

1 WOODNICK LAW, PLLC



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3  
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,**

**MOTION TO COMPEL**

11  
12 Petitioner,

(Assigned to the Honorable Julie Mata)

13 And

14 **CLAYTON ECHARD,**

15  
16 Respondent.

17 Respondent, **CLAYTON ECHARD**, by and through counsel undersigned and  
18 pursuant to Rule 65(a)(2), *Arizona Rules of Family Law Procedure (ARLFP)* hereby moves  
19 this Court to compel Petitioner's disclosure and enter appropriate sanctions for her  
20 noncompliance.  
21

22 At Petitioner's Rule 57 deposition on March 1, 2024, Petitioner testified (1) She altered  
23 an ultrasound image falsely claiming they came from Southwest Medical Imaging (SMIL)<sup>1</sup>;  
24 (2) She "miscarried" two (2) hand sized fetuses sometime in September/October and was  
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26  
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28 <sup>1</sup> To be clear, this Motion to Compel in no way implies that Petitioner's multiple prior attorneys or her current counsel knew that they were using falsified/tampered medical evidence.

Case No. FC2023-052114  
Clerk of the Superior Court  
C. Diaz, Deputy  
3/11/2024 4:13:04 PM  
Filing ID 17478403

1 seen by yet to be named tele-health providers but provided no records regarding the same nor  
2 confirmation of the date of the alleged event; (3) When she “miscarried,” she took photos of  
3 what would have been of 19-24 week twin fetuses, but she no longer had the photos (which  
4 she claimed she sent to her sister) because she had gotten a new phone, and (4) There is a  
5 fourth (4<sup>th</sup>) case in California where someone alleged that Petitioner fabricated a pregnancy.  
6

7 **Compulsive lying is not a defense to disclosure production.** Petitioner’s  
8 increasingly apocryphal tales include her telling *Us Weekly* (just last week) that her pregnancy  
9 was “confirmed” at an urgent care (again, hCG tests are *not* confirmation of pregnancy).  
10 While the loss of a pregnancy is a tragedy, the loss of a fake pregnancy is not. Here, Petitioner  
11 was photographed competing in horse jumping competitions with a flat stomach weeks before  
12 she appeared in Court before Judge Gialketsis with a seemingly large pregnancy stomach  
13 (moon belly) claiming she was “100%” and “24 weeks” pregnant by Clayton, who she never  
14 had sexual intercourse with.  
15

16  
17  
18 Notably, of the litany (14+) provider names given through Petitioner’s testimony *prior*  
19 to her deposition, multiple providers have denied providing care or ever  
20 seeing/communicating with Petitioner (**Exhibit 1**). Moreover, Petitioner lied about obtaining  
21 obstetric care, because sonograms taken by actual sonographers cannot be easily faked nor  
22 can fetal anatomy scans or the frequent checkup appointments one would expect to have for  
23 her proclaimed “high-risk” twin pregnancy.  
24

25  
26 Undersigned counsel has sent Petitioner’s current counsel reminders that this data  
27 needs to be immediately disclosed per Rule 49 (which Petitioner evaded for eight (8) months).  
28

1 Counsel has not only received no response but no response to efforts to meet and discuss  
2 consistent with Rule 9(c). Nevertheless, Rule 9c has been complied with.

3  
4 **As and for his Motion to Compel, Respondent states as follows:**

5 1. On August 1, 2023, Petitioner initiated the underlying action when she filed her  
6 Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support,  
7 alleging that she was pregnant with Respondent's twins.

8  
9 2. On August 21, 2023, Respondent filed his Answer, denying that Petitioner  
10 could scientifically be pregnant with his twins after they engaged in oral sex on May 20, 2023.

11 3. On September 28, 2023, the parties attended an Early Resolution Conference  
12 and entered into a Rule 69 Agreement stating, "Petitioner agrees to contribute a sample on  
13 October 2, 2023 to determine paternity of the alleged pregnancy."  
14

15 4. On October 6, 2023, Petitioner filed for an Order of Protection against  
16 Respondent (FC2023-052771; granted by Judge Doody), alleging that she was pregnant by  
17 him and that he was cyberbullying her.

