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7 *Gregg R. Woodnick, #020736*  
8 *Isabel Ranney, #038564*  
9 *Attorney for Respondent*

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

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

12 In Re the Matter of:

Case No.: **FC2023-052114**

**NOTICE OF NON-APPEARANCE AT  
DEPOSITION PURSUANT TO RULE  
57(g)**

13 [REDACTED]  
14 Petitioner,

(Assigned to The Honorable Julie Mata)

15 and

16 [REDACTED]  
17 Respondent.

18  
19 Respondent, [REDACTED], by and through undersigned counsel and pursuant  
20 to Rule 57(g), *Arizona Rules of Family Law Procedure*, hereby notifies this Court that  
21 Petitioner [REDACTED] failed to appear at the properly noticed deposition scheduled for  
22 January 17, 2024 at 1:00 p.m.

23  
24 Counsel conducting the deposition was notified the day prior to the deposition that  
25 Petitioner was not going to attend. Petitioner (and her former counsels) were previously  
26 Noticed and agreed to the date of the deposition on or about December 28, 2023. Notably, when  
27  
28

1 Petitioner obtained new counsel, she did not request an extension of time or otherwise indicate  
2 she would not be prepared for the deposition.

3           It should also be noted that Petitioner, through her prior counsel, filed a *Motion to Quash*  
4 *the Deposition* (filed 1/2/24), which is still pending before the Court. Respondent provided his  
5 Response/Objection on January 4<sup>th</sup>, 2023. No Reply was timely filed and no court order  
6 restricted this properly noticed deposition. Still, Petitioner willfully (see attached) failed to  
7 attend.  
8

9  
10           The reasons provided by Petitioner's new counsel for not attending the property noticed  
11 deposition fail to comport with Rule 57, *Arizona Rules of Family Law Procedure*. As a result  
12 of Petitioner's failure to attend and failure to adequately provide notice of her non-attendance,  
13 Respondent has incurred attorney's fees and costs, which he is entitled to under Rule 57(g).

14  
15           Petitioner's counsel indicated that he will be filing for some sort of request for protective  
16 order. As Petitioner's most recent counsel was advised in the correspondence attached, this is  
17 not valid cause to fail to attend a deposition and does not comply with the Rules. (The  
18 communications regarding the deposition are attached heretofore as **Exhibit A.**)  
19

20           The Court currently has a Motion for Sanctions pending. Respondent intends to  
21 reference this Notice in advancing the consistent arguments regarding appropriate  
22 consequences for Petitioner's continued noncompliance with the Rules, including legal fees  
23 and other relief available per law.  
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RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of January, 2024.

WOODNICK LAW, PLLC



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Gregg R. Woodnick  
Isabel Ranney  
*Attorneys for Respondent*


ORIGINAL of the foregoing e-filed  
This 17<sup>th</sup> day of January, 2024 with:

Clerk of Court  
Maricopa County Superior Court

COPY of the foregoing document  
delivered/emailed this 17<sup>th</sup> day of January, 2024, to:

The Honorable Julie Mata  
Maricopa County Superior Court

Cory Keith  
The Valley Law Group, PLLC  
3101 N. Central Ave, Ste 1470  
Pheonix, AZ 85012

  
*Attorney for Petitioner*

By: /s/ MB

# Exhibit “A”



**From:** [Gregg Woodnick](#)  
**To:** Cory Keith  
**Cc:** [REDACTED]  
**Subject:** [REDACTED]  
**Date:** Wednesday, January 17, 2024 10:54:39 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[REDACTED] [Blank HIPAA.pdf](#)  
[appx3001-certificate-death.pdf](#)

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Cory,

I appreciate you letting us know that L [REDACTED] is not planning on showing up to the Noticed deposition this afternoon. That said, and as I am sure you advised her in a CYA letter, she is not allowed to simply ignore a properly noticed deposition. In light of her actions, and exercising efforts to save [REDACTED] costs, we are canceling the court reporter. We will include the anticipated cancellation fees required by the service in our cost statement and append it to the anticipated *China Doll Affidavit*. Note, we will prepare an affidavit confirming her non-appearance and send you the same after 1:00pm.

The matter has been set for trial. [REDACTED] needs to comply with Rule 49 (she has provided zero disclosure notwithstanding you being the third attorney I have communicated with about this FC case).

I am sending you again the fetal death certificate form I provided to you yesterday and submitting for the 3<sup>rd</sup> time HIPAA forms (attached) for each of the following providers: Dr. [REDACTED], Tamara [REDACTED] NP, Dr. [REDACTED], Dr. [REDACTED] and PPC, so we can get the records directly from the source and consistent with her testimony in Court already. As I explained to Lexi before she quit the case, we will not accept any "records" from your client that are not given to us from the providers *directly*. There is an arts-and-crafts history here. Fortunately, [REDACTED] herself invