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3 [REDACTED]
4 **Gregg R. Woodnick, #020736**
5 **Isabel Ranney, #038564**
6 *Attorney for Respondent*

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

8 **IN AND FOR THE COUNTY OF MARICOPA**

9 In Re the Matter of:

Case No.: FC2023-052114

10 **LAURA OWENS,**

EXPEDITED MOTION TO
SET VIRTUAL STATUS
CONFERENCE

11
12 Petitioner,

[Expedited Ruling Requested]

13 And

(Assigned to the Honorable Julie Mata)

14 **CLAYTON ECHARD,**

15
16 Respondent.

17 Respondent, **CLAYTON ECHARD**, by and through counsel hereby requests that this
18 Court set an expedited thirty (30) minute virtual status conference. This Motion is expedited,
19 as trial is currently scheduled for the end of February and myriad pretrial issues must be
20 addressed prior to the scheduled Evidentiary Hearing, including addressing the Motion to
21 Continue/Additional Trial Time.
22

23
24 Petitioner has grossly exploited the judicial process by refusing to comply with the
25 Rules and legal process that she invoked when she initiated the underlying Petition. To date,
26 Petitioner has willfully and wantonly refused to provide any Rule 49 disclosure, respond to
27 any Requests for Production, and failed to attend a properly noticed deposition.
28

1 Simultaneously, Petitioner filed a *Motion for Confidentiality and Preliminary Protective*
2 *Order* (filed 1/18/2024) to seemingly shield herself from any further criticism for her
3 noncompliance and deposed Respondent when she refused to participate in the same.
4
5 Petitioner's perpetual disregard for Court Rules is exhausting.

6 Respondent's *Expedited Motion to Continue Trial and Motion for Additional Trial*
7 *Time* (filed 2/6/2024) is pending before the Court. Consistent with her historical disregard
8 for court process, Petitioner failed to respond to the email inquiry asking her position on the
9 same and has still not done so.

10
11 While due process requires the Court to grant the continuance and provide for
12 additional trial presentation time (for the reasons detailed in the still unopposed motion), there
13 is an urgency for a status conference to be held prior to this eventual hearing date. The antics
14 from Petitioner continue to proliferate, and it is clear from the communication as appended,
15 that Petitioner's most recently retained counsel (approximately the 12th in this series of cases)
16 is having challenges with client control that impact Respondent's ability to access requisite
17 disclosure.
18
19

20 **As and for his Expedited Motion to Set Virtual Status Conference, Respondent**
21 **states as follows:**

22
23 1. On August 1, 2023, Petitioner initiated the underlying action when she filed her
24 *Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support,*
25 alleging that she was pregnant with Respondent's twins after only oral sex. Respondent has
26 consistently maintained that this alleged pregnancy was entirely fraudulent and that oral sex
27 does not result in babies.
28

1 2. Petitioner’s blatant refusal to provide *any* disclosure or engage in discovery
2 must be addressed prior to the evidentiary hearing. During the nearly seven (7) months since
3
4 initiating this action, Petitioner’s only evidence provided in support of her alleged pregnancy
5 has consisted of faked sonograms and positive hCG tests (there is a history of the same in
6 CV2021-052893). No medically verifiable proof of pregnancy that would satisfy the
7 requirements of Rule 2, which Petitioner herself invoked, has been provided (likely because
8 no such proof exists). *See also Respondent’s Reply to Petitioner’s Response to Motion for*
9 *Sanctions Pursuant to Rule 26* (explaining that a positive hCG test is merely a *sign* of
10 pregnancy and false positives can be caused by mediations, such as those associated with
11 epilepsy and infertility).
12
13

14 3. Petitioner has provided no disclosure and continues to flout the Rules of the
15 Court she invoked. Instead of providing basic discovery, she has filed Bar complaints, Board
16 complaints, and sued journalists who have covered the story that she reported and with whom
17 she actively communicates. Meanwhile, Respondent has complied with all requests for
18 disclosure as required by the Rules and requested by Petitioner. More offensively, Petitioner
19 has alluded to having the records Respondent requested multiple times but has refused to
20 provide access under the guise of “protection from public scrutiny.” (Parenthetically, while
21 claiming she needs “*protection*,” Petitioner continues to reach out to the media and self-
22 published two (2) more Medium.com articles on 2/9/24 and 2/10/24) **(Exhibit 1). To be very**
23 **clear, Petitioner is claiming she cannot disclose records to Respondent, but as recently**
24 **as days ago is publishing apocryphal articles about the situation.**
25
26
27
28

1 Notably, during Respondent's video deposition on 2/2/2024, Petitioner's counsel
2 presented a highly redacted (+/80% of words blacked out) copy of a medical record
3 purportedly containing "proof" of alleged pregnancy. When Respondent's counsel asked to
4 see the unredacted document (not to make copies or otherwise distribute, only view it in
5 person to verify it actually existed), Petitioner refused. This refusal to allow Respondent's
6 counsel to view a document ostensibly central to the foundation of this case only further
7 exhibits Petitioner's sanctionable conduct and wholesale inability to support the fiction of her
8 alleged pregnancy. Petitioner claiming that she had access to verifiable medical records to
9 support her allegations of pregnancy but then refusing to make them available for
10 Respondent's inspection is a blatant act of disrespect to the court and judicial process.

11
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13
14 4. Although Respondent believes the alleged pregnancy was a con/scam/rerun, he
15 needs access to disclosure and documents ostensibly in Petitioner's possession. Petitioner's
16 blatant refusal to comply with the rules of the Court and instead push her own narrative has
17 required further legal involvement in obtaining this information, which Petitioner claims to
18 possess. Respondent has continuously provided Petitioner with ample opportunity for her to
19 admit she fabricated this entire pregnancy or to comply with Court Rules, only to be rebuffed
20 or outright ignored (**Exhibits 2-4**). As a sample of Respondent's efforts:

21
22
23 *2/5/2024: Since we have not received any disclosure from Laura, the RFPs remain*
24 *outstanding, the HIPAAs have not been executed (provided 3x), the Fetal Death*
25 *Certificates (provided 2x) also ostensibly not executed and we still need to depose*
26 *Laura after she failed to appear at her deposition, we are going to file a Motion to*
Continue and request additional trial time.

27 *2/8/2024: You have not yet responded to our motion to continue and for additional*
28 *time nor have we received a written response. I am guessing that you are having*

1 *significant client control issues as evidenced by Laura’s recent behavior in*
2 *California and online...*

3 *I appreciate that Laura is going to refuse (contrary to law and Court Rules) to*
4 *provide actual medical records (as there are none that support her under oath*
5 *statements). Assuming we will continue to receive no disclosure from your client,*
6 *our motion to compel is forthcoming.*

7 **2/9/2024:** *Things just keep getting more ridiculous. Even after my email yesterday,*
8 *there is another article by your client... Since Laura’s bag of tricks tends to fit a*
9 *pattern, we suspect that the postings were a contrived ploy to yet again request a*
10 *Motion to Seal. I appreciate that your client wants to view herself as a victim by the*
11 *press that she incited and continues to stoke with her articles, but these postings*
12 *should be viewed with several grains of salt. (We personally tried to find the alleged*
13 *postings, but to no avail.)*

14 *Should you be inclined to file anything further regarding the opacity of the legal*
15 *proceedings that Laura instigated, please promptly disclose the alleged postings in a*
16 *manner that complies with Rule 2 so we can assess the same and properly respond to*
17 *the court in kind.*

18 Petitioner now says she is “no longer pregnant” but has failed to identify if it this is a
19 result of fetal death or the alleged babies have been put up for adoption.¹ This is the *nexus* of
20 her conduct in choosing to continually refuse to engage in discovery or disclose records, and
21 precisely the reason Respondent is entitled to relief including sanctions, attorneys fees and a
22 finding that the action was not filed in good faith.

23 Based on her testimony before Judge Gialketsis on 11/2/2023 that she was “100%”
24 pregnant and “24 weeks” (and appearance with a moon bump on 10/24/24), Petitioner must
25 answer for what allegedly happened to the fictitious twin fetuses. Both fetal death certificates

26 ¹ Notably, Respondent attempted to register himself on Arizona Putative Father’s
27 Registry in the event that Petitioner actually delivered twins and/or claimed to have put them
28 up for adoption as a reason for explaining their nonexistence (*see Respondent’s Notice of*
Filing Affidavit of Non-Paternity).

1 (as required per statute) and blank HIPAA releases have been provided to Petitioner three (3)
2 times, which have gone unacknowledged (*see Exhibit 2*).

3
4 *If* (impossible from oral sex) Petitioner was actually pregnant, delivered twins and/or
5 suffered a miscarriage (post twenty-four (24) weeks gestation) at any point during this
6 proceeding, she would have verifiable medical evidence. To date, no fetal death certificates
7 have been executed, no confirmable medical evidence has been presented, and Petitioner has
8 continued to claim “protection” while reaching out to the media directly. For all Respondent
9 knows, the imaginary twins are buried at a horse ranch.
10

11 5. To discuss the outstanding Motions as well as the blatant absence of
12 disclosure/discovery by Petitioner, Respondent requests this Court set an expedited status
13 conference for thirty (30) minutes.
14

15 6. Respondent also requests this reasonable attorney’s fees and costs pursuant to
16 A.R.S. § 25-324 as a result of Petitioner’s noncompliance with Court rules, continued
17 disregard for her Rule 49 disclosure obligation, and her wholesale unreasonable behavior in
18 bringing this litigation despite providing no verifiable proof she was ever pregnant.
19

20 **WHEREFORE, Respondent respectfully requests the Court:**

21
22 A. Schedule a thirty (30) minute virtual status conference to address pretrial issues
23 prior to the evidentiary hearing scheduled for 2/27/24 at 4:00 p.m.;

24 B. Award Respondent his reasonable attorney’s fees and costs due to Petitioner’s
25 unreasonableness pursuant to A.R.S. § 25-324;

26
27 C. Order such further relief as the Court deems just.

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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


Attorney for Petitioner

By: MB

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EXHIBIT "1"



Member-only story

From Plea to Persecution: The Harsh Reality of My Appeal for Justice



Laura Owens · Follow

3 min read · 2 days ago



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

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Written by Laura Owens

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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



◆ 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.

OFFICE OF THE ATTORNEY GENERAL
STATE OF NEW YORK
ALBANY, N. Y.

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

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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

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Email: 

OFFICE OF THE ATTORNEY GENERAL
STATE OF NEW YORK
ALBANY, N. Y.

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

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Em