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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:

[redacted]

Plaintiff,

And

CLAYTON ECHARD,

Defendant.

In Re the Matter of:

[redacted]

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:

[redacted]
Scottsdale, Arizona 85254
[redacted]

By: */s/ MB*

EXHIBIT "1"

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

[redacted]

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, correct*." **(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

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[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

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[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:

[redacted]
Scottsdale, Arizona 85254
[redacted]

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:)
)
[redacted]) No. FC2023-052114
)
Petitioner,)
and)
)
CLAYTON ECHARD,)
)
Respondent.)

VIDEO DEPOSITION OF
[redacted]

Friday, March 1, 2024

8:00 a.m.

Phoenix, Arizona

Rosanne P. Huebener
Certificate No. 50897

APPEARANCES OF COUNSEL

On behalf of the Petitioner:

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INDEX OF EXAMINATION

WITNESS: PAGE:
[redacted]
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 [redacted] E-mail to Reality Steve, et al. Friday 10/13/23
No. 26 --
No. 27 [redacted] E-Mail to Reality Steve 10/6/23
No. 28 --
No. 29 --
No. 30 [redacted] 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 [redacted] E-Mail

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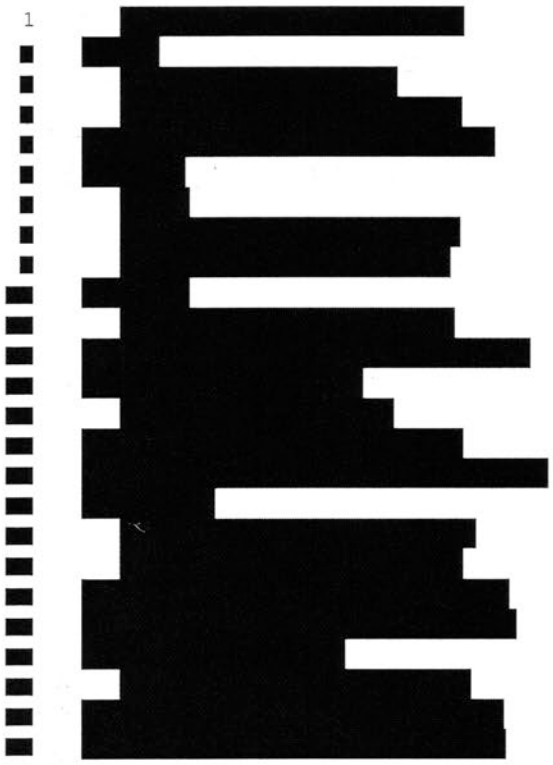

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name begins with a Z but I just forgot --
A.
Q. He --
A. She.
Q. Is your neurologist at Barrow?
A. Uh-huh.
Q. Yes?
A. Yes.
Q. So . You also told me you are seeing the on-line provider, correct?
A. Correct.
Q. When was the last time you saw the on-line 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?

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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?

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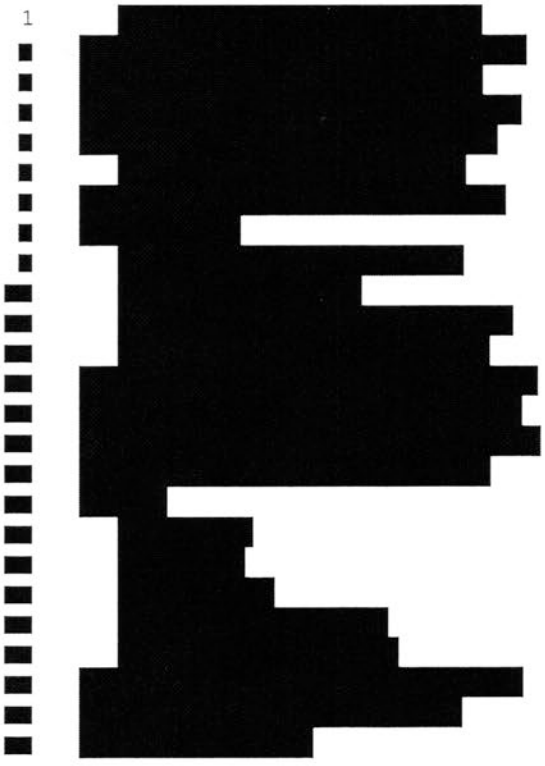

