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8 *Attorneys for Petitioner*

9  
10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
11  
12 IN AND FOR THE COUNTY OF MARICOPA

13 In Re the Matter Of:

Case No. FC2023-052114

14 LAURA OWENS,

**REPLY TO RESPONDENT'S  
RESPONSE TO PETITIONER'S  
MOTION FOR CONFIDENTIALITY  
AND PRELIMINARY PROTECTIVE  
ORDER**

15 Petitioner,  
16 and

17 CLAYTON ECHARD,

(Assigned to the Hon. Julie Mata)

18 Respondent.

19  
20 Petitioner, LAURA OWENS (hereinafter "Petitioner"), by and through undersigned  
21 counsel, files this "Reply to Respondent's Response to her Motion for Confidentiality and  
22 Preliminary Protective Order" pursuant to Rule 53, *Arizona Rules of Family Law Procedure*,  
23 ("ARFLP").

24  
25 1. *Respondent Repeatedly Cites Petitioner's Lack of Compliance in Disclosure,  
While Seemingly Every Communication or Piece of Evidence Petitioner Provides  
to the Media with Intent to Further Embarrass Petitioner.*

26 In his Response, Respondent asserts the Court issuing a protective order prohibiting  
27 Respondent from speaking to the public would not withstand Constitutional scrutiny. Rather  
28 than using his Response as a platform to assert he has not frequently communicated with  
and distributed information to the media, Respondent instead claims it as his Constitutional

1 right to do so. To this point, Respondent admits in his Response to “not doubt[ing] that  
2 Petitioner will be annoyed or embarrassed by ... deposition.” *Response* at 4. While in a  
3 normal case or under ordinary circumstances, this discovery might not be problematic, this  
4 case is not normal. Conveniently omitted from his Response is Respondent’s likely intent to  
5 disseminate Petitioner’s deposition and its contents to “[his] little Reddit army.”<sup>1</sup>  
6

7 With good reason, Petitioner fears this “Reddit army” will then use the information  
8 to create further embarrassing content against her. Respondent also attacked Petitioner’s  
9 reluctance to disclose privileged documents while enlisting the help of his self-proclaimed  
10 army to further embarrass and oppress Petitioner. To the extent Respondent really believes  
11 Rule 52, *ARFLP* “ignore[s] the First Amendment,” Respondent should address his concern  
12 with the legislature—outside of the family court. *Response* at 2. Respondent believes his First  
13 Amendment rights should be given heavy consideration while constantly undermining and  
14 disregarding Petitioner’s right to privacy. Petitioner simply seeks protection from further  
15 embarrassment and harassment from Respondent’s army.  
16  
17

18 As such, the Court should limit the method or scope of prospective discovery under  
19 Rule 52, *ARFLP*. Such limitations are most appropriate in situations like that at bar, when  
20 the anticipated discovery will embarrass and further oppress a litigant.  
21

22 Respondent’s continued exploits to seek privileged documents must be thwarted with  
23 such disclosures being ordered protected and deemed further confidential, avoiding  
24

25 <sup>1</sup> During his January 11, 2024, interview with Nick Viall, Respondent gives praise to what he calls “[his] little Reddit  
26 army.” Specifically, Respondent discussed users on the Reddit platform who help him in this matter, stating, “So, that’s  
27 what Reddit found. My little Reddit army. I’ll shout them out. They also tore me to shreds in the beginning, but now  
28 they’re mostly on my side.” Nick Viall, *Going Deeper with Clayton Echard - “I Am Not The Father” | The Viall Files*  
w/ Nick Viall at 01:31:25, <https://www.youtube.com/watch?v=zakKq3kUloc>. This same Reddit army is now at least one  
of the groups of people harassing and embarrassing Petitioner online.

