interest for him if it weren't for two prior abortions. The source of the misinformation he's spreading traces back to two men I'd been pregnant by before. Their animosity against me, triggered by the restraining orders I have against them, is the driving force behind the distorted tales being circulated about me, and ones they have shared with Dave. They supplied him with court documents containing entirely baseless, never-seriously-considered-by-a-judge claims about me, which Dave has disseminated as if they were factual. Although their accusations were unequivocally untrue, they were mortifyingly embarrassing and not something I wanted anyone to know. My decision to stay silent inadvertently bolstered Dave's platform, giving him free rein to harass me without facing any consequences.

The allegations they had previously made against me in response to cases I filed against them were horrendous, alleging that I falsified my pregnancies, tampered with records regarding my past pregnancies, and fabricated the severity of the injuries I sustained due to abuse. In a desperate effort to get him to stop spreading false and extremely damaging information about me, I offered to sign a release to have my previous pregnancy records sent directly to him from my providers. I sent him proof that I was one of only 630 patients accepted into the Domestic Violence Brain Injury Program at Barrow Neurological Institute, the only one of its kind in the nation, as a result of "multiple strangulation injuries" resulting in me developing epilepsy. However, he ignored my offers, revealing that he cared little for the truth.

Dave's motivation in continuing to create content about me has been the massive surge in viewers and listeners on his monetized platforms by peddling sensationalized, entirely untrue tales about my life. He claims that he "doesn't take a shit without monetizing it", and so his motivation is clearly financial. Dave puts out so much content that it feels like doing damage control is a full time job: he posts three shows, usually one about me, to YouTube and two podcasts a day. Each time, it sparks a fresh wave of discussions that only add more fuel to this never-ending fire.

Dave's enormous following on Reddit has made my life incredibly difficult. They've created countless threads in Bachelor-related subreddits, and in the ultimate showing of targeted harassment, one person even went as far as creating a subreddit in my name just to bully me. I was taken aback when I read a post purported to be from a high school peer with outrageously far-fetched and blatantly false allegations, claiming that during that time, I was pregnant by multiple men, including a special needs student and fathers of my peers. One fabricated story claimed that my father offered one student

$6000 to buy new speakers for his car if he would date me for a month. The reality was quite different — I was extremely introverted throughout high school, never attended a party, and had my first kiss during the week of graduation. These claims hold no resemblance to reality, yet they've left me feeling utterly powerless and deeply ashamed. It feels as though the reputation I painstakingly built and every achievement I've held dear have been ruthlessly torn apart and relentlessly mocked in profoundly disheartening posts.

The comments said about me have been brutal, such as, "I hope she's an organ donor so something good can come out of her pathetic existence", and that I am "a complete waste of skin and bones". I've been told to kill myself, with comments suggesting it might help my family move past the supposed disgrace they claim I've brought upon them. My dad's Wikipedia has even been edited several times by trolls to state that he only has one daughter, my sister.

Dave claims to have only referred to me by "Jane Doe", but my name has appeared in his content many times, and his fixation on me has reached the level of an obsession. Since September, he's churned out over fifty videos about me, boldly claiming that the count might escalate to "more than one hundred and forty" as he continues to probe into my life. Moreover, he's generated well over a hundred hours of podcast content solely focused on me and actively pursued opportunities to appear on any podcasts, offering to fly anywhere in the country to do so, because he is so eager to discuss my life through his lens of lies.

I would be lying if I said I wasn't afraid of Dave. During one of his live streams, he inadvertently displayed a map leading to my home. In an interview just this week, his comments became even more alarming as he

said he wished I had been a passenger on the missing Malaysian flight 370. Adding insult to injury, he shamelessly exhibited a picture of me in a bra with an exposed pregnant belly during one of his episodes. When I requested its removal, he callously dismissed my concerns, laughing as he told his audience, "Bra or no bra, who cares?". He's joked about me having a miscarriage, which is something that is not remotely funny.

As a last resort, I filed for an Injunction Against Harassment against Dave due to his obsessive interest in me and his flat out refusal to stop making videos and podcasts about me when asked. However, when I informed him that he would be served by a process server, he turned the tables. Deceptively, he began painting himself as fearful of me. His followers swiftly joined in, spreading these unfounded notions that I might pose a threat. I've been called "unhinged" an innumerable amount of times and his followers have posted countless times that I need to be institutionalized. It's been outrageous, entirely unwarranted, and incredibly upsetting.

My physical appearance has been a relentless subject of mockery. Multiple memes have been created, emphasizing my looks and targeting me with hurtful comments about my looks. People claimed to be stunned that Clayton chose to be intimate with me for just one night after having numerous beautiful women to select from during his time as The Bachelor. Clayton himself mentioned I didn't look as pretty as I appeared in some Instagram photos he scrolled through.

I thought that maybe if I were able to change my identity on the outside, I might get back to feeling like myself on the inside. After a lot of thought, I decided to file for a legal name change, which was discovered by Dave the day after I filed the petition with the court, and my new identity as Emily

Wilson was disclosed to his audience, making it obsolete. I felt like I had run out of ideas to escape the relentless nightmare I was living in.

My integrity means everything to me. I've never lied about being pregnant nor the extent to which I've been abused, and I have medical records to back both of those things up. However, I won't be sharing updates regarding the status of my pregnancy with Clayton. *I kindly ask not to receive congratulations or engage in discussions about Clayton and my pregnancy.* This post is not intended for that purpose. What I can confirm is that I sought an order of protection against him. Despite my only sending him pregnancy updates, interestingly, a month later, he obtained an Injunction Against Harassment against me.

Dave's followers have chosen to write my full name on Reddit and in the comments sections on his YouTube videos because they say that in doing so, they will alter the SEO algorithm so that these blatant lies about me are shown at the top of Google search results. He has incited hatred, harassment, and threats against me, and I am just exhausted from it.

Over the last few months, I've often questioned: What is the allure of a 33-year-old woman, confirmed to be pregnant three times, to him and his audience? How much more content can he create, and how much more can I take? Although I would be more than entitled to file a defamation lawsuit against Dave, I have no desire to have my life drained by the legal system and simply want him to stop and remove the videos. **If you want to watch how cruelly, and flat-out bizarrely, Dave has spoken to and about me, you can watch this video.**

I'm sure this post will spark more hateful content from Dave, and he will incite his followers to make more cruel comments about me. Despite

outwardly claiming to my family that I've become desensitized to anything that can be said to me at this point, Dave's videos still deeply affect me, as do the words of his supporters. While I *know* I will advocate against cyberbullying in the future, right now, I just wish for this torment to stop. His relentless bullying has pushed me to the brink, causing moments where I've felt close to the edge of despair. I've even expressed to him that the blood would be on his hands if I harmed myself due to his relentless harassment, but it had no impact on him. It just provided him with something else to talk about on his shows. And why would he stop talking about me? Spreading misinformation generates profit for him, and that appears to be his sole concern. It's an ongoing struggle to try to rise above this situation.

My life has changed after witnessing how cruel people can be, and while I'm a changed person after all of this (how could I not be?), I still want to be Laura Owens, not Emily Wilson. I'm anxious about how people might perceive me once I share my story, but holding all of this inside hurts. **In the face of relentless cyberbullying, I yearn for the torment to cease, hoping that someday, my story will speak louder than the falsehoods, and the strength I find within will reclaim the identity they sought to shatter.**

Cyberharassment Cyberbully Struggle Overcoming Obstacles Empowerment



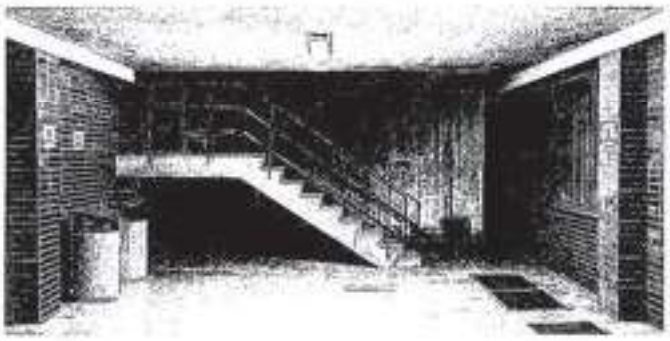
Written by Laura Owens

Follow

9 Followers

Sharing my story isn't about seeking sympathy; it's about reclaiming power, standing up against online abuse, and empowering others along the way.

Recommended from Medium



TrueAlreadyHappenedStories

When I was a kid, my dad kept a second family in our basement.

Growing up, I thought everyone had a second family in their basement. In retrospect, I...

· 12 min read · Nov 23

5K 81



Alexandru Lazar in ILLUMINATION

Ten Habits that will get you ahead of 99% of People

Improve your life and get ahead of your peers in 10 simple steps

9 min read · Nov 18

8.8K 157

Lists



Staff Picks

531 stories · 517 saves



Admiral Cloudberg

A Matter of Millimeters: The story of Qantas flight 32

How a mistake of less than half a millimeter in a single part nearly brought down the world'...

42 min read · 3 days ago

1.92K 28



Lessig

ChatGPT, or: How I Learned to Stop Worrying and Love AI

In my first book, Code and Other Laws of Cyberspace (1999), I told the story of why I...

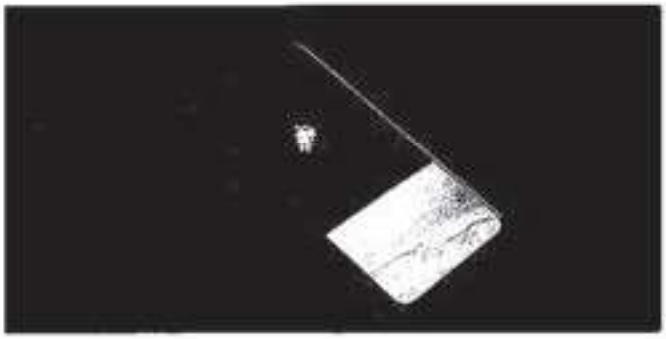
7 min read · Nov 28

4.8K 122



Maevyn Frey in Fourth Wave

The Gender Divide, Holiday Workload Edition



Kiera Bolden in Human Parts

TikTok Diagnosed Me With Autism

The controversial social media algorithm has been the answer to my identity crisis

I'm throwing out the old model and proposing something new

· 9 min read · 3 days ago

938 18

· 9 min read · 4 days ago

877 9

See more recommendations

Clerk of the Superior Court
*** Electronically Filed ***
C. Diaz, Deputy
1/31/2024 5:54:58 PM
Filing ID 17277625

THE VALLEY LAW GROUP, PLLC
Cory B. Keith – SBN 035209
3101 N. Central Avenue, Suite 1470
Phoenix, Arizona 85012
Phone: (480) 300-6012
Fax: (480) 781-0722
Cory@thevalleylawgroup.com
Attorneys for Petitioner

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter Of: **LAURA OWENS,** Petitioner, and **CLAYTON ECHARD,** Respondent.	Case No. FC2023-052114 **REPLY TO RESPONDENT'S RESPONSE TO PETITIONER'S MOTION FOR CONFIDENTIALITY AND PRELIMINARY PROTECTIVE ORDER** (Assigned to the Hon. Julie Mata)

Petitioner, **LAURA OWENS** (hereinafter "Petitioner"), by and through undersigned counsel, files this "Reply to Respondent's Response to her Motion for Confidentiality and Preliminary Protective Order" pursuant to Rule 53, *Arizona Rules of Family Law Procedure,* ("ARFLP").

