Clerk of the Superior Court \*\*\* Electronically Filed \*\*\* C. Diaz, Deputy 12/12/2023 11:22:18 AM Filing ID 17035065

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Attorney for Respondent

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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:



Petitioner,

and

CLAYTON ECHARD,

Respondent,

Case No.: FC2023-052114

MOTION FOR LEAVE TO AMEND RESPONDENT'S RESPONSE TO PETITION TO ESTABLISH PATERNITY

(Assigned to The Honorable Julie Mata)

Pursuant to Rule 28(A)(2) of the Arizona Rules of Family Law Procedure ("ARFLP"), Respondent, CLAYTON ECHARD, through undersigned counsel, respectfully requests leave from this Court to file the Amended Response attached hereto as Exhibit A, which clarifies the modifications that Respondent is requesting.

The reasons for this Amended Response are as follows:

- Rule 28(A)(2) provides that "Leave to amend will be freely given when justice requires."
- Respondent's Amended Response is attached as Exhibit A. Note, for 2. clarification purposes, the Amended Response is not provided on the self-service documents



1	that were initially filed. Any changes are bolded, and the remainder remains consistent with
2	the initial filing.
3	3. Specifically, Respondent seeks to amend his Response to include pertinent
5	background information for this Court, request this Court sanction Petitioner under Rule 26,
6	request his reasonable attorney's fees, and request this Court enter a finding of nonpaternity.
7	WHEREFORE, Respondent respectfully requests that this Court permit Respondent
9	to file the attached Amended Response, attached hereto as Exhibit A, and incorporated herein
0	by reference.
1	RESPECTFULLY SUBMITTED this 12th day of December, 2023.
3	WOODNICK LAW, PLLC
4	a the
5	Gregg R. Woodnick Isabel Ranney
7	ORIGINAL of the foregoing e-filed this 12th day of December, 2023 with:
9	Clerk of Court Maricopa County Superior Court
1	COPY of the foregoing document delivered/emailed this 12th day of December, 2023, to:
3	The Honorable Julie Mata Maricopa County Superior Court
25	
27	By: /s/ MB



GAIR

3 4

### 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 Leave to Amend Respondent's Response to Petition to Establish Paternity 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

12/11/23

Date



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### From JusticeForClayton community on Reddit

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	K LAW, PLLC	
The state of the s	ten Avenue, Suite 20	5
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Deandra M. Isabel Rann	oodnick, #020736 Arena, #033369 ley, #038564 Respondent	
Altorney jor		TO COLUMN OF THE OF A DIZONA
	IN THE SUPERIO	OR COURT OF THE STATE OF ARIZONA
	IN AND FO	OR THE COUNTY OF MARICOPA
In Re the M	atter of:	Case No.: FC2023-052114
1		A CENTRED DECRONCE TO DETITION TO
	Petitioner,	AMENDED RESPONSE TO PETITION TO ESTABLISH PATERNITY
	retitioner,	EG L'ADLADIX TAXABLE (TAX
and		
CLAYTON	NECHARD,	(Assigned to the Honorable Julie Mata)
	Respondent.	
		ECHARD, by and through undersigned counsel, hereby
submits his	Amended Response	e to Petition to Establish Paternity, Legal Decision-Making,
Parenting T	ime, and Child Suppo	ort and states the following:
I.	BACKGROUND	
1.	Petitioner has no	ot provided any verifiable scientific evidence that she is



pregnant, and all DNA tests have come back showing "little to no fetal DNA." The testing

company, Ravgen Inc, has indicated that it will not release records of the testing without



a Court Order.