18  
19 5. On October 18, 2023, Petitioner filed a Request for Pre-Decree Mediation  
20 (denied November 22, 2023) alleging Respondent would not speak to her and "*he even acts*  
21 *as if the unborn children don't exist despite a pro ponderous of evide* [sic]."  
22

23 6. On October 24, 2023, Petitioner appeared on video in a court proceeding before  
24 Judge Gialketsis (CV2023-053952) wearing what appeared to be a fake pregnant stomach  
25 (moon belly).  
26

27 7. On November 2, 2023, in the second day of trial on Respondent's granted  
28 Injunction Against Harassment against Petitioner, she testified, under oath, that she was

1 “100%” and “24 weeks” pregnant by Respondent and that she was due “February 14, 2024.”  
2 Petitioner further testified that she was having a *high-risk* pregnancy (due to her alleged  
3 epilepsy) and that she was being seen by “Dr. Makhoul” and “Dr. Higley” and that she had  
4 had an appointment with Dr. Higley “last Friday.”  
5

6 8. Petitioner willfully and wantonly refused to comply with *any* disclosure or  
7 discovery rules, forcing Respondent to file the following:

- 8
- 9 a. *Notice of Non-Appearance at Deposition Pursuant to Rules 57(g);*
  - 10 b. *Response/Objection to Petitioner’s Motion for Confidentiality and*  
11 *Preliminary Protective Order;*
  - 12 c. *Reply to Petitioner’s Response to Motion for Sanctions Pursuant to Rule*  
13 *26;*
  - 14 d. *Amended Response to Petition to Establish Paternity.*
- 15

16 9. It was not until the Status Conference before the Court on February 21, 2024,  
17 that Petitioner agreed to sign a basic HIPAA release to allow Respondent to obtain the  
18 documents himself and in compliance with Rule 2, which Petitioner invoked. Of note,  
19 Petitioner, apparently mistakenly, signed the HIPAA release in open court with the *wrong*  
20 *year*, causing numerous providers to reject the HIPAA release as expired.  
21

22 10. Since the Status Conference, Respondent has received confirmation from nearly  
23 all providers that Petitioner was never a patient of theirs. Notably, the HIPAA releases for  
24 “Dr. Makhoul” revealed that Petitioner had never attended an appointment at his office,  
25 despite her testimony before Judge Gialketsis and the appointment confirmation email that  
26 she submitted as evidence in the Injunction matter (CV2023-053952).  
27  
28



1 11. Days prior to Petitioner's deposition, Petitioner sent Respondent's counsel a  
2 letter (excluding her own attorney) blatantly seeking to extort Respondent into dismissing this  
3 action or she would file a baseless, incoherent, and legally unsupported lawsuit for \$1.4  
4 million dollars (**Exhibit 2**). If Respondent agreed to sign a "*stipulation to dismiss*" this action  
5 "*and to mutually agree to forebear from any future legal actions [...] [by] February 29, 2024*"  
6 (the day before her deposition), she would not pursue the fake legal claim.  
7

8  
9 12. More bizarrely, at the deposition of Petitioner on March 1, 2024, Petitioner  
10 confirmed:

11 a. **She had never received obstetric care for her "high-risk" pregnancy with "twins"**  
12 and denied being the owner of the sonograms Petitioner posted on Reddit and/or provided to  
13 various journalists at the beginning of this case.  
14

15 b. **She doctored a sonogram to attribute it to Southwest Medical Imaging (SMIL)**  
16 **and added her name and date of birth, which was previously an exhibit in a court**  
17 **proceeding.** She did this, according to her testimony, because she had initially gotten the  
18 sonogram "*anonymously*" at Planned Parenthood - Mission Viejo Health Center in California  
19 and she did not want Respondent to know where she had gone for the sonogram (but somehow  
20 she was fine with him thinking she had gotten it at SMIL?). Unsurprisingly, Planned  
21 Parenthood - Mission Viejo has confirmed that **they do not offer anonymous appointments**  
22 **and they have an easily accessible patient portal.** No records from Planned Parenthood –  
23 Mission Viejo have been disclosed despite repeated requests.  
24  
25  
26