1. *Respondent Repeatedly Cites Petitioner's Lack of Compliance in Disclosure, While Seemingly Every Communication or Piece of Evidence Petitioner Provides to the Media with Intent to Further Embarrass Petitioner.*

In his Response, Respondent asserts the Court issuing a protective order prohibiting Respondent from speaking to the public would not withstand Constitutional scrutiny. Rather than using his Response as a platform to assert he has not frequently communicated with and distributed information to the media, Respondent instead claims it as his Constitutional

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470 ~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

right to do so. To this point, Respondent admits in his Response to "not doubt[ing] that Petitioner will be annoyed or embarrassed by … deposition." *Response* at 4. While in a normal case or under ordinary circumstances, this discovery might not be problematic, this case is not normal. Conveniently omitted from his Response is Respondent's likely intent to disseminate Petitioner's deposition and its contents to "[his] little Reddit army."[1]

With good reason, Petitioner fears this "Reddit army" will then use the information to create further embarrassing content against her. Respondent also attacked Petitioner's reluctance to disclose privileged documents while enlisting the help of his self-proclaimed army to further embarrass and oppress Petitioner. To the extent Respondent really believes Rule 52, *ARFLP* "ignore[s] the First Amendment," Respondent should address his concern with the legislature–outside of the family court. *Response* at 2. Respondent believes his First Amendment rights should be given heavy consideration while constantly undermining and disregarding Petitioner's right to privacy. Petitioner simply seeks protection from further embarrassment and harassment from Respondent's army.

As such, the Court should limit the method or scope of prospective discovery under Rule 52, *ARFLP*. Such limitations are most appropriate in situations like that at bar, when the anticipated discovery will embarrass and further oppress a litigant.

Respondent's continued exploits to seek privileged documents must be thwarted with such disclosures being ordered protected and deemed further confidential, avoiding

[1] During his January 11, 2024, interview with Nick Viall, Respondent gives praise to what he calls "[his] little Reddit army." Specifically, Respondent discussed users on the Reddit platform who help him in this matter, stating, "So, that's what Reddit found. My little Reddit army. I'll shout them out. They also tore me to shreds in the beginning, but now they're mostly on my side." Nick Viall, *Going Deeper with Clayton Echard - "I Am Not The Father" | The Viall Files w/ Nick Viall* at 01:31:25, https://www.youtube.com/watch?v=zakKq3kUloc. This same Reddit army is now at least one of the groups of people harassing and embarrassing Petitioner online.

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

unnecessary dissemination to the public. Petitioner has documents she believes appropriate to disclose and witnesses who have stated that they are not willing to come forward as they are concerned with being subjected to similar ridicules online as Petitioner. Unfortunately, Respondent's "Reddit army" and his other followers have created an environment where Petitioner does not feel comfortable disclosing information and presenting her case without confidentiality.

2. *Respondent is Intentionally Worsening the Embarrassment of Petitioner with his Pleadings and Conduct.*

Respondent's "Reddit army" has risen to new heights causing concerns for Petitioner's safety and well-being. Case in point, recently Petitioner has received erratic voicemails on her personal cell phone referencing this case and stating that she should "go fuck herself" and referring to her as a "con artist cunt." The petitioner was also subject of what appear to be three prank welfare check calls sending officers to her home. Respondent's active engagement and encouragement of this type of conduct from his followers has risen to the level of concern and warrants protections or confidentiality designations being ordered as requested.

All the while, Respondent's Motions and statements have worsened and become more aggressive, sarcastic, and demeaning. Respondent's motions are littered with false allegations and unnecessary, borderline unprofessional remarks. This conduct has become the subject of more parody for Petitioner online. Respondent claims the public interest in the case only adds weight to maintaining transparency, instead of limiting it. *Response* at 5. However, that rationale is flawed when that public interest rises to the level of causing

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

extreme embarrassment and oppression, and when it limits Petitioner's ability to defend her claims and to put forth evidence corroborating her allegations.

3. Deposition Participation.

Petitioner is not refusing to be deposed, she is just asking for time to allow the Court to address these issues. Petitioner will fully participate at a properly noticed deposition in the event the Court denies her Motion to Quash and once the Court has issued a ruling on her Motion for a Protective Order. Prior to the postponement of the January 17, 2024, deposition, Petitioner sought postponement from Respondent pending resolution of the ruling on her Motion to Quash; Respondent declined. As such, when Petitioner observed worsening conduct, she postponed the deposition pending the Court's involvement.

Regarding Respondent's noticed deposition, Petitioner offered to postpone same to afford Respondent the protections she has sought from this Court.

WHEREFORE, Petitioner respectfully requests that this Court sign the proposed form of Preliminary Protective Order attached as "Exhibit 1" to her Motion for Confidentiality. Respondent seeks disclosure of Petitioner's confidential medical records; the Court should grant Petitioner's request and allow her to prove her case under the confines of confidentially.

RESPECTFULLY submitted this 31st day of January 2024.

THE VALLEY LAW GROUP, PLLC

/s/ Cory B. Keith

Cory B. Keith
Attorney for Petitioner

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

ORIGINAL of the foregoing e-filed
this 31st day of January 2024, with:
Clerk of the Superior Court
Maricopa County Superior Court

COPY presumed delivered even date to:
The Honorable Julie Mata

COPY emailed this 31st day of January 2024 to:
Gregg Woodnick
Woodnick Law, PLLC
1747 E. Morten Ave. Ste 205
Phoenix, Arizona 85020
office@WoodnickLaw.com
Attorney for Respondent

By: *ILS*

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

VERIFICATION

I, **LAURA OWENS**, Petitioner in the above-mentioned matter, declare (or certify, verify or state) under penalty of perjury that the contents of the forgoing "Reply to Respondent's Response to Petitioner's Motion for Confidentiality and Preliminary Protective Order" are true and correct to the best of my present knowledge, information and belief.

31/01/2024
Date

Laura Owens
Laura Owens (Jan 31, 2024 17:37 MST)
Laura Owens, *Petitioner*

Reply to Motion for Confidentiality and Preliminary Protective Order Final

Final Audit Report 2024-02-01

Created:	2024-01-31
By:	Cory Keith (isabel@attorneys-arizona.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAEgF3_GmmlBkVN4kZqR5WWjh36G1KXwnh

"Reply to Motion for Confidentiality and Preliminary Protective Order Final" History

Document created by Cory Keith (isabel@attorneys-arizona.com)
2024-01-31 - 11:40:04 PM GMT

Document emailed to Laura Owens (laura@lauramichelleowens.com) for signature
2024-01-31 - 11:40:08 PM GMT

Email viewed by Laura Owens (laura@lauramichelleowens.com)
2024-02-01 - 0:33:40 AM GMT

Document e-signed by Laura Owens (laura@lauramichelleowens.com)
Signature Date: 2024-02-01 - 0:37:31 AM GMT - Time Source: server

Agreement completed.
2024-02-01 - 0:37:31 AM GMT

Adobe Acrobat Sign

Clerk of the Superior Court
*** Electronically Filed ***
C. Diaz, Deputy
2/12/2024 3:06:09 PM
Filing ID 17335943

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, And **CLAYTON ECHARD**, Respondent.	Case No.: FC2023-052114 **EXPEDITED MOTION TO SET VIRTUAL STATUS CONFERENCE** **[Expedited Ruling Requested]** (Assigned to the Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through counsel hereby requests that this Court set an expedited thirty (30) minute virtual status conference. This Motion is expedited, as trial is currently scheduled for the end of February and myriad pretrial issues must be addressed prior to the scheduled Evidentiary Hearing, including addressing the Motion to Continue/Additional Trial Time.

Petitioner has grossly exploited the judicial process by refusing to comply with the Rules and legal process that she invoked when she initiated the underlying Petition. To date, Petitioner has willfully and wantonly refused to provide any Rule 49 disclosure, respond to any Requests for Production, and failed to attend a properly noticed deposition.

Simultaneously, Petitioner filed a *Motion for Confidentiality and Preliminary Protective Order* (filed 1/18/2024) to seemingly shield herself from any further criticism for her noncompliance and deposed Respondent when she refused to participate in the same. Petitioner's perpetual disregard for Court Rules is exhausting.

Respondent's *Expedited Motion to Continue Trial and Motion for Additional Trial Time* (filed 2/6/2024) is pending before the Court. Consistent with her historical disregard for court process, Petitioner failed to respond to the email inquiry asking her position on the same and has still not done so.

While due process requires the Court to grant the continuance and provide for additional trial presentation time (for the reasons detailed in the still unopposed motion), there is an urgency for a status conference to be held prior to this eventual hearing date. The antics from Petitioner continue to proliferate, and it is clear from the communication as appended, that Petitioner's most recently retained counsel (approximately the 12th in this series of cases) is having challenges with client control that impact Respondent's ability to access requisite disclosure.

As and for his Expedited Motion to Set Virtual Status Conference, Respondent states as follows:

1. On August 1, 2023, Petitioner initiated the underlying action when she filed her *Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support*, alleging that she was pregnant with Respondent's twins after only oral sex. Respondent has consistently maintained that this alleged pregnancy was entirely fraudulent and that oral sex does not result in babies.

2. Petitioner's blatant refusal to provide *any* disclosure or engage in discovery must be addressed prior to the evidentiary hearing. During the nearly seven (7) months since initiating this action, Petitioner's only evidence provided in support of her alleged pregnancy has consisted of faked sonograms and positive hCG tests (there is a history of the same in CV2021-052893). No medically verifiable proof of pregnancy that would satisfy the requirements of Rule 2, which Petitioner herself invoked, has been provided (likely because no such proof exists). *See also Respondent's Reply to Petitioner's Response to Motion for Sanctions Pursuant to Rule 26* (explaining that a positive hCG test is merely a *sign* of pregnancy and false positives can be caused by mediations, such as those associated with epilepsy and infertility).

3. Petitioner has provided no disclosure and continues to flout the Rules of the Court she invoked. Instead of providing basic discovery, she has filed Bar complaints, Board complaints, and sued journalists who have covered the story that she reported and with whom she actively communicates. Meanwhile, Respondent has complied with all requests for disclosure as required by the Rules and requested by Petitioner. More offensively, Petitioner has alluded to having the records Respondent requested multiple times but has refused to provide access under the guise of "protection from public scrutiny." (Parenthetically, while claiming she needs "*protection,*" Petitioner continues to reach out to the media and self-published **two (2)** more Medium.com articles on 2/9/24 and 2/10/24) (**Exhibit 1). To be very clear, Petitioner is claiming she cannot disclose records to Respondent, but as recently as days ago is publishing apocryphal articles about the situation.**

Notably, during Respondent's video deposition on 2/2/2024, Petitioner's counsel presented a highly redacted (+/80% of words blacked out) copy of a medical record purportedly containing "proof" of alleged pregnancy. When Respondent's counsel asked to see the unredacted document (not to make copies or otherwise distribute, only view it in person to verify it actually existed), Petitioner refused. This refusal to allow Respondent's counsel to view a document ostensibly central to the foundation of this case only further exhibits Petitioner's sanctionable conduct and wholesale inability to support the fiction of her alleged pregnancy. Petitioner claiming that she had access to verifiable medical records to support her allegations of pregnancy but then refusing to make them available for Respondent's inspection is a blatant act of disrespect to the court and judicial process.

4. Although Respondent believes the alleged pregnancy was a con/scam/rerun, he needs access to disclosure and documents ostensibly in Petitioner's possession. Petitioner's blatant refusal to comply with the rules of the Court and instead push her own narrative has required further legal involvement in obtaining this information, which Petitioner claims to possess. Respondent has continuously provided Petitioner with ample opportunity for her to admit she fabricated this entire pregnancy or to comply with Court Rules, only to be rebuffed or outright ignored **(Exhibits 2-4).** As a sample of Respondent's efforts:

> **2/5/2024:** *Since we have not received any disclosure from Laura, the RFPs remain outstanding, the HIPAAs have not been executed (provided 3x), the Fetal Death Certificates (provided 2x) also ostensibly not executed and we still need to depose Laura after she failed to appear at her deposition, we are going to file a Motion to Continue and request additional trial time.*
>
> **2/8/2024:** *You have not yet responded to our motion to continue and for additional time* nor *have we received a written response. I am guessing that you are having*

significant client control issues as evidenced by Laura's recent behavior in California and online…

I appreciate that Laura is going to refuse (contrary to law and Court Rules) to provide actual *medical records (as there are none that support her under oath statements). Assuming we will continue to receive* no *disclosure from your client, our motion to compel is forthcoming.*

2/9/2024: *Things just keep getting more ridiculous. Even after my email yesterday, there is* another *article by your client… Since Laura's bag of tricks tends to fit a pattern, we suspect that the postings were a contrived ploy to yet again request a Motion to Seal. I appreciate that your client wants to view herself as a victim by the press that she incited and continues to stoke with her articles, but these postings should be viewed with several grains of salt. (We personally tried to find the alleged postings, but to no avail.)*

Should you be inclined to file anything further regarding the opacity of the legal proceedings that Laura instigated, please promptly disclose the alleged postings in a manner that complies with Rule 2 so we can assess the same and properly respond to the court in kind.

