

[REDACTED]
[REDACTED]
Scottsdale, AZ 85254
[REDACTED]

Pro Per

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

In Re the Matter of:

[REDACTED]

Petitioner,

Case No. FC2023-052114

vs.

CLAYTON ECHARD

Respondent,

MOTION FOR CONTEMPT

COMES NOW, Petitioner [REDACTED] who requests that the Court schedule Civil Contempt proceedings against Respondent Clayton Echard in this case, and in support thereof would show unto the Court the following matters and facts:

1. On May 20th, 2023, Petitioner and Respondent engaged in sexual activity.
2. On June 1st, 2023, Petitioner took a positive pregnancy test at Banner Urgent Care on Greenway and 64th Street in Scottsdale (**EXHIBIT 1**). Petitioner informed the Respondent that she was pregnant, presenting him with the evidence from the visit. Petitioner told Respondent that she had not been intimate with any other man since March of 2022, and that she was positive the pregnancy was his.
3. On June 17th, 2023, Respondent invited Petitioner to his apartment. Respondent had purchased a pregnancy test and asked Petitioner to urinate in front of him to confirm the

FILED IN THE SUPERIOR COURT OF THE STATE OF ARIZONA, COUNTY OF MARICOPA, ON 8/23/2023 AT 4:55:40 PM BY CLERK OF COURT C. DIAZ

pregnancy. Petitioner complied and the pregnancy test was positive.

4. On June 18th, 2023, Respondent messaged Petitioner, stating, *"I wanted you to come over to confirm what I was doubting. And you did confirm that. So, I don't see you as a liar anymore."* (EXHIBIT 2)
5. On August 1st, 2023, Petitioner filed a Petition to Establish Paternity.
6. On August 2nd, 2023, Respondent was served.
7. On August 5th, 2023, Petitioner told Respondent via email that there was an urgent issue regarding their pregnancy with twins that needed to be discussed. The Petitioner informed Respondent of the requirement to have a Good Faith Consultation, pursuant to ARFLP Rule 9(c), before submitting the Motion.
8. Between August 5th and 8th, 2023, Respondent did not respond to several more emails and attempts at communication via phone and text message, which led the Petitioner to submit the Motion to Communicate on August 8th, 2023. The Respondent's refusal to participate in the Good Faith Consultation is a violation as pursuant to A.R.S. Rule 76.2 (a)(4).
9. On August 18th, 2023, Petitioner emailed Respondent saying that she would file a Motion for Contempt and attached this in an email to him (EXHIBIT 3). Within this message said, *"There is no Order of Protection or Injunction Against Harassment between the Petitioner and the Respondent that would serve as a cause for the meeting to take place in a public setting [stating that he wanted cameras in case either party made a statement that would go on to be challenged at a later date. There was no mention of concern for safety when asked why.]. Were the Respondent to file one at this point, knowing that this document was to be filed, as a way to avoid meeting up, the Respondent*

would be falsely filing a restraining order, with perjury charges that could lead to jail time and the Petitioner's ability to file for damages."

10. On August 21st, 2023, Respondent filed a Response to Petition to Establish Paternity, stating "I am concerned that she is stalking me." This was days after Petitioner informed Respondent that filing an Order of Protection or Injunction Against Harassment as a way to avoid meeting up would be at this point would be falsely filing a restraining order and purely retaliatory in nature. The Respondent has not filed anything against the Petitioner and has not expressed a concern for his safety before, although the Petitioner was concerned enough for hers to make a police report against Respondent on July 31st, 2023 (**EXHIBIT 4**), which he was in possession of.
11. On August 21st, 2023, Respondent filed a Response to Petition to Establish Paternity, *stating under oath* that it had been emailed to [REDACTED] as mailed via USPS First-Class Mail to the Petitioner's address. Neither were done and the Petitioner did not have knowledge of the Response until she saw it on ECR Online on the afternoon of August 23rd. Respondent was informed on August 22nd that the Petitioner planned to file for Default on August 23rd. Despite knowing this (and the Petitioner's confirmation that he read the email via Mailtrack), Respondent still did not inform Petitioner of his filing. Therefore, without the knowledge of anything being submitted by the Respondent, Petitioner filed for Default on the morning of August 23rd.
12. The Respondent has committed fraud upon the court in his Response to Establish Paternity, filed on August 21st, 2023. An act of fraud upon the court "harms the integrity of the judicial process and is a wrong against the institutions set up to protect and safeguard the public." (*Rogone v. Correia*, 236 Ariz. 43, 48 (Ct. App. 2014).)

- a. The Respondent falsely claimed under oath that, "Party A is making up this entire claim", "Pregnancy has not been proven", and "no proof of children shown". Respondent had been given Petitioner's discharge papers from her visit to Banner Urgent Care on June 1st, 2023 (**EXHIBIT 1**), and acknowledged that Petitioner had taken a pregnancy test that he had purchased in front of him, so Respondent knew she was pregnant. This is fraud upon the court.
- b. The Respondent falsely claimed that Petitioner was "refusing a paternity test" and "unwilling to do a paternity test", **despite the Petitioner offering to take one twenty-one times (EXHIBIT 5)**. Within this email, Petitioner included a ZIP file of those unanswered emails, which are voluminous and are not included here, but can be provided. The Petitioner scheduled a prenatal paternity test at the lab of the Respondent's choice, Ravgen, paid \$725 as a deposit, and CC'd him on emails with the lab. The Respondent was given several opportunities to confirm his paternity test appointment to the lab, but did not respond to them, so the test was canceled (**EXHIBIT 6**). Clearly, the Respondent is the party who is unwilling to take a prenatal paternity test, not the Petitioner. The Respondent's accusations are knowingly untrue, and presenting them under oath is fraud upon the court.
- c. The Respondent falsely claimed that the Petitioner would only take a paternity test "if we were to date exclusively". The Petitioner had requested a one or two week trial relationship given that the Respondent was going to be the father of her children. However, the Petitioner offered several times to take the prenatal paternity test with no stipulations at all (**EXHIBIT 7**), which the Respondent knew. Presenting to the court that the *only* conditions presented required the

Respondent to be romantic in nature are purely false, and therefore, is fraud upon the court.

- d. The Respondent claimed that the Petitioner would write defamatory comments to the press. "If an allegedly defamatory statement is substantially true, it provides an absolute defense to an action for defamation." *Fendler v. Phx. News., Inc.*, 130 Ariz. 475, 479, 636 P.2d 1257, 1261 (Ct. App. 1981). The Petitioner has multiple text messages where the Respondent is abusive in writing (**EXHIBIT 8**). In addition, the Petitioner has guaranteed the Respondent that he is the father and even offered to pay him \$100,000 if he was not (with proof of funds given to him). Despite this, he refuses to take a paternity test. Claims of defamation are purely false since the truth of Respondent's statements can be proven.
- e. The Respondent has been unavailable for any conversations with the Petitioner, including a Good Faith Consultation (A.R.S. Rule 76.2 (a)(4)). Respondent has falsely claimed representation when none has existed. On August 4th, 2023, Respondent said, "I just walked out of a meeting with Raees Mohamed with RM Warner Law. He will be representing me here shortly once I send over payment to him." Petitioner attempted to get in touch with RM Warner Law, but they did not respond regarding their representation of the Respondent. In Respondent's Response to Petition to Establish Paternity, he states that he is representing himself without a lawyer.

13. The Petitioner has attempted to have a Good Faith Consultation with the Respondent prior to submitting this Motion, but did not get a response.

EXHIBITS IN SUPPORT OF PETITIONER

Proof of the Respondent's demands for Petitioner to schedule test at the prenatal paternity test at the lab of his choice, Ravgen.

Proof that after the Respondent's selection of testing facility, the Petitioner asked the Respondent about what date and time would work for him **twenty-one** times via email to prove to the Respondent that the twins were hers. The messages are not attached here since that would go significantly over the page limit imposed by the court for evidence, however, they are available for review.