27 c. **According to Petitioner, the *only* individual who told her that she was having "boy**  
28 **and girl twins" was a medical provider to whom she texted a six (6) week admittedly**

1 **altered sonogram.** Despite medical science (and medical experts) stating that a sonogram  
2 can only determine the sex of fetuses with accuracy around eighteen (18) weeks, Petitioner  
3 testified that an unnamed provider was able to glean from a six (6) week tampered with  
4 sonogram that Petitioner was pregnant with a boy and a girl. **This alleged provider has yet**  
5 **to be disclosed, nor has the text exchange between Petitioner and the provider –**  
6 **ostensibly because it does not exist** (at the deposition, Petitioner claimed she had a new  
7 phone and was unable to pull up records to confirm her increasingly ridiculous tale).  
8  
9

10 d. On the undisclosed day of the alleged miscarriage (ambiguously sometime in either  
11 September *or* October and prior to appearing in Court before Judge Gialketsis with a fake  
12 pregnant stomach and testifying to being “100%” pregnant), Petitioner **claims to have passed**  
13 **two (2) fetal sacs.** Of course did not go to the hospital or the doctor. She claims to have met  
14 with tele-health appointment with a provider, who she testified was not concerned that she  
15 had miscarried. *Incredibly*, she testified that she had also shown the two (2) hand-sized sacs  
16 to her mother and took a photo, which she shared with the tele-health provider and her sister.  
17 No records have been provided despite repeated requests.  
18  
19

20 e. **There is a fourth (4<sup>th</sup>) man who has accused Petitioner of fabricating a pregnancy,**  
21 **which supports Respondent’s contention that faking pregnancies is either pathological**  
22 **or the oddest of pastimes.** Petitioner initiated a paternity action out of California in 2014  
23 (Exhibit 3) regarding what is believed to be her first (out of 5) feigned pregnancies. Petitioner  
24 was asked to comply with her disclosure of the same. **Exhibit 4.**  
25  
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27 13. **Petitioner has willfully and wantonly failed to disclose information**  
28 **pursuant to Rule 49.** After the Status Conference before this Court, Petitioner provided

1 minimal disclosure after evading *any* compliance with Rule 49 for over eight (8) months.  
2 Now, Petitioner has testified to attending appointments and speaking with providers who only  
3 have access to records that are critical to support the “miscarriage” she allegedly had in  
4 September or October but did not reveal to Respondent or the Court until her *Motion for*  
5 *Confidentiality and Preliminary Protective Order* filed January 17, 2024.  
6

7  
8 14. Respondent has complied with Rule 9(c), to the extent possible given  
9 Petitioner’s refusal to respond or communicate (**Exhibit 5**). As detailed in correspondence,  
10 there have been multiple meetings in person (one at the courthouse and at both depositions)  
11 regarding disclosure, including the Court requiring the parties to submit a list of the providers  
12 they intend to seek HIPAA records from (where Petitioner notably failed to mention Planned  
13 Parenthood – Mission Viejo, tele-med providers, or other providers – **Exhibit 6**). Petitioner  
14 continues to claim there are records in her exhausting attempts to explain away why no  
15 medical evidence supporting her fictional pregnancy exists.  
16  
17

18 15. **Respondent is entitled to his reasonable attorney’s fees in costs incurred in**  
19 **this entire action, including filing this Motion to Compel.** Petitioner’s commitment to  
20 crafting a trail of medical evidence that cannot be verified (an “*anonymous*” appointment, a  
21 photo of miscarried fetuses that somehow disappear when you get a new iPhone, a  
22 confirmation of an appointment with a doctor she never goes to, etc.), is *astounding*. That  
23 Petitioner keeps weaving this insane web has only caused Respondent to incur more fees to  
24 show what he has always known to be true: that Petitioner is a fraud who concocts fictitious  
25 pregnancies as a ruse to force men into dating her. Due to the significant efforts he has  
26  
27  
28

1 undertaken, Respondent is entitled to his reasonable attorney's fees and costs pursuant to  
2 A.R.S. § 25-324.

