

Laura Owens



Scottsdale, AZ 85254

Pro Se

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

In Re the Matter of:

LAURA OWENS

Plaintiff,

vs.

Case No. CV2021-052893

GREGORY GILLESPIE,

Defendant,

_____ /

**PLAINTIFF'S REPLY TO
DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION TO SEAL
(EXHIBITS)**

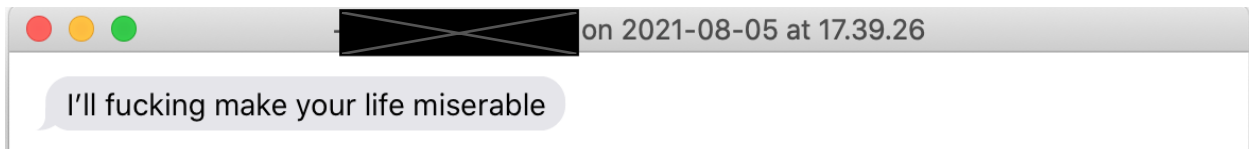


EXHIBIT 1

Gillespie/Owens > Inbox x



Gregg Woodnick



Wed, Sep 1, 10:10 AM ☆ ↶ ⋮

to me, Sara, Kaci ▾

Laura,

You should have received the confirmation data from ARCpoint regarding the prenatal paternity testing. As I trust you will be advised by counsel, it is your choice to participate in the testing at this point. As litigation proceeds that will not be the case as the court will order the same pursuant to ARS 25-814 and relevant case law.

You should be in receipt of our Notice of Appearance. The Court issued permission for alternate service but that is not necessary as we have notified the court that we represent Mr. Gillespie. We are in the process of drafting a Response to your Complaint and a Counter Petition.

You can avoid both litigation expenses and exposure to a sizable civil judgment by promptly filing to dismiss your civil suit. Please be advised, as I am sure your Uncle Joe warned you was forthcoming, the counter petition will contain a Fraud allegation as the images you sent to Mr. Gillespie were confirmed to be a recycled ultrasound from 2015.

Greg has advised that he will suspend his counter claim and related litigation once you promptly file to dismiss your civil suit and confirm that you are not pregnant.

Gregg

WOODNICK LAW, PLLC

1747 E. Morten Ave., Suite 205

Phoenix, AZ 85020



www.woodnicklaw.com



EXHIBIT 2

RE: Gregg Woodnick External Inbox x



Patrice Omalley

to me, Ronn ▾

Thu, Sep 30, 2:58 PM (4 days ago) ☆ ↶ ⋮

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



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EXHIBIT 3

Paternity Test > Inbox x



Sara Seeburg [REDACTED]

to me, Kaci, Gregg ▾

Laura,

You should receive an email from ARCpoint Labs of Scottsdale later today setting your appointment for non-invasive prenatal paternity testing for next week.

Thank you.
Sara

Sara Seeburg, Paralegal
WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
Phoenix, AZ 85020



www.woodnicklaw.com



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Laura Owens

to ARCpoint

Mon, Sep 27, 7:06 PM (7 days ago)



Hi! I am self represented. I know the opposing attorney said that it would be under my name and they have lied about several things, so I just wanted to confirm that there were no orders. I don't believe there are and I am the plaintiff. Thanks!

Laura

Sent from my iPhone

On Sep 27, 2021, at 6:22 PM, ARCpoint Labs of Scottsdale Administration <[redacted]> wrote:



ARCpoint Labs of Scottsdale Administration

to me

Tue, Sep 28, 10:41 AM (6 days ago)



I don't see anything pending with your name on it. Sorry

Cheryl Jimson
Lab Administrator

Please excuse any typos, this phone has a mind off its own! 😊

EXHIBIT 4

Procedure Performed at One Medical

Date: Jul 16, 2021

Patient

Legal Name: Laura Owens

Goes By: Laura

Birth Date: [REDACTED]

Phone: [REDACTED]

Is patient pregnant:

See attached for complete demographic and insurance information.

Procedure

Urine pregnancy test, 81025

Indication

Amenorrhea (ICD-10CM: N91.2)

Procedure Summary

Result: 2 lines - positive

Thank you,



John Jones





15210 N Scottsdale Road · Suite 275 · Scottsdale, AZ 85254

July 16, 2021

Laura Owens, DOB: [REDACTED]

To Whom It May Concern:

Patient was evaluated in the office today and was determined to be in early stages of pregnancy. Patient was on seizure medication that decreased the effectiveness of her oral contraceptives. Please contact our office for any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Jones', is placed on a light gray rectangular background.