Proof that the parties agreed, booked the test for August 23rd (a date that worked for both parties), paid for it, and then the Respondent did not respond to either the lab or the Petitioner's several messages to confirm. It was canceled.



FINAL OFFER! Need to know ASAP.

Mon, Aug 14, 2023 at 11:02 AM

To: Clayton Echard

Alright, you read it and have had time to consider it. You are refusing to take the paternity test now? I'm not playing games with you. If it is a no, please tell me.

All the best,



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Phone

Email

[Quoted text hidden]

final-offer-need-to-know-asap.pdf
56K

From	[REDACTED]
Subject	FINAL OFFER! Need to know ASAP.
Message ID	<CAJOGz=a2VZ+g8SwvZ1qndQ+56cHgtUCZjNHP9Hs9UJfUy25GQ@mail.gmail.com>
Delivered on	14 Aug, 2023 at 1:45 PM
Delivered to	Clayton Echard [REDACTED]

Tracking history

👁 Opened on 14 Aug, 2023 at 1:49 PM by Clayton Echard



2023 © The Mail Track Company, S.L.
C/ Córcega 301, At. 2.
08008 Barcelona - España



Re: Canceling NIPP test on August 23rd

bvallecillo ravgen.com <[redacted]> Mon, Aug 21, 2023 at 7:06 AM
To: [redacted], Clayton Echard [redacted], Clayton Echard [redacted]
Cc: "asender ravgen.com" [redacted]

Good morning [redacted]

We have canceled the test and refunded the \$725 back to the card. It should take 3-4 days for the payment to post. Let us know if you have any questions or concerns.

Thanks,
Brett

Brett Vallecillo
Ravgen, Inc
9241 Rumsey Road
Columbia MD 21045
[redacted]
www.ravgen.com

From: [redacted]
Sent: Friday, August 18, 2023 5:43 PM
To: Clayton Echard [redacted], Clayton Echard [redacted] info
ravgen.com [redacted]
Subject: Canceling NIPP test on August 23rd

Hi,

Unfortunately, Clayton Echard has refused to take the prenatal paternity test that I had scheduled at Exam One in Phoenix on Wednesday, August 23rd. Can you please cancel it and refund the \$725 back to my card? Please let me know if you have any questions.

Thank you for your help scheduling it. I'm very disappointed to have to cancel!

All the best,

[redacted]

--

All the best,



[redacted]
[redacted]

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Phone [redacted]
Email [redacted]



No stipulations

Thu, Aug 17, 2023 at 8:34 PM

To: Clayton Echard Clayton Echard

Clayton,

I genuinely thought you would have unblocked me based on what I wrote about how I felt disrespected, but I guess that's a no. As you can see, I was offering to do the test with no stipulations if you had done that. Now, it's not an option. I have tried everything at this point and give up on trying to get you to take accountability and deal with this issue privately. I think you want it to be public, which I don't want. Anyway, that's how it will have to go because you can't ignore the fact that you will be a dad in February.

All the best,



[Redacted signature block]

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Phone [Redacted]

Email [Redacted]

RPreplay_Final1692329210.mp4
6553K

ABOVE ATTACHMENT WAS A SCREEN RECORDING OF PETITIONER'S TEXT MESSAGE TO RESPONDENT ASKING TO TAKE THE PATERNITY TEST.



Paternity test

Fri, Aug 4, 2023 at 4:39 PM

To: Clayton Echard

Clayton,

You can have your attorney talk to me rather than Davis because I'm not sure what type of lawyer to retain since you hired an entertainment/defamation attorney rather than a family lawyer. Similarly, you can respond to me and not Davis. Anyway, he relayed your message and here is my response:

"She continues to claim that I'm denying a paternity test, but I haven't once."
You're right, you haven't once...you have TWENTY ONE TIMES. See attached.

If that's what you've told your lawyer, it's an out-and-out lie.

I continue to say that I will gladly do a paternity test under the conditions I am comfortable with. Nothing has changed. Let me know if you're amenable to that. If so, let's schedule to get it done ASAP.