Petitioner now says she is "*no longer pregnant*" but has failed to identify if it this is a result of fetal death or the alleged babies have been put up for adoption.[1] This is the *nexus* of her conduct in choosing to continually refuse to engage in discovery or disclose records, and precisely the reason Respondent is entitled to relief including sanctions, attorneys fees and a finding that the action was not filed in good faith.

Based on her testimony before Judge Gialketsis on 11/2/2023 that she was "*100*%" pregnant and "*24 weeks*" (and appearance with a moon bump on 10/24/24), Petitioner must answer for what allegedly happened to the fictious twin fetuses. Both fetal death certificates

[1] Notably, Respondent attempted to register himself on Arizona Putative Father's Registry in the event that Petitioner actually delivered twins and/or claimed to have put them up for adoption as a reason for explaining their nonexistence (*see Respondent's Notice of Filing Affidavit of Non-Paternity*).

(as required per statute) and blank HIPAA releases have been provided to Petitioner three (3) times, which have gone unacknowledged (*see* **Exhibit 2**).

If (impossible from oral sex) Petitioner was actually pregnant, delivered twins and/or suffered a miscarriage (post twenty-four (24) weeks gestation) at any point during this proceeding, she would have verifiable medical evidence. To date, no fetal death certificates have been executed, no confirmable medical evidence has been presented, and Petitioner has continued to claim "protection" while reaching out to the media directly. For all Respondent knows, the imaginary twins are buried at a horse ranch.

5. To discuss the outstanding Motions as well as the blatant absence of disclosure/discovery by Petitioner, Respondent requests this Court set an expedited status conference for thirty (30) minutes.

6. Respondent also requests this reasonable attorney's fees and costs pursuant to A.R.S. § 25-324 as a result of Petitioner's noncompliance with Court rules, continued disregard for her Rule 49 disclosure obligation, and her wholesale unreasonable behavior in bringing this litigation despite providing no verifiable proof she was ever pregnant.

WHEREFORE, Respondent respectfully requests the Court:

A. Schedule a thirty (30) minute virtual status conference to address pretrial issues prior to the evidentiary hearing scheduled for 2/27/24 at 4:00 p.m.;

B. Award Respondent his reasonable attorney's fees and costs due to Petitioner's unreasonableness pursuant to A.R.S. § 25-324;

C. Order such further relief as the Court deems just.

//

RESPECTFULLY SUBMITTED this 12th day of February, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
This 12th day of February, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document
delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document
emailed this same day to:

Cory Keith
The Valley Law Group, PLLC
3101 N. Central Ave, Ste 1470
Pheonix, AZ 85012
cory@thevalleylawgroup.com
Attorney for Petitioner

By: *MB*

EXHIBIT “1”

Open in app ↗ Sign up Sign in

Medium Search Write

Member-only story

From Plea to Persecution: The Harsh Reality of My Appeal for Justice



Laura Owens · Follow

3 min read · 2 days ago

1

The aftermath of my article has unfolded in a manner I can scarcely believe, yet can't say I am totally surprised by. The notion that I would be the mastermind behind threats to my own family defies logic, yet some have latched onto this theory with a fervor that's both bewildering and painful. *"There's nothing that will convince me she didn't concoct all this herself,"* echoes a sentiment that feels like a knife twist, turning my quest for safety into an absurd spectacle. Another accusation hits: *"Yup, 100% catfished profile created by Laura…She is beyond sick."* The speed with which these unfounded claims spread is not just reckless; it's soul-crushing.

The personal attacks that follow cut even deeper, warping my reality into something unrecognizable: *"It's hysterical that Laura thinks she can try to cover her tracks now with that fake profile. It's too late Laura — AND we also see clearly*

how you weaponize and use race to fit into your disgusting victim narrative." Such assertions are a bitter pill to swallow, particularly when contrasted with the diversity of my own family. My half-Asian nephew stands as a living contradiction to these baseless claims of racism, making them not just wrong, but deeply hurtful.

The insinuation of deceit is relentless. *"Makes [content creator] sign a 'I will not incite violence' clause, then days later drops an article about a [content creator] fan threatening her 🙄 there's nothing that will convince me she didn't concoct all this herself,"* accuses one commenter, suggesting a calculated orchestration of events that couldn't be further from my truth.

It's a bizarre twist of fate, where those who claim to seek justice are the very ones perpetuating injustice. By pointing fingers at me without proof, by calling for the FBI to investigate me (*"she's actually committing federal crimes now by catfishing and posting death threats to herself"*), they are not only

Create an account to read the full story.

The author made this story available to Medium members only.
If you're new to Medium, create a new account to read this story on us.

Sign up with Google

Sign up with Facebook

Sign up with email

Already have an account? Sign in



Written by Laura Owens

Follow

30 Followers

Sharing my story isn't about seeking sympathy; it's about reclaiming power, standing up against online abuse, and empowering others along the way.

More from Laura Owens



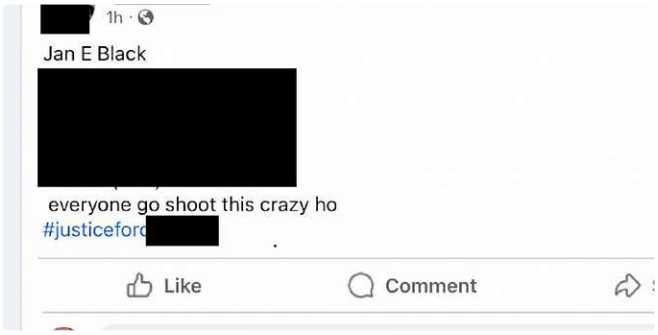
Laura Owens

Unveiling the Unbearable: My Battle Against Cyberbullying and...

It's incredibly hard to put this into words and share what's been going on. I've never asked...

10 min read · Dec 7, 2023

211



Laura Owens

The Night Things Changed

I've been forced to break my silence. Last night, something happened that I never...

· 5 min read · 3 days ago

32

See all from Laura Owens

Recommended from Medium





James Presbitero Jr. in Practice in Public

These Words Make it Obvious That Your Text is Written By AI

These 7 words are painfully obvious. They make me cringe. They will make your reader...

4 min read · Dec 31, 2023

36K 960

Unbecoming

10 Seconds That Ended My 20 Year Marriage

It's August in Northern Virginia, hot and humid. I still haven't showered from my...

· 4 min read · Feb 16, 2022

75K 1060

Lists



Work 101

26 stories · 99 saves



Staff Picks

578 stories · 743 saves



Iain Stanley in Digital Global Traveler

I Went Speed-Dating in Tokyo: It Explains Japan's Sexless...

Exclusive conversations with a bevy of beautiful, single girls? What could go wrong...

✦ · 8 min read · Jan 16, 2024

10.4K 132



Allison Wiltz in Momentum

What Do You Wish More People Knew About Black History?

We have to be the change we want to see

✦ · 7 min read · Jan 27, 2024

5.9K 132



Cory Doctorow

How I got scammed

And why AI will make it worse.

10 min read · Feb 5, 2024

4.7K 71



Dare Obasanjo

5 Things I Learned About Leadership from the Death &...

In 2007 Paul Graham, the founder of Y-Combinator, penned an essay titled Microsof...

8 min read · Feb 4, 2024

5.9K 127

See more recommendations

Open in app ↗ Sign up Sign in

Medium Search Write

Member-only story

The Night Things Changed



Laura Owens · Follow
5 min read · 3 days ago

32

I've been forced to break my silence. Last night, something happened that I never imagined could be a part of my reality. Threats against me and those I hold dear were articulated with chilling specificity and malice, all stemming from a smear campaign orchestrated by a content creator who has turned my life into a spectacle for profit. "Crazy c***, I'll find u and all my n****** will shoot u! #justicefor******** (name of content creator)," one message read, another ominously targeting my mother. These threats were not mere acts of internet cruelty; they were the direct outcome of his relentless use of my story for financial gain. The safety of my family, once taken for granted, is now compromised, our lives overturned by a narrative spun by a total stranger.

Six Months of Turmoil

For six excruciating months, this content creator has been the conductor of a relentless smear campaign against me, pulling strings and painting me as the villain in a story so twisted from reality it's unrecognizable. He has made

videos about me at least once daily and sometimes more than that. He has leveraged lies sourced from those with vendettas against me — men I have restraining orders against — and told their stories as if *they* were the victims. He's spun these fabrications into hundreds of hours of content, with each video, each post, not just an attack on my reputation but a considerable source of revenue for him. My attempts to seek help, including desperate 911 calls, have been obtained by his cult-like following and have been twisted into entertainment for an audience that revels in my distress.

This relentless assault has devastated my mental health and halted my professional life. His refusal to halt his attacks or remove the harmful content, my sole request, has left me with no choice but to pursue legal action for defamation, invasion of privacy, and intentional infliction of emotional distress. But the real wake-up call came last night, proving that the stakes are far higher than reputational damage or court battles; this is about survival.

A Desperate Plea

Create an account to read the full story.

The author made this story available to Medium members only.
If you're new to Medium, create a new account to read this story on us.

Sign up with Google

Sign up with Facebook

Sign up with email

Already have an account? Sign in



Written by Laura Owens

Follow

30 Followers

Sharing my story isn't about seeking sympathy; it's about reclaiming power, standing up against online abuse, and empowering others along the way.

More from Laura Owens



Laura Owens

Unveiling the Unbearable: My Battle Against Cyberbullying and...

It's incredibly hard to put this into words and share what's been going on. I've never asked...

10 min read · Dec 7, 2023

211



Laura Owens

From Plea to Persecution: The Harsh Reality of My Appeal for...

The aftermath of my article has unfolded in a manner I can scarcely believe, yet can't say I...

· 3 min read · 2 days ago

1

See all from Laura Owens

Recommended from Medium





James Presbitero Jr. in Practice in Public

These Words Make it Obvious That Your Text is Written By AI

These 7 words are painfully obvious. They make me cringe. They will make your reader...

4 min read · Dec 31, 2023

36K 960

Unbecoming

10 Seconds That Ended My 20 Year Marriage

It's August in Northern Virginia, hot and humid. I still haven't showered from my...

· 4 min read · Feb 16, 2022

75K 1060

Lists



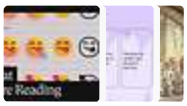
What is ChatGPT?

9 stories · 290 saves



The New Chatbots: ChatGPT, Bard, and Beyond

12 stories · 304 saves



Stories to Help You Grow as a Designer

11 stories · 541 saves



Best of The Writing Cooperative

67 stories · 205 saves



Iain Stanley in Digital Global Traveler

I Went Speed-Dating in Tokyo: It Explains Japan's Sexless...

Exclusive conversations with a bevy of beautiful, single girls? What could go wrong...

· 8 min read · Jan 16, 2024



Laura Owens

From Plea to Persecution: The Harsh Reality of My Appeal for...

The aftermath of my article has unfolded in a manner I can scarcely believe, yet can't say I...

· 3 min read · 2 days ago

10.4K 132 1



Dare Obasanjo

5 Things I Learned About Leadership from the Death &...

In 2007 Paul Graham, the founder of Y-Combinator, penned an essay titled Microsof...

8 min read · Feb 4, 2024

5.8K 127



Shahriar Shahrabi in Realities.io

Designing for Apple Vision Pro: Lessons Learned from Puzzling...

The Apple Vision Pro presents new design challenges to consider. Here are some of the...

13 min read · Feb 5, 2024

1.2K 39

See more recommendations

EXHIBIT “2”

From: Gregg Woodnick
To: Cory Keith
Cc: Isabel Sissel; Isabel Ranney
Subject: Echard/Owens
Date: Monday, February 5, 2024 11:41:59 AM

Cory,

It was nice seeing you on Friday.

