

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

3 [REDACTED]
4
5 *Gregg Woodnick,* [REDACTED]
Isabel Ranney, [REDACTED]
6 *Attorneys for Respondent*

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

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

10 In Re the Matter of:

11 **LAURA OWENS,**

12
13 Petitioner,

14 And

15 **CLAYTON ECHARD,**

16
17 Respondent.

Case No.: FC2023-052114

**RESPONDENT’S PRETRIAL
STATEMENT**

(Assigned to the Honorable Julie Mata)

**[Evidentiary Hearing scheduled for June
10, 2024 at 8:45 a.m.]**

18 Respondent/Defendant, CLAYTON ECHARD, hereby provides this Pre-Trial
19 Statement for the Evidentiary Hearing scheduled for June 10, 2024 at 8:45 a.m.

20
21 This proceeding is not complicated, but it is certainly unique given the fraud and circus-
22 style antics from Petitioner/Plaintiff, LAURA OWENS. Laura, who seems unburdened by *both*
23 science and societal expectations of truth, filed an improper Establishment Petition and Order
24 of Protection predicated on faked medical records *after* being rejected by Clayton Echard.
25 Laura’s medical record arts and crafts skills have been honed over a decade wherein she
26 falsified records to support fabricated “twin” pregnancies, forged ultrasounds, manufactured
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1 hcG reports, faked ovarian cancer, and feigned having an oophorectomy (ovary removal). She
2 cannot claim that she lacked the “intent” to commit fraud upon this court when she filed these
3 actions after oral sex and then appeared in court—twice—donning what appeared to be a fake
4 moon bump. Laura’s malignancy was exposed because she targeted Clayton, the former ABC
5 *Bachelor*, as her fourth mark.

7 Clayton immediately disputed the pregnancy, causing Laura to utilize her playbook –
8 alleging “twins,” crafting dating “contracts,” offering abortions, claiming suicidality, and
9 alleging that she was the victim of sexual assault. Laura also contacted the media,¹ which
10 resulted in three (3) prior victims of the same pregnancy con connecting. What Laura failed to
11 consider was that her claims of being “24 weeks” pregnant with “twins” and vague miscarriage
12 allegations (including suggesting that “twins” were “reabsorbed” into her body) would result
13 in the media (she contacted) comparing her to known fraudsters like *Scamanda*.

16 As if unable to stop, Laura continued to commit fraud, including misleading her own
17 medical expert (who, impressively and contrary to science, appears to have determined
18 paternity without DNA testing) by failing to tell him about her medical history (or faked
19 history), including but not limited to ovarian cancer, an oophorectomy as well as the fabrication
20 of the sonogram he reviewed (and perhaps even the “July 23” “miscarriage” photos).

23 Laura’s attempts to prevent a full and fair adjudication have only escalated as, through
24 counsel, she (per witness Michael Marraccini) suggested a witness would be arrested if he
25 appeared at Court for this trial. Further efforts to embarrass Mr. Marraccini involved Laura’s
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27
28 ¹ In addition to Laura contacting *The Sun*, *Page Six*, and *People*, her counsel has made comments about looking forward to reading the *obituaries* of reporters and about making them *homeless*; ostensibly consistent with how “Conor McGregor” would act if he was litigating this case.

1 counsel posting a California deposition transcript from 2018 online. She, through counsel, even
2 Tweeted commentary about the case and this court² as well as posted “medical records”
3 contrary to the court’s orders. She even mocked Dr. Dean’s expertise and expert report and
4 then published it online. On May 28, 2024, Laura *and* her counsel published a joint blog post,
5 in which Laura made overt claims of suicidality and appears to admit the 2,500 pages of texts
6 with Marraccini were legitimate, and that she never received an ultrasound for her alleged
7 “twin” pregnancy. Days later, Laura (through counsel) posted parts of the video deposition of
8 Clayton Echard on YouTube.³ The level of inappropriate behavior in this matter is astounding.

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10
11 Laura’s anticipated *crocodile tears* and claims to have been the *victim* of the media (who
12 exposed her cons) are disingenuous. Laura’s behavior should result in findings from the court
13 in these two (2) causes and may justify a referral to the Maricopa County Attorney for charges
14 of *both* perjury and evidence tampering (A.R.S. § 13-2702 and § 13-2809).

15
16 **I. BACKGROUND**

17
18 1. On August 1, 2023, Laura initiated litigation when she filed her *Petition to*
19 *Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support*, alleging that
20 she became pregnant with Respondent’s “twins” on May 20, 2023.

21
22 2. On August 8, 2023, Laura filed a **denied** *Motion to Communicate* and, on August
23 23, 2023, a **denied** *Motion to Compel*. On August 29, 2023, Laura filed a **denied** *Expedited*

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26 ² Tweeting on or about May 26, 2024 that Clayton’s counsel “*wanted to inflame and bias the judge*”
and it “*seems to have worked*.”

27 ³ See <https://www.youtube.com/watch?v=BnYoVsQez5g> (“Clayton implies he wanted to have sex, but
28 Laura didn’t”); https://www.youtube.com/watch?v=IICdmvLc_7I&t=74s (“Taking pregnancy test at
Clayton’s apartment”).