All the best,



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Phone

Email

Unanswered emails to paternity test.zip
8741K

EXHIBIT 5



Booking paternity testing for the soonest date

Sun, Aug 13, 2023 at 1:10 PM

To: info@ravgen.com, Clayton Echard [Redacted]

Hi,

I would like to book prenatal paternity testing for the soonest possible date for the twins I conceived with Clayton Echard on May 20th. We would like to book in the Scottsdale/Phoenix area, and when I have called before, you guys said there were two facilities you used. Which would you recommend?

Thanks so much!

All the best,



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Phone [Redacted]

Email [Redacted]



Petitioner's messages to Respondent regarding taking prenatal paternity test

Paternity test, etc.

Clayton Echard [Redacted]
To: [Redacted]

Sat, Jun 24, 2023 at 4:32 PM

I will pay for 100% of it. You have my word. Let this message serve as the proof. Just schedule it and let me know where you scheduled and I'll pay.

Thanks,

Clayton Echard

On Jun 24, 2023, at 3:20 PM, [Redacted] wrote:

[Quoted text hidden]

https://mail.google.com/mail/u/0/?ic=606142f46b&view=pt&search=all&permmsgid=msg-f:1769628852061514537&simpl=msg-f:1769628852061514537



And proof of payment at Planned Parenthood...

Clayton Echard [Redacted]

Wed, Jun 28, 2023 at 3:47 PM

To: [Redacted]



" I will contact you [Redacted] with information of a local clinic that will provide a paternity test, [Redacted] I will ask you to schedule a time and date. You will go in and submit your DNA and then I will come in after and submit mine. That is how we will be proceeding."

Clayton Echard

On Jun 28, 2023, at 3:36 PM, [Redacted] wrote:

[Quoted text hidden]

https://mail.google.com/mail/u/0/?ik=606142f46b&view=pt&search=all&permmsgid=msg-f:1769988368301320380



Paternity test

Clayton Echard

To: [Redacted]

Tue, Jul 25, 2023 at 9:27 PM

Yes, schedule the Ravgen test asap.

Clayton Echard

On Jul 25, 2023, at 8:54 PM, [Redacted] wrote:

[Quoted text hidden]

https://mail.google.com/mail/u/0/?ik=606142f46b&view=pt&search=all&permmsgid=msg-f:1772455885135254238&simpl=msg-f:1772455885135254238

To: Clayton Echard

Respondent's message to Petitioner the day after Petitioner took pregnancy test that Respondent purchased in front of him. It was positive.

EXHIBIT 8

[REDACTED] I wanted you to come over to confirm what I was doubting. And [REDACTED] did confirm that. So, I don't see you as a liar anymore. [REDACTED]

acid please, with folic acid please, 55 kg, 06/01/23 11:25:00 MST, ...
Encounter for pregnancy test

EXHIBIT 1

Ordered:
81025 Urine Pregnancy POC Amb, 06/01/23 11:17:00 MST, Encounter for pregnancy test

Point of Care Test Results
hCG QI POC: Positive

What You Were Seen for Today

First trimester pregnancy
Encounter for pregnancy test

Vital Signs

T: 36.8 °C (Tympanic) **HR:** 85(Monitored)
RR: 16 **BP:** 134/87 **SpO2:** 98%
WT: 55 kg
Weight (lb): 121.25 lb
Temperature (F): 98.24 Fahrenheit

Allergies

No known allergies

Your Care Team

Attending Physician - [REDACTED]

Primary Care Physician - [REDACTED]

What Happened Today

Test Results from Today

Results not available today will be available in your Banner Health patient account on the portal once they are complete.

Scheduled Appointments

Save time and schedule online by downloading the Banner Health app or by visiting bannerhealth.com and find doctors to book your appointment. It's that easy!