Since we have not received any disclosure from Laura, the RFPs remain outstanding, the HIPAAs have not been executed (provided 3x), the Fetal Death Certificates (provided 2x) also ostensibly not executed ***and*** we still need to depose Laura after she failed to appear at her deposition, we are going to file a Motion to Continue and request additional trial time.

I assume you agree, but let me know so I can note it in the MTC.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

EXHIBIT “3”

From: Gregg Woodnick
To: Cory Keith; Isabel Sissel
Cc: Isabel Ranney
Subject: Echard/Owens
Date: Thursday, February 8, 2024 12:02:03 PM

Cory,

You have not yet responded to our motion to continue and for additional time *nor* have we received a written response. I am guessing that you are having significant client control issues as evidenced by Laura's recent behavior in California and online (not including the recent bar complaints on your watch).

I appreciate that Laura is going to refuse (contrary to law and Court Rules) to provide *actual* medical records (as there are none that support her under oath statements). Assuming we will continue to receive *no* disclosure from your client, our motion to compel is forthcoming.

Notwithstanding the severe lack of discovery/discovery, please disclose a copy of your fee agreement by end of business tomorrow along with the same from all of the prior counsel in this matter (Barreda/Platter, Lexie/Teracio and any others I may be forgetting).

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

EXHIBIT “4”

From:	Gregg Woodnick
To:	Cory Keith; Isabel Sissel
Cc:	Isabel Ranney
Subject:	Owens/Echard
Date:	Friday, February 9, 2024 12:15:10 PM

Cory,

Things just keep getting more ridiculous. Even after my email yesterday, there is *another* article by your client. She appears to be focusing her efforts on the video journalist, Dave Neal. I trust Dave is a big boy and he can deal with this nonsense, but her allegations against him (after dismissing her ridiculous attempt at an Injunction) are concerning to say the least. She is now alleging that Dave somehow incited violence against her and that she is now facing "death threats" (note, the few videos I have seen by Dave repeatedly condemn violence against Laura).

Since Laura's bag of tricks tends to fit a pattern, we suspect that the postings were a contrived ploy to yet again request a Motion to Seal. I appreciate that your client wants to view herself as a victim by the press that she incited and continues to stoke with her articles, but these postings should be viewed with several grains of salt. (We personally tried to find the alleged postings, but to no avail.)

Should you be inclined to file anything further regarding the opacity of the legal proceedings that Laura instigated, please promptly disclose the alleged postings in a manner that complies with Rule 2 so we can assess the same and properly respond to the court in kind.

As always, I am happy to discuss this offline and appreciate that you may be having client control issues.

Here is link to her most recent Medium article is: https://medium.com/@laura_owens/the-night-things-changed-605e8ae698dc.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

Clerk of the Superior Court
*** Electronically Filed ***
C. Diaz, Deputy
3/11/2024 4:13:04 PM
Filing ID 17478403

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, And **CLAYTON ECHARD**, Respondent.	Case No.: FC2023-052114 **MOTION TO COMPEL** (Assigned to the Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through counsel undersigned and pursuant to Rule 65(a)(2), *Arizona Rules of Family Law Procedure* (ARLFP) hereby moves this Court to compel Petitioner's disclosure and enter appropriate sanctions for her noncompliance.

At Petitioner's Rule 57 deposition on March 1, 2024, Petitioner testified (1) She altered an ultrasound image falsely claiming they came from Southwest Medical Imaging (SMIL)[1]; (2) She "miscarried" two (2) hand sized fetuses sometime in September/October and was

[1] To be clear, this Motion to Compel in no way implies that Petitioner's multiple prior attorneys or her current counsel knew that they were using falsified/tampered medical evidence.

seen by yet to be named tele-health providers but provided no records regarding the same nor confirmation of the date of the alleged event; (3) When she "miscarried," she took photos of what would have been of 19-24 week twin fetuses, but she no longer had the photos (which she claimed she sent to her sister) because she had gotten a new phone, and (4) There is a fourth (4th) case in California where someone alleged that Petitioner fabricated a pregnancy.

Compulsive lying is not a defense to disclosure production. Petitioner's increasingly apocryphal tales include her telling *Us Weeky* (just last week) that her pregnancy was "confirmed" at an urgent care (again, hCG tests are *not* confirmation of pregnancy). While the loss of a pregnancy is a tragedy, the loss of a fake pregnancy is not. Here, Petitioner was photographed competing in horse jumping competitions with a flat stomach weeks before she appeared in Court before Judge Gialketsis with a seemingly large pregnancy stomach (moon belly) claiming she was "100%" and "24 weeks" pregnant by Clayton, who she never had sexual intercourse with.

Notably, of the litany (14+) provider names given through Petitioner's testimony *prior* to her deposition, multiple providers have denied providing care or ever seeing/communicating with Petitioner (**Exhibit 1)**. Moreover, Petitioner lied about obtaining obstetric care, because sonograms taken by actual sonographers cannot be easily faked nor can fetal anatomy scans or the frequent checkup appointments one would expect to have for her proclaimed "high-risk" twin pregnancy.

Undersigned counsel has sent Petitioner's current counsel reminders that this data needs to be immediately disclosed per Rule 49 (which Petitioner evaded for eight (8) months).

Counsel has not only received no response but no response to efforts to meet and discuss consistent with Rule 9(c). Nevertheless, Rule 9c has been complied with.

As and for his Motion to Compel, Respondent states as follows:

1. On August 1, 2023, Petitioner initiated the underlying action when she filed her Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support, alleging that she was pregnant with Respondent's twins.

2. On August 21, 2023, Respondent filed his Answer, denying that Petitioner could scientifically be pregnant with his twins after they engaged in oral sex on May 20, 2023.

3. On September 28, 2023, the parties attended an Early Resolution Conference and entered into a Rule 69 Agreement stating, "Petitioner agrees to contribute a sample on October 2, 2023 to determine paternity of the alleged pregnancy."

4. On October 6, 2023, Petitioner filed for an Order of Protection against Respondent (FC2023-052771; granted by Judge Doody), alleging that she was pregnant by him and that he was cyberbullying her.

5. On October 18, 2023, Petitioner filed a Request for Pre-Decree Mediation (denied November 22, 2023) alleging Respondent would not speak to her and "*he even acts as if the unborn children don't exist despite a pro ponderous of evide* [sic]."

6. On October 24, 2023, Petitioner appeared on video in a court proceeding before Judge Gialketsis (CV2023-053952) wearing what appeared to be a fake pregnant stomach (moon belly).

7. On November 2, 2023, in the second day of trial on Respondent's granted Injunction Against Harassment against Petitioner, she testified, under oath, that she was

"*100*%" and "*24 weeks*" pregnant by Respondent and that she was due "*February 14, 2024*." Petitioner further testified that she was having a *high-risk* pregnancy (due to her alleged epilepsy) and that she was being seen by "*Dr. Makhoul*" and "*Dr. Higley"* and that she had had an appointment with Dr. Higley "*last Friday*."

8. Petitioner willfully and wantonly refused to comply with *any* disclosure or discovery rules, forcing Respondent to file the following:

a. *Notice of Non-Appearance at Deposition Pursuant to Rules 57(g);*

b. *Response/Objection to Petitioner's Motion for Confidentiality and Preliminary Protective Order;*

c. *Reply to Petitioner's Response to Motion for Sanctions Pursuant to Rule 26;*

d. *Amended Response to Petition to Establish Paternity.*

9. It was not until the Status Conference before the Court on February 21, 2024, that Petitioner agreed to sign a basic HIPAA release to allow Respondent to obtain the documents himself and in compliance with Rule 2, which Petitioner invoked. Of note, Petitioner, apparently mistakenly, signed the HIPAA release in open court with the *wrong year*, causing numerous providers to reject the HIPAA release as expired.

10. Since the Status Conference, Respondent has received confirmation from nearly all providers that Petitioner was never a patient of theirs. Notably, the HIPAA releases for "*Dr. Makhoul*" revealed that Petitioner had never attended an appointment at his office, despite her testimony before Judge Gialketsis and the appointment confirmation email that she submitted as evidence in the Injunction matter (CV2023-053952).

11. Days prior to Petitioner's deposition, Petitioner sent Respondent's counsel a letter (excluding her own attorney) blatantly seeking to extort Respondent into dismissing this action or she would file a baseless, incoherent, and legally unsupported lawsuit for $1.4 million dollars (**Exhibit 2).** If Respondent agreed to sign a "*stipulation to dismiss*" this action "*and to mutually agree to forebear from any future legal actions […]* [by] *February 29, 2024*" (the day before her deposition), she would not pursue the fake legal claim.

12. More bizarrely, at the deposition of Petitioner on March 1, 2024, Petitioner confirmed:

a. **She had never received obstetric care for her "*high-risk*" pregnancy with "*twins*"** and denied being the owner of the sonograms Petitioner posted on Reddit and/or provided to various journalists at the beginning of this case.

b. **She doctored a sonogram to attribute it to Southwest Medical Imaging (SMIL) and added her name and date of birth, which was previously an exhibit in a court proceeding.** She did this, according to her testimony, because she had initially gotten the sonogram *"anonymously"* at Planned Parenthood - Mission Viejo Health Center in California and she did not want Respondent to know where she had gone for the sonogram (but somehow she was fine with him thinking she had gotten it at SMIL?). Unsurprisingly, Planned Parenthood - Mission Viejo has confirmed that **they do not offer** anonymous appointments and they have an easily accessible patient portal. No records from Planned Parenthood – Mission Viejo have been disclosed despite repeated requests.

c. **According to Petitioner, the *only* individual who told her that she was having "boy and girl twins" was a medical provider to whom she texted a six (6) week admittedly**

altered sonogram. Despite medical science (and medical experts) stating that a sonogram can only determine the sex of fetuses with accuracy around eighteen (18) weeks, Petitioner testified that an unnamed provider was able to glean from a six (6) week tampered with sonogram that Petitioner was pregnant with a boy and a girl. **This alleged provider has yet to be disclosed, nor has the text exchange between Petitioner and the provider – ostensibly because it does not exist** (at the deposition, Petitioner claimed she had a new phone and was unable to pull up records to confirm her increasingly ridiculous tale).

d. On the undisclosed day of the alleged miscarriage (ambiguously sometime in either September *or October and* prior to appearing in Court before Judge Gialketsis with a fake pregnant stomach and testifying to being "100%" pregnant), Petitioner **claims to have passed two (2) fetal sacs**. Of course did not go to the hospital or the doctor. She claims to have met with tele-health appointment with a provider, who she testified was not concerned that she had miscarried. *Incredibly*, she testified that she had also shown the two (2) hand-sized sacs to her mother and took a photo, which she shared with the tele-health provider and her sister. No records have been provided despite repeated requests.

e. **There is a fourth (4th) man who has accused Petitioner of fabricating a pregnancy, which supports Respondent's contention that faking pregnancies is either pathological or the oddest of pastimes.** Petitioner initiated a paternity action out of California in 2014 (**Exhibit 3**) regarding what is believed to be her first (out of 5) feigned pregnancies. Petitioner was asked to comply with her disclosure of the same. **Exhibit 4.**

13. **Petitioner has willfully and wantonly failed to disclose information pursuant to Rule 49.** After the Status Conference before this Court, Petitioner provided

minimal disclosure after evading *any* compliance with Rule 49 for over eight (8) months. Now, Petitioner has testified to attending appointments and speaking with providers who only have access to records that are critical to support the "miscarriage" she allegedly had in September or October but did not reveal to Respondent or the Court until her *Motion for Confidentiality and Preliminary Protective Order* filed January 17, 2024.

14. Respondent has complied with Rule 9(c), to the extent possible given Petitioner's refusal to respond or communicate (**Exhibit 5)**. As detailed in correspondence, there have been multiple meetings in person (one at the courthouse and at both depositions) regarding disclosure, including the Court requiring the parties to submit a list of the providers they intend to seek HIPAA records from (where Petitioner notably *failed* to mention Planned Parenthood – Mission Viejo, tele-med providers, or other providers – **Exhibit 6**). Petitioner continues to claim there are records in her exhausting attempts to explain away why no medical evidence supporting her fictional pregnancy exists.