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

4  
5 A. Order Petitioner to obtain the California paternity file from 2014 where she was  
6 first accused of faking a pregnancy and disclose the same;

7 B. Order Petitioner to obtain the records, if they exist, from Planned Parenthood –  
8 Mission Viejo Health Center; said Records should come from the provider in light of the  
9 history of doctoring records.

10 C. Order Petitioner to provide the name of the tele-health doctor(s) who she claims  
11 told her that she did not need to seek actual medical care or hospitalization after allegedly  
12 delivering two (2) stillbirth fetuses prior to the October and November court hearings;  
13

14 D. Order Petitioner to produce the image(s) (confidential if they exist) of the two  
15 (2) stillbirth fetuses she allegedly delivered and shared with the tele-health provider and her  
16 sister;  
17

18 E. Award Respondent his reasonable attorney's fees and costs incurring in filing  
19 this Motion to Compel consistent with A.R.S. § 25-324;  
20

21 F. Order such further relief as the Court deems just.  
22

23 **RESPECTFULLY SUBMITTED** this 11<sup>th</sup> day of March, 2024.

24 **WOODNICK LAW, PLLC**

25 

26 \_\_\_\_\_  
27 Gregg R. Woodnick  
28 Isabel Ranney  
*Attorneys for Respondent*

1 ORIGINAL of the foregoing e-filed  
2 this 11<sup>th</sup> day of March, 2024 with:

3 Clerk of the Court  
4 Maricopa County Superior Court

5 COPY of the foregoing document  
6 delivered this same day to:

7 The Honorable Julie Mata  
8 Maricopa County Superior Court

9 COPY of the foregoing document  
10 emailed this same day to:


11 Cory Keith  
12 DESERT LEGAL GROUP, LLC  
13   
14 *Attorney for Petitioner*

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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 to Compel* 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 11, 2024 15:42 PDT)  
**CLAYTON ECHARD**

03/11/2024  
Date

1000 N. 1st Street, Suite 100, Phoenix, AZ 85004  
Phone: (602) 254-2000 Fax: (602) 254-2001

# EXHIBIT "1"

February 23, 2024

Dr. Joshua A. Makhoul, MD  
Scottsdale Perinatal Associates  
6950 E Chauncey Lane Suite 150  
Phoenix, AZ 85054

**VIA EMAIL & U.S. Mail**

Re: **Owens v. Echard**  
**Maricopa County Superior Court Case No. FC2023-052114**

Dear Provider,

Attached please find an executed HIPAA release regarding a potential patient of yours, **Laura Michelle Owens** DOB 05/14/1990, who also may use the alias "**Emily Laura Wilson**", with the same DOB.

This HIPAA compliant release was executed by Ms. Owens in front of Maricopa County Superior Court Judge Mata on February 21, 2024 for use in cause number FC2023-052114. As evidenced by her signature, you have the authority to release Ms. Owen's records from **August 2020 to present date** directly to our office. The Court will also be issuing a Minute Entry confirming your authority to release records regarding the same.

Please promptly provide any and all records from that time period for any treatment services and communications provided to/with Ms. Owens. This is meant to be comprehensive.

Please note this this cause does involve fraud allegations against one of the parties (including medical records doctoring/manipulation). As such, please assure your custodian of records not only provides the full file, but that if there are records that were not produced by your office (e.g. submitted by a party through an online portal) that they be clearly identified as such (including the submission date) so that they are not misconstrued as records prepared by your office.

//  
//



Inversely, if your records search confirms no records exist, please have your custodian of records provide a basic affidavit indicating:

1. They are the custodian of medical records for the facility.
2. A comprehensive records search was conducted.
3. No records matching Laura Michelle Owens or Emily Laura Wilson with the date of birth of May 14, 1990 were identified.

We will be forwarding you the Minute Entry from the Court confirming your authority under separate cover. For now, and because time is of the essence, we are asking that you expedite production of the requisite data (or confirming the absence of information) and provide the same directly to our office.

We appreciate your prompt attention to this matter. We will of course pay for copies upon presentation of invoices.

Very truly yours,  
WOODNICK LAW, PLLC

Gregg R. Woodnick

Cc: C. Keith, esq.