John Jones, DO

EXHIBIT 6

Notes

BEGIN - Office Visit

Chief Complaint	OV: amenorrhea
Note Type	Office Visit
Date of Service	Fri Jul 16 2021 @ 09:00 AM
Created By	John Jones, DO (NPI: [REDACTED])
Signed By	John Jones, DO (NPI: [REDACTED])
Date Signed	Fri Jul 16 2021 @ 01:06 PM

Subjective

Pt stated that she thinks her LMP was about 4-6 weeks ago. Pt stated that she had been taking Minastrin OCP daily but that she didn't realize Lamictal interacted with OCP decreasing the effectiveness. She stated that her Lamictal was increased in 2020. Pt stated that she is in a relationship with her bf.

Pt stated that she has generalized epilepsy that was dx in 2017 at which point patient was started on Lamictal.

Vitals

sys dia HR RR temp wt ht BMI
102 68 68 16 — 113 lb 64.5 in 19.1

Exam

Gen: Awake and alert, in NAD

HEENT: normocephalic, atraumatic. Trachea midline, no scleral icterus, EOM intact, clear conjunctiva, nares normal

Cardio: RRR with no murmurs, rubs, or gallops

Resp: CTA b/l with no wheezing, rhonchi, or crackles

Neuro: no gross focal deficits, answering questions appropriately

Extremities: No significant edema

Psy: appropriate mood and affect

Skin: warm to touch with no erythema or rash

Procedures & Services

Urine pregnancy test - N91.2 - 81025

Result: 2 lines - positive

Assessment & Plan

Pregnancy - Z33.1

Urine pregnancy test positive. Pt advised to start taking prenatal vitamin and to establish care with an obgyn for prenatal care.

After Visit Guidance To Patient

My visit

 You ▸ John Jones, DO
Jul 16, 2021 at 10:55 AM

Hey, thanks so much for seeing me today! Was wondering if you could message or e-mail me [REDACTED] the letter and the visit summary/my health info from this last visit? My boyfriend wanted me to send it to him even though I did take a pic of your letter. Thank you so much!

 John Jones, DO
Jul 16, 2021 at 1:12 PM

Hi Laura,

Attached is the office visit note from today. Please let me know if you need anything else. Hope you have a great weekend!

 Office Visit Note.pdf





EXHIBIT 8





Greg Gillespie on 2021-07-17 at 10.21.32

7/16/21, 9:34 AM

Pregnant

 IMG_6653 

 IMG_6651 

7/16/21, 10:51 AM

Can you send me the portal access just to see :)

Sorry I could make it there! Work is nuts today

Putting out fires

Portal access? I can just call them and give them permission to talk to you if you want? Not sure what you mean

EXHIBIT 9

We take steps to protect your personal information here and take that job seriously, however we completely understand that sometimes we need to take extra care to protect a patient in this scenario. I have notated your account to take additional steps to verify any release of information request before sending, including contacting you each time we receive a request.

I do recommend making sure your online calendars are not linked to the ex-boyfriend's email (such as google calendars, or icloud calendar, etc.) to keep doctor appointment times/dates private. And also logging out of your One Medical account from the app and website after each use if you are still meeting or visiting with him.

Very importantly, if you do feel unsafe or in a crisis please without hesitation call or text 911 (If you are in Scottsdale or anywhere in Maricopa County and cannot call, they are text enabled). We are of course always here 24/7 to assist you as well by phone or video chat with some wait time for non-emergency concerns.

Wishing you lots of support and strength during this time,

Nicole

EXHIBIT 10



on 2021-08-05 at 17.39.26

Will you take the pills tonight? I don't want to have a baby this way

That would mean you can take the others tomorrow. And Friday. And by the weekend, I will be hopefully 100%, this will be past us and we can plan to go to Sedona maybe Sunday? I have PTO also, if you can get off work, we could go Sunday Monday?

I need to relax after all this. I know you do also.

And I can't with everything going on. This should have been completed this time last week.