Scheduled Appointments

No future appointments scheduled

Patient Name: [REDACTED]

our upcoming

Banner Health

This document and other
do not have a account, or
www.BannerHealth.com

 **Banner**
Urgent Care

RECEIPT

Payment Date: 06/01/2023

BANNER URGENT CARE SERVICES
PO Box 2916
PHOENIX, AZ 85062
(866) 807-9776
<https://mydocbill.com/bucs>

Location: BUCS GREENWAY AND 64TH ST
6501 EAST GREENWAY PARKWAY
SCOTTSDALE, AZ 85254

Patient Name: [REDACTED]
Account Number: [REDACTED]

Today's Services Payment	Prior Balance Payment	Total Payment
\$50.00	\$0.00	\$50.00

Payment Method
Card #: [REDACTED]
Total Amount Paid: \$50.00
Approval Code: 04747D

Thank you for your business!

THIS IS AN ESTIMATE

If we are filing insurance for you today, once your insurance carrier receives your claim, they may determine that you are responsible for a different amount than discussed at your time of service. Exact patient responsibility amounts will be determined by your insurance company.

EXHIBIT 2

To: Clayton Echard

I'm sorry this made it harder. I wanted you to come over to confirm what I was doubting. And did confirm that. So, I don't see you as a liar anymore. But, that doesn't change how I feel ab

EXHIBIT 3



To be filed tomorrow

Thu, Aug 17, 2023 at 10:11 AM

To: Clayton Echard [redacted], Clayton Echard <[redacted]>

Clayton,

If you don't agree to meet up privately, then tomorrow I will be filing the Motion to Contempt and the **second** Good Faith Consultation Certificate showing you yet again refused to participate in the conference needed for this motion.

If you agree to meet up privately, then I will be filing the Notice of Withdrawal of Motion to Communicate.

Please let me know what you want to do, or if I don't hear back, I will be filing the first two I mentioned.

All the best,



[Redacted signature block]

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Phone [Redacted]

Email [Redacted]

Motion for Contempt-2.pdf

Good Faith Consultation Certificate 2.pdf

OR

Notice of Withdrawal of Motion to Communica...

BELOW IS A PORTION OF MOTION FOR CONTEMPT SENT BY THE PETITIONER TO THE RESPONDENT

4. There is no Order of Protection or Injunction Against Harassment between the Petitioner and the Respondent that would serve as a cause for the meeting to take place in a public setting. Were the Respondent to file one at this point, knowing that this document was to be filed, as a way to avoid meeting up, the Respondent would be falsely filing a restraining order, with perjury charges that could lead to jail time and the Petitioner's ability to file for damages.

8:26

88%

< 121

CE

Clayton

Text Message
Today 8:26 PM

Clayton, if you unblocked me like I asked you to, then I will take the test next Wednesday with no stipulations, okay?



TEXTS FROM CLAYTON (note: I have the originals, just listed here for convenience)

EXHIBIT 8

You're trying to destroy my mental state.

[REDACTED], I legitimately hate you right now.

You've made my life so stressful since I've known you and if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more. *[note: I obviously was pregnant]*

my hatred will only grow if you decide to put me through all of this.

My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. Even if a kid was present... I would not say a word to you. I would not acknowledge you.

One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever

My hate is toward you and you only.

God is telling me this man will provide me with the clarity I need, as I have many questions and those questions have turned into beliefs...ones that have led to animosity and a complete lack of trust toward you. *(note: God told him my abusive ex whose abuse caused me to get epilepsy would be a better resource than me? And he could trust him more than me?)*

You better be serious about being pregnant because if you're not, I'm bringing this all to light. People like you need to be held accountable. You can back off now if this is all a game and I'll let it go, but if you continue any longer and it's all a lie, I won't hesitate to reveal the truth.

My personal hell would be having to have you be a part of my life

I'm living in the fear of having to be associated with you for my lifetime.



[Redacted] <[Redacted]@gmail.com>

Clayton Echard [Redacted]

Bernie Zilio <bzilio@nypost.com>

Mon, Sep 11, 2023 at 4:17 PM

To: [Redacted] <[Redacted]@gmail.com>

Ok, thank you.