1000 N. 4th Street, Suite 200  
Chicago, Illinois 60610  
Phone: (773) 867-1111  
Fax: (773) 867-1112

## EXHIBIT "2"

Laura Owens

February 27, 2024

Clayton Echard

**Subject: Comprehensive Legal Notice of Intent to Sue for Breaches of Contractual and Fiduciary Duties**

Dear Mr. Echard,

I write to you with a matter of utmost legal gravity and urgency, pursuant to the breaches of contractual obligations, fiduciary duties, negligence, fraudulent misrepresentation, and professional misconduct as verified by the Arizona Department of Real Estate (ADRE). Your failure to fulfill your professional obligations, specifically in relation to the properties at 19777 N 76th St, Apt 2228, and 7609 N Lynn Oaks Drive, Scottsdale, AZ, has necessitated this action.

**1. Specification of Damages:**

The total compensatory damages sought, \$1,368,936.80, is meticulously calculated based on the current market values of the aforementioned properties as of February 27, 2024, amounting to \$1,244,488. This valuation is derived from reputable real estate valuation services, including Redfin, to ensure accuracy and fairness in compensation for the loss of opportunity and financial detriment caused by your actions. Additionally, \$124,448.80 is sought for emotional distress, quantified in consideration of the psychological impact and distress directly attributable to your professional negligence and the subsequent ADRE findings.

**2. Legal Foundation and ADRE Findings:**

The ADRE's determination that your failure to submit an offer constituted a violation of ARTICLE 11. PROFESSIONAL CONDUCT R4-28-1101, specifically regarding the expeditious performance required by a license holder, solidifies the legal basis of my claims. This finding is pivotal, not merely as an administrative admonition but as substantive evidence of your failure to uphold the duties owed to me, thereby strengthening my legal stance on the breaches of contractual and fiduciary duties.

The precedential value of similar legal disputes, notably **Stewart v. Sterling**, as adjudicated by the Arizona Court of Appeals, serves as a pertinent legal analog, illustrating the judiciary's stance on such professional breaches within our jurisdiction. It is imperative to acknowledge that the legal principles espoused in these precedents underscore the seriousness with which the courts regard such breaches and the consequent liabilities thereof.

**3. Stipulated Conditions for Resolution:**

In lieu of immediate litigation, I propose an alternative resolution contingent upon your stipulation to dismiss FC2023-052114 Owens v. Echard forthwith and to mutually agree to forebear from any future legal actions against each other for any claims. This proposition is tendered in a spirit of amicable dispute resolution and to mitigate further legal entanglements.

**Requirement for Immediate Compliance:**

Your response to this legal notice is mandated by no later than February 29, 2024, by the close of business. Absent a satisfactory response, I am fully prepared to initiate legal proceedings to seek redress and restitution for the aforementioned breaches.

Sincerely,

Laura Owens

01/24/2024 11:15 AM  
Laura Owens  
FC2023-052114  
Owens v. Echard

OFFICE OF THE ATTORNEY GENERAL  
STATE OF MISSISSIPPI

## EXHIBIT "3"

**From:** Gregg Woodnick  
**To:** [REDACTED]  
**Cc:** Isabel Ranney; Cory Keith; Isabel Sissel  
**Subject:** CA: Owens adv. [REDACTED]  
**Date:** Monday, March 4, 2024 4:55:00 PM

---

[REDACTED]

It is my understanding that you represented Laura Owens in a paternity claim involving [REDACTED] in 2014. That matter involved allegations of a fabricated pregnancy with altered medical records. It is our understanding that the feigned pregnancy was perceived as a ploy for your client to coerce [REDACTED] into a relationship. Since that case resolved in California, three (3) additional men have claimed that they were victims of a fake pregnancy ruse by Ms. Owens.

I represent Clayton Echard the pending matter in Arizona. Laura is represented by my friend and colleague, Cory Keith (copied).

Ms. Owens was deposed on March 1, 2024, at which time she was asked directly about all prior litigation. She failed to disclose this California matter, but it was during this deposition that we learned of Mr. [REDACTED] existence and the fact that he had also alleged she fabricated a pregnancy with him.