Neither of us had handled it well. I'm sorry I got upset, I'm sorry I blacked you, I'm sorry I am sick and can't be myself a

8/4/21, 9:20:37 AM

I promised you We would continue to see one another (assuming you want to?!), grow with each other, use this as a reason to be stronger and build a foundation. We moved way too fast, I said this then and I say it now. We need to get to know one another and not on this stressing

Stresser

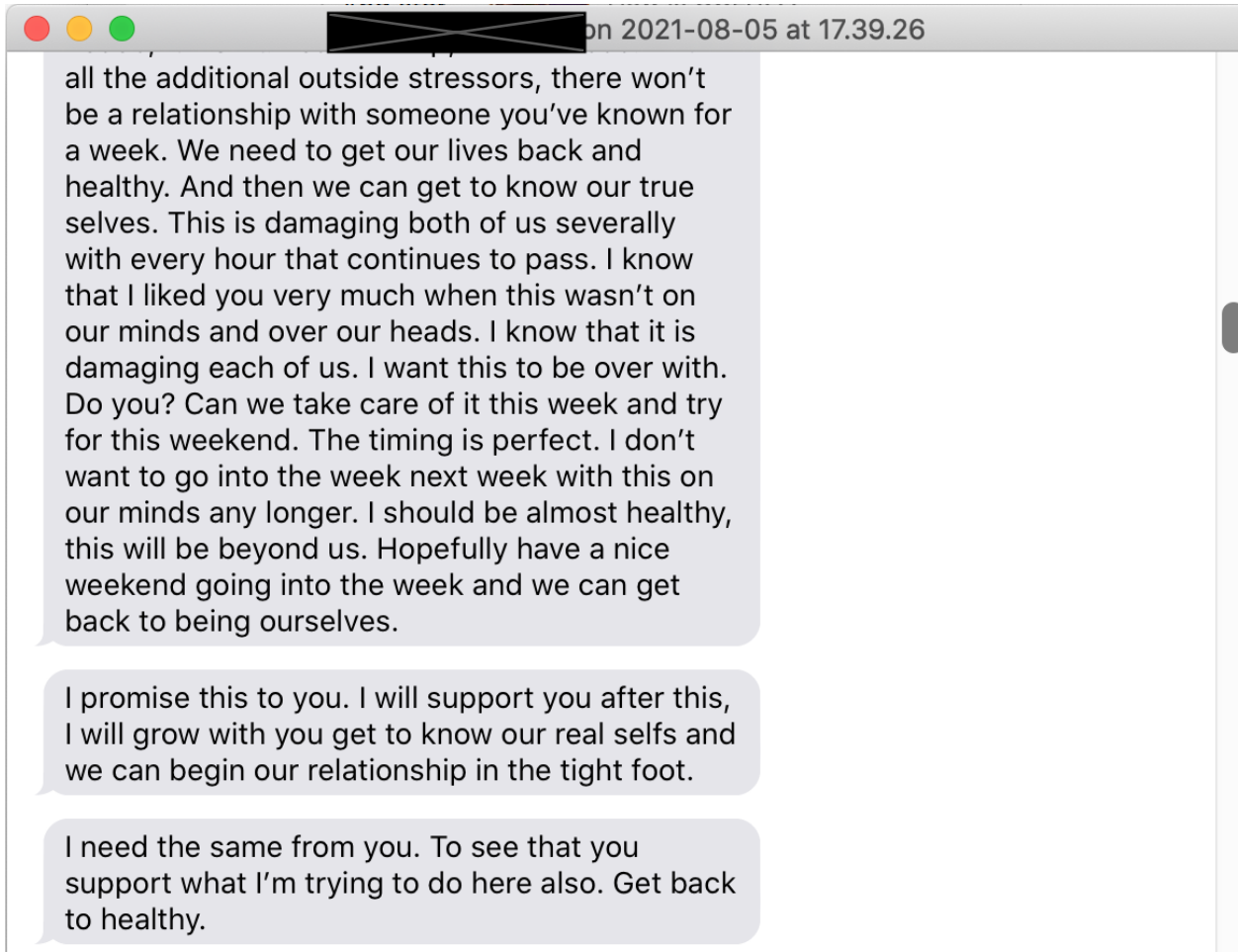
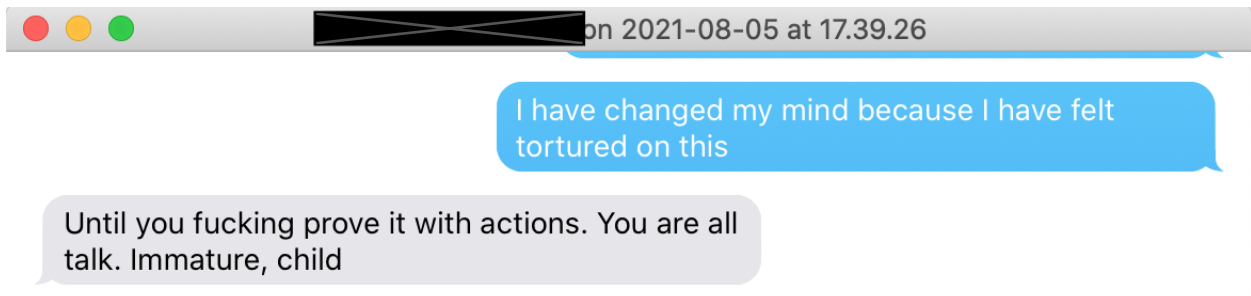
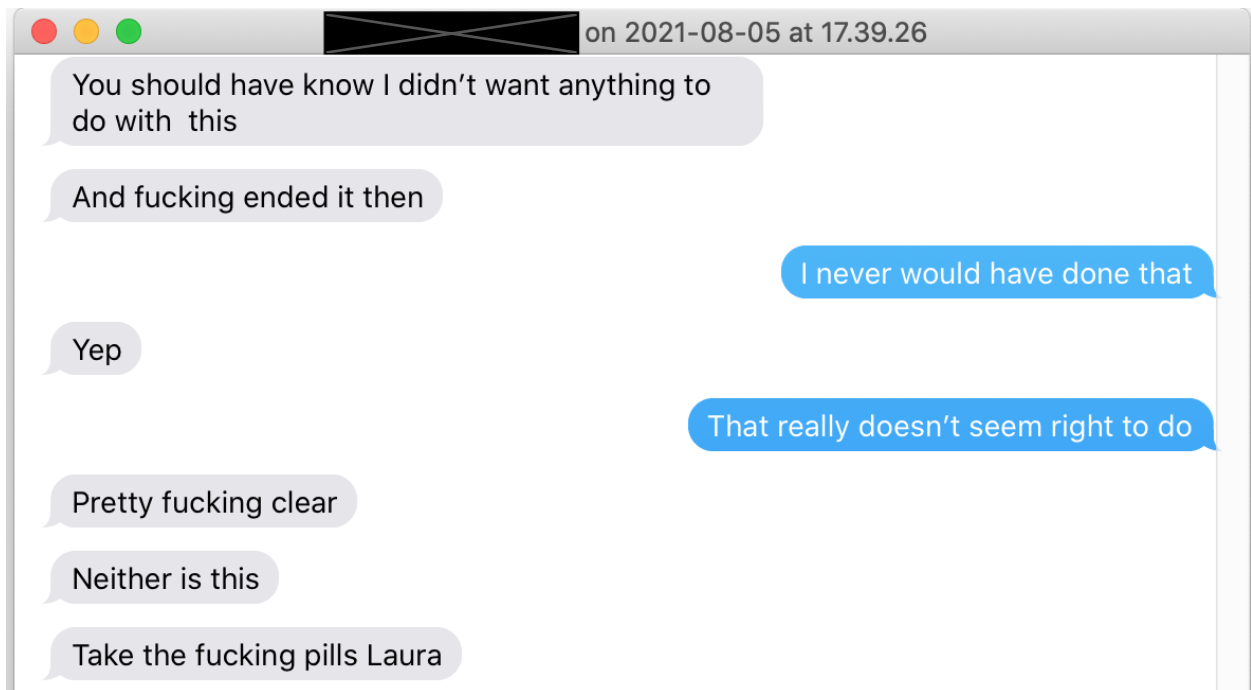