15. **Respondent is entitled to his reasonable attorney's fees in costs incurred in this entire action, including filing this Motion to Compel**. Petitioner's commitment to crafting a trail of medical evidence that cannot be verified (an "*anonymous*" appointment, a photo of miscarried fetuses that somehow disappear when you get a new iPhone, a confirmation of an appointment with a doctor she never goes to, etc.), is *astounding*. That Petitioner keeps weaving this insane web has only caused Respondent to incur more fees to show what he has always known to be true: that Petitioner is a fraud who concocts fictious pregnancies as a ruse to force men into dating her. Due to the significant efforts he has

undertaken, Respondent is entitled to his reasonable attorney's fees and costs pursuant to A.R.S. § 25-324.

WHEREFORE, Respondent respectfully requests the Court:

A. Order Petitioner to obtain the California paternity file from 2014 where she was first accused of faking a pregnancy and disclose the same;

B. Order Petitioner to obtain the records, if they exist, from Planned Parenthood – Mission Viejo Health Center; said Records should come from the provider in light of the history of doctoring records.

C. Order Petitioner to provide the name of the tele-health doctor(s) who she claims told her that she did not need to seek actual medical care or hospitalization after allegedly delivering two (2) stillbirth fetuses prior to the October and November court hearings;

D. Order Petitioner to produce the image(s) (confidential if they exist) of the two (2) stillbirth fetuses she allegedly delivered and shared with the tele-health provider and her sister;

E. Award Respondent his reasonable attorney's fees and costs incurring in filing this Motion to Compel consistent with A.R.S. § 25-324;

F. Order such further relief as the Court deems just.

RESPECTFULLY SUBMITTED this 11th day of March, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 11th day of March, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

Cory Keith
DESERT LEGAL GROUP, LLC
Cory@desertlegalgroup.com
Attorney for Petitioner

By: */s/ MB*

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Motion to Compel* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Mar 11, 2024 15:42 PDT)

CLAYTON ECHARD

03/11/2024

Date

EXHIBIT “1”

747 East Morten Avenue, Suite 205
Phoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

February 23, 2024

Dr. Joshua A. Makhoul, MD
Scottsdale Perinatal Associates
6950 E Chauncey Lane Suite 150
Phoenix, AZ 85054

VIA EMAIL & U.S. Mail

Re: **Owens v. Echard**
Maricopa County Superior Court Case No. FC2023-052114

Dear Provider,

Attached please find an executed HIPAA release regarding a potential patient of yours, **Laura Michelle Owens** DOB 05/14/1990, who also may use the alias "**Emily Laura Wilson**", with the same DOB.

This HIPAA compliant release was executed by Ms. Owens in front of Maricopa County Superior Court Judge Mata on February 21, 2024 for use in cause number FC2023-052114. As evidenced by her signature, you have the authority to release Ms. Owen's records from **August 2020 to present date** directly to our office. The Court will also be issuing a Minute Entry confirming your authority to release records regarding the same.

Please promptly provide any and all records from that time period for any treatment services and communications provided to/with Ms. Owens. This is meant to be comprehensive.

Please note this this cause does involve fraud allegations against one of the parties (including medical records doctoring/manipulation). As such, please assure your custodian of records not only provides the full file, but that if there are records that were not produced by your office (e.g. submitted by a party through an online portal) that they be clearly identified as such (including the submission date) so that they are not misconstrued as records prepared by your office.

//
//

'47 East Morten Avenue, Suite 205
hoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

Inversely, if your records search confirms no records exist, please have your custodian of records provide a basic affidavit indicating:

1. They are the custodian of medical records for the facility.
2. A comprehensive records search was conducted.
3. No records matching Laura Michelle Owens or Emily Laura Wilson with the date of birth of May 14, 1990 were identified.

We will be forwarding you the Minute Entry from the Court confirming your authority under separate cover. For now, and because time is of the essence, we are asking that you expedite production of the requisite data (or confirming the absence of information) and provide the same directly to our office.

We appreciate your prompt attention to this matter. We will of course pay for copies upon presentation of invoices.

Very truly yours,
WOODNICK LAW, PLLC

Gregg R. Woodnick

Cc: C. Keith, esq.

EXHIBIT “2”

Laura Owens
11440 N 69th St
Scottsdale, AZ 85254

February 27, 2024

Clayton Echard
6855 E Camelback Road #7002
Scottsdale, AZ 85251

Subject: Comprehensive Legal Notice of Intent to Sue for Breaches of Contractual and Fiduciary Duties

Dear Mr. Echard,

I write to you with a matter of utmost legal gravity and urgency, pursuant to the breaches of contractual obligations, fiduciary duties, negligence, fraudulent misrepresentation, and professional misconduct as verified by the Arizona Department of Real Estate (ADRE). Your failure to fulfill your professional obligations, specifically in relation to the properties at 19777 N 76th St, Apt 2228, and 7609 N Lynn Oaks Drive, Scottsdale, AZ, has necessitated this action.

1. Specification of Damages:
The total compensatory damages sought, $1,368,936.80, is meticulously calculated based on the current market values of the aforementioned properties as of February 27, 2024, amounting to $1,244,488. This valuation is derived from reputable real estate valuation services, including Redfin, to ensure accuracy and fairness in compensation for the loss of opportunity and financial detriment caused by your actions. Additionally, $124,448.80 is sought for emotional distress, quantified in consideration of the psychological impact and distress directly attributable to your professional negligence and the subsequent ADRE findings.

2. Legal Foundation and ADRE Findings:
The ADRE's determination that your failure to submit an offer constituted a violation of ARTICLE 11. PROFESSIONAL CONDUCT R4-28-1101, specifically regarding the expeditious performance required by a license holder, solidifies the legal basis of my claims. This finding is pivotal, not merely as an administrative admonition but as substantive evidence of your failure to uphold the duties owed to me, thereby strengthening my legal stance on the breaches of contractual and fiduciary duties.

The precedential value of similar legal disputes, notably **Stewart v. Sterling**, as adjudicated by the Arizona Court of Appeals, serves as a pertinent legal analog, illustrating the judiciary's stance on such professional breaches within our jurisdiction. It is imperative to acknowledge that the legal principles espoused in these precedents underscore the seriousness with which the courts regard such breaches and the consequent liabilities thereof.

3. Stipulated Conditions for Resolution:
In lieu of immediate litigation, I propose an alternative resolution contingent upon your stipulation to dismiss FC2023-052114 Owens v. Echard forthwith and to mutually agree to forebear from any future legal actions against each other for any claims. This proposition is tendered in a spirit of amicable dispute resolution and to mitigate further legal entanglements.

Requirement for Immediate Compliance:
Your response to this legal notice is mandated by no later than February 29, 2024, by the close of business. Absent a satisfactory response, I am fully prepared to initiate legal proceedings to seek redress and restitution for the aforementioned breaches.

Sincerely,

Laura Owens

EXHIBIT “3”

From: Gregg Woodnick
To: [redacted]
Cc: Isabel Ranney; Cory Keith; Isabel Sissel
Subject: CA: Owens adv. [redacted]
Date: Monday, March 4, 2024 4:55:00 PM

[redacted]

It is my understanding that you represented Laura Owens in a paternity claim involving [redacted] in 2014. That matter involved allegations of a fabricated pregnancy with altered medical records. It is our understanding that the feigned pregnancy was perceived as a ploy for your client to coerce [redacted] into a relationship. Since that case resolved in California, three (3) additional men have claimed that they were victims of a fake pregnancy ruse by Ms. Owens.

I represent Clayton Echard the pending matter in Arizona. Laura is represented by my friend and colleague, Cory Keith (copied).

Ms. Owens was deposed on March 1, 2024, at which time she was asked directly about all prior litigation. She failed to disclose this California matter, but it was during this deposition that we learned of Mr. [redacted] existence and the fact that he had also alleged she fabricated a pregnancy with him.

We are requesting cooperation for access to the California paternity file. With Ms. Owens neglecting to mention the litigation and prior discovery delays (and an upcoming trial), we need this process expedited. I am asking you to connect with Cory Keith to coordinate production and disclosure of the California court file. Of course we are not requesting privileged information; only the public file from your court.

Our efforts here are about obtaining the otherwise limited access California file without the need to file a Motion to Compel Ms. Owens' complaince with disclosure of prior matters. Arizona Rules require that parties attempt to resolve discovery disputes before bringing them to the court. This is that effort and I certainly understand that your response may simply be that you "no longer represent Ms. Owens". I need to ask as a precondition to asking the court for relief.

Gregg Woodnick

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850

Email: gregg@woodnicklaw.com

EXHIBIT “4”

From: Gregg Woodnick
To: Cory Keith; Isabel Sissel
Cc: Isabel Ranney
Subject: Owens/Echard
Date: Friday, March 8, 2024 12:47:44 PM

Cory,

As it has now been a week since we deposed Laura and we have yet to receive any disclosure from you:

1. L**aura claimed she had an appointment with tele-med providers about her alleged miscarriage**. She testified she would be providing us with the provider names and we have not received the same. This stymies our consulting experts who are already limited in the records they are reviewing in light of Laura claiming that the sonograms she sent to the media and Clayton are not hers. The fact that she does not know the *date* of the alleged miscarriage is *incredible* but could be supported if she provides records from the appointment she claims she had immediately after the alleged miscarriage, including the photo she testified she shared with the provider of the alleged two hand-sized fetuses she delivered. Laura has health insurance, so the providers should be a phone call away for confirmation. If she paid by credit card, she could just look at the statement and give us the vendor name so we can issue the subpoena. There is no excuse for the delay other than more of the same… doctors claimed that say she was not their patient and records that never existed. (As you saw in the supplmental discovery, *more* providers she claimed she was using have no records). We anticipate Planned Parenthood confirming the same.

2. **Larua lied when she said there was no other litigation she was involved in**. The situation with [redacted] appears to be paternity matter in SF. Those files are not public but can be accessed by the parties. Her CA attorney did not respond to my email and neither did you. I am happy to ask [redacted] to cooperate with the release of records. I trust Laura realizes he will confirm yet another pregnancy con from 2014 that was eerily similar to victim #4 (at least, we believe him to be 4th) Clayton.

3. **We need the alleged fetus photos.** Laura said she sent them to both Sarah and the tele-med provider. If she provides the provider name (#1 above) I am sure we will find them there in their records. We should not be fishing for these as Laura should provide the same after she testified under oath to having been seen by these providers and volunteered the information regarding the photo she took and dispatched. She has been on an iPhone for all four men so there will be accessible iCloud backup. It will be easy for Bryan Neumeister (tech forensic expert) to see her images from September/October that were sent to Sarah and the alleged tele-med provider. You did not want her committing to that process at the deposition, which I understand, but Laura needs to cooperate or we are going to seek court intervention. Our medical experts need to see the images so that they can cross refence them to the alleged timeline of the pregnancy that never was.

I think our discussion about disclosure at both depositions in our chat before the last hearing with

Judge Mata covers our Rule 9 obligation. If you disagree, let me know and we can talk Monday afternoon (any time after 2pm). Laura can anticipate our Motion to Compel.

Last, it should go without saying that I am sure you did not know about the pregnancy fraud case in California *or* that Laura tampered with exhibits that you used as evidence in Clayton's deposition. I think Bonnie Platter realized that the records were fake and that is why they tagged out. Perhaps Lexi also realized the same.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

EXHIBIT “5”

From: Gregg Woodnick
To: Cory Keith; Isabel Sissel
Cc: Isabel Ranney
Subject: Echard/Owens
Date: Monday, February 26, 2024 9:57:27 AM

Cory,

I am confirming receipt of the disclosure we received from your office late Friday night. I'd like to quickly point out that the section with the advisory regarding medical records includes alleged records that are *already* part of the public domain (published by your client herself). My understanding is that, not only did Laura post them, but she also emailed them to various journalists, including Steve Carbone and David Neal. She even refers to some of them in her publications (which she appears to be *revising* to fit the new alleged miscarriage timeline your presented to Judge Mata last week-- I trust she is aware that the original versions have been preserved). I am assuming you are not aware of the extent she has put her "records" out in the mediasphere or her new tactic of revising history.

