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3 [REDACTED]
4 **Gregg R. Woodnick, #020736**
5 **Isabel Ranney, #038564**
6 *Attorney for Respondent/Defendant*

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 Petitioner,

**STIPULATED MOTION FOR VIRTUAL
APPEARANCE OF WITNESS**

12 and

13 **CLAYTON ECHARD,**

(Assigned to the Honorable Julie Mata)

14 Respondent.

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17
18 Respondent/Defendant, CLAYTON ECHARD, by and through his undersigned
19 counsel, and Petitioner/Plaintiff, LAURA OWENS, by and through her undersigned counsel,
20 respectfully request that that this honorable Court grant permission for
21 Respondent/Defendant's witness, Dr. Samantha Deans, be allowed to appear virtually for the
22 6/10/24 trial in this matter.

23
24 1. Rule 8(c), *Arizona Rules of Family Law Procedure*, states that, "On the request of a
25 party or a witness or on its own, and subject to A.R.S § 25-1256(F), the court may allow a party
26 or witness to testify telephonically if the court finds it would not substantially prejudice any
27 party and the testifying party or witness: (1) is not reasonably able to attend the hearing or trial
28

1 (2) would be unduly inconvenienced by attending the hearing or trial in-person, or (3) would
2 incur a burdensome expense to attend the hearing or trial in-person.”

3
4 2. Dr. Deans’ appearance as a witness and this request for her to appear virtually at
5 trial has been timely disclosed to Petitioner/Plaintiff, who has indicated she has no objection to
6 her telephonic appearance.

7
8 3. As Dr. Deans is based out of Buffalo, New York, the requirement for her to travel
9 and appear in person at this matter would be both unduly burdensome and expensive.

10 4. There is no risk of prejudice to either party or the witness by permitting Dr. Deans
11 to appear telephonically.

12
13 **WHEREFORE**, the parties respectfully request that Dr. Samantha Deans be permitted
14 to appear virtually before this court at the upcoming trial on June 10, 2024.

15 **RESPECTFULLY SUBMITTED** this 21st day of May, 2024.

16 GINGRAS LAW OFFICE, PLLC

WOODNICK LAW, PLLC

17 



18 With permission

19 David Gingras
20 *Attorney for Petitioner/Plaintiff*

Gregg R. Woodnick
21 *Attorneys for Respondent/Defendant*

1 **ORIGINAL** of the foregoing e-filed
2 this 21st day of May, 2024 with:

3
4 Clerk of the Court
5 Maricopa County Superior Court

6 **COPY** of the foregoing delivered
7 This 21st day of May, 2024 with:

8 Honorable Julie Mata
9 Maricopa County Superior Court

10 David Gingras
11 Gingras Law Office, PLLC

12 
13 By: /s/MB