

1 **WOODNICK LAW, PLLC**
1747 E. Morten Avenue, Suite 205
2 Phoenix, Arizona 85020
Telephone: (602) 449-7980
3 Facsimile: (602) 396-5850
office@woodnicklaw.com

4 *Gregg R. Woodnick, #020736*
5 *Isabel Ranney, #038564*
6 *Attorney for Respondent*

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

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

9 In Re the Matter of:

Case No.: FC2023-052114

10 **LAURA OWENS,**

11
12 Petitioner,

**RESPONSE/OBJECTION TO
PETITIONER'S MOTION TO
COMPEL LUNCH AND FOR
ALTERNATIVE RELIEF**

13 And

(Assigned to the Honorable Julie Mata)

14 **CLAYTON ECHARD,**

15
16 Respondent.

17 Respondent, CLAYTON ECHARD, by and through counsel undersigned, hereby
18 objects and responds to Petitioner's Motion to Compel Lunch and for Alternative Relief filed
19 April 8, 2024. As and for his Response, Respondent states as follows:
20

21 Maybe this was meant as a *joke*, but in the context of the other communications from
22 Petitioner (bar complaints, more threats of bar complaints, threats of lawsuits, hinting at
23 lawsuits against journalists, and allegations of rape), it is inappropriate. (Parenthetically, the
24 case law cited by Petitioner is factually distinct from this matter, where Petitioner continues
25 to evade compliance with basic disclosure).
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1 To be clear, Respondent does not *object* to the notion of lunch with Petitioner's
2 counsel. However, as repeatedly expressed to Petitioner (see below) Respondent will not
3 engage in lunch without the **compelled** disclosure and, in light of the nature of Petitioner's
4 communications, without a neutral third-party present.
5

6 As detailed in an email to Petitioner's counsel on April 1, 2024:

7 As for lunch, I enjoy food. In my 24 years of practice, I have never said no to a lunch
8 or beer invitation, but I am saying "*not now.*" Perhaps this will be nothing more than
9 fodder for a future blog post, but I trust you are being sincere. Your statements in
10 emails, over the phone, on your blog, on your Twitter, etc, may have been the
11 product of passion but they were received as combative and unpleasant. Given your
12 verbiage and your approach online and to my team, I think Judge Mata will side with
13 me on any trepidation issues here. That said, I am quick to forgive, and if your email
14 is meant to be an olive branch apology for the professional allegations and
15 overzealous advocacy, I would certainly accept that apology.

16 As further provided to Petitioner's counsel on 4/4/24:

- 17 1. While I appreciate your right to speak on all issues, I am deeply uncomfortable with
18 the tone you are using in emails to my office, on Twitter and in your blog.
- 19 2. Comments like "*I am the Connor McGregor of litigation*" and "*I look forward to*
20 *reading their obituaries,*" really invoke something extremely unpleasant. Using the
21 term "*special ed*" in a derogatory way is also not something I am comfortable with
22 either (as a lawyer and parent).
- 23 3. I have never tweeted in my life. There are certainly passionate followers of this case
24 from Bachelor Nation (due to your client bringing the matter to the world's
25 attention). That said, I was forwarded some of the postings over the past few days as
26 well as your recent blog post and I am just not sure why you are engaging with
27 them. We don't. I am also not certain why you are publishing court documents and
28 your client's personal medical records contrary to court order. {...}

1. **Lunch does not fix the fact that the Petitioner has failed to provide
disclosure notwithstanding the granted Motion to Compel.** These antics have delayed the

1 work of both medical and forensic expert reports¹ as the experts are waiting for the alleged
2 twin fetus pictures, records between Petitioner and Sarah Navarro on the date of the alleged
3 miscarriage, and the alleged records from the telehealth doctor that allegedly treated Petitioner
4 for her alleged miscarriage. These records were specifically confirmed to be in the possession
5 of Petitioners counsel when he stated “*Gregg – that is NOT going to be a problem. You are*
6 *going to LOVE the image dates – because the images are dated July 23, 2023.*” July?
7
8
9 Petitioner testified in two (2) related protective order proceedings, at her deposition in March
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14 ¹ As detailed in an email to Petitioner on 3/29/24:

15
16 { ... } Giving us the picture and timestamp for our forensic technology expert, Byran
17 [*sic*] Neumeister, when there is already admissions of records fraud and a trial in 2
18 months is also not something that requires delay. And, as we said before, we will
19 address the photo if it is complimented by the alleged verifiable meta data and
20 medical record. Laura claimed she deleted the picture from her iPhone, claimed
21 Sara [*sic*] deleted too, but also claimed she sent it to the tele-med provider. There
22 should be a very clear digital footprint for Neumeister and a picture of a picture is not
23 going to cut it in light of the history (and her testimony). We also are awaiting the
24 original sonogram she claimed she got anonymously from PPH (which has affirmed
25 it does not offer anonymous appointments and that is has an easily accessible patient
26 portal). This was the sonogram she admitted she doctored and that is the core of our
27 Motion for relief under the OOP cause number.

28 2. [...] When you speak with [redacted] and [redacted] they will confirm the
fabricated documents and fake pregnancy allegations were happening back in
2014. And...since you saw she blamed Greg Gillespie for the other ultrasounds
(that came from her email address and phone number in emails and texts as will be
verified by Neumeister) she should be reminded that she did not even know Greg
existed back in 2014 when she first claimed to be fake pregnant by [redacted] and the
records were faked.

1 and made statements before this Court that *grossly* differ on the timeline for the alleged
2 miscarriage (also known as *perjury*).²

3
4 Perhaps, in addition to trying to cajole a trial continuance, the missing disclosure has
5 not been provided because it contains more fabricated records. Instead of acknowledging that
6 she lied to this court, Petitioner has ostensibly dialed up her photoshop skills. She insisted on
7 deposing Echard in February (video recorded) and allowed her series of (since withdrawn)
8 attorneys (Bonnie Platter, Alexis Lindvall, and Cory Keith) to (*unwittingly*) use a sonographic
9 exhibit that she since has admitted to doctoring. This is the same fake sonogram she flaunted
10 claiming she was pregnant with Echard's "twins" after showing up to Court before Judges
11 Doody and Gialketsis with a (ostensibly fake) pregnant stomach claiming she was "100%"
12 pregnant and due with twins on "*February 14, 2024*."
13
14

15 This is *not* just a faked sonogram that was used in court proceedings, but Petitioner
16 testified in the collateral protective order proceedings that her OBGYN's were "*Dr. Makhoul*"
17 and that she was seen "*last Friday*" by "*Dr. Higley*." There are no records that support these
18 statements by Petitioner and the provider's absence of records confirm they never treated
19 Petitioner for pregnancy. Now, contrary to the confounding responses to this court's direct
20 questions at the last status conference and her own medical records, her public postings seem
21 to range to claiming her alleged miscarriage either took place in July or even as late as
22 November 2023 (*see* email from Petitioner's counsel dated 4/8/24 in **Exhibit 1**).
23
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27 ² Petitioner also presented "evidence" in these proceedings that including alleged videos of
28 her "pregnant stomach" and statements by her neurologists that she "looked 21 weeks
pregnant." *If* Petitioner is now claiming she "miscarried" in July, she would not have a
visibly growing pregnant stomach that looked "21 weeks."

1 While Petitioner appears to have recently toned down her social media posts, her
2 newest counsel has back-filled that void with persistent Twitter and Blog posts and outlines
3 his theory of the case including his *anticipated* motions and more. (see *generally* postings
4 by Petitioner's counsel **Exhibit 2**). A sample of these postings below³⁴:
5



7 **David S. Gingras** @DavidSGingras · 3m ...