1 *Consideration Requested! Motion to Communicate* and, on September 14, 2023, a **denied**
2 *Expedited (!) Motion to Seal Court Record.*

3
4 3. On August 21, 2023, Clayton (representing himself) filed his Answer, denying
5 any pregnancy with “twins” after only oral sex.⁴ *See also* Respondent’s **granted** *Motion for*
6 *Leave to Amend Response*, filed December 12, 2023 and Respondent’s *Amended Response to*
7 *Petition to Establish*, filed January 26, 2024.

8
9 4. On September 28, 2023, through an Early Resolution Conference parties entered
10 a Rule 69 Agreement stating, “*Petitioner agrees to contribute a sample on October 2, 2023 to*
11 *determine paternity of the alleged pregnancy*”; testing to be conducted by Ravgen.

12
13 5. On October 6, 2023, Laura filed for an ex parte Order of Protection (FC2023-
14 052771), claiming that she was pregnant by Clayton and that he was cyberbullying her by
15 posting her medical records online. That same day, the Ravgen results came back, indicating
16 “little to no fetal DNA” and Clayton *thought* the nightmare was over. He was very wrong.

17
18 6. On October 18, 2023, Laura filed a Request for Pre-Decree Mediation (**denied**
19 November 22, 2023) alleging Clayton would not speak to her and “*he even acts as if the unborn*
20 *children don’t exist despite a pro ponderous of evide [sic].*”

21
22 7. On October 24, 2023, Laura appeared by video before Judge Cynthia Gialketsis
23 (CV2023-053952) wearing what appears to be a fake pregnant stomach (moon belly). She was

24
25 ⁴ Laura’s evolving tale regarding May 20, 2023 has changed during the litigation and now includes a
26 rape insinuation. In messages to Clayton in effort to force a “*dating contract*”, Laura acknowledges
27 there was *no* intercourse, and offered that her vagina is “tight” after “not having sex in more than a
28 year” but then claimed “*some of [his] fluids were ‘down there’*” and that “*I don’t know the difference*
between types of cum [...].” It was not until 2024 that she alleged she was raped (after first alleging
that Clayton was too high to remember having intercourse – insinuating *she* had taken advantage of
him).

1 also photographed on September 27, 2023 competing in a horse jumping competition with a
2 visibly flat stomach and was signed up to compete in late November 2023 but allegedly backed
3 out after attempting to sign up under a different name.
4

5 8. On October 25, 2023, Laura appeared before Judge Doody (FC2023-052771)
6 *again* wearing what appears to be a moon belly and testified as to the veracity of a “sonogram”
7 of their “son,” which she has since claimed no knowledge of but that she sent to both Clayton
8 and the media, as well as including in her publicly accessible Dropbox on Reddit. (*See also*
9 Respondent’s *Motion for Relief from Judgment*, filed March 26, 2024.)
10

11 9. On November 2, 2023, the second day of trial on Clayton’s **granted** Injunction
12 Against Harassment, Laura testified that she was “100%” and “24 weeks” pregnant by Clayton
13 and that she was due “February 14, 2024.” Laura further specifically detailed she was
14 experiencing a *high-risk* pregnancy (due to her alleged epilepsy) and that she was being seen
15 by specialists “Dr. Makhoul” and “Dr. Higley” and that she had had an appointment with Dr.
16 Higley “last Friday.” After this Court ordered Laura to comply with disclosure (she had refused
17 to comply with Rule 49), it was confirmed that Laura’s testimony was false and she was never
18 treated by Drs. Makhoul, Higley or any obstetrician or gynecologist *during* her alleged high-
19 risk pregnancy with “twins”.⁵
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25 ⁵ Laura self-reported to her neurologist *via video* while in the seated position that she was 21 weeks
26 pregnant with “twins”. Laura also told the provider that she saw for the first time on November 14,
27 2023 (Momdoc) that she *had* been pregnant, that the pregnancy had been “*confirmed by planned*
28 *parenthood*,” that she “*passed two sacs*” and that she had been told that her blood hcG levels were
“*not consistent with a viable pregnancy*.” There was no sonogram at Planned Parenthood and, *if* the
latter statement bears any truth, this means Laura was told she was not pregnant **before** she testified
in front of Judges Doody, Gialketis, and this Court.

1 10. On December 6, 2023, results of the yet another Ravgen test again confirmed
2 “little to no fetal DNA” Again, Clayton thought the nightmare was over—he was wrong, again.
3
4 (Note the second Ravgen test was *allegedly* “lost” in transit).

5 11. On December 12, 2023, Clayton filed a *Notice of Filing Affidavit of Non-*
6 *Paternity*, avowing that he could not be the father to any children from Laura as they never had
7 sexual intercourse. Clayton also filed his **granted** *Expedited Motion to Extend Dismissal Date*
8 *on Inactive Calendar and Schedule an Evidentiary Hearing*.