- Petitioner filed her Petition only after Respondent indicated that he did not want to have any relationship with her, romantic or otherwise, after she performed oral sex on him on May 20, 2023.
- 3. Prior to and following her filing, Petitioner repeatedly threatened to go to the media about her "pregnancy" and sent Respondent over 500 messages from different phone numbers and email accounts. Judge Gialketsis found these messages and Petitioner's conduct to constitute harassment when she granted Respondent's Injunction Against Harassment on November 2, 2023 (Exhibit 1).
- 4. A sampling of Petitioner's efforts to force Respondent into a relationship are documented, in part, below:
  - a. Petitioner drafted a "contract" for Respondent to sign that promised "for a period of one week, while determining the best court [sic] of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with "intention" [...] There is no obligation to engage in intercourse if either Party is uncomfortable with the act." (Exhibit 2 Initial Response Exhibit 1)
  - b. 6/28/23: "I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for one another [...] I need to know your decision tonight because I am getting rid of the abortion pills it it's a no or if I don't hear back from you." (Exhibit 3).
  - c. Petitioner threatened to post on her public Instagram account that she



- 11		
1		was pregnant with Respondent's children if he did not "unblock" her and
2		said "if I can't get you to do it, then maybe the public can convince you to."
3		(Exhibit 4)
5		d. Petitioner contacted Respondent's Father, ostensibly to convince him to
6		force his son, Respondent, to speak with her ("I have not heard back from
7		Clayton and presume he has still blocked me.") (Exhibit 5).
8	5.	While this Family case was pending, Petitioner posted an "anonymous" blog
9		dium.com (which she later deleted) (Exhibit 6), contacted the news media, and
1		iple postings on Reddit.com claiming that she was pregnant with Respondent's
2		nd including a Dropbox of doctored "medical" documents. (Exhibit 7).
14	6.	Despite two (2) fetal DNA tests indicating "little to no fetal DNA" (and one
5	(1) test los	t in transit), Petitioner posted another Medium.com article identifying herself
16	as the "and	onymous woman" on December 8, 2023. In the article, Petitioner continues to
17	maintain s	he is pregnant with twins by Respondent. (Exhibit 8).
19	п.	RESPONSE TO PETITIONER'S PETITION TO ESTABLISH
20	7.	Respondent affirmatively alleges that Petitioner is fabricating pregnancy, as well
21	as refusing	a paternity test.
22 23	8.	Respondent affirmatively alleges that neither pregnancy nor paternity has been
24	proven.	
25	9.	Respondent contests that Petitioner is pregnant by him and therefore venue is not
26	relevant.	
27 28		Respondent contests that Petitioner is pregnant by him and since Petitioner is
	10.	respondent comests man remaining to Pro-



unwilling to participate in a fourth paternity test, paternity and the jurisdiction for determining its validity are unable to be proven/determined.

- 11. Respondent contests that Petitioner is pregnant by him and affirmatively alleges that Petitioner has neither proven pregnancy nor Respondent's paternity.
- 12. Respondent contests that Petitioner is pregnant by him and therefore there is no legal parenthood to establish. Respondent alleges that only oral sex was performed between the parties. Respondent further alleges that despite multiple requests to do so, Petitioner has refused to take a paternity test. Petitioner responded to Respondent's request via email stating that she would only take a paternity test if the parties were to date exclusively (Exhibit 1). Petitioner has threatened that she will write defamatory comments about this matter and release it to the press (Exhibit 1). Petitioner has not established proof of paternity. Upon information and belief, Petitioner suffers from mental health issues, and has caused Respondent to become concerned that she is stalking him.
- 13. Petitioner was not married at the time the minor child(ren) were born or conceived or at least 10 months before minor child(ren) were born or conceived.
- 14. Respondent contests that Petitioner is pregnant by him and therefore legal decision-making and parenting time are not relevant.
- 15. Respondent does not have any information regarding any court action in this state involving the minor child(ren) in question that could affect this case including court cases for enforcement and relating to domestic violence, protective orders, termination of parental rights and adoptions.
  - 16. Respondent does not know a person other than Petitioner who has physical

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custody or who claims legal decision-making (legal custody) or parenting time rights to any of the minor children in question.