8 Don't like my bio? Ask for details. I am the
9 Conor McGregor of litigation. Done TONS
10 of family law cases. I don't list those,
11 because they are boring.
12

13
14 FYI - Clayton's lawyer has handled TWO
15 federal cases (high profile cases go to
16 federal court).
17

18 Me? 79 federal cases & counting.
19



FUCK THESE SICK, SELFISH, LYING
ASSHOLES. Should I clarify how I feel?

These vile scum, I mean people, are not helping anything. They are human cockroaches spreading feces on the floor and then spinning the facts to make them more dramatic than they really are in the hopes this will drive traffic and increase revenue for their sad, pathetic lives. One day, these trash humans will wake up and realize that lying for money is not a good way to live. Or maybe they will never see their sins. Either way, I look forward to reading their obituaries, briefly, before throwing them in the trash where they belong.

21 **This is not complicated – Petitioner claims she has the bulk of the requested**
22 **disclosure in her possession.**
23

24 Contrary to her testimony and statements to this Court through her parade of prior
25 attorneys, Petitioner has stated, several times, that she has the requested information and she
26

27
28 ³ See Petitioner's counsel's Twitter at [Twitter.com/davidsgingras](https://twitter.com/davidsgingras).

⁴ Taken from Petitioner's counsel's blog at <https://gingraslaw.com/blog/>.

1 now ostensibly claims to have miscarried in JULY. Specifically, Petitioner, through counsel,
2 stated in emails that he *had* the photos of the fetuses, the contact information for the telehealth
3 provider, and the communications between Petitioner and her sister (all of which is requested
4 in Respondent's *Motion to Compel*) (*see generally*, **Exhibit 1**):

- 6 • 3/27/24 at 9:53 a.m.: *Let me speak with Laura about the request for the photo of the*
7 *"sacs" (hate that word). She told me she had this photo available, and if she does,*
8 *then I'll immediately provide it to you today. Same with the name of the telehealth*
9 *provider. [...]* (Emphasis added).
- 10 • 3/27/24 at 1:54 p.m.: *Having said all that, I just got off the phone with Laura, and she*
11 *is sending me the sac photo and the name of the telehealth person. (...)*(Emphasis
12 added).
- 13 • 3/28/24 at 5:20 p.m.: *As promised, I have talked to Laura about the fetal sac photos,*
14 *and she has produced copies of those photos to me (I have them in my possession*
15 *right now). I am prepared to disclose these to you, along with some additional*
16 *information (Laura found additional information showing a consult with a*
17 *healthcare provider at the time the fetal sacs were discharged (or whatever you call*
18 *it). (Emphasis added).*
- 19 • 4/8/24 at 3:07 p.m.: *As I mentioned before, I have the photos you want to see. I*
20 *understand you want to give them to your experts [...]* **Gregg – that is NOT going to**
21 **be a problem. You are going to LOVE the image dates – because the images are**
22 **dated July 23, 2023.** [...] *I also have the text messages between Laura and her sister*
23 *dated July 23, 2023 [...]* *I do have some telehealth info showing Laura seeking medical*
24 *advice on July 23, 2023. I don't think that is helpful to either party, but it is something*
25 *I am willing to disclose. (Underlines in original; Emphasis added).⁵*

26
27 2. Instead of just simply complying with Rule 49 and disclosing the information
28 he acknowledges having, counsel bombards Respondent's attorney and his attorney's office

⁵ Notably, if the photos were from 7/23, as current counsel is now claiming (but not disclosing), then EVERY filing after that date is *per se* a violation of Rule 26 and the testimony at the deposition and the protective orders proceedings were all perjurious.

1 staff with communications, comments about personal sanctions against attorneys, and
2 suggestions that the State Bar needs to be involved. (Petitioner having already filed two (2)
3 complaints (dismissed) and at least two (2) others against her prior attorneys—also
4 dismissed), and so on (*see generally* **Exhibit 1**).