EXHIBIT 11



on 2021-08-05 at 17.39.26

So fucking do it

I don't.

I don't care.

I'm not going to do that.

on 2021-08-05 at 17.39.26

I will not relive one moment of this

Is that clear?

I will not discuss this one more minute

If you bring it up and show hesitation

I'm calling the cops

Or not

Your choice

EXHIBIT 12



2021 © The Mail Track Company, S.L.
C/ Córcega 301, At. 2.
08008 Barcelona - España

Official case documents

▶ Sent: **12 August 2021 at 15:54h.**

👤 Recipients: [REDACTED]

Your email was opened **134 times.**

- 👁 Opened on 30 September 2021 by [REDACTED] at 23:14
- 👁 Opened on 29 August 2021 by [REDACTED] at 15:27
- 👁 Opened on 27 August 2021 by [REDACTED] at 16:50
- 👁 Opened on 26 August 2021 by [REDACTED] at 18:51
- 👁 Opened on 26 August 2021 by [REDACTED] at 18:48
- 👁 Opened on 26 August 2021 by [REDACTED] at 11:13
- 👁 Opened on 25 August 2021 by [REDACTED] at 22:31
- 👁 Opened on 25 August 2021 by [REDACTED] at 12:27
- 👁 Opened on 23 August 2021 by [REDACTED] at 15:58
- 👁 Opened on 23 August 2021 by [REDACTED] at 15:44
- 👁 Opened on 23 August 2021 by [REDACTED] at 15:24
- 👁 Opened on 23 August 2021 by [REDACTED] at 14:51
- 👁 Opened on 23 August 2021 by [REDACTED] at 14:11
- 👁 Opened on 23 August 2021 by [REDACTED] at 14:01
- 👁 Opened on 23 August 2021 by [REDACTED] at 13:58
- 👁 Opened on 23 August 2021 by [REDACTED] at 13:58
- 👁 Opened on 23 August 2021 by [REDACTED] at 13:57

Email Activity Report - Mailtrack
Generated on Thursday, 07 October 2021 at 16:43

- 👁 Opened on 23 August 2021 by [REDACTED] at 13:57
- 👁 Opened on 23 August 2021 by [REDACTED] at 13:20
- 👁 Opened on 23 August 2021 by [REDACTED] at 13:01
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- 👁 Opened on 23 August 2021 by [REDACTED] at 12:54
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- 👁 Opened on 23 August 2021 by [REDACTED] at 12:46
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- 👁 Opened on 23 August 2021 by [REDACTED] at 12:45
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- 👁 Opened on 23 August 2021 by [REDACTED] at 12:35
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- 👁 Opened on 23 August 2021 by [REDACTED] at 12:34
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:32
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:28
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:23
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:23
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:23
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:22
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- 👁 Opened on 23 August 2021 by [REDACTED] at 12:15
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:15
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:13
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- 👁 Opened on 23 August 2021 by [REDACTED] at 12:09
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:07
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:06
- 👁 Opened on 23 August 2021 by [REDACTED] at 12:05
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- 👁 Opened on 23 August 2021 by [REDACTED] at 11:35
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- 👁 Opened on 23 August 2021 by [REDACTED] at 11:35
- 👁 Opened on 23 August 2021 by [REDACTED] at 11:20
- 👁 Opened on 23 August 2021 by [REDACTED] at 11:15
- 👁 Opened on 23 August 2021 by [REDACTED] at 11:13
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- 👁 Opened on 23 August 2021 by [REDACTED] at 11:12
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- 👁 Opened on 23 August 2021 by [REDACTED] at 11:08
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- 🕒 **Opened** on 23 August 2021 by [REDACTED] at 11:03
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- 🕒 **Opened** on 21 August 2021 by [REDACTED] at 00:33
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- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 20:36
- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 18:44
- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 18:44
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- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 18:13
- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 17:59
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- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 17:57
- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 17:57
- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 17:57
- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 17:57
- 🕒 **Opened** on 20 August 2021 by [REDACTED] at 17:31

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- 👁 **Opened** on 20 August 2021 by [REDACTED] at 17:26
- 👁 **Opened** on 16 August 2021 by [REDACTED] at 13:24
- 👁 **Opened** on 15 August 2021 by [REDACTED] at 18:16
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- 👁 **Opened** on 14 August 2021 by [REDACTED] at 00:28
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- 👁 **Opened** on 12 August 2021 by [REDACTED] at 16:22

----- Forwarded message -----

From: **Kaci Bowman** <[REDACTED]>

Date: Mon, Aug 23, 2021 at 12:34 PM

Subject: RE: CV2021-052893

To: [REDACTED]

Cc: Gregg Woodnick <[REDACTED]>, Sara Seeburg <[REDACTED]>

Ms. Owens,

Attached hereto are the Notice of Appearance and Acceptance of Service that we e-filed this morning (along with confirmation the filings were received). We will be sure to provide you with conformed copies as soon as we receive the same.

In the meantime, it appears from a brief review of the pleadings that have been filed to date that a non-invasive prenatal paternity test should be ordered. Mr. Gillespie is willing to pay for the test. Please let us know if you are agreeable.

If so, we believe that ARCpoint labs in Scottsdale can administer the test and we would be happy to contact them and forward additional details about the testing process. I am attaching ARCpoint's website, below, for your review.



