Clerk of the Superior Court *** Electronically Filed *** M. Saldana, Deputy 10/7/2021 10:58:04 AM

		M. Saldana, Deputy 10/7/2021 10:58:04 AM Filing ID 13465402	
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5	Gregg R. Woodnick, #020736 Kaci Y. Bowman, #023542		
6	<i>Kaci Y. Bowman, #023542</i> <i>Attorneys for Defendant</i>		
7	IN THE SUPERIOR COURT OF THE STATE OF ARIZONA		
8			
9	IN AND FOR THE C	COUNTY OF MARICOPA	
10		Case No.: CV2021-052893	
11	LAURA OWENS,	MOTION TO STRIKE	
12	Plaintiff,	PETITIONER'S "DECLARATION OF FRAUD, PERJURY,	
13	vs.	IMPERSONATION, EXTORTION,	
14	GREGORY GILLESPIE,	AND ADDITIONAL ILLEGAL ACTIONS TAKEN BY THE	
15		DEFENDANT AND HIS COUNSEL"	
16	Defendant.	(Honorable Alison Bachus)	
17			
18	Defendant, GREGORY GILLESPIE, through undersigned counsel, requests the		
19	Court strike Plaintiff's Declaration of Fraud, Perjury, Impersonation, Extortion, and		
20 21	Additional Illegal Actions Taken by the Defendant and his Counsel ("Declaration")		
22	pursuant to Rule 7.1(f)(1), Arizona Rules of Civil Procedure.		
23			
24			
25	domestic violence, and intentional infliction of emotional distress.		
26	2. Defendant filed a <i>Motion to L</i>	Dismiss on September 24, 2021.	
27			
28			
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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.	Plaintiff filed her "Declaration" October 4, 2021 (also non-rule conforming).	
4			
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 9		and a law firm in California;	
10		b. Defendant and Counsel impersonated a California attorney;	
11		c. Defendant and counsel were involved in extortion.	
12	7.	Neither counsel nor Defendant tampered with Plaintiff's email or the email	
13		-	
14	system of a law firm in California. This allegation alone warrants sanctions from the Court.		
15	8. Further, in Plaintiff's relentless attempts to blame Defendant for documents <i>she</i>		
16 17	fabricated, Plaintiff has inadvertently admitted that the documents are <u>indeed fictitious</u> .		
18	9.	If Petitioner is pregnant, the remedy is found in A.R.S. § 25-803.	
19	10.	Striking the Filing is Proper Pursuant to Arizona Rule of Civil Procedure	
20	<u>7.1</u> as A.R.C	2.P., Rule 7.1(f)(1) provides the court may strike "any part of a filing that is	
21 22	prohibited, or not authorized, by a specific statute, rule, or court order." As this is not a		
23	permitted pleading pursuant to A.R.C.P. Rule 7, it must be stricken.		
24	11.	Rule 11 Sanctions are Warranted. Although Defendant is not formally	
25	cooling A D		
26	seeking A.R.C.P. Rule 11 sanctions at this time, he reserves the right to seek sanctions if		
27	Plaintiff's vexatious litigation continues.		
28	WHEREFORE, Defendant hereby respectfully requests the following:		
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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	Coulisei,		
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	C. That this Court grant such other and further relief as deemed appropriate.		
8			
9 10	RESPECTFULLY SUBMITTED this 7 th day of October 2021.		
11	WOODNICK LAW, PLLC		
12	an		
13	Gregg R. Woodnick		
14	Kaci Y. Bowman		
15	Attorneys for Defendant ORIGINAL of the foregoing e-filed		
16	This 7th day of October 2021, with:		
17	Clerk of Court		
18	Maricopa County Superior Court 201 W. Jefferson Street		
19	Phoenix, Arizona 85003		
20	Honorable Alison Bachus		
21	Maricopa County Superior Court		
22	COPY of the foregoing document		
23	e-mailed the same day to:		
24 25	Laura Owens		
26			
20	Plaintiff Pro Per		
28	By: <u>/s/Sara Seeburg</u>		