Of course, we intend to honor Judge Mata's directives regarding medical records but, in anticipation of her alleging there is a leak regarding what you just provided, I am advising you in writing of the history and that the majority of "records" provided were the very same Laura published online.

Last, I was hoping that your disclosure from Friday would have been something closer to complying with the overdue RFP and Rule 49. This puts the financial burdeon of discovery on Clayton but is completely not surprising in light of the history here. We will disclose the records we receive in response to the HIPAA requests. I trust you saw that the first vendor denied any records even existed.

We will see you Friday.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Gregg Woodnick
To: Woody Law Clerk
Subject: FW: Owens/Echard
Date: Wednesday, February 28, 2024 7:51:40 AM
Attachments: 2-27-24 - Notice of Intent to Sue.pdf

From: Gregg Woodnick
Sent: Tuesday, February 27, 2024 7:57 PM
To: Cory Keith <Cory@desertlegalgroup.com>; Isabel Sissel <Paralegal@desertlegalgroup.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: Owens/Echard

Cory,

1. Your client emailed me directly tonight (below). I am sure you did not approve or even know about this as it is so woefully inappropriate. Of course, I did not respond.

2. This will be an exhibit at trial. You can also expect my client may release this to the media as exposing Laura's overt and nonsensical extortion does the world good and nothing contained in her "notice" is private information.

3. I have more witnesses stepping forward regarding your clients pattern of faking pregnancies and using this disturbing narrative to somehow extort relationships.

4. I trust you already saw that three (3) providers your client claimed were providing services have indicated they have no medical records for her in their system.

I look forward to seeing you both on Friday.

Gregg

From: Laura Owens <laura@lauramichelleowens.com>
Sent: Tuesday, February 27, 2024 6:39 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Subject: Legal notice - please forward to Clayton

Gregg,

I am contacting you directly rather than through Cory as this is related to a civil matter. I

would appreciate it if you would share the attached with Clayton.

Regards,

Laura Owens

From:	Gregg Woodnick
To:	Cory Keith; Isabel Sissel
Cc:	Isabel Ranney
Subject:	Owens/Echard
Date:	Monday, March 4, 2024 1:29:25 PM
Attachments:	FAX_20240304_1709512377_806.pdf Honor Health Scottsdale-Osborn.pdf Honor Health Scottsdale-Shea.pdf

---

Cory,

At the Status Conference on February 21, 2024, you told Judge Mata that Laura had *not lied* in prior or current proceedings. I trust you have realized that may have been an inaccurate statement in the wake of her deposition last Friday and that you may need to amend your statement.

1. You were copied with the email to Planned Parenthood/Mission Viejo. As I am sure you saw, staff confirmed that they do not offer anonymous appointments. And, if Laura did go there (which is highly doubtful, given the tidal wave of providers who have denied ever seeing her), she would have access to the patient portal and should have no difficulty obtaining the original (not tampered with) sonogram.

2. I am forwarding you the records we received from Barrow. You will note, on page 45, Laura tells her neurologist during an appointment on November 29, 2023 that her "*ob/gyn thinks it was a chromosome thing*" that caused her to miscarry and "*she passed two things that looked like fetuses*." I am eager to see those OBGYN records.

3. Per your client's testimony, please **immediately** disclose:
    a. The names of the telehealth providers she spoke to on August (when she was "spotting" per her testimony) and in September/October on the day that she allegedly miscarried *"…two things that looked like fetuses*."
    b. The "abortion pill" provider who allegedly is the *only* individual who told her she was pregnant with twins *and* they were a boy and a girl based on what we now know is a doctored sonogram. (I was not aware that abortion pill providers were able to use ultrasounds see the genders at 8-9 weeks. I Googled it. Medical science is not aware of it either.)

4. Also per your client's testimony she was seen in August at HonorHealth. They, too, have no records of her. See attached.

5. Add [redacted] to the list of victims. I am sure you did not know this, because unlike the overt lies plaguing the case, Laura lied to you by omission and never told you about the litigation in CA that involved nearly identical allegations of fake/doctored ultrasounds.

Here is our working theory of the case: Laura Owens is a serial pregnancy-faker and prolific forger of medical documents (apparently for at least the past 10 years). Her *modus operandi* is to force relationships with men who do not want to be with her.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

EXHIBIT “6”

From:	Cory Keith
To:	Isabel Ranney; DRJ06@JBAZMC.Maricopa.gov
Cc:	Gregg Woodnick; Maribeth Burroughs; Isabel Sissel
Subject:	Re: FC2023-052114 - List of Providers
Date:	Wednesday, February 28, 2024 2:04:00 PM
Attachments:	image001.png image002.png

Good afternoon,

To ensure an exhaustive list, my client asked that I also communicate the following providers for your records:

- Momdoc
- Banner Health

If these are already covered in your below list of providers, please disregard. Let me know if you need any additional information.

Warmest regards,



*Please include my paralegal, Paralegal@DesertLegalGroup.com, on all communications with our firm.

Confidentiality Notice:
This electronic message and all contents contain information from Desert Legal Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

From: Isabel Ranney <isabel@woodnicklaw.com>

Date: Wednesday, February 21, 2024 at 12:46 PM

To: DRJ06@JBAZMC.Maricopa.gov <DRJ06@JBAZMC.Maricopa.gov>

Cc: Gregg Woodnick <Gregg@woodnicklaw.com>, Cory Keith

<Cory@desertlegalgroup.com>, cory@thevalleylawgroup.com <cory@thevalleylawgroup.com>, Maribeth Burroughs <maribeth@woodnicklaw.com>, Isabel Sissel <Paralegal@desertlegalgroup.com>
Subject: RE: FC2023-052114 - List of Providers

Good afternoon,

Per the Court's request, the providers we will be requesting records from via the HIPAA release signed in Court today (2/21) by Ms. Owens are (and subject to additional providers listed by Mr. Keith):

- Dr. Jeffrey Blake Higley, MD
- Dr. Joshua A. Makhoul, MD
- Tamara Lister, NP
- Dr. John Jones, DO
- One Medical
- HonorHealth Scottsdale
- Family Planning Associates
- Any Lab Test Now
- Choice DNA
- ArcPoint Labs
- Planned Parenthood California
- SMIL Southwest Medical Imaging
- Barrow Neurological Institute
- Dr. Zeiman

Thank you,

Isabel Ranney

ISABEL RANNEY
Attorney
WL | WOODNICK LAW PLLC
1747 E. Morten Ave., #205
Phoenix, Arizona 85020
Phone: 602-449-7980
Fax: 602-396-5850
www.woodnicklaw.com
Email: isabel@woodnicklaw.com

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication

is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.

Clerk of the Superior Court
*** Electronically Filed ***
M. Cain, Deputy
3/11/2024 4:21:30 PM
Filing ID 17478511

WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
Telephone: (602) 449-7980
Facsimile: (602) 396-5850
office@woodnicklaw.com

Gregg R. Woodnick, #020736
Isabel Ranney, #038564
Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of: **LAURA OWENS**, Petitioner, And **CLAYTON ECHARD**, Respondent.	Case No.: FC2023-052114 **MOTION TO COMPEL** (Assigned to the Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through counsel undersigned and pursuant to Rule 65(a)(2), *Arizona Rules of Family Law Procedure* (ARLFP) hereby moves this Court to compel Petitioner's disclosure and enter appropriate sanctions for her noncompliance.

At Petitioner's Rule 57 deposition on March 1, 2024, Petitioner testified (1) She altered an ultrasound image falsely claiming they came from Southwest Medical Imaging (SMIL)[1]; (2) She "miscarried" two (2) hand sized fetuses sometime in September/October and was

[1] To be clear, this Motion to Compel in no way implies that Petitioner's multiple prior attorneys or her current counsel knew that they were using falsified/tampered medical evidence.

seen by yet to be named tele-health providers but provided no records regarding the same nor confirmation of the date of the alleged event; (3) When she "miscarried," she took photos of what would have been of 19-24 week twin fetuses, but she no longer had the photos (which she claimed she sent to her sister) because she had gotten a new phone, and (4) There is a fourth (4th) case in California where someone alleged that Petitioner fabricated a pregnancy.

Compulsive lying is not a defense to disclosure production. Petitioner's increasingly apocryphal tales include her telling *Us Weeky* (just last week) that her pregnancy was "confirmed" at an urgent care (again, hCG tests are *not* confirmation of pregnancy). While the loss of a pregnancy is a tragedy, the loss of a fake pregnancy is not. Here, Petitioner was photographed competing in horse jumping competitions with a flat stomach weeks before she appeared in Court before Judge Gialketsis with a seemingly large pregnancy stomach (moon belly) claiming she was "100%" and "24 weeks" pregnant by Clayton, who she never had sexual intercourse with.

Notably, of the litany (14+) provider names given through Petitioner's testimony *prior* to her deposition, multiple providers have denied providing care or ever seeing/communicating with Petitioner (**Exhibit 1)**. Moreover, Petitioner lied about obtaining obstetric care, because sonograms taken by actual sonographers cannot be easily faked nor can fetal anatomy scans or the frequent checkup appointments one would expect to have for her proclaimed "high-risk" twin pregnancy.

Undersigned counsel has sent Petitioner's current counsel reminders that this data needs to be immediately disclosed per Rule 49 (which Petitioner evaded for eight (8) months).

Counsel has not only received no response but no response to efforts to meet and discuss consistent with Rule 9(c). Nevertheless, Rule 9c has been complied with.

As and for his Motion to Compel, Respondent states as follows:

1. On August 1, 2023, Petitioner initiated the underlying action when she filed her Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support, alleging that she was pregnant with Respondent's twins.

2. On August 21, 2023, Respondent filed his Answer, denying that Petitioner could scientifically be pregnant with his twins after they engaged in oral sex on May 20, 2023.

3. On September 28, 2023, the parties attended an Early Resolution Conference and entered into a Rule 69 Agreement stating, "Petitioner agrees to contribute a sample on October 2, 2023 to determine paternity of the alleged pregnancy."

4. On October 6, 2023, Petitioner filed for an Order of Protection against Respondent (FC2023-052771; granted by Judge Doody), alleging that she was pregnant by him and that he was cyberbullying her.

5. On October 18, 2023, Petitioner filed a Request for Pre-Decree Mediation (denied November 22, 2023) alleging Respondent would not speak to her and "*he even acts as if the unborn children don't exist despite a pro ponderous of evide* [sic]."

6. On October 24, 2023, Petitioner appeared on video in a court proceeding before Judge Gialketsis (CV2023-053952) wearing what appeared to be a fake pregnant stomach (moon belly).

7. On November 2, 2023, in the second day of trial on Respondent's granted Injunction Against Harassment against Petitioner, she testified, under oath, that she was

"*100*%" and "*24 weeks*" pregnant by Respondent and that she was due "*February 14, 2024*." Petitioner further testified that she was having a *high-risk* pregnancy (due to her alleged epilepsy) and that she was being seen by "*Dr. Makhoul*" and "*Dr. Higley"* and that she had had an appointment with Dr. Higley "*last Friday*."

8. Petitioner willfully and wantonly refused to comply with *any* disclosure or discovery rules, forcing Respondent to file the following:

a. *Notice of Non-Appearance at Deposition Pursuant to Rules 57(g);*

b. *Response/Objection to Petitioner's Motion for Confidentiality and Preliminary Protective Order;*

c. *Reply to Petitioner's Response to Motion for Sanctions Pursuant to Rule 26;*

d. *Amended Response to Petition to Establish Paternity.*

9. It was not until the Status Conference before the Court on February 21, 2024, that Petitioner agreed to sign a basic HIPAA release to allow Respondent to obtain the documents himself and in compliance with Rule 2, which Petitioner invoked. Of note, Petitioner, apparently mistakenly, signed the HIPAA release in open court with the *wrong year*, causing numerous providers to reject the HIPAA release as expired.

10. Since the Status Conference, Respondent has received confirmation from nearly all providers that Petitioner was never a patient of theirs. Notably, the HIPAA releases for "*Dr. Makhoul*" revealed that Petitioner had never attended an appointment at his office, despite her testimony before Judge Gialketsis and the appointment confirmation email that she submitted as evidence in the Injunction matter (CV2023-053952).