We are requesting cooperation for access to the California paternity file. With Ms. Owens neglecting to mention the litigation and prior discovery delays (and an upcoming trial), we need this process expedited. I am asking you to connect with Cory Keith to coordinate production and disclosure of the California court file. Of course we are not requesting privileged information; only the public file from your court.

Our efforts here are about obtaining the otherwise limited access California file without the need to file a Motion to Compel Ms. Owens' compliance with disclosure of prior matters. Arizona Rules require that parties attempt to resolve discovery disputes before bringing them to the court. This is that effort and I certainly understand that your response may simply be that you "no longer represent Ms. Owens". I need to ask as a precondition to asking the court for relief.

Gregg Woodnick

WOODNICK LAW, PLLC

[REDACTED]

OFFICE OF THE ATTORNEY GENERAL  
STATE OF CALIFORNIA

# EXHIBIT "4"

**From:** Gregg Woodnick  
**To:** Cory Keith; Isabel Sissel  
**Cc:** Isabel Ranney  
**Subject:** Owens/Echard  
**Date:** Friday, March 8, 2024 12:47:44 PM

---

Cory,

As it has now been a week since we deposed Laura and we have yet to receive any disclosure from you:

- 1. Laura claimed she had an appointment with tele-med providers about her alleged miscarriage.** She testified she would be providing us with the provider names and we have not received the same. This stymies our consulting experts who are already limited in the records they are reviewing in light of Laura claiming that the sonograms she sent to the media and Clayton are not hers. The fact that she does not know the date of the alleged miscarriage is *incredible* but could be supported if she provides records from the appointment she claims she had immediately after the alleged miscarriage, including the photo she testified she shared with the provider of the alleged two hand-sized fetuses she delivered. Laura has health insurance, so the providers should be a phone call away for confirmation. If she paid by credit card, she could just look at the statement and give us the vendor name so we can issue the subpoena. There is no excuse for the delay other than more of the same... doctors claimed that say she was not their patient and records that never existed. (As you saw in the supplemental discovery, *more* providers she claimed she was using have no records). We anticipate Planned Parenthood confirming the same.
- 2. Larua lied when she said there was no other litigation she was involved in.** The situation with [REDACTED] appears to be paternity matter in SF. Those files are not public but can be accessed by the parties. Her CA attorney did not respond to my email and neither did you. I am happy to ask [REDACTED] to cooperate with the release of records. I trust Laura realizes he will confirm yet another pregnancy con from 2014 that was eerily similar to victim #4 (at least, we believe him to be 4<sup>th</sup>) Clayton.
- 3. We need the alleged fetus photos.** Laura said she sent them to both Sarah and the tele-med provider. If she provides the provider name (#1 above) I am sure we will find them there in their records. We should not be fishing for these as Laura should provide the same after she testified under oath to having been seen by these providers and volunteered the information regarding the photo she took and dispatched. She has been on an iPhone for all four men so there will be accessible iCloud backup. It will be easy for Bryan Neumeister (tech forensic expert) to see her images from September/October that were sent to Sarah and the alleged tele-med provider. You did not want her committing to that process at the deposition, which I understand, but Laura needs to cooperate or we are going to seek court intervention. Our medical experts need to see the images so that they can cross refence them to the alleged timeline of the pregnancy that never was.

I think our discussion about disclosure at both depositions in our chat before the last hearing with

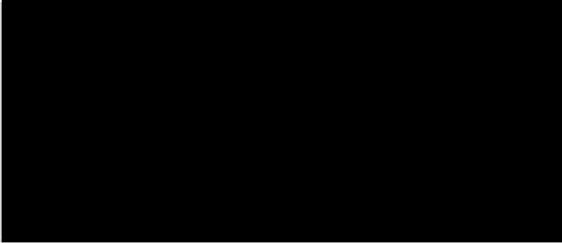


Judge Mata covers our Rule 9 obligation. If you disagree, let me know and we can talk Monday afternoon (any time after 2pm). Laura can anticipate our Motion to Compel.