- 6
- 7 • 4/3/24 at 11:20 a.m.: [...] *Jesus man – seriously? I mean seriously? Does Clayton*
8 *mean THAT much to you? So look – I guess what is going to happen next is you can*
9 *submit your proposed order on the MTC to the court. I will respond and object to the*
10 *order, and I will probably have to file a motion asking for relief on the basis of fraud*
11 *(by you). This stuff is going to be MESSY. Like really messy. [...] If you won't agree*
12 *to do something remedial, I need to be clear about what happens next – I am going*
13 *to file something explaining this crap to the judge, and I am going to ask her to make*
14 *a referral to the state bar...and that applies to BOTH you and to Isabel. Isabel now*
15 *knows that you have lied to the court multiple times. She cannot sit back and allow this*
16 *to continue. I don't care if she's new and I don't care if she hasn't signed any*
17 *pleadings. That is irrelevant. Isabel cannot stick her head in the sand. She has an*
18 *absolute duty under ER 8.3 to report professional misconduct (as do I). She also has*
19 *an absolute duty under ER 8.4(a) NOT to help you violate the rules. **If Isabel sits back***
20 *and lets this go further off the rails without taking appropriate remedial steps, she is*
21 *putting her own license in peril.*
- 22 • 4/4/24: *As a compromise, I offer this proposal: **Don't apply for fees right now.** [...] **In***
23 *return for you not seeking fees right now, I will agree not to bring a motion asking*
24 *for relief from the MTC order on the basis of fraud. Like I said, I am not happy about*
25 *what I have recently learned, but if we can avoid fighting over that new issue now, it*
26 *would be helpful for both sides.*

27 3. Petitioner's Motion is also misleading. The parties are communicating over
28 email and Respondent is responding *where appropriate*. Undersigned has no ethical or legal
obligation to expose himself to unnecessary criticism that is not conducive to resolution.

4. While Petitioner's counsel did eventually apologize for his toxic comments, the
online activity continues and the toothpaste is out of the tube.

1 5. Undersigned Counsel realizes that filing this objection and bringing the above-
2 mentioned to the attention of the court will likely escalate Petitioner's tactics, but believes it
3 is relevant for the Court to have all the information when considering Petitioner's Motion to
4 Compel Lunch and Alternative Relief.
5

6 6. **This is not a complicated case, contrary to what Petitioner promotes.** Trial
7 (already continued once due to the same lack of disclosure) is in June and Respondent is
8 prepared to proceed and argue appropriate inferences consistent with the data set (and lack
9 thereof) and the Court can enter relief as deemed appropriate.
10

11 7. **Respondent is entitled to his reasonable attorney's costs and fees in**
12 **responding to this Motion pursuant to A.R.S. § 25-324.** Petitioner has been forced to incur
13 significant fees due to Respondent's continued efforts to avoid resolving her perjurious
14 statements in these proceedings (that have affected at least three cases in Arizona -- not
15 including those involving other presumable victims in AZ (2) and CA (1)). Quite simply, there
16 is nothing to be resolved without the disclosure Respondent has already spent significant time
17 (since at least October 2023) attempting to gain access to (which have repeatedly been met
18 with Petitioner's overt efforts to avoid the same). Likewise, intimidation does not resolve
19 this. Attorneys' fees and accountability do.
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23 **WHEREFORE, Respondent respectfully requests the Court:**

- 24 A. Deny Petitioner's Motion for Lunch;
25 B. Grant Respondent leave to file a *China Doll Affidavit* for his reasonable
26 attorney's fees and costs under A.R.S. § 25-324;
27 C. Enter appropriate sanctions and other relief as the Court deems proper.
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RESPECTFULLY SUBMITTED this 10th day of April, 2024.

WOODNICK LAW, PLLC



Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

ORIGINAL of the foregoing e-filed
this 10th day of April, 2024 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the foregoing document
delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document
emailed this same day to:

David Gingras
Gringas Law Office, PLLC
David@GingrasLaw.com
Attorney for Petitioner

By: /s/ MB