9
10 12. On December 28, 2023, Laura filed her **denied**⁶ *Motion to Dismiss Petition to*
11 *Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice*
12 as well as a *Notice Requiring Strict Compliance with Arizona Rules of Evidence*, which invoked
13 Rule 2(a), *Arizona Rules of Family Law Procedure*. For the first time, Laura’s *Motion*
14 *cryptically* claimed that she “*is not now pregnant [...]*.”

15
16 13. That same day, Clayton notified Laura of his intent to depose her pursuant to
17 Rule 57(a)(1) and requested the production of documents pursuant to Rule 62.

18
19 14. On January 2, 2024, Laura filed a **denied** *Expedited Motion to Quash Deposition*
20 *of Petitioner*. Laura’s counsel (her first of three attorneys) withdrew.

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22 15. On January 3, 2024, Clayton filed a *Response/Objection to Petitioner’s Motion*
23 *to Dismiss*⁷ as well as a (withdrawn) *Motion for Sanctions Pursuant to Rule 26*.

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26 _____
27 ⁶ Although the Court’s Minute Entry dated January 25, 2024 does suggest that Laura’s *Motion to*
28 *Dismiss* was granted but maintained as “the issue of sanctions and attorney’s fees remain,” the
Court’s Minute Entry dated February 21, 2024 and discussion in Court *clarifies* that the Court was
“*denying Petitioner’s Motion to Dismiss Petition to Establish [...]*.”

⁷ For brevity, this background summary excludes all other *Response* and *Reply*’s filed in this matter.

1 16. On January 17, 2024, Clayton filed a *Notice of Non-Appearance at Deposition*
2 *Pursuant to Rule 57(g)*, notifying the Court that Laura willfully failed to appear at her
3 deposition and requesting attorney’s fees pursuant to Rule 57(g).
4

5 17. On January 18, 2024, Laura, with her 2nd counsel, filed a **denied** *Motion for*
6 *Confidentiality and Preliminary Protective Order* claiming, for the first time, that Laura had a
7 miscarriage. Notably, no other information about the *alleged* miscarriage was provided.
8

9 18. On February 2, 2024, Clayton was deposed by Laura.⁸

10 19. On February 6, 2024, Respondent filed a **granted** *Expedited Motion to Continue*
11 *Trial and Motion for Additional Trial Time*.
12

13 20. On February 12, 2024, Respondent filed a **granted** *Expedited Motion to Set*
14 *Virtual Status Conference*. The Court scheduled an in-person Status Conference for 2/21/24.
15

16 21. At the Conference on February 21, 2024, this Court addressed Petitioner’s failure
17 to comply with Rule 49 (see attorney’s fees below). Petitioner claimed that she had a
18 miscarriage sometime in “***September or October***.” The Court indicated it would “*hear evidence*
19 *and testimony as it applies to [...] all pleadings filed within the Maricopa County Superior*
20 *Court*” and it would be viewing the *Order of Harassment Hearings*.
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27 ⁸ Pursuant to Rule 59(c)(2), Clayton intends on offering this deposition against Laura, including
28 discussion of the ultrasound Laura has admitted to altering and presented as an exhibit as well as the
ultrasound video on pages 42-44, 46, 63, 90-91, 111-122.

1 22. On March 1, 2024, Laura was deposed, and it was discovered that there was yet
2 another pregnancy fraud allegation (#4) from 2014 in San Francisco. Clayton intends to offer
3 the entire deposition⁹ as evidence against Laura, consistent with Rule 59(c)(2).
4

5 23. On March 11, 2024, Respondent filed a **granted** *Motion to Compel*. On March
6 12, 2024, Petitioner's 3rd attorney withdrew.
7

8 24. On March 25, 2024, Respondent filed a **granted** *Motion for Joint Hearing* and a
9 **granted (in part)**¹⁰ *Motion for Relief from Judgment*, which was *Amended* on April 26, 2024.

10 25. On April 1, 2024, Petitioner's 3rd attorney filed a **denied** *Motion for Extension*
11 *of Time to Respond to Respondent's Motion to Compel* and a *Declaration of David S. Gringas*
12 *In Support of Petitioner Laura Owens' Motion for Extension of Time to Respond to*
13 *Respondent's Motion to Compel*.
14

15 26. On April 3, 2024, Respondent filed a **granted** *Motion to Withdraw Motion for*
16 *Sanctions Pursuant to Rule 26*. Petitioner filed a *Notice of Non-Objection* on April 4, 2024.
17

18 27. On April 8, 2024, Petitioner filed a **denied** *Motion to Compel Lunch and For*
19 *Alternative Relief*.
20

21 28. On April 12, 2024, Petitioner filed a **granted** *Request for Judicial Notice*,
22 requesting this Court take notice of Petitioner's case against Greg Gillespie.¹¹
23

24 ⁹ Specifically pages 1-175. Line numbers would be unhelpful, as parts of the entire deposition will be
25 utilized as evidence against Laura. ¹⁰ In the Courts Minute Entry dated 5/22/24, the Court clarified
26 that it would be viewing the Order of Protection hearing before Judge Doody and deferring ruling on
27 the *Motion* pending the trial.