Regarding your request, our legal team has no control over what is public record.
[Quoted text hidden]



[Redacted] <[Redacted]@gmail.com>

Clayton Echard

Bernie Zilio <bzilio@nypost.com>

Mon, Sep 11, 2023 at 5:23 PM

To: [Redacted] <[Redacted]@gmail.com>

I've been in the information gathering phase. I have a million other stories and things on my plate at the moment. If you are not ok with me publishing information you have provided me, I understand. However, if the information is public record, that is a different story.

On Mon, Sep 11, 2023 at 5:16 PM [Redacted] <[Redacted]@gmail.com> wrote:

[Quoted text hidden]

[Quoted text hidden]



[REDACTED] <[REDACTED]@gmail.com>

Clayton Echard [REDACTED]

Bernie Zilio <bzilio@nypost.com>

Mon, Sep 11, 2023 at 4:21 PM

To: [REDACTED] <[REDACTED]@gmail.com>

I don't know yet. Your name being part of the public record might change things.

On Mon, Sep 11, 2023 at 4:20 PM [REDACTED] <[REDACTED]@gmail.com> wrote:

[Quoted text hidden]

[Quoted text hidden]

Home

www.bannerhealth.com

Health Profile

COVID Center

Health Profile

Lab Results

Pathology

Radiology

Documents

Visit Summaries

Medications

Procedures

Advance Directives

Messaging

Appointments

Pharmacy

Requests

Laura Owens



hcg QI POC

Learn more about this

Positive

Date: Jun 01, 2023 11:31 a.m. MST

Show less info

Ordered By:

Previous

Next

The information provided below is in the electronic medical record. If you believe any data is incorrect, please notify your provider's office.

EXHIBIT 5

To: Scottsdale Police Department

Report prepared by: [REDACTED]

Subject: Threats, intimidation, verbal abuse, endangerment and extortion from Clayton Echard

Date: July 31, 2023

To Whom It May Concern:

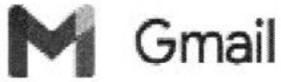
Clayton Echard is the father of my unborn twins. When I told him I was pregnant, he started writing erratic, illogical and threatening messages. He has been clear that being a father has not been in his life plan and would get in the way of his dating and professional life. These would be followed by periods of silence and him blocking me, then unblocking me to demand alternative forms of proof of pregnancy beyond the medical report I had provided him from Banner Health Urgent Care confirming it.

Clayton has said he would file legal charges (criminal fraud) against me for stating that he is the father of my unborn twins. Extortion is a crime under ARS 13-1804. He alleges I am being untruthful; however, I have even done a test in front of him that he purchased himself. It was positive. In addition, he has been provided with medical test results, recorded phone calls with doctor's offices confirming the viability of the pregnancy, and screenshots of my patient portals. I also agreed to take a prenatal paternity test through a lab he found called Ravgen, but he has now gone MIA and will not allow me to schedule the test, which would prove to him once and for all that the twins are his. Finally, I told him that I would sign a HIPAA release to allow him to speak to any and all of my medical providers regarding the validity of the pregnancy.

I have included written correspondence with Clayton to date that clearly demonstrate his potentially violent, threatening and intimidating behavior. I have invited him to attend a doctor's appointment on August 7th at Scottsdale Perinatal Associates with Dr. Makhoul for a consultation and ultrasound. His paranoia extends to the level that he believes I will have hired someone to pretend to be a doctor and who will confirm the pregnancy. He simply refuses to believe that I am pregnant, despite seeing a test with his own eyes, and that he is the father, despite my willingness to take a paternity test.

Clayton also demanded contact information for my abusive ex, whose attempts to kill me I did a TEDx talk about, and which Clayton linked to in the message for his request. I have a CLETS restraining order against the man he wanted to speak to, and engaging him in communication would put me in a vulnerable position. Endangerment is a crime under ARS 13-1201.

I am very concerned about my safety and I don't know what actions Clayton will take because he is so volatile, controlling, demeaning and hateful. I have asked him on many occasions to reassure me that he will not hurt me or our unborn babies, and he will not respond to that simple question. I told him I would file a police report if he didn't. I have proof that Clayton has read



And proof of payment at Planned Parenthood...