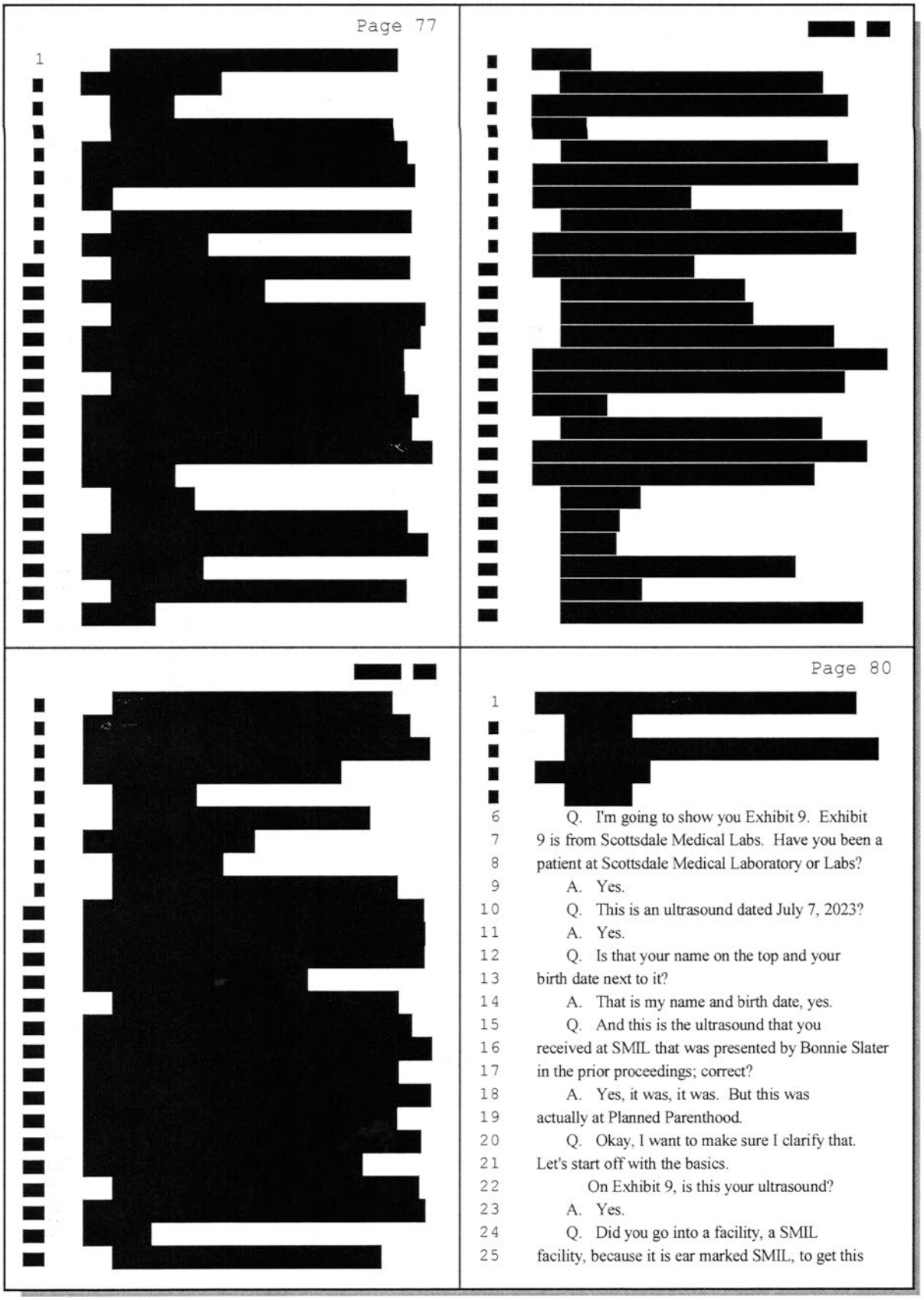

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Q. I'm going to show you Exhibit 9. Exhibit 9 is from Scottsdale Medical Labs. Have you been a patient at Scottsdale Medical Laboratory or Labs?

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

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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

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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, [redacted] 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

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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?

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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, [redacted]?
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. [redacted]
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

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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.

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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, [redacted] 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.

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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.

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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

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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?

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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

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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

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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 [redacted]	**Defendant** Clayton Ray Echard	**Case No.** FC2023-052771
☐ **On behalf of minor/person in need of protection named:**	**Defendant's address** [redacted] Scottsdale, AZ 85254	**PETITION for:** ☒ **Order of Protection** ☐ **Injunction Against Harassment** ☐ **Workplace Injunction**
Agent's name (if Workplace Injunction)	**Defendant's birth date** [redacted]	
	Defendant's phone [redacted]	

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 humillated 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/ [redacted]
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
[redacted]

JOSHUA A LOPEZ

AND

CLAYTON RAY ECHARD

CLAYTON RAY ECHARD
[redacted]
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, [redacted] 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.

[redacted] and Clayton Ray Echard are sworn.

The Court addresses previous motions filed by Plaintiff.

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

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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.