27 ¹⁰ In the Courts Minute Entry dated 5/22/24, the Court clarified that it would be viewing the Order of
28 Protection hearing before Judge Doody and deferring ruling on the *Motion* pending the trial.

28 ¹¹ Mr. Gillespie is expected to testify that he experienced "twin" pregnancy fraud by Laura after
rejecting her and as addressed by Judges Bachus and Gordon and which involved a fake sonogram

1 29. On April 30, 2024, Petitioner filed a **denied** *Emergency Motion to Strike and*
2 *Request for Immediate Telephonic Scheduling Conference* and **denied** *Motion in Limine,*
3 attempting to preclude testimony from the three (3) men who are anticipated to testify that
4 Laura fabricated pregnancies, medical records, cancer, oophorectomies to force unrequited
5 relationships.
6

7 30. On May 10, 2024, Petitioner filed a **denied** *Motion for Judgment on the*
8 *Pleadings and Renewed Motion to Dismiss* and, on May 13, 2024, a *Notice of Non-Availability*
9 *and Notice of Errata.*
10

11 31. On May 21, 2024, Respondent filed a *Stipulated Motion for Virtual Appearance*
12 *of Witness* (Dr. Deans, MD, MPH).
13

14 **II. CONTESTED ISSUES**

15 1. **NON-PATERNITY: This Court should find that Clayton was not**
16 **responsible for any alleged pregnancy.** That Laura will claim she *believed* she was pregnant
17 from oral sex is farcical and not the legal standard. Even *if* that was the standard, it is
18 indisputable that Laura did not have any basis to believe she was pregnant with “twins”, as she
19 alleged in her Petition because she faked the sonogram records, she never sought
20 obstetric/gynecological care, she never had an ultrasound, and she lied to the Court about her
21 “high risk pregnancy” with “twins.”¹²
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24 _____
25 that Laura purchased (it is water marked “*Fiverr*,” a website where you can ostensibly hire people to
26 photoshop images).

27 ¹² Before Judge Gialketsis on November 2, 2023, Laura testified to having a high-risk pregnancy with
28 “boy” and “girl” twins, being “100%” and “24 weeks pregnant,” and to being “seen” by Drs. Higley
and Makhoul. Laura offered (admitted) as an Exhibit a screenshot of her making an appointment with
Dr. Makhoul. Laura has since testified that she never received care from any pregnancy provider or
specialist.

1 **Alleged Pregnancy: Pregnancy is caused by sex, not relationship cons. Laura and**
2 **Clayton did not have penile-vaginal sex** . Laura’s allegations about what happened that night
3 have morphed over time in order to fit Laura’s narrative as she is confronted with science and
4 the significant holes in her story. Laura has claimed there were “fluids” “down there,” then
5 claimed Clayton was “too high” to remember having intercourse, and then claimed Clayton
6 raped her.¹³ Laura even sent an email admitting they did **not** have sex and essentially begging
7 Clayton to have sex with her for the first time, because she was “*tight*” and had not had sex in
8 years.¹⁴

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11 Laura’s only “proof” of pregnancy is one (1) urine hcG¹⁵ test conducted at Banner on
12 June 1, 2023, one (1) blood hcG test on October 16, 2023 that indicated levels of hcG that, by
13 Laura’s own admission are inconsistent with a pregnancy.¹⁶ Note, even her October 16, 2023
14 hcG test (provided to her expert) is dubious as Laura (through counsel) has admitted to sending
15 an altered version with 102,000 hcG (1,000 x higher) levels to the media. Laura again fabricated
16 a medical record while simultaneously refusing to cooperate with Rule 49 disclosure
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21 ¹³ Curiously, in her underlying *Petition to Establish*, Laura stated there was no domestic violence and
22 requested Joint Legal Decision-Making (and a holiday schedule), as the sexual assault allegation did
23 not arise until *after* Laura realized Clayton (like others) had zero interest in a relationship and that he
24 was questioning her “twin” pregnancy narrative.

25 ¹⁴ Note: with Gillespie, Laura also claimed she had not had sex in years. She later (with Gillespie)
26 concocted a disturbing story that Gillespie and his counsel (undersigned) were involved in her
27 kidnapping and rape and that it was being investigated by the FBI in an *ex parte* letter to Judge
28 Bachus.

¹⁵ HcG tests are *not* dispositive of pregnancy. As Dr. Deans will confirm, hcG can be present in an
individual for reasons unrelated to pregnancy – including medications for epilepsy and fertility
treatment, as well as if the person *injects themselves* with hcG.

¹⁶ Laura also alleges that she “lost 30 pounds” and that is somehow proof of pregnancy or that her
body absorbed 24-28 weeks fetuses, all while competing in horse jumping competitions. Per her
records, on June 1st, 2023, Laura weighed 121.25 pounds; On November 14th she weighed 133 lbs.)

1 obligations resulting in the Order to Compel. Laura is guilty of both *copious* perjury and
2 evidence tampering, warranting this Court endorsing the Maricopa County Attorney’s Office.