11. Days prior to Petitioner's deposition, Petitioner sent Respondent's counsel a letter (excluding her own attorney) blatantly seeking to extort Respondent into dismissing this action or she would file a baseless, incoherent, and legally unsupported lawsuit for $1.4 million dollars (**Exhibit 2).** If Respondent agreed to sign a "*stipulation to dismiss*" this action "*and to mutually agree to forebear from any future legal actions […]* [by] *February 29, 2024*" (the day before her deposition), she would not pursue the fake legal claim.

12. More bizarrely, at the deposition of Petitioner on March 1, 2024, Petitioner confirmed:

a. **She had never received obstetric care for her "*high-risk*" pregnancy with "*twins*"** and denied being the owner of the sonograms Petitioner posted on Reddit and/or provided to various journalists at the beginning of this case.

b. **She doctored a sonogram to attribute it to Southwest Medical Imaging (SMIL) and added her name and date of birth, which was previously an exhibit in a court proceeding.** She did this, according to her testimony, because she had initially gotten the sonogram *"anonymously"* at Planned Parenthood - Mission Viejo Health Center in California and she did not want Respondent to know where she had gone for the sonogram (but somehow she was fine with him thinking she had gotten it at SMIL?). Unsurprisingly, Planned Parenthood - Mission Viejo has confirmed that **they do not offer** anonymous appointments and they have an easily accessible patient portal. No records from Planned Parenthood – Mission Viejo have been disclosed despite repeated requests.

c. **According to Petitioner, the *only* individual who told her that she was having "boy and girl twins" was a medical provider to whom she texted a six (6) week admittedly**

altered sonogram. Despite medical science (and medical experts) stating that a sonogram can only determine the sex of fetuses with accuracy around eighteen (18) weeks, Petitioner testified that an unnamed provider was able to glean from a six (6) week tampered with sonogram that Petitioner was pregnant with a boy and a girl. **This alleged provider has yet to be disclosed, nor has the text exchange between Petitioner and the provider – ostensibly because it does not exist** (at the deposition, Petitioner claimed she had a new phone and was unable to pull up records to confirm her increasingly ridiculous tale).

d. On the undisclosed day of the alleged miscarriage (ambiguously sometime in either September *or October and* prior to appearing in Court before Judge Gialketsis with a fake pregnant stomach and testifying to being "100%" pregnant), Petitioner **claims to have passed two (2) fetal sacs**. Of course did not go to the hospital or the doctor. She claims to have met with tele-health appointment with a provider, who she testified was not concerned that she had miscarried. *Incredibly*, she testified that she had also shown the two (2) hand-sized sacs to her mother and took a photo, which she shared with the tele-health provider and her sister. No records have been provided despite repeated requests.

e. **There is a fourth (4th) man who has accused Petitioner of fabricating a pregnancy, which supports Respondent's contention that faking pregnancies is either pathological or the oddest of pastimes.** Petitioner initiated a paternity action out of California in 2014 (**Exhibit 3**) regarding what is believed to be her first (out of 5) feigned pregnancies. Petitioner was asked to comply with her disclosure of the same. **Exhibit 4.**

13. **Petitioner has willfully and wantonly failed to disclose information pursuant to Rule 49.** After the Status Conference before this Court, Petitioner provided

minimal disclosure after evading *any* compliance with Rule 49 for over eight (8) months. Now, Petitioner has testified to attending appointments and speaking with providers who only have access to records that are critical to support the "miscarriage" she allegedly had in September or October but did not reveal to Respondent or the Court until her *Motion for Confidentiality and Preliminary Protective Order* filed January 17, 2024.

14. Respondent has complied with Rule 9(c), to the extent possible given Petitioner's refusal to respond or communicate (**Exhibit 5)**. As detailed in correspondence, there have been multiple meetings in person (one at the courthouse and at both depositions) regarding disclosure, including the Court requiring the parties to submit a list of the providers they intend to seek HIPAA records from (where Petitioner notably *failed* to mention Planned Parenthood – Mission Viejo, tele-med providers, or other providers – **Exhibit 6**). Petitioner continues to claim there are records in her exhausting attempts to explain away why no medical evidence supporting her fictional pregnancy exists.

15. **Respondent is entitled to his reasonable attorney's fees in costs incurred in this entire action, including filing this Motion to Compel**. Petitioner's commitment to crafting a trail of medical evidence that cannot be verified (an "*anonymous*" appointment, a photo of miscarried fetuses that somehow disappear when you get a new iPhone, a confirmation of an appointment with a doctor she never goes to, etc.), is *astounding*. That Petitioner keeps weaving this insane web has only caused Respondent to incur more fees to show what he has always known to be true: that Petitioner is a fraud who concocts fictious pregnancies as a ruse to force men into dating her. Due to the significant efforts he has

undertaken, Respondent is entitled to his reasonable attorney's fees and costs pursuant to A.R.S. § 25-324.

WHEREFORE, Respondent respectfully requests the Court:

A. Order Petitioner to obtain the California paternity file from 2014 where she was first accused of faking a pregnancy and disclose the same;

B. Order Petitioner to obtain the records, if they exist, from Planned Parenthood – Mission Viejo Health Center; said Records should come from the provider in light of the history of doctoring records.

C. Order Petitioner to provide the name of the tele-health doctor(s) who she claims told her that she did not need to seek actual medical care or hospitalization after allegedly delivering two (2) stillbirth fetuses prior to the October and November court hearings;

D. Order Petitioner to produce the image(s) (confidential if they exist) of the two (2) stillbirth fetuses she allegedly delivered and shared with the tele-health provider and her sister;

E. Award Respondent his reasonable attorney's fees and costs incurring in filing this Motion to Compel consistent with A.R.S. § 25-324;

F. Order such further relief as the Court deems just.

RESPECTFULLY SUBMITTED this 11th day of March, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 11th day of March, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

Cory Keith
DESERT LEGAL GROUP, LLC
Cory@desertlegalgroup.com
Attorney for Petitioner

By: */s/ MB*

GOOD FAITH CONSULTATION CERTIFICATE

In conformance with Rule 9(C), *Arizona Rules of Family Law Procedure*, counsel undersigned hereby certifies that Respondent, Clayton Echard, satisfied his Rule 9(c) obligation when he had a private in person conversation regarding Petitioner's outstanding disclosure with Petitioner's counsel, Cory Keith, around 10:30 a.m. on February 2, 2024 and on prior to the Status Conference on February 21, 2024. Respondent's counsel sent numerous emails to Petitioner's counsel (see 3/4/24 email) regarding the same and specifically requested a meet and confer on March 8, 2024 which, as of the date of signing, has not been responded to.

WOODNICK LAW, PLLC

Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Motion to Compel* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard (Mar 11, 2024 15:42 PDT)

CLAYTON ECHARD

03/11/2024

Date

EXHIBIT “1”

747 East Morten Avenue, Suite 205
Phoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

February 23, 2024

Dr. Joshua A. Makhoul, MD
Scottsdale Perinatal Associates
6950 E Chauncey Lane Suite 150
Phoenix, AZ 85054

VIA EMAIL & U.S. Mail

Re: **Owens v. Echard**
Maricopa County Superior Court Case No. FC2023-052114

Dear Provider,

Attached please find an executed HIPAA release regarding a potential patient of yours, **Laura Michelle Owens** DOB 05/14/1990, who also may use the alias "**Emily Laura Wilson**", with the same DOB.

This HIPAA compliant release was executed by Ms. Owens in front of Maricopa County Superior Court Judge Mata on February 21, 2024 for use in cause number FC2023-052114. As evidenced by her signature, you have the authority to release Ms. Owen's records from **August 2020 to present date** directly to our office. The Court will also be issuing a Minute Entry confirming your authority to release records regarding the same.

Please promptly provide any and all records from that time period for any treatment services and communications provided to/with Ms. Owens. This is meant to be comprehensive.

Please note this this cause does involve fraud allegations against one of the parties (including medical records doctoring/manipulation). As such, please assure your custodian of records not only provides the full file, but that if there are records that were not produced by your office (e.g. submitted by a party through an online portal) that they be clearly identified as such (including the submission date) so that they are not misconstrued as records prepared by your office.

//
//

'47 East Morten Avenue, Suite 205
hoenix, AZ 85020
(602) 449-7980
(602) 396-5850
office@woodnicklaw.com
www.woodnicklaw.com

WL WOODNICK LAW PLLC

Inversely, if your records search confirms no records exist, please have your custodian of records provide a basic affidavit indicating:

1. They are the custodian of medical records for the facility.
2. A comprehensive records search was conducted.
3. No records matching Laura Michelle Owens or Emily Laura Wilson with the date of birth of May 14, 1990 were identified.

We will be forwarding you the Minute Entry from the Court confirming your authority under separate cover. For now, and because time is of the essence, we are asking that you expedite production of the requisite data (or confirming the absence of information) and provide the same directly to our office.

We appreciate your prompt attention to this matter. We will of course pay for copies upon presentation of invoices.

Very truly yours,
WOODNICK LAW, PLLC

Gregg R. Woodnick

Cc: C. Keith, esq.

EXHIBIT “2”

Laura Owens
11440 N 69th St
Scottsdale, AZ 85254

February 27, 2024

Clayton Echard
6855 E Camelback Road #7002
Scottsdale, AZ 85251

Subject: Comprehensive Legal Notice of Intent to Sue for Breaches of Contractual and Fiduciary Duties

Dear Mr. Echard,

I write to you with a matter of utmost legal gravity and urgency, pursuant to the breaches of contractual obligations, fiduciary duties, negligence, fraudulent misrepresentation, and professional misconduct as verified by the Arizona Department of Real Estate (ADRE). Your failure to fulfill your professional obligations, specifically in relation to the properties at 19777 N 76th St, Apt 2228, and 7609 N Lynn Oaks Drive, Scottsdale, AZ, has necessitated this action.

1. Specification of Damages:
The total compensatory damages sought, $1,368,936.80, is meticulously calculated based on the current market values of the aforementioned properties as of February 27, 2024, amounting to $1,244,488. This valuation is derived from reputable real estate valuation services, including Redfin, to ensure accuracy and fairness in compensation for the loss of opportunity and financial detriment caused by your actions. Additionally, $124,448.80 is sought for emotional distress, quantified in consideration of the psychological impact and distress directly attributable to your professional negligence and the subsequent ADRE findings.

2. Legal Foundation and ADRE Findings:
The ADRE's determination that your failure to submit an offer constituted a violation of ARTICLE 11. PROFESSIONAL CONDUCT R4-28-1101, specifically regarding the expeditious performance required by a license holder, solidifies the legal basis of my claims. This finding is pivotal, not merely as an administrative admonition but as substantive evidence of your failure to uphold the duties owed to me, thereby strengthening my legal stance on the breaches of contractual and fiduciary duties.

The precedential value of similar legal disputes, notably **Stewart v. Sterling**, as adjudicated by the Arizona Court of Appeals, serves as a pertinent legal analog, illustrating the judiciary's stance on such professional breaches within our jurisdiction. It is imperative to acknowledge that the legal principles espoused in these precedents underscore the seriousness with which the courts regard such breaches and the consequent liabilities thereof.

3. Stipulated Conditions for Resolution:
In lieu of immediate litigation, I propose an alternative resolution contingent upon your stipulation to dismiss FC2023-052114 Owens v. Echard forthwith and to mutually agree to forebear from any future legal actions against each other for any claims. This proposition is tendered in a spirit of amicable dispute resolution and to mitigate further legal entanglements.

Requirement for Immediate Compliance:
Your response to this legal notice is mandated by no later than February 29, 2024, by the close of business. Absent a satisfactory response, I am fully prepared to initiate legal proceedings to seek redress and restitution for the aforementioned breaches.

Sincerely,

Laura Owens

EXHIBIT “3”

From: Gregg Woodnick
To: [redacted]
Cc: Isabel Ranney; Cory Keith; Isabel Sissel
Subject: CA: Owens adv. [redacted]
Date: Monday, March 4, 2024 4:55:00 PM

[redacted]

It is my understanding that you represented Laura Owens in a paternity claim involving [redacted] in 2014. That matter involved allegations of a fabricated pregnancy with altered medical records. It is our understanding that the feigned pregnancy was perceived as a ploy for your client to coerce [redacted] into a relationship. Since that case resolved in California, three (3) additional men have claimed that they were victims of a fake pregnancy ruse by Ms. Owens.

