

1 **WOODNICK LAW, PLLC**  
1747 E. Morten Avenue, Suite 205  
2 Phoenix, Arizona 85020  
Telephone: [REDACTED]  
3 Facsimile: [REDACTED]

4 **Gregg R. Woodnick,** [REDACTED]  
5 **Kaci Y. Bowman,** [REDACTED]  
6 *Attorneys for Defendant*

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
8 **IN AND FOR THE COUNTY OF MARICOPA**

9  
10 **LAURA OWENS,**

11 Plaintiff,

12 vs.

13 **GREGORY GILLESPIE,**

14 Defendant.  
15  
16  
17

Case No.: CV2021-052893

**MOTION TO STRIKE  
PETITIONER'S "DECLARATION OF  
FRAUD, PERJURY,  
IMPERSONATION, EXTORTION,  
AND ADDITIONAL ILLEGAL  
ACTIONS TAKEN BY THE  
DEFENDANT AND HIS COUNSEL"**

(Honorable Alison Bachus)

18 Defendant, GREGORY GILLESPIE, through undersigned counsel, requests the  
19 Court strike Plaintiff's Declaration of Fraud, Perjury, Impersonation, Extortion, and  
20 Additional Illegal Actions Taken by the Defendant and his Counsel ("Declaration")  
21 pursuant to Rule 7.1(f)(1), *Arizona Rules of Civil Procedure*.  
22

23 1. On August 11, 2021, Plaintiff filed her Complaint, alleging abortion coercion,  
24 domestic violence, and intentional infliction of emotional distress.  
25

26 2. Defendant filed a *Motion to Dismiss* on September 24, 2021.  
27  
28

1           3.       Plaintiff filed a non-Rule conforming *Motion to Seal* on September 24, 2021  
2 just hours after receiving Defendant’s *Motion to Dismiss*.

3  
4           4.       Plaintiff filed her “Declaration” October 4, 2021 (also non-rule conforming).

5           5.       The Declaration must be struck pursuant to Rule 7.1(f)(1)).

6           6.       In her Declaration, Plaintiff alleges, among other things:

7                   a.       Defendant and Counsel fraudulently drafted emails between Plaintiff  
8                               and a law firm in California;

9                   b.       Defendant and Counsel impersonated a California attorney;

10                   c.       Defendant and counsel were involved in extortion.

11  
12           7.       Neither counsel nor Defendant tampered with Plaintiff’s email or the email  
13 system of a law firm in California. This allegation alone warrants sanctions from the Court.

14           8.       Further, in Plaintiff’s relentless attempts to blame Defendant for documents *she*  
15 fabricated, Plaintiff has inadvertently admitted that the documents are indeed fictitious.

16  
17           9.       If Petitioner is pregnant, the remedy is found in A.R.S. § 25-803.

18           10.       Striking the Filing is Proper Pursuant to Arizona Rule of Civil Procedure  
19 7.1 as A.R.C.P., Rule 7.1(f)(1) provides the court may strike “any part of a filing . . . that is  
20 prohibited, or not authorized, by a specific statute, rule, or court order.” As this is not a  
21 permitted pleading pursuant to A.R.C.P. Rule 7, it must be stricken.

22           11.       Rule 11 Sanctions are Warranted. Although Defendant is not formally  
23 seeking A.R.C.P. Rule 11 sanctions at this time, he reserves the right to seek sanctions if  
24 Plaintiff’s vexatious litigation continues.

25  
26           **WHEREFORE**, Defendant hereby respectfully requests the following:  
27  
28

1 A. That this Court strike Plaintiff's Declaration of Fraud, Perjury, Impersonation,  
2 Extortion, and Additional Illegal Actions Taken by the Defendant and his  
3 Counsel;  
4

5 B. That this Court award Defendant his attorneys' fees and costs pursuant to A.R.S.  
6 §§ 12-341, 12-349, and Rule 11, *Arizona Rules of Civil Procedure*; and  
7

8 C. That this Court grant such other and further relief as deemed appropriate.

9 **RESPECTFULLY SUBMITTED** this 7<sup>th</sup> day of October 2021.

10 **WOODNICK LAW, PLLC**

11 

12 \_\_\_\_\_  
13 Gregg R. Woodnick

14 Kaci Y. Bowman

15 *Attorneys for Defendant*

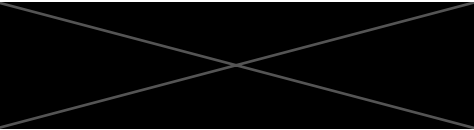
16 **ORIGINAL** of the foregoing e-filed  
17 This 7th day of October 2021, with:

18 Clerk of Court  
19 Maricopa County Superior Court  
20 201 W. Jefferson Street  
21 Phoenix, Arizona 85003

22 Honorable Alison Bachus  
23 Maricopa County Superior Court

24 **COPY** of the foregoing document  
25 e-mailed the same day to:

26 Laura Owens

27 

28 *Plaintiff Pro Per*

By: /s/Sara Seeburg