3
4 **Alleged Sonogram(s): Laura faked the sonograms (at least three (3) with Clayton).**

5 There are no verifiable (and requisite) sonograms to support Laura’s claim of being pregnant
6 (with “boy” and “girl” “twins”) after oral sex.¹⁷ On 10/25/23, Laura testified before Judge
7 Doody to getting a sonogram of their “son” and providing it to Clayton because she was
8 “*concerned about the baby’s profile*”, whom she accused of using it to make an online
9 Halloween meme (which he vehemently denies). Laura also admitted an Exhibit¹⁸ where she
10 tells Clayton that she has a “*sonogram video*” dated 9/5/23. On 2/2/24, Laura used the doctored
11 sonogram as an exhibit during her deposition of Clayton. On 3/1/24, Laura testified to obtaining
12 the same sonogram “anonymously”¹⁹ at Planned Parenthood “Mission Viejo” on July 7, 2023
13 and falsely (and illegally) attributing it to Southwest Medical Imaging (SMIL) and that she
14 “*found out she was pregnant with twins*” in July. On or about 4/15/24, Laura then claimed the
15 appointment date was July 2, 2023 and that she was seen at the Planned Parenthood in Costa
16 Mesa. Both SMIL and Planned Parenthood have confirmed Laura was never seen there for an
17 ultrasound. Planned Parenthood further confirmed that the alleged July sonogram is *not*
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23 ¹⁷ Per Dr. Deans, an ultrasound provider may be able to determine a possible twin gestation (not
24 gender) no earlier than 7 weeks gestation during an ultrasound. The only sonogram Laura states is
25 hers indicates a gestational age of 6 weeks, 4 days. (Parenthetically, the gestational age on the
26 doctored sonogram (if obtained on 7/2/23) would be consistent with a conception date of June 2,
27 2023 – not May 20, 2023). Sexes would *not* be discernable until around sixteen (16) weeks). Laura
28 texted Clayton “*We are having a boy and a girl and I have an ultrasound to show you and they dated
it literally exactly to when we were together.*”

¹⁸ Laura’s Exhibit 6 (an email from Laura to Clayton) was admitted during the Order of Protection
hearing before Judge Doody (FC2023-052771).

¹⁹ Planned Parenthood confirmed they do not offer anonymous appointments.

1 “consistent with ultrasound images generated by” their practice. Still, Laura signed an affidavit
2 for her expert that *included the fake sonogram* and stated, “*This image was taken at Planned*
3 *Parenthood*” (emphasis in original). No evidence supports Laura ever being seen by any
4 provider for an ultrasound, as this Court noted in its 5/22/24 minute entry stating “*neither*
5 *Planned Parenthood in Mission Viejo nor SMIL have any records for any ultrasound*
6 *appointment for Plaintiff.*”
7

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9 **Alleged miscarriage: Laura was never pregnant by Clayton could not have**
10 **miscarried Clayton’s “twins.”** Laura’s miscarriage tale (now apparently dated July 23rd) only
11 arose *after* she was confronted by Clayton’s desire to prevent her from getting away with her
12 extreme pregnancy fraud con (and exploiting *another* TedX talk or *Chicken Soup* essay). This
13 included Clayton notifying Laura he had contacted the Putative Father Registry to prevent
14 Laura from claiming she put the “twins” up for pretend adoption as a means of explaining their
15 nonexistence (all *after* testifying she was “24 weeks,” actively being seen for “high-risk”
16 pregnancy and due in “February”). Meanwhile, Laura continued to post on Reddit, published
17 various blogs on Medium.com portraying herself as a victim, and contacting the media to
18 advance her fictitious narrative.
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22 **This is not the first time Laura has feigned a miscarriage or leveraged offers to**
23 **terminate a pregnancy in exchange for the victim agreeing to date her.** With Michael

24 Marraccini in 2016²⁰, Laura alleged she was pregnant with his “twins,” that she believed she
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27 ²⁰ Clayton disclosed 2,500 pages of text messages between Michael Marraccini and Laura. In light of
28 Laura’s repeated claims that her victims (including Michael) have fabricated or tampered with
communications, a computer forensic expert, Mr. John Berryhill, assessed the meta data and
confirmed that there was **no** tampering. This confirmed that Laura historically claimed she had

1 had a “miscarriage” and that after speaking with providers she knew “what to look for [to
2 determine whether she was miscarrying].” With Gillespie, it was offering to abort the “twins”
3 if he agreed to date her. With Clayton, Laura alleged, for the first time, that she miscarried
4 when she requested a protective order on 1/18/24. On 11/14/23, Laura self-reported to Momdoc
5 (a provider she had never seen before) that she “*passed two sacs which appeared to have*
6 *membrane but denies having much bleeding.*” During the status conference on 2/21/24, Laura
7 told this Court she miscarried sometime in “*September*” or “*October*” 2023.²¹ Days later, at her
8 deposition on 3/1/24, Laura testified that in “*September or October*” she passed “*two sacs*” that
9 were “*less than the size of [her] hand*” that she took a picture of them and sent it to an online
10 provider.²² On 4/8/24, Laura (via counsel) stated that she passed the “*two sacs*” on “July 23,
11 2023” (***BEFORE*** Laura filed the underlying Petition, her OOP, and ***before*** she testified before
12 three (3) different judges about her feigned pregnancy). Clayton’s experts have reviewed the
13 images (which may be *fake* but even *assuming* they are real), and Dr. Deans will testify that
14 “*there is no obvious embryonic or fetal tissue*” which is complicated by the theory that Laura
15 would have been miscarrying “twins” that were 8-11 weeks and would have experienced
16 significant bleeding. (Note: Laura refused to provide her phone to a forensic expert to confirm
17 the images’ authenticity, which is highly dubious given her admitted history of fabricating
18 records).
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25 ovarian cancer and an ovary removed, in addition to alleging she was pregnant with twins, had a
26 miscarriage, had a “*severe allergic reaction*” to an abortion drug, and that only *one* of the fetuses was
27 terminated via abortion (which she also told Gillespie).

