

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FC 2023-052114

02/01/2024

HONORABLE JULIE ANN MATA

CLERK OF THE COURT
L. Overton
Deputy

IN RE THE MATTER OF
LAURA OWENS

CORY B KEITH

AND

CLAYTON ECHARD

GREGG R WOODNICK

JUDGE MATA

MINUTE ENTRY

IT IS ORDERED setting an Evidentiary Hearing regarding the issue of sanctions and attorney's fees, on **February 27, 2024, at 4:00 p.m.** (45 minutes allotted). The parties, and counsel if represented, shall appear in person before:

**Judge Julie Mata
Superior Court of Arizona
Northeast Regional Court Center
18380 North 40th Street
Courtroom 102
Phoenix, Arizona 85032
(602) 372-0825**

Failure to Appear:

IT IS FURTHER ORDERED that the failure of a party to appear pursuant to the instructions set forth above may result in the Court proceeding in that party's absence, taking evidence from the appearing party and making findings and orders on the Motion. Failure of both parties to appear may result in the dismissal of the Motion.

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IT IS FURTHER ORDERED that if this matter involves a request for contempt sanctions against you for failure to pay child support, **a failure to appear at the hearing may result in the court issuing a child support or civil warrant for your arrest.** If you are arrested, you may be held in jail for up to 24 hours before you see a judge.

Exhibits:

EXHIBITS SUBMITTED THROUGH CASE CENTER

This division is piloting Case Center (also known as Case Lines), a statewide electronic exhibit portal. Accordingly, **IT IS ORDERED** that the parties shall submit all proposed exhibits for the upcoming evidentiary hearing as follows:

- (1) **Submit Hearing Exhibits through Case Center.** Attorneys must submit exhibits through Case Center. Self-represented litigants can request to opt-out of Case Center by contacting the judge's division (DRJ06@jbazmc.maricopa.gov or (602) 372-0825). Exhibits must be submitted at least 3 days before the hearing.

Each party must make sure the Court has the party's valid current email address. If you do not have an email address, you can obtain a free one through accounts.google.com. Each party must register for Case Center at www.digitalevidence.azcourts.gov. The website has links to training resources that will guide you through uploading exhibits and navigating Case Center. The Clerk of Court will email each party (or their attorney of record) a case-specific Case Center link that the party will use to upload exhibits. Case Center accepts most digital formats (including photographs, PDFs, Word files, audio files, and video files). Case Center automatically numbers the exhibits. Petitioner's exhibits have an A- prefix (Exhibit A1, A2, etc.) and Respondent's exhibits have a B- prefix (Exhibit B1, B2, etc.). Third parties will have a C- or D- prefix. During the hearing, the parties must refer to exhibits using the Case Center exhibit numbers. For assistance with Case Center, contact AOC Support Services at (602) 452-3519 or pasupport@courts.az.gov, Monday – Friday 7 AM – 6 PM.

- (2) **Exchange Exhibits.** At least 3 days before the hearing, you must give the other party copies of all exhibits you submitted for use at the hearing. Exhibits you do not give to the other party before the hearing may not be used in the hearing.
- (3) **Appear for the Hearing and Present Your Case.** At the hearing, each party will be allowed approximately half of the time available to present their case, including any witness

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testimony and exhibits. All witnesses must be present at the beginning of the hearing to be sworn in by the Clerk and to be provided the Court's admonition. The witnesses may then be released from the hearing, and you will need to notify the witness when to return to the hearing to testify.

The Court only considers an exhibit after a party explains its relevance and moves for its admission into evidence. The judge will use Case Center to view the exhibits. Each party must either (1) bring paper copies for themselves and any witnesses or (2) access the exhibits on Case Center using their own wifi-enabled device or the iPads provided in the courtroom.

A party presenting an exhibit should be prepared to identify the page(s) with relevant information. Any party that wants to present electronic media (such as audio or video) during a hearing must upload it into Case Center and be prepared to identify and play the relevant portions during the hearing.

IT IS FURTHER ORDERED that if a witness will be virtually testifying by audio or video, the parties/counsel shall, prior to that witness' virtual testimony, provide that witness with copies of all properly numbered exhibits that the party/counsel intends to use in the virtual examination.

IT IS FURTHER ORDERED that failure to provide a copy of any exhibit to the opposing party pursuant to this Minute Entry will likely result in the Court not considering the exhibit and not admitting it into evidence.

Pretrial Filings and Exchange of Information:

IT IS FURTHER ORDERED that at least two business days (48 hours) prior to the evidentiary hearing, each party must file a pre-trial statement identifying the disputed issues and the party's position on those issues, along with the names, contact information, and summary of testimony from proposed witnesses. If child support is at issue, each party must also file an Affidavit of Financial Information (AFI) along with a Parent's Worksheet for Child Support Amount. **Due to delays that may be caused by the electronic docketing system, each party shall also provide a hard copy of these filings to the Judge at the same time they are filed with the Clerk of the Court.**

For information about pre-trial statements, affidavits of financial information, and worksheets for child support, see Rule 76.1, Arizona Rules of Family Law Procedure, at the court website, www.superiorcourt.maricopa.gov, and/or the forms available at the Court Resource Center.

Requests for reasonable accommodation for persons with disabilities must be made to the office of the Judge or Commissioner scheduled to hear this case seventy-two (72) hours before

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your scheduled court date. Requests for an interpreter for persons with limited English proficiency must be made seventy-two (72) hours in advance of your hearing.

All parties representing themselves must keep the Court updated with address changes. A form may be downloaded at: https://superiorcourt.maricopa.gov/llrc/fc_gn9/

ARIZONA SUPERIOR COURT MARICOPA COUNTY
CLERK OF COURT
1000 N. CENTRAL AVENUE, SUITE 1000, PHOENIX, ARIZONA 85004
PHONE: 602.506.6000 FAX: 602.506.6001
WWW.SUPERIORCOURT.MARICOPA.GOV

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

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

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

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

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

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

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

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

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

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

3
4 *3. Deposition Participation.*

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

12
13 Regarding Respondent's noticed deposition, Petitioner offered to postpone same to
14 afford Respondent the protections she has sought from this Court.

15
16 WHEREFORE, Petitioner respectfully requests that this Court sign the proposed
17 form of Preliminary Protective Order attached as "Exhibit 1" to her Motion for
18 Confidentiality. Respondent seeks disclosure of Petitioner's confidential medical records;
19 the Court should grant Petitioner's request and allow her to prove her case under the confines
20 of confidentiality.
21

22 **RESPECTFULLY** submitted this 31st day of January 2024.

23 **THE VALLEY LAW GROUP, PLLC**

24
25 */s/ Cory B. Keith*

26 _____
27 Cory B. Keith
28 *Attorney for Petitioner*

THE VALLEY LAW GROUP, PLLC
3101 N. Central Avenue, Ste. 1470~ Phoenix, Arizona 85012
Phone : (480) 300-6012 ~ Attorneys@thevalleylawgroup.com

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

COPY presumed delivered even date to:
The Honorable Julie Mata

COPY emailed this 31st day of January 2024 to:
Gregg Woodnick
Woodnick Law, PLLC
1747 E. Morten Ave. Ste 205
Phoenix, Arizona 85020
office@WoodnickLaw.com
Attorney for Respondent

By: ILS

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VERIFICATION

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

31/01/2024

Date

Laura Owens

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

Laura Owens, *Petitioner*






Reply to Motion for Confidentiality and Preliminary Protective Order Final

Final Audit Report

2024-02-01

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