

[REDACTED]
[REDACTED]
[REDACTED]
Pro Se

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

[REDACTED]

Plaintiff,

Case No. CV2021-052893

vs.

GREGORY GILLESPIE,

Defendant,

**PLAINTIFF'S REPLY TO
DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION TO SEAL**

_____/

COME NOW Plaintiff, [REDACTED], and files this, her reply to Defendant's Response to Plaintiff's Motion to Seal, and in support thereof states as follows:

1. On August 11, 2021, Plaintiff filed a Complaint against Defendant for domestic violence, abortion coercion, and intentional infliction of emotional distress.
2. On September 24, 2021, Plaintiff filed a Motion to Seal, given that she is a popular self-help podcaster who is scheduled to give a TEDxWomen talk in December and Defendant has made it perfectly clear that he is out to ruin her reputation.
3. Thereafter, on October 6, 2021, Defendant, through counsel, filed his response to Plaintiff's Motion to Seal.

4. Defendant has improperly used his untimely Motion to Dismiss and Response to Motion to Seal to raise fraud allegations against the Plaintiff. Defendant is not using his motions for the purpose that they are available for and is instead using any motion he files to include damaging false allegations against the Plaintiff with the intention of making these allegations public. To date, the Defendant has not addressed anything in the Plaintiff's Complaint.

5. Defendant's use of his Motion to Dismiss and Response to Motion to Seal make it all the more clear that it is necessary that this Court grants Plaintiff's Motion to Seal in order to protect Plaintiff from Defendant's malicious intentions of tarnishing Plaintiff's reputation (**EXHIBIT 1**). Pursuant to Rule 5.2, Section (c)(2)(B) of Arizona's Rules of Civil Procedure, a court may order that a document may be filed under seal when "a substantial probability exists that the person seeking to file the document under seal (or another person) would be prejudiced if it is not under seal..."

6. Defendant continues to make desperate attempts to ruin the Plaintiff's reputation, including, but not limited to:

- A. fabrication of emails and submitting them on the record (while committing fraud upon the court),
- B. the Defendant's counsel sending five emails between August 24 and October 8, 2021 to California Attorney Joe Cotchett, a family friend who has no involvement in this case, in blatant, malicious attempts to embarrass the Plaintiff with accusations of fraud that they claim occurred between August 19 and on the night of August 22, 2021. The Complaint was filed on August 11, and coincidentally, the Defendant's attorney notified the Plaintiff of their representation of the

Defendant on the morning of August 23, 2011. Mr. Cotchett was unaware of the Plaintiff's pregnancy until the Defendant's counsel leaked that confidential medical information to him.

- C. made up conversation between Defendant's counsel and Mr. Cotchett, claiming that Mr. Cotchett had likely warned the Plaintiff of a pending counter petition for Fraud if she did not promptly dismiss her claim against the Defendant (**EXHIBIT 2**), saying, *"You can avoid both litigation expenses and exposure to a sizable civil judgment by promptly filing to dismiss your civil suit. Please be advised, as I am sure your Uncle Joe [Joe Cotchett] warned you was forthcoming, the counter petition will contain a Fraud allegation as the images you sent to Mr. Gillespie were confirmed to be a recycled ultrasound from 2015. Greg has advised that he will suspend his counter claim and related litigation once you promptly file to dismiss your civil suit and confirm that you are not pregnant."*
- D. Mr. Cotchett has been in contact with the Plaintiff since the Defendant's counsel first contacted him, and Mr. Cotchett has not spoken with the Defendant's counsel once, let alone to warn her of this potential counterclaim by the Defendant. Mr. Cotchett has called the conduct of the Defendant and his counsel 'outrageous' and has offered the Plaintiff 'help in any way' (**EXHIBIT 3**).
- E. *several* bizarre attempts by the Defendant to turn the Plaintiff's Complaint relating to abortion coercion into a paternity case, such as made up conversation between Defendant's counsel and ArcPoint Labs regarding 'prenatal paternity testing' that they claim to have scheduled on the Plaintiff's behalf in three emails

and in a sworn statement (Motion to Dismiss). ArcPoint Labs denied any communication between their employees and the Defendant's counsel, and this was proven to be yet another threatening, fraudulent tactic used by the Defendant to intimidate her into dropping the case **(EXHIBIT 4)**.