28 ²¹ Laura also was engaging in repeated communication with Clayton and the media referring to
sonograms and videos that showed she was “**still pregnant**” in addition to testifying before two (2)
judges in late October/early November to being “100%” and “24 weeks pregnant.”

²² There is no record indicating Laura showed any provider these alleged “two sacs.”

1 2. **ORDER OF PROTECTION: The OOP against Echard must be dismissed**
2 **because it was procured through intrinsic and extrinsic fraud by Laura.** Clayton’s
3 positions are well summarized by this Court in its 5/22/24 ruling and fully briefed in the Motion
4 for Relief. The order was upheld by Judge Doody (who did not know the history of fraud) as a
5 result of extrinsic and intrinsic fraud by Laura because she was never pregnant with his “twins”
6 and the ultrasound in the image Judge Doody found to uphold the Order of Protection was
7 manufactured by Laura (who has since denied the image belongs to her, despite her sending it
8 to Clayton and the media and including it in her public Dropbox on Reddit).

9
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11 3. **ATTORNEY’S FEES, SANCTIONS AND REFERRALS: This court has**
12 **broad authority to assess the conduct of Owens throughout the three (3) proceedings**
13 **before three (3) different Judges and to sanction Laura pursuant to A.R.S. §§ 25-324, 25-**
14 **415, and 25-809(G).** Laura ignored disclosure obligations for nearly seven (7) months and it
15 was not until this Court compelled her cooperation that evidence of a fourth (4th) victim was
16 revealed or that she committed to her recent tale of a miscarriage in July. But despite allegedly
17 passing two fetuses less than the size of her hand, she allegedly did not “know” she had
18 miscarried until November and curiously did not inform Clayton or this Court until January).

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21 Laura’s conduct cannot be accurately captured in the word “*unreasonable*,” as faking a
22 “twin” pregnancy after oral sex, doctoring and submitting medical records, threatening
23 witnesses, and committing continuous perjury deserves a word more befitting behavior beyond
24 even the Family Court pale. In addition to the fraud underpinning the entire litigation, the Court
25 merely needs to read Laura’s Medium articles, the Tweets, and blog posts to appreciate the
26 scope of the damage she has caused which, as recent as May 28, 2024, includes a **joint blog**
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1 post from Laura and her counsel and YouTube postings of Clayton’s video deposition.

2 Clayton is entitled to all his reasonable fees and costs incurred pursuant to A.R.S. § 25-
3 324. To date, Laura has provided no evidence to support that she was ever pregnant by Clayton
4 and with Clayton’s “twins”. Laura has refused every opportunity to resolve the matter outside
5 of court and all efforts to comply with disclosure (including failing to appear at a scheduled
6 deposition and *not* fully complying with the eventual Order to Compel). Recall, this entire saga
7 was initiated by Laura going to *The Sun* and making false claims of pregnancy ostensibly
8 because Clayton rejected her. Laura’s Order of Protection and the underlying Petition were
9 both filed in bad faith, as Laura knew that she was not and could not have been pregnant with
10 Clayton’s “twins.” Laura then proceeded to fabricate evidence (not for the first time)²³, testify
11 before three (3) Judges to being “100%” and “24 weeks” pregnant with “twins”²⁴, and file
12 irrational and legally unsupported filings that continued to assert what Laura cannot prove: that
13 she was pregnant with Clayton’s twins.
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18 And it was more than just simple “*misstatements*,” as this is extrinsic and intrinsic fraud
19 upon the Court encompassing false testimony, altering evidence, and using coercive threats to
20 tamper with potential witnesses and extort Clayton. Laura, the day before her deposition on
21 March 1st, sent Clayton a letter threatening to *sue* him for a collateral allegation for around
22 \$1.4 Million unless he agreed to dismiss *this* action. This overt extortive effort is eerily similar
23 to Laura’s antics with Judge Bachus in the Gillespie matter, where she maliciously claimed
24
25

26 _____
27 ²³ As witnesses Marraccini and Gillespie are expected to testify, Laura fabricated medical records
(including sonograms) in her pregnancy con with their fake “twins.”

28 ²⁴ At the same time as her claimed “high-risk” pregnancy, Laura was actively participating in horse
jumping competitions with a visibly flat stomach (contrary to her very visible “moon belly”).

1 Gillespie and his counsel were involved in her rape in an attempt to avoid a hearing. Through
2 her third counsel in this matter, Laura has intimidated witnesses (including suggesting
3 Marraccini would be *arrested* if he appears to testify); filed legally unsound filings designed to
4 waste fees and delay trial; sent overt threats and harassing communications to Clayton’s
5 counsel and members of the media; engaged in toxic and inappropriate diatribe regarding this
6 case through Twitter and blog postings (including using derogatory terms, insinuating that any
7 ruling in Clayton’s favor would be a “mistake,” and that the judge was biased against Laura)
8 and appeared to intimidate Laura’s *own* prior counsel into *refraining* from complying with his
9 Rule 3.3 ethical obligations.
10
11

12 **III. WITNESSES**

13 **Respondent’s Witnesses:**

- 14 1. Clayton Echard will testify to all issues.
- 15 2. Laura Owens will testify to all issues.
- 16 3. **Michael Marraccini**, former romantic partner of Laura. *See Response to Motion*
17 *in Limine*. He is expected to testify regarding the origin of the 2,500 pages of
18 messages with Laura from 2016/2017 where she made nearly identical claims
19 involving fake “twins”, miscarriages, abortions, threatened suicidality (including
20 claiming to be admitted into a mental hospital). He is expected to also testify
21 regarding the personal claims in Laura’s recent affidavit claiming he faked her
22 medical records, which have been disproven by the forensic technology expert
23 who verified that the “medical records” indicating ovarian cancer/ovary removal
24 were sent to him by Laura.
25
26
27
28

1 4. **Gregory Gillespie**, former romantic partner of Laura. *See Response to Motion in*
2 *Limine*. He is expected to testify that Laura fabricated being pregnant with twins,
3 claimed she had an abortion several times, and repeatedly stated she would
4 dismiss her lawsuit if he agreed to date her. Gillespie is expected to confirm that
5 the sonogram of “twins” sent to him by Laura was from “Fiver.” He is also
6 expected to testify in response to Laura’s allegations that *he* doctored her
7 “medical records.”
8

9
10 5. **Dr. Samantha Deans, MD, MPH**, will testify regarding her expert review of the
11 medical records of Ms. Owens, including her analysis that the alleged hCG tests
12 were never dispositive of pregnancy and that the related miscarriage timeline,
13 which includes detailed analysis of the likely origin of hCG in Petitioner’s blood
14 and urine, is not indicative of human gestational norms. Her testimony will also
15 address the veracity of Petitioner’s miscarriage of two (2) fetal sacs and alleged
16 sonogram from Planned Parenthood.
17
18

19 6. **Jon A. Berryhill**, a forensic data expert, will testify regarding his expert review
20 of the personal computer of Michael Marraccini, including his analysis of the
21 meta data, which confirms that no text messages or images sent by either party
22 were altered or otherwise fabricated.
23

24 7. Any and all witnesses listed by Petitioner subject to appropriate objection.
25

26 **Respondent’s Objections to Petitioner’s Witnesses:**

27 Respondent objects to any and all of Petitioner’s witnesses which have not been timely
28 disclosed. Respondent specifically objects to the expert testimony of Dr. Medchill under Rules

1 702 and 703, Ariz. R. Evid., as he relied on an admittedly tampered with data set, made
 2 inappropriate conclusions regarding his “beliefs” unrelated to science, and appears to have
 3 concluded, with zero scientific/DNA basis, that Clayton was the father of “twins.” His
 4 testimony is not the product of “reliable principles and methods” or based on “sufficient facts
 5 or data” and his opinion does not “reflect[] a reliable application of the principles and methods
 6 to the facts of the case” and should be precluded (or given the weight it deserves).
 7

8 **IV. EXHIBITS**

9 **Respondent’s Exhibits:**

11 NO.	DESCRIPTION
12 1.	Text from Petitioner re: unblocking
13 2.	Text between parties re: blocking and meeting up
14 3.	Messages between the parties
15 4.	LinkedIn messages between the parties, dated 5/17/23
16 5.	Text messages between the parties, dated 5/25/23
17 6.	Emails between the parties, dated 6/28/23
18 7.	Email from Petitioner, dated 7/1/23
19 8.	Emails between the parties, dated 9/17/23
20 9.	Email from Petitioner re: Sonogram, dated 10/14/23
21 10.	Email from Petitioner to Respondent’s Father
22 11.	Email from Petitioner re: Ultrasound, dated 10/6/23
23 12.	Text from Petitioner re: unblocking
24 13.	Email from Petitioner re: Going Public
25 14.	Article Petitioner wrote “I am the anonymous woman in the Clayton Echard scandal. Here is my story,” dated 9/22/23
26 15.	Articles where Petitioner spoke to the press
27 16.	Article Petitioner wrote “Unveiling the Unbearable: My Battle Against Cyberbullying and Online Harassment”
28 17.	Petitioner’s Medical documents
	Petitioner’s email to HOPE, re: Respondent speaking, dated 8/3/23
	Emails from Petitioner’s Mother to Respondent
	Email from Petitioner re: Threatening to Sue, dated 9/21/23

1	21.	Email from Petitioner re: Medical Documents
2	22.	Text messages between Petitioner and Greg Gillespie dated 7/11/2021- 8/24/21
3	23.	Text messages between Petitioner and Greg Gillespie re: ultrasound dated 8/6/21
4	24.	Records produced by Family Planning Associates in response to HIPAA Release
5	25.	Audio of Greg Gillespie and Laura Owens re: being pregnant with twins
6	26.	Audio of Greg and Laura Conversation Re: Fabricated Sonogram from August 2021
7	27.	Petitioner's Affidavit, dated 5/3/24
8	28.	Petitioner's "sonogram," dated 7/7/23
9	29.	Planned Parenthood Response to follow up letter, dated 4/26/27
10	30.	Emails between Respondent's Attorney and [REDACTED] dated 4/26/24
11	31.	Petitioner faking ultrasound
12	32.	FTR for October 2023 Hearing part 1
13	33.	FTR for October 2023 Hearing part 2
14	34.	FTR for November 2023 Hearing part 1
15	35.	FTR for November 2023 Hearing part 2
16	36.	Records produced by Dr. Hunter and Any Lab Test Now in response to HIPAA Release
17	37.	Records produced by Dr. Makhoul and Scottsdale Perinatal Associates in response to HIPAA Release
18	38.	Records produced by Barrow Neurological Institute in response to HIPAA Release
19	39.	Samantha J Deans, MD MPH Curriculum Vitae
20	40.	Faye Elizabeth Justicia-Linde, MD Curriculum Vitae
21	41.	Samantha J Deans, MD MPH and Faye Elizabeth Justicia-Linde, MD Expert Report
22	42.	Email to Steve Carbone, dated 4/24/24
23	43.	Email from Steve Carbone, dated 4/29/24
24	44.	Email to Dave Neal, dated 4/25/24
25	45.	Email from Michael Marraccini, dated 4/26/24, including medical records sent from Laura Owens in 2016
26	46.	Twitter Posts from David S. Gingras
27	47.	Berryhill Expert Report, dated 5/7/24
28	48.	Berryhill Digital Forensics Report, selected text messages
	49.	Petitioner's Deposition
	50.	Respondent's Deposition

1	51.	Petitioner's Counsel's Blog Posts
2	52.	Petitioner's email to the Court, dated 8/1/22
3	53.	Petitioner Counsel's emails and tweets
4	54.	Email between Petitioner current and former counsel
5	55.	Notice of Intent to Sue
6	56.	Petitioner's MomDoc records
7	57.	Email from Petitioner re: suicide, dated 9/21/23
8	58.	Email from Petition to Scottsdale PD, dated 7/31/23
9	59.	Medical Records from Women's Care of AZ/Dr. Higley

10 Respondent and his counsel reserve the right to supplement this List of Exhibits as
11 necessary.

12 **Respondent's Objections to Petitioner's Exhibits:**

13 Respondent objects to Petitioner's expert's report under Rule 703, Ariz. R. Evid.
14 Petitioner submitted admittedly falsified medical records to her expert for his review, including
15 the sonogram that she has admitted to tampering and which has been confirmed *not* to have
16 originated at Planned Parenthood or SMIL and notably *not* including the ovary removal she
17 allegedly had in 2016 (which she appears to be claiming she does not "remember" fabricating).
18 Her expert relied on fabricated data to reach his conclusion (which itself is inadmissible under
19 702), meaning his written opinion is not based on "those kinds of facts or data" that experts in
20 his field would "reasonably rely on."
21

22 Respondent objects to any and all of Petitioner's exhibits which have not been timely
23 disclosed. Respondent objects to any and all of Petitioner's exhibits, which have been doctored
24 in any way, including those already admitted to being fabricated by Petitioner and which were
25 confirmed not to have originated from any source Petitioner testified to being seen by.
26
27
28

1 Respondent further objects to any of Petitioner's exhibits which are not relevant, cumulative
2 or lack foundation to these proceedings. Respondent is unable to prepare specific objections as
3
4 Petitioner has not disclosed her list of exhibits.

5 **RESPECTFULLY SUBMITTED** this 3rd day of June, 2024.

6 WOODNICK LAW, PLLC

7 

8 _____
9 Gregg R. Woodnick

10 Isabel Ranney

11 *Attorneys for Respondent/Defendant*


12 **ORIGINAL** of the foregoing e-filed
13 This 3rd day of June, 2024 with:

14 Clerk of the Court
15 Maricopa County Superior Court

16 **COPY** of the foregoing document
17 Delivered/emailed this same day to:

18 The Honorable Julie Mata
19 Maricopa County Superior Court

20 David Gingras
21 Gingras Law Office, PLLC
22 4802 E. Ray Road, #23-271
23 Phoenix, AZ 85004

24 
25 *Attorney for Petitioner/Plaintiff*

26 By: /s/MB

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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 *Respondent's Pretrial Statement* 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 (Jun 3, 2024 15:28 PDT)
CLAYTON ECHARD

06/03/2024
Date