<https://www.arcpointlabs.com/scottsdale-north/paternity/>

Thanks in advance,

Kaci

1 WOODNICK LAW, PLLC
1747 E. Morten Avenue, Suite 205
2 Phoenix, Arizona 85020



3
4 *Gregg R. Woodnick,* 
5 *Kaci Y. Bowman,* 
6 *Attorneys for Defendant*

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

9 LAURA OWENS,
10 Plaintiff,

Case No.: CV2021-052893

11 and

ACCEPTANCE OF SERVICE

12
13 GREGORY GILLESPIE,
14 Defendant.

(Assigned to:
Honorable Alison Bachus)

15
16
17 Pursuant to Rule 4(f)(2), Arizona Rules of Civil Procedure, undersigned counsel Kaci
18 Y. Bowman, hereby accepts service on behalf of Defendant, GREGORY GILLESPIE, of the
19 following documents:

- 20
21 1. Summons;
22 2. Civil Complaint;
23 3. Certificate of Compulsory Arbitration; and
24 4. Civil Cover Sheet.

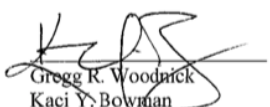
25
26 ///
27 ///
28 ///

1 I, Kaci Y. Bowman, am accepting service of the above referenced documents on behalf
2 of Defendant, GREGORY GILLESPIE, and agree that service shall be effective on the date
3 upon which this Acceptance of Service is executed, and this action may proceed as though
4 Defendant had been personally served with the State of Arizona
5 Defendant had been personally served with the State of Arizona

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DATED this 23rd day of August, 2021.

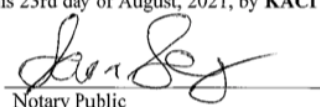
WOODNICK LAW, PLLC


Gregg R. Woodnick
Kaci Y. Bowman
Attorneys for Defendant

STATE OF ARIZONA)
)ss.
COUNTY OF MARICOPA)

SUBSCRIBED AND SWORN to before me this 23rd day of August, 2021, by **KACI Y. BOWMAN**.

Seal/My Commission Expires:
10-16-2022



Notary Public



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ORIGINAL of the foregoing filed
this 23rd day of August, 2021 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document delivered
this day of 23rd day of August, 2021 to:



The Honorable Alison Bachus
Maricopa County Superior Court

COPY of the foregoing document emailed
this day of 23rd day of August, 2021 to:

Laura Owens


1 **WOODNICK LAW, PLLC**
1747 E. Morten Avenue, Suite 205
2 Phoenix, Arizona 85020



3
4 *Gregg R. Woodnick,* 
5 *Kaci Y. Bowman,* 
6 *Attorneys for Defendant*

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

9 **LAURA OWENS,**
10
11 Plaintiff,
12 and
13 **GREGORY GILLESPIE,**
14
15 Defendant.

Case No.: **CV2021-052893**

ACCEPTANCE OF SERVICE

(Assigned to:
Honorable Alison Bachus)

16
17 Pursuant to Rule 4(f)(2), Arizona Rules of Civil Procedure, undersigned counsel Kaci
18 Y. Bowman, hereby accepts service on behalf of Defendant, GREGORY GILLESPIE, of the
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25
26 ///
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1 I, Kaci Y. Bowman, am accepting service of the above referenced documents on behalf
2 of Defendant, GREGORY GILLESPIE, and agree that service shall be effective on the date
3 upon which this Acceptance of Service is executed, and this action may proceed as though
4

5 Defendant had been personally served with the State of Arizona.

6 DATED this 27th day of August, 2021.

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WOODNICK LAW, PLLC

Gregg R. Woodnick
Kaci Y. Bowman
Attorneys for Defendant

STATE OF ARIZONA)
)ss.
COUNTY OF MARICOPA)

SUBSCRIBED AND SWORN to before me this 27th day of August, 2021, by **GREGG R WOODNICK.**

Seal/My Commission Expires:

10-16-2022


Notary Public



1 **ORIGINAL** of the foregoing filed
2 this 27th day of August, 2021 with:

3 Clerk of the Court
4 Maricopa County Superior Court

5 **COPY** of the foregoing document delivered
6 this day of 27th day of August, 2021 to:

7 The Honorable Alison Bachus
8 Maricopa County Superior Court

9 **COPY** of the foregoing document emailed

EXHIBIT 15