Last, it should go without saying that I am sure you did not know about the pregnancy fraud case in California or that Laura tampered with exhibits that you used as evidence in Clayton's deposition. I think Bonnie Platter realized that the records were fake and that is why they tagged out. Perhaps Lexi also realized the same.

Gregg

**WOODNICK LAW, PLLC**



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ALBANY COUNTY COURT HOUSE, ALBANY, N.Y. 12214  
CLERK OF COURT

# EXHIBIT "5"

**From:** [Gregg Woodnick](#)  
**To:** [Cory Keith](#); [Isabel Sissel](#)  
**Cc:** [Isabel Ranney](#)  
**Subject:** Echard/Owens  
**Date:** Monday, February 26, 2024 9:57:27 AM

---

Cory,

I am confirming receipt of the disclosure we received from your office late Friday night. I'd like to quickly point out that the section with the advisory regarding medical records includes alleged records that are *already* part of the public domain (published by your client herself). My understanding is that, not only did Laura post them, but she also emailed them to various journalists, including Steve Carbone and David Neal. She even refers to some of them in her publications (which she appears to be *revising* to fit the new alleged miscarriage timeline your presented to Judge Mata last week-- I trust she is aware that the original versions have been preserved). I am assuming you are not aware of the extent she has put her "records" out in the mediasphere or her new tactic of revising history.

Of course, we intend to honor Judge Mata's directives regarding medical records but, in anticipation of her alleging there is a leak regarding what you just provided, I am advising you in writing of the history and that the majority of "records" provided were the very same Laura published online.

Last, I was hoping that your disclosure from Friday would have been something closer to complying with the overdue RFP and Rule 49. This puts the financial burdeon of discovery on Clayton but is completely not surprising in light of the history here. We will disclose the records we receive in response to the HIPAA requests. I trust you saw that the first vendor denied any records even existed.

We will see you Friday.

Gregg

**WOODNICK LAW, PLLC**

1747 E. Morton Ave. Suite 205



**From:** [Gregg Woodnick](#)  
**To:** [Woody Law Clerk](#)  
**Subject:** FW: Owens/Echard  
**Date:** Wednesday, February 28, 2024 7:51:40 AM  
**Attachments:** 2-27-24 - Notice of Intent to Sue.pdf

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**From:** Gregg Woodnick  
**Sent:** Tuesday, February 27, 2024 7:57 PM  
**To:** Cory Keith [REDACTED]; Isabel Sissel [REDACTED]  
**Cc:** Isabel Ranney [REDACTED]; Maribeth Burroughs [REDACTED]  
**Subject:** Owens/Echard

Cory,

1. Your client emailed me directly tonight (below). I am sure you did not approve or even know about this as it is so woefully inappropriate. Of course, I did not respond.
2. This will be an exhibit at trial. You can also expect my client may release this to the media as exposing Laura's overt and nonsensical extortion does the world good and nothing contained in her "notice" is private information.
3. I have more witnesses stepping forward regarding your clients pattern of faking pregnancies and using this disturbing narrative to somehow extort relationships.
4. I trust you already saw that three (3) providers your client claimed were providing services have indicated they have no medical records for her in their system.

I look forward to seeing you both on Friday.

Gregg

---

**From:** Laura Owens [REDACTED]  
**Sent:** Tuesday, February 27, 2024 6:39 PM  
**To:** Gregg Woodnick [REDACTED]  
**Subject:** Legal notice - please forward to Clayton

Gregg,

I am contacting you directly rather than through Cory as this is related to a civil matter. I

would appreciate it if you would share the attached with Clayton.

Regards,

Laura Owens

APR 18 4 00 PM '08  
FROM: Laura Owens <louowens@llnwd.net>  
TO: Clayton <clayton@llnwd.net>

**From:** Gregg Woodnick  
**To:** Cory Keith; Isabel Sissel  
**Cc:** Isabel Ranney  
**Subject:** Owens/Echard  
**Date:** Monday, March 4, 2024 1:29:25 PM  
**Attachments:** FAX\_20240304\_1709512377\_806.pdf  
Honor Health Scottsdale-Osborn.pdf  
Honor Health Scottsdale-Shea.pdf

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Cory,

At the Status Conference on February 21, 2024, you told Judge Mata that Laura had *not lied* in prior or current proceedings. I trust you have realized that may have been an inaccurate statement in the wake of her deposition last Friday and that you may need to amend your statement.