- 17. Respondent contests that Petitioner is pregnant by him and therefore unreimbursed medical expenses incurred by Petitioner are not relevant.
- 18. Respondent contests that Petitioner is pregnant by him and therefore unreimbursed other expenses are not relevant.
- Respondent contests that Petitioner is pregnant by him and therefore the Parent Information Program is not relevant.
- Respondent affirmatively alleges that domestic violence has not occurred in this relationship.
- 21. Respondent affirmatively alleges that to his knowledge, neither party has been convicted for a drug offense or driving under the influence of drugs or alcohol in the last twelve (12) months.
- 22. Respondent contests that Petitioner is pregnant by him and therefore child support orders for either party are not relevant.
  - 23. Respondent denies any allegations not specifically admitted herein.
- 24. Respondent is entitled to an adjudication of non-paternity. Petitioner's relentless and harassing behavior through the media will only continue if this matter is not resolved by this Court finding Respondent is <u>not</u> the father of any alleged (and believed to be fictitious) children.
- 25. Rule 26 sanctions are appropriate. Petitioner has violated Rule 26(b),

  Arizona Rules of Family Law Procedure, and sanctions under Rule 26(c) are appropriate.





Petitioner filed this action for the purposes of harassing Respondent and forcing him to communicate with her. Despite Respondent's repeated requests, Petitioner has provided Respondent with no verified scientific evidence proving she is or was pregnant. Further, after filing her Petition, Petitioner filed a "Motion to Communicate," threatening to take her "pregnancy" to the media if Respondent did not communicate with her. This Motion was denied. See Petitioner's Motion to Communicate, filed August 8, 2023. Petitioner also filed a "Motion for Contempt," which this Court also denied, which requested this Court hold Respondent in contempt for not communicating with her. See Petitioner's Motion for Contempt filed August 23, 2023 (also denied by this Court). As such, Petitioner's Petition lacks evidentiary support, is being presented for the improper purpose, to harass Respondent into communicating with her, and to cause Respondent to incur fees.

- 26. The requirement of Rule 9(c) have been met in so far as there has been excessive communication regarding these issues, not limited to Petitioner's recent Medium article and the 500+ texts and emails that predicate Judge Gialketsis' granting of the Injunction Against Harassment.
- 27. Respondent is entitled to his reasonable attorney's fees and costs incurred based on Petitioner's unreasonableness pursuant to A.R.S. § 25-324. Petitioner initiated this filing based on a pregnancy that could not have occurred from oral sex. Despite this, Petitioner repeatedly harassed Respondent, filed numerous bad faith pleadings with this Court in an effort to force Respondent to communicate with her, went to the media when Respondent would not unblock her, and fabricated medical documents. Petitioner's behavior is the very definition of unreasonableness.



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# From JusticeForClayton community on Reddit

1	WHI	EREFORE, based upon all of the foregoing, Respondent respectfully requests the
2	Court enter	the following Orders:
3	A.	Issue an order declaring that Respondent is not the natural father of the minor
5	ehildren; a	ny children born to Petitioner;
6	В.—	Order that both parties be ordered to submit to such blood and tissue tests
7	as may be r	necessary by this Court to establish paternity, and Petitioner be ordered to pay
8	all-costs an	d expenses of this lawsuit under Arizona law, A.R.S. 25-809.
10	c.	Issue an Order compelling Ravgen Inc produce all records and documents
11	related to t	he fetal DNA testing in this matter;
12 13	D.	That this Court sanction Petitioner pursuant to Rule 26;
14	E.	That this Court award Respondent his reasonable attorney's fees and costs
15	based on P	etitioner's unreasonableness, pursuant to A.R.S. § 25-324;
16	F	Enter appropriate orders regarding costs and attorneys' fees herein; and
17 18	G.	For such other and further relief as the Court deems just and proper under these
19	circumstano	es.
20	RES	PECTFULLY SUBMITTED this 12th day of December, 2023.
21		WOODNICK LAW, PLLC
22		
23		Gregg R. Woodnick
24		Isabel Ranney
25		Deandra Arena  Attorneys for Respondent
26		
27		L of the foregoing e-filed ay of December, 2023 with:





Clerk of the Superior Court \*\*\* Electronically Filed \*\*\* C. Diaz, Deputy 12/12/2023 11:00:20 AM Filing ID 17034731

ı	WOODNICK LAW, PLLC
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Gregg R. Woodnick, #020736 Isabel Ranney, #038564

Attorneys for Respondent

### IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

### IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:



Petitioner,

and

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CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

## NOTICE OF FILING AFFIDAVIT OF NON-PATERNITY

(Assigned to the Honorable Julie Mata)

Respondent, CLAYTON ECHARD, by and through counsel undersigned, hereby provides notice of filing his Affidavit of Non-Paternity, dated December 11, 2023, attached hereto as "Exhibit A."