Clayton Echard

Wed, Jun 28, 2023 at 3:47 PM

To: [Redacted]

Thank you for the picture of the pills. I still would like the ultrasound image from Planned Parenthood. They keep a record of it... I worked in the medical industry. They don't take images without recording them. Have them send the image over to me. They can do so, you just have to provide them with consent. It's not a HIPAA violation if you give permission. As for what will follow, I am resending what I sent earlier for next steps...

" I will contact you on June 8th with information of a local clinic that will provide a paternity test, as June 8th marks 8 weeks. I will ask you to schedule a time and date. You will go in and submit your DNA and then I will come in after and submit mine. That is how we will be proceeding."

Clayton Echard

On Jun 28, 2023, at 3:36 PM, [Redacted] wrote:

[Quoted text hidden]

Clayton Echard
[Redacted]
[Redacted]



And proof of payment at Planned Parenthood...

Clayton Echard <[redacted]>

Wed, Jun 28, 2023 at 3:53 PM

To: [redacted]

What? I'm confused what you mean? I just need to see the ultrasound to make any decision. I cannot make any decision without seeing it.

Clayton Echard

On Jun 28, 2023, at 3:50 PM, [redacted] wrote:

[Quoted text hidden]



And proof of payment at Planned Parenthood...

Clayton Echard <[redacted]>
To: [redacted]

Wed, Jun 28, 2023 at 4:15 PM

Just please get me the ultrasound.

Thanks,

Clayton Echard

On Jun 28, 2023, at 4:12 PM [redacted] wrote:

[Quoted text hidden]
<IMG_5375.jpeg>
<IMG_5378.jpeg>

Vertical text on the left side of the page, possibly a watermark or scanning artifact.



Where things stand

Clayton Echard

Thu, Jun 29, 2023 at 5:48 AM

To:

Here's the last request I'll make. I don't need your patient portal information. But I would like for you to give me permission to speak with [redacted] about your visit to their CA PPH clinic. Confirmation from a licensed medical physician assistant will be enough confirmation to me. If you can, please call them, give verbal permission for me to talk with her and then fill out the release forms.

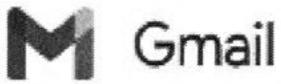
If you really want me to believe you, then give me a chance to. Let me talk to the medical provider that saw you. That's a fair request, considering the circumstances.

Clayton Echard

On Jun 29, 2023, at 4:38 AM, Clayton Echard [redacted] wrote:

No, it would not make a difference. My final answer is to not date, as I have no interest in doing so.

[Quoted text hidden]



Where things stand

Clayton Echard

Thu, Jun 29, 2023 at 7:28 AM

To:

It would definitely make me much nicer. As I have stated, I've only hear information come from your mouth since this whole ordeal started. Never have I heard from a medical provider. But if I did, it would drastically change how I interact with you.

I just wanted to throw this out there as a possibility. It seems you would rather leave me in a place of doubt, so I suppose that's where I will stay.

Clayton Echard

On Jun 29, 2023, at 7:26 AM, [redacted] wrote:

[Quoted text hidden]

Clayton Echard
[redacted]
[redacted]



Where things stand

Thu, Jun 29, 2023 at 8:22 AM

Clayton Echard <[redacted]>
To: [redacted]

There's no reason to jump to all these conclusions that haven't happened yet. Just give me a chance to talk with Mandeep. Once she confirms your story, I will then want a paternity test scheduled, but I will stop doubting your words. Let's make this easier on the both of us. There's no reason not to.

Clayton Echard

On Jun 29, 2023, at 8:06 AM, [redacted] wrote:

[Quoted text hidden]

Clayton Echard <[redacted]>
To: [redacted]



Where things stand

Clayton Echard

To:

Thu, Jun 29, 2023 at 8:35 AM

Ok, when and where are you doing that ultrasound?