1. You were copied with the email to Planned Parenthood/Mission Viejo. As I am sure you saw, staff confirmed that they do not offer anonymous appointments. And, if Laura did go there (which is highly doubtful, given the tidal wave of providers who have denied ever seeing her), she would have access to the patient portal and should have no difficulty obtaining the original (not tampered with) sonogram.
2. I am forwarding you the records we received from Barrow. You will note, on page 45, Laura tells her neurologist during an appointment on November 29, 2023 that her *"ob/gyn thinks it was a chromosome thing"* that caused her to miscarry and *"she passed two things that looked like fetuses."* I am eager to see those OBGYN records.
3. Per your client's testimony, please immediately disclose:
  - a. The names of the telehealth providers she spoke to on August (when she was "spotting" per her testimony) and in September/October on the day that she allegedly miscarried *"...two things that looked like fetuses."*
  - b. The "abortion pill" provider who allegedly is the *only* individual who told her she was pregnant with twins and they were a boy and a girl based on what we now know is a doctored sonogram. (I was not aware that abortion pill providers were able to use ultrasounds see the genders at 8-9 weeks. I Googled it. Medical science is not aware of it either.)
4. Also per your client's testimony she was seen in August at HonorHealth. They, too, have no records of her. See attached.
5. Add [REDACTED] to the list of victims. I am sure you did not know this, because unlike the overt lies plaguing the case, Laura lied to you by omission and never told you about the litigation in CA that involved nearly identical allegations of fake/doctored ultrasounds.

Here is our working theory of the case: Laura Owens is a serial pregnancy-faker and prolific forger of medical documents (apparently for at least the past 10 years). Her *modus operandi* is to force relationships with men who do not want to be with her.

Gregg

WOODNICK LAW, PLLC



WOODNICK LAW, PLLC  
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...





**From:** Cory Keith  
**To:** Isabel Ranney; [REDACTED]  
**Cc:** Gregg Woodnick; Maribeth Burroughs; Isabel Sissel  
**Subject:** Re: FC2023-052114 - List of Providers  
**Date:** Wednesday, February 28, 2024 2:04:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Good afternoon,

To ensure an exhaustive list, my client asked that I also communicate the following providers for your records:

- Momdoc
- Banner Health

If these are already covered in your below list of providers, please disregard. Let me know if you need any additional information.

Warmest regards,



**Cory Keith**  
FOUNDER AND MANAGING ATTORNEY

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PHOENIX, AZ 85013

[VISIT OUR WEBSITE](#)

\*Please include my paralegal, [REDACTED] on all communications with our firm.

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**From:** Isabel Ranney [REDACTED]  
**Date:** Wednesday, February 21, 2024 at 12:46 PM  
**To:** [REDACTED]  
**Cc:** Gregg Woodnick [REDACTED], Cory Keith

[REDACTED]

[REDACTED] Maribeth Burroughs [REDACTED]

Isabel Sissel [REDACTED]

**Subject:** RE: FC2023-052114 - List of Providers

Good afternoon,

Per the Court's request, the providers we will be requesting records from via the HIPAA release signed in Court today (2/21) by Ms. Owens are (and subject to additional providers listed by Mr. Keith):

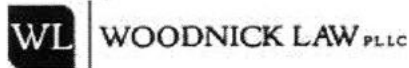
- Dr. Jeffrey Blake Higley, MD
- Dr. Joshua A. Makhoul, MD
- Tamara Lister, NP
- Dr. John Jones, DO
- One Medical
- HonorHealth Scottsdale
- Family Planning Associates
- Any Lab Test Now
- Choice DNA
- ArcPoint Labs
- Planned Parenthood California
- SMIL Southwest Medical Imaging
- Barrow Neurological Institute
- Dr. Zeiman

Thank you,

Isabel Ranney

**ISABEL RANNEY**

Attorney



[REDACTED]

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4/28/23 10:41 AM [REDACTED]