-1-

RESPECTFULLY SUBMITTED this 12th day of December, 2023.

WOODNICK LAW, PLLC

Gregg R. Woodnick Isabel Ranney

Attorneys for Respondent



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### AFFIDAVIT OF NON-PATERNITY

- I, CLAYTON ECHARD, being duly sworn upon my oath under penalty of perjury, depose, and say:
- 1. Let a and I had one sexual encounter on May 20, 2023 where she performed oral sex on me. We never had sexual intercourse or engaged in conduct that could lead to conception.
- 2. Continues to claim that I am the father of alleged twins. I do not believe she is pregnant and certainly not pregnant by me.
- 3. Attached hereto, pursuant to A.R.S. § 8-106.01 (Putative Father's Registry), is a Notice of Claim of Paternity. To be clear, I dispute that the interaction between and I could have resulted in a pregnancy.
- 4. I am concerned that if I do not file with the Putative Father Registry she will use her social media platform to claim that she had my children or that she somehow put them up for adoption to explain their nonexistence.
- Consistent with filings in Family Court in Maricopa County under cause number FC2023-052114, I am asking the Court to make specific findings of non-paternity.

-1-

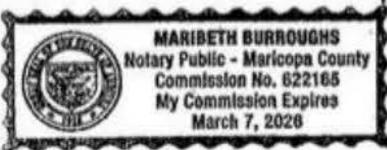
Clayton Echard

STATE OF ARIZONA )

County of Maricopa

SUBSCRIBED AND SWORN to me before this 11 day of December, 2023, by Clayton Echard.

My Commission Expires: 3 7 2026



Marier Burnglob Notary Public





Clerk of the Superior Court

\*\*\* Electronically Filed \*\*\*

C. Brown, Deputy

12/12/2023 11:11:23 AM

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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:

WOODNICK LAW, PLLC

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Facsimile: (602) 396-5850 Office@WoodnickLaw.com

Gregg R. Woodnick, #020736

Phoenix, Arizona 85020

Isabel Ranney, #038564

Attorneys for Respondent

1747 E. Morten Avenue, Suite 205



Petitioner,

and

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

NOTICE OF APPEARANCE

(Assigned to The Honorable Julie Mata)

Notice is hereby given that WOODNICK LAW, PLLC, by and through Gregg R. Woodnick and Isabel Ranney, enters an appearance in the above-captioned matter on behalf of Respondent, CLAYTON ECHARD, and hereby respectfully requests that all future orders and documents from the Court pertaining to this matter be endorsed to undersigned counsel.

RESPECTFULLY SUBMITTED this 12th day of December, 2023.

WOODNICK LAW, PLLC

Gregg R. Woodnick Isabel Ranney

Attorney for Respondent







### Clayton,

I was going to sak if you warried to read the article I wrote before submitting it to the Huffington Post, but I know you won't respond so i'll take it that I have your permission to send it in as is. Before I do that and prior to your work getting involved with withholding income for child support, I wanted to ask one last time about the agreement. I added a few things to it that are in bold. Here it is:

### Worston 4 - Relationship Non-Disclosure Ag.

I also contacted another abortion pill company who said we could still do it at this point if we wanted to. You haven't end aren't putting pressure on me to do that, but it is really important that we talk about this if you don't want to have the twins with me. Your behavior leads me to believe that would be your preference, so you need to say something if it is. I will not hold it against you whatsoever if you sign the agreement. If you don't, that's time, but we are having them.

I just want to have a fresh start and remove all of this enimosity from the picture. We need to be making smart decisions right now, not ones driven by emotions. No lither one of us wented this, but it's happened, and we need to make smart choices. If I don't hear back, then line, we can continue like this and I will submit my piece to Hull Post, but your unmaponal venese is getting you nowhere with me and will get you in trouble with the court.

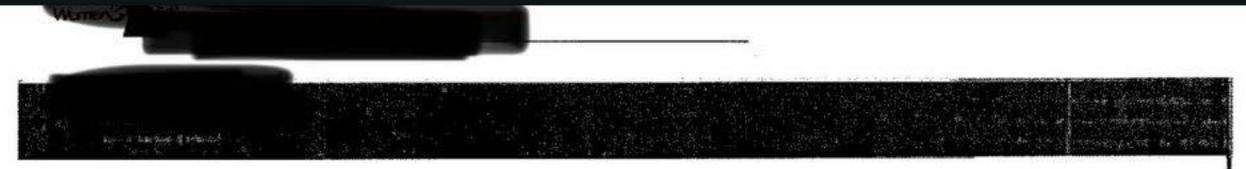
Please simply consider the agreement with modifications. It is written entirely in your favor, not mine.

All the best









### Here are the changes:

IV. Turns of the agreement.

### The Couple agrees that:

- For a period of one week, while determining the bast court of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with "intention", meening with the goal of it turning into comething tong-tasting and meaningful. There is no obligation to engage in intercourse if either Party is uncomfortable with the act.
- From the date that this agreement is signed until one week after, no action whatsoever will be taken in FC2023-052114 or in any family, civil, or criminal court case.
- Party A and Party B agree to take a paternity test with the lab of Party A's choice. Ravgen, and will actedule it within 24 hours of when this agreement is algorith.
- 4. After the paremity test results come back providing Party A to be the father of Party B's twins, then Party B will execute a HIPAA release for Party B to discuss the programmy with any of Party A's providers from the date of conception (May 20th) through the end of the pregnancy in February 2024.
- 8. If a joint deciation is made to terminate the pregnancy, then Party A and Party B will elipsiste to demiss FC2023-052114 once the pregnancy is confirmed by a doctor to no longer be viable. Party B will pay Party A's legal fees to dete.
- 8. During the one week period, if the decision is made to continue the pregnancy, then Party A and Party B will discuss what would make the best situation for the children, whether that be raising them together or apart. The goal would be to keep the case out of the court and to avoid accruing continued legal from PC2023-052114 will remain active until an agreement is made outside of court, then the parties will all pulsate to dismiss it.
- 7. There is no obligation for the relationship to work out beyond the one weeks, however if it is apparent that this agreement was entered into for the wrong reasons, evidenced by abuse of any kind (vertisal, emotional, or physical), it is not and void.
- B. At the end of the one week period, provided the terms have been met, than Party A and Party B are forever barred from bringing charges against each other for any resson up to that date.





Clayton Echard

### From JusticeForClayton community on Reddit

June 28, 2023 at 8:11 PM To: Clay I'm physically and emotionally exhausted from the pregnancy and all of this. I just need clarity as to what we are doing. I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for each other. I bring a lot to the table and feel like I could really make you a better person. Yes, I've called out your BS a lot, but it's because I know you are better than how you act sometimes. I get your anxiety because I've been there and truly believe in your mission despite the fact that you haven't shown me kindness when clearly I have been emotionally struggling I couldn't give a shit that you were The Bachelor and still know nothing about you other than the clips I saw of you with two girls when I was angry at you. I want to get to know you and be a great partner for you. I would feel exactly the same way if I was in this situation with any man; I need to care about someone and trust them to consider ending a human life when I want nothing more than to be a mom someday. Don't you understand that? In regards to intimacy -- I know it's important to you and it is to me as well. If you think about it, having sex with me is the safest thing you can do at this point. I'm already pregnant and if we choose to go this route (and trust each other enough to have sex), then we are at the point where I would be taking abortion pills. so there's no risk. Also, under no circumstances would I have an abortion if you want to be on dating apps or seeing other women while we are figuring this out. I would want to date with intention. I know what I bring to the table as a partner and I'm well aware that you don't want to become a father right now. It's a win-win situation for you, but a huge leap of faith for me. You haven't been trustworthy to this point, so I'm the one taking a gamble on the outcome of this. You could be leading me on, but I would take your word that you're not because for whatever reason, despite how you've treated me, I believe in you. We're both hard headed as hell, but I think we can make a very good team. If I didn't think so, I would just go ahead and have the kid since like I said, I want to be a mom more than anything in the world. I need to know your decision tonight because I am getting rid of the abortion pills if it's a no or if I don't hear back from you. I really do need to adjust my seizure medication and take other preceutions for my health and the wellbeing of our baby if we are going to have a kid. You're the father -- there's no two ways about it -- so saying no here is a guarantee you will be a dad. June 25, 2023 at 8:36 FM I will not date you in any capacity, as I do not have any interest in you. So, you can proceed however you'd like. I will be awaiting the ultrasound on the 8th week and then will do a paternity test as soon as I'm able to. You have told me a million times now that you'll give me "one more chance" to move forward with dating you, but I'm 100% not going to do that, so please just stop communicating with me from this point forward. I will find someone else to love and share my life with. I may honestly move to the east coast at this point as well. We'll see. I can do whatever I want with my life, but what I won't do is allow you to hold me back. And don't try to explain to me that I can't move out of the state and away from you. I absolutely can. All I have to do is either take 100% custody of the child or allow you to have 100% custody. Joint isn't an option and is never mandated. That's common sense. Besides, I will fight until I have no fight left in me to not have you be a part of my life. The courts can't force someone to stay with someone else. That's unheard of and has never been done. Just remember, there is no scenario in which we raise the child together, if you even have a child, which I'm shill not convinced. But if you do and it is somehow miraculously mine, like I said, I'll take care of the child if that's what it comes to, but I WILL NOT UNDER ANY CIRCUMSTANCE co-parent with you. Just want to make that clear. I would rather co-parent with literally anybody else besides you, as you have shown me you don't respect my opinion. You just force what you want onto people to get your way

That's my two-cents. Take it or leave it. Again, there's no more need for conversation and no more need for you to pester me each day until the 8th week. I tell you to stop sending me messages and

you just have zero respect and keep sending them regardless. So, I suppose I'll just continue to receive them and not respond, as my days are much better when I don't interact with you.





Yestorday at 2.23 PM

...and if you want option A, I will not post this. I am just looking for support during this incredibly overwhelming time.

Final email regarding this, but I wanted to give you the courtesy of showing you the post. I'm attaching the photo I'm going to use. I'm over being treated like shit and at least if this is public, you'll have to give a statement to the media. Not sure when I will put it up.

The caption is:

Surprisel I can't wait for the arrival of these two next Valentine's Day!

On a more serious note, their father, @ciaytonechard, has said he "wants nothing to do with this process". He has blocked me from messaging him, refuses to see me and his growing babies, and says he will continue to ignore me. He doesn't want to have anything to do with them when they're born and thinks they will negatively impact his dating life. Tag him and let him know what you think.

Please note the following legal waiver:

If, after proof of opening is obtained, I choose not to respond to this email, I am confirming that its content is true. This includes my acknowledgment of paternity. In addition, by not responding, I am giving my approval to Laura Owens to post the above content on social media.

Clayton, this is a situation you can't run and hide from -- you will need to take accountability for your actions which created twins. If I can't get you to do it, then maybe the public can convince you to.

All the best,



Pregnancy announcement



### Good morning.

I wanted to give an update on where things stand as I have not heard back from Clayton and presume he has still blocked me, which he told me before he does when he doesn't want to deal with a situation. If only I had the opportunity to do the same (I), but obviously, my body isn't allowing me to forget that I am pregnant. Rather than continuing to send him several emails a day. I hope that we can meet in person to discuss what is going on, because as Clayton said last week, "I lee! we need to have a face to face discussion. It's too easy to get upset via text. But in-person, conversations are more caring and cordial. I believe this is exactly what we need, as texting hasn't been working well," and, "We should have been talking in-person for most of this anyways. Texting isn't meant for meaningful/impactlut/life-changing conversations and I've known and learned that plenty of times."

I told Ctayton last week that I was going to be going to California for the weekend and that if I was going to get abortion pills, it would be much easier to do so there in California for many reasons, and less traumatic because there isn't a law there like there is in Arizona that the mother has to view the ultrasound. He has told me that he wants me to take the pills, but understands that his preference for me doing so (because it would impact his ability to date other women in the future) is not enough of a reason for me to end a human life. I am attaching a screenshot of my chart after my visit on Sunday to Planned Parenthood in Orange County, which confirms that I had an ultrasound that was consistent with the conception date of 5/20 when I was with Clayton (and like I've said, he's the only person I've been with since March of 2022), that there was a gestational sac meaning a viable pregnancy, and that I refused to view the ultrasound and take the abortion pills at the clinic. They don't typically allow you to take them home, but since I live out of state and was as conflicted as I was, they allowed me to.

Now that we know we have a viable pregnancy, things seem all the more urgent. It continue to say until I'm blue in the face that Clayton is the father and that there is zero percent chance that it is anyone else. I told him that he needs to pay for the prenatal paternity test because it is not providing me with any information that I don't know, but that I will gladly relimburse him for the full amount if I'm wrong. He agreed to that. I am eager to get it done and have contacted multiple companies about the timing of it. The consensus is that while it can be performed at seven weeks, there is a chance that there is not enough fetal DNA present at that point, in which case you would have to repeat the \$1500 test. It seems like we would be safest doing it at eight weeks, although ArcPoint Labs based in Scottsdale said twelve weeks was their minimum. The results will come back in 7-10 business days.

It was explained to me at Planned Parenthood that medication abortions are most successful early on in the pregnancy and that as the weeks go on, they become less effective. By the time the results are back from the prenatal paternity test, I would need to do a surgical abortion, which I will not do under any circumstances. I only mention this because once the prenatal paternity test is taken, it's a done deal that I am having the child and there will not be an option for an abortion once the results come back. My preference has been to have the baby all along, so that's obviously not an issue for me, but If it is for Clayton, he needs to know that. I haven't lied about one thing so far, despite his doubts; he himself had me take a pregnancy test, which turned out positive, and now, a doctor has confirmed the pregnancy on an ultrasound and said that it was the very small size it should be based on the date I was intimate with him. If he doesn't trust me, that's fine, and I am more than happy to prove him wrong again. I just know how high the stakes are right now and want to be clear that this really is the last time that I will consider an abortion.

The last thing I would want if I were in Clayton's position is to feel like I didn't have an opinion on something so important, but it seems like his reaction to the stakes getting higher is to withdraw even turther. However, there are several factors at play that he needs to consider regarding my health and its impact on the baby if we decide to carry it to term. First of all, my stress levels have a major impact on the fetus's development in the womb and not having any emotional support from Clayton like he promised has been extremely difficult on me. Most importantly, though, my neurologist has emphasized that I need to change my dose of epilepsy medication significantly because I'm at a higher risk of a seizure during pregnancy and having one could have a terrible impact on the baby. I've delayed going up on it because I haven't known what we are doing, but I really need to make a decision. I don't think that either Clayton nor I could forgive ourselves if the child ends up having a lifelong condition that could have been preventable.

On a personal level, I wanted to share that a big reason I am against terminating the prognancy is because of the impact not having an abortion had on my family. My great-grandma was fourteen when she gave birth to my grandma, who she gave up for adoption. If she had an abortion, I wouldn't be here. It's impossible for me to think about terminating the pregnancy without thinking of that, even though in many ways, not having the baby would be an easier option. I'm also getting feedback from my sister, whose baby was born a month early on May 24th, and who says that it is the greatest thing she's ever experienced, but that it is also the hardest and she can't imagine how she could do it without a partner. On the other hand, my morn has been my main source of support on this asked me to think about what I would regret more when I'm ninety years old and on my deathbed; having had an abortion or having had the child? When I think of it that way, the idea of giving up the child feels implausible, even though Clayton has told me many times that he would not want any custody nor to have anything to do with him or her. I imagine that would change at some point once he saw the baby. I would absolutely expect him to share custody and parenting time with me.

I apologize for yet another email, but I leel really helpless in terms of communicating with Clayton, and as the father of the child, he's the only person whose support and input really matter to me.

Obviously, having a child would completely change the course of our lives and I want to figure out what we are doing together. I know that many women would make their own decision without regard for the baby's father's opinion, but that's not me and I need him to understand that. I really care about Clayton's feelings, but can't take them into consideration if he is treating me like this. If we are going forward with it, that's great and I want to be able to get excited about it! But right now, it feels like there's tension in the air about what is happening and the silence is deafening. If there's anything you can do to talk to him, I would really appreciate it.

Thank you so much for your time!

All the best,