- F. falsely stating that the Plaintiff was not pregnant despite clear evidence on the record that the Plaintiff underwent pregnancy testing at the Kierland Commons location of One Medical, a nationally known and well-respected health care provider. The Plaintiff did not send fraudulent sonographic images to the Defendant on August 6, 2021, and had no motive to, as it was already a known fact that she was pregnant **(EXHIBITS 5-8)**.
- G. accessing the Plaintiff's online accounts and any fraudulent action the Defendant chooses to take on her behalf. The Defendant manipulated the Plaintiff into giving him her passwords to her personal email and medical Portal on July 16, 2021, after he claimed to disbelieve the documents presented by One Medical **(EXHIBIT 9)** that proved the Plaintiff's pregnancy. In addition, the Defendant forced the Plaintiff to have a live video call with a nurse practitioner on the same day to verify it. The One Medical was worried for the Plaintiff's safety after witnessing the Defendant's aggressive behavior towards her in the video call and **contacted her via One Medical Portal's Messenger five times** between July 16 and September 4, 2021, as well as had her schedule a private video call, to ensure her well being and send domestic violence resources *as they believed the Defendant to be a possible threat*. The Plaintiff received a message on September

28, 2021, from Nicole Russell at One Medical warning her about a possible security breach that she indicated may have been linked to the Defendant **(EXHIBIT 10)**.

H. allegations of ‘forcing’ the Defendant into a relationship, when in reality, every text message between the Defendant and the Plaintiff prove that it was the Defendant who wanted a relationship with the Plaintiff, as shown in manipulative text messages on August 4th, which was the night before the Defendant forced the Plaintiff to take abortion pills in front of him **(EXHIBIT 11)**.

7. Moreover, in Defendant’s Response to Plaintiff’s Motion to Seal, it is falsely alleged that Plaintiff seeks only to seal the Motion to Dismiss. This is false, as Plaintiff seeks to seal all documents given that the Defendant is attempting to raise false allegations against the Plaintiff in every court filing, no matter how irrelevant or improper it may be.

8. The evidence in the Complaint shows the Defendant to be coercive, threatening, and intimidating **(EXHIBIT 12)**, making statements such as, “take the fucking pills”, “stop fucking saying it and do it”, “It’s pathetic. Yeah, I said end the life of an unwanted, not created out of love child that doesn’t have a heart beat. And let us live are fu Kong loves [our fucking lives] which right now you are ruining. Then prove it. And fucking do it. ” and, “I will not relive one moment of this. Is that clear? I will not discuss this one more minute. If you bring it up and show hesitation [regarding the decision to abort], I’m calling the cops. Or not. Your choice.” These do not show the Defendant in a good light, so the only reason why he would want these messages to remain public record is to humiliate the Plaintiff.

9. Plaintiff would also like to bring to this Court's attention the fact that Defendant and Defendant's counsel have altered the date of service, misleading the court into recording an incorrect date of service. The Defendant was made aware of impending service, emailed the case number, Summons, Civil Complaint, Certificate of Compulsory Arbitration, and Civil Cover Sheet, in an email that **he read ten times on September 12** and a **total of 134 times** as of October 7, 2021 (**EXHIBIT 13**). Nevertheless, the Plaintiff had to file a Motion for Alternative Service on September 21, 2021 after three attempts by the process server, who believed that the Defendant was evading service.

The Defendant's counsel emailed the Plaintiff on September 23, 2021, to notify her that they were accepting service on his behalf. They filed an acceptance of service **with notarization by Sara Seeburg, a paralegal who worked at the Defendant's counsel's law firm**, reflecting a date of September 23, 2021 (**EXHIBIT 14**). Thereafter, Defendant's counsel filed a second notarized acceptance of service with a date of September 27, 2021 (**EXHIBIT 15**), with notarization by the same paralegal, Sara Seeburg. On the advice of the Secretary of State's Office, the Plaintiff sent Ms. Seeburg an urgent email asking for her notary journal request, an explanation, and for the Defendant's counsel's office to rectify the error with the Court, but did not receive a response.

WHEREFORE, Plaintiff respectfully requests that this Court grants Plaintiff's Motion to Seal and grant such other relief as deemed appropriate.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via the electronic portal system to all parties on this 11th day of October, 2021.

By: _____

Email: _____