Clayton Echard

On Jun 29, 2023, at 8:26 AM, [redacted] wrote:

[Quoted text hidden]

4000 N. Central Expressway, Suite 1000, Charlotte, NC 28205
Tel: 704.366.1000 | Fax: 704.366.1001 | www.abc.org



Paternity test

Clayton Echard <[redacted]>
To: [redacted]

Tue, Jul 25, 2023 at 8:09 PM

I'll respond to you this one time, just so that it's 1000% clear where I stand.

1. I will not meet up and explore things with you.
2. I want you to schedule the Ravgen test ASAP, but I believe you won't do so because you're not pregnant with my children. Hence why you keep making up illogical excuses to wait until February. You also won't provide consent for me to speak with any of the doctors that dealt with administering the ultrasounds. That's because you never got one done. What I've seen is what I believe is a created image from the internet. At this point, your lack of willingness to provide what I'm asking tells me all I need to know.
3. I'm giving you one out right now to not proceed with legal action. In this moment, I am organizing all the documents and am planning to speak with a lawyer in the next few days. I have every intention of suing you for emotional damage and fraud, especially if you continue to harass me. Your "out" is this...stop sending any more messages. I will allow you to send one message stating when you are scheduling the Ravgen test. Nothing else! If you cannot schedule the exam in the next two weeks, then do not send any other message to me and I will not pursue legal action at all. But if you send me another message at any point and it's about anything other than scheduling the Ravgen test, then I will proceed forward with hiring a lawyer. You have my word.

Clayton Echard

On Jul 25, 2023, at 5:24 PM, [redacted] wrote:

[Quoted text hidden]



Paternity test

Clayton Echard

Tue, Jul 25, 2023 at 8:14 PM

To:

I don't need to decide anything. I will not be exploring anything with you in any capacity.

Schedule the Ravgen exam for the soonest possible date and time and let me know when you do.

Do not send me anything else.

Clayton Echard

On Jul 25, 2023, at 8:11 PM, wrote:

[Quoted text hidden]

https://mail.google.com/mail/u/0/?ik=606142f46b&view=pt&search=all&permmsgid=msg-f:1772451294531005596&simpl=msg-f:1772451294531005596



Paternity test

Clayton Echard

Tue, Jul 25, 2023 at 9:27 PM

To

Yes, schedule the Ravgen test asap.

Clayton Echard

On Jul 25, 2023, at 8:54 PM, [redacted] wrote:

[Quoted text hidden]

4000 N. Central Expressway, Suite 200, Raleigh, NC 27609
Phone: 919.876.1000 | Fax: 919.876.1001 | www.ravgen.com

7/27/23, 8:19 AM

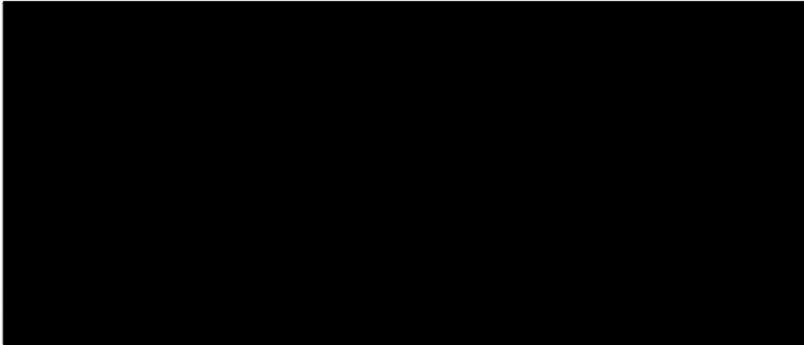
Can you reiterate that I want her to schedule the Ravgen test in the next week and a half? And can you let me know what her ultimate decision is to do (whether she schedules the Ravgen test now or not)? If she refuses to schedule the exam now and decides to wait until February, then I would like that confirmation in writing so that I can proceed forward on my end with legal action.

I'm sorry you've had to deal with this and also with my frustrations last week. But I think you can see now why I have been so aggravated [redacted] reasoning is not based in any rationale and I do believe at this point, I have enough evidence to prove she is faking a pregnancy.

Let me know what she ultimately decides to do about the paternity test.

Thanks,

Clayton Echard



1000 N. ...
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