I represent Clayton Echard the pending matter in Arizona. Laura is represented by my friend and colleague, Cory Keith (copied).

Ms. Owens was deposed on March 1, 2024, at which time she was asked directly about all prior litigation. She failed to disclose this California matter, but it was during this deposition that we learned of Mr. [redacted] existence and the fact that he had also alleged she fabricated a pregnancy with him.

We are requesting cooperation for access to the California paternity file. With Ms. Owens neglecting to mention the litigation and prior discovery delays (and an upcoming trial), we need this process expedited. I am asking you to connect with Cory Keith to coordinate production and disclosure of the California court file. Of course we are not requesting privileged information; only the public file from your court.

Our efforts here are about obtaining the otherwise limited access California file without the need to file a Motion to Compel Ms. Owens' complaince with disclosure of prior matters. Arizona Rules require that parties attempt to resolve discovery disputes before bringing them to the court. This is that effort and I certainly understand that your response may simply be that you "no longer represent Ms. Owens". I need to ask as a precondition to asking the court for relief.

Gregg Woodnick

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850

Email: gregg@woodnicklaw.com

EXHIBIT “4”

From: Gregg Woodnick
To: Cory Keith; Isabel Sissel
Cc: Isabel Ranney
Subject: Owens/Echard
Date: Friday, March 8, 2024 12:47:44 PM

Cory,

As it has now been a week since we deposed Laura and we have yet to receive any disclosure from you:

1. L**aura claimed she had an appointment with tele-med providers about her alleged miscarriage**. She testified she would be providing us with the provider names and we have not received the same. This stymies our consulting experts who are already limited in the records they are reviewing in light of Laura claiming that the sonograms she sent to the media and Clayton are not hers. The fact that she does not know the *date* of the alleged miscarriage is *incredible* but could be supported if she provides records from the appointment she claims she had immediately after the alleged miscarriage, including the photo she testified she shared with the provider of the alleged two hand-sized fetuses she delivered. Laura has health insurance, so the providers should be a phone call away for confirmation. If she paid by credit card, she could just look at the statement and give us the vendor name so we can issue the subpoena. There is no excuse for the delay other than more of the same… doctors claimed that say she was not their patient and records that never existed. (As you saw in the supplmental discovery, *more* providers she claimed she was using have no records). We anticipate Planned Parenthood confirming the same.

2. **Larua lied when she said there was no other litigation she was involved in**. The situation with [redacted] appears to be paternity matter in SF. Those files are not public but can be accessed by the parties. Her CA attorney did not respond to my email and neither did you. I am happy to ask [redacted] to cooperate with the release of records. I trust Laura realizes he will confirm yet another pregnancy con from 2014 that was eerily similar to victim #4 (at least, we believe him to be 4th) Clayton.

3. **We need the alleged fetus photos.** Laura said she sent them to both Sarah and the tele-med provider. If she provides the provider name (#1 above) I am sure we will find them there in their records. We should not be fishing for these as Laura should provide the same after she testified under oath to having been seen by these providers and volunteered the information regarding the photo she took and dispatched. She has been on an iPhone for all four men so there will be accessible iCloud backup. It will be easy for Bryan Neumeister (tech forensic expert) to see her images from September/October that were sent to Sarah and the alleged tele-med provider. You did not want her committing to that process at the deposition, which I understand, but Laura needs to cooperate or we are going to seek court intervention. Our medical experts need to see the images so that they can cross refence them to the alleged timeline of the pregnancy that never was.

I think our discussion about disclosure at both depositions in our chat before the last hearing with

Judge Mata covers our Rule 9 obligation. If you disagree, let me know and we can talk Monday afternoon (any time after 2pm). Laura can anticipate our Motion to Compel.

Last, it should go without saying that I am sure you did not know about the pregnancy fraud case in California *or* that Laura tampered with exhibits that you used as evidence in Clayton's deposition. I think Bonnie Platter realized that the records were fake and that is why they tagged out. Perhaps Lexi also realized the same.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

EXHIBIT “5”

From: Gregg Woodnick
To: Cory Keith; Isabel Sissel
Cc: Isabel Ranney
Subject: Echard/Owens
Date: Monday, February 26, 2024 9:57:27 AM

Cory,

I am confirming receipt of the disclosure we received from your office late Friday night. I'd like to quickly point out that the section with the advisory regarding medical records includes alleged records that are *already* part of the public domain (published by your client herself). My understanding is that, not only did Laura post them, but she also emailed them to various journalists, including Steve Carbone and David Neal. She even refers to some of them in her publications (which she appears to be *revising* to fit the new alleged miscarriage timeline your presented to Judge Mata last week-- I trust she is aware that the original versions have been preserved). I am assuming you are not aware of the extent she has put her "records" out in the mediasphere or her new tactic of revising history.

Of course, we intend to honor Judge Mata's directives regarding medical records but, in anticipation of her alleging there is a leak regarding what you just provided, I am advising you in writing of the history and that the majority of "records" provided were the very same Laura published online.

Last, I was hoping that your disclosure from Friday would have been something closer to complying with the overdue RFP and Rule 49. This puts the financial burdeon of discovery on Clayton but is completely not surprising in light of the history here. We will disclose the records we receive in response to the HIPAA requests. I trust you saw that the first vendor denied any records even existed.

We will see you Friday.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

From: Gregg Woodnick
To: Woody Law Clerk
Subject: FW: Owens/Echard
Date: Wednesday, February 28, 2024 7:51:40 AM
Attachments: 2-27-24 - Notice of Intent to Sue.pdf

From: Gregg Woodnick
Sent: Tuesday, February 27, 2024 7:57 PM
To: Cory Keith <Cory@desertlegalgroup.com>; Isabel Sissel <Paralegal@desertlegalgroup.com>
Cc: Isabel Ranney <isabel@woodnicklaw.com>; Maribeth Burroughs <maribeth@woodnicklaw.com>
Subject: Owens/Echard

Cory,

1. Your client emailed me directly tonight (below). I am sure you did not approve or even know about this as it is so woefully inappropriate. Of course, I did not respond.

2. This will be an exhibit at trial. You can also expect my client may release this to the media as exposing Laura's overt and nonsensical extortion does the world good and nothing contained in her "notice" is private information.

3. I have more witnesses stepping forward regarding your clients pattern of faking pregnancies and using this disturbing narrative to somehow extort relationships.

4. I trust you already saw that three (3) providers your client claimed were providing services have indicated they have no medical records for her in their system.

I look forward to seeing you both on Friday.

Gregg

From: Laura Owens <laura@lauramichelleowens.com>
Sent: Tuesday, February 27, 2024 6:39 PM
To: Gregg Woodnick <Gregg@woodnicklaw.com>
Subject: Legal notice - please forward to Clayton

Gregg,

I am contacting you directly rather than through Cory as this is related to a civil matter. I

would appreciate it if you would share the attached with Clayton.

Regards,

Laura Owens

From:	Gregg Woodnick
To:	Cory Keith; Isabel Sissel
Cc:	Isabel Ranney
Subject:	Owens/Echard
Date:	Monday, March 4, 2024 1:29:25 PM
Attachments:	FAX_20240304_1709512377_806.pdf Honor Health Scottsdale-Osborn.pdf Honor Health Scottsdale-Shea.pdf

---

Cory,

At the Status Conference on February 21, 2024, you told Judge Mata that Laura had *not lied* in prior or current proceedings. I trust you have realized that may have been an inaccurate statement in the wake of her deposition last Friday and that you may need to amend your statement.

1. You were copied with the email to Planned Parenthood/Mission Viejo. As I am sure you saw, staff confirmed that they do not offer anonymous appointments. And, if Laura did go there (which is highly doubtful, given the tidal wave of providers who have denied ever seeing her), she would have access to the patient portal and should have no difficulty obtaining the original (not tampered with) sonogram.

2. I am forwarding you the records we received from Barrow. You will note, on page 45, Laura tells her neurologist during an appointment on November 29, 2023 that her "*ob/gyn thinks it was a chromosome thing*" that caused her to miscarry and "*she passed two things that looked like fetuses*." I am eager to see those OBGYN records.

3. Per your client's testimony, please **immediately** disclose:
    a. The names of the telehealth providers she spoke to on August (when she was "spotting" per her testimony) and in September/October on the day that she allegedly miscarried *"…two things that looked like fetuses*."
    b. The "abortion pill" provider who allegedly is the *only* individual who told her she was pregnant with twins *and* they were a boy and a girl based on what we now know is a doctored sonogram. (I was not aware that abortion pill providers were able to use ultrasounds see the genders at 8-9 weeks. I Googled it. Medical science is not aware of it either.)

4. Also per your client's testimony she was seen in August at HonorHealth. They, too, have no records of her. See attached.

5. Add [redacted] to the list of victims. I am sure you did not know this, because unlike the overt lies plaguing the case, Laura lied to you by omission and never told you about the litigation in CA that involved nearly identical allegations of fake/doctored ultrasounds.

Here is our working theory of the case: Laura Owens is a serial pregnancy-faker and prolific forger of medical documents (apparently for at least the past 10 years). Her *modus operandi* is to force relationships with men who do not want to be with her.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020
Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com
Email: gregg@woodnicklaw.com

EXHIBIT “6”

From:	Cory Keith
To:	Isabel Ranney; DRJ06@JBAZMC.Maricopa.gov
Cc:	Gregg Woodnick; Maribeth Burroughs; Isabel Sissel
Subject:	Re: FC2023-052114 - List of Providers
Date:	Wednesday, February 28, 2024 2:04:00 PM
Attachments:	image001.png image002.png

Good afternoon,

To ensure an exhaustive list, my client asked that I also communicate the following providers for your records:

- Momdoc
- Banner Health

If these are already covered in your below list of providers, please disregard. Let me know if you need any additional information.

Warmest regards,



*Please include my paralegal, Paralegal@DesertLegalGroup.com, on all communications with our firm.

Confidentiality Notice:
This electronic message and all contents contain information from Desert Legal Group, PLLC. which may contain information that is privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copying, or distribution of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender immediately and destroy the original message and any copies.

From: Isabel Ranney <isabel@woodnicklaw.com>

Date: Wednesday, February 21, 2024 at 12:46 PM

To: DRJ06@JBAZMC.Maricopa.gov <DRJ06@JBAZMC.Maricopa.gov>

Cc: Gregg Woodnick <Gregg@woodnicklaw.com>, Cory Keith

<Cory@desertlegalgroup.com>, cory@thevalleylawgroup.com <cory@thevalleylawgroup.com>, Maribeth Burroughs <maribeth@woodnicklaw.com>, Isabel Sissel <Paralegal@desertlegalgroup.com>
Subject: RE: FC2023-052114 - List of Providers

Good afternoon,

Per the Court's request, the providers we will be requesting records from via the HIPAA release signed in Court today (2/21) by Ms. Owens are (and subject to additional providers listed by Mr. Keith):

- Dr. Jeffrey Blake Higley, MD
- Dr. Joshua A. Makhoul, MD
- Tamara Lister, NP
- Dr. John Jones, DO
- One Medical
- HonorHealth Scottsdale
- Family Planning Associates
- Any Lab Test Now
- Choice DNA
- ArcPoint Labs
- Planned Parenthood California
- SMIL Southwest Medical Imaging
- Barrow Neurological Institute
- Dr. Zeiman

Thank you,

Isabel Ranney

ISABEL RANNEY
Attorney
WL | WOODNICK LAW PLLC
1747 E. Morten Ave., #205
Phoenix, Arizona 85020
Phone: 602-449-7980
Fax: 602-396-5850
www.woodnicklaw.com
Email: isabel@woodnicklaw.com

CONFIDENTIAL/PRIVILEGED INFORMATION: The information contained in this electronic mail message is Attorney privileged and confidential information intended ONLY for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication

is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via electronic mail or the U.S. Postal Service. Thank you.