1 unnecessary dissemination to the public. Petitioner has documents she believes appropriate  
2 to disclose and witnesses who have stated that they are not willing to come forward as they  
3 are concerned with being subjected to similar ridicules online as Petitioner. Unfortunately,  
4 Respondent's "Reddit army" and his other followers have created an environment where  
5 Petitioner does not feel comfortable disclosing information and presenting her case without  
6 confidentiality.  
7

8           2. *Respondent is Intentionally Worsening the Embarrassment of Petitioner with his*  
9           *Pleadings and Conduct.*

10           Respondent's "Reddit army" has risen to new heights causing concerns for  
11 Petitioner's safety and well-being. Case in point, recently Petitioner has received erratic  
12 voicemails on her personal cell phone referencing this case and stating that she should "go  
13 fuck herself" and referring to her as a "con artist cunt." The petitioner was also subject of  
14 what appear to be three prank welfare check calls sending officers to her home. Respondent's  
15 active engagement and encouragement of this type of conduct from his followers has risen  
16 to the level of concern and warrants protections or confidentiality designations being ordered  
17 as requested.  
18

19  
20 All the while, Respondent's Motions and statements have worsened and become more  
21 aggressive, sarcastic, and demeaning. Respondent's motions are littered with false  
22 allegations and unnecessary, borderline unprofessional remarks. This conduct has become  
23 the subject of more parody for Petitioner online. Respondent claims the public interest in the  
24 case only adds weight to maintaining transparency, instead of limiting it. *Response* at 5.  
25 However, that rationale is flawed when that public interest rises to the level of causing  
26  
27  
28

1 extreme embarrassment and oppression, and when it limits Petitioner's ability to defend her  
2 claims and to put forth evidence corroborating her allegations.

3  
4 *3. Deposition Participation.*

5 Petitioner is not refusing to be deposed, she is just asking for time to allow the Court  
6 to address these issues. Petitioner will fully participate at a properly noticed deposition in  
7 the event the Court denies her Motion to Quash and once the Court has issued a ruling on  
8 her Motion for a Protective Order. Prior to the postponement of the January 17, 2024,  
9 deposition, Petitioner sought postponement from Respondent pending resolution of the  
10 ruling on her Motion to Quash; Respondent declined. As such, when Petitioner observed  
11 worsening conduct, she postponed the deposition pending the Court's involvement.  
12

13 Regarding Respondent's noticed deposition, Petitioner offered to postpone same to  
14 afford Respondent the protections she has sought from this Court.  
15

16 WHEREFORE, Petitioner respectfully requests that this Court sign the proposed  
17 form of Preliminary Protective Order attached as "Exhibit 1" to her Motion for  
18 Confidentiality. Respondent seeks disclosure of Petitioner's confidential medical records;  
19 the Court should grant Petitioner's request and allow her to prove her case under the confines  
20 of confidentiality.  
21

22 **RESPECTFULLY** submitted this 31<sup>st</sup> day of January 2024.

23 **THE VALLEY LAW GROUP, PLLC**

24 */s/ Cory B. Keith*

25 \_\_\_\_\_  
26 Cory B. Keith  
27 *Attorney for Petitioner*

THE VALLEY LAW GROUP, PLLC  
3101 N. Central Avenue, Ste. 1470- Phoenix, Arizona 85012

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**ORIGINAL** of the foregoing e-filed  
this 31<sup>st</sup> day of January 2024, with:  
Clerk of the Superior Court  
Maricopa County Superior Court

**COPY** presumed delivered even date to:  
The Honorable Julie Mata

**COPY** emailed this 31<sup>st</sup> day of January 2024 to:  
Gregg Woodnick  
Woodnick Law, PLLC  
1747 E. Morten Ave. Ste 205  
Phoenix, Arizona 85020

*Attorney for Respondent*

By: ILS

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**VERIFICATION**

I, **LAURA OWENS**, Petitioner in the above-mentioned matter, declare (or certify, verify or state) under penalty of perjury that the contents of the forgoing "Reply to Respondent's Response to Petitioner's Motion for Confidentiality and Preliminary Protective Order" are true and correct to the best of my present knowledge, information and belief.

31/01/2024

Date

Laura Owens

Laura Owens (Jan 31, 2024 17:37 MST)

Laura Owens, *Petitioner*

# Reply to Motion for Confidentiality and Preliminary Protective Order Final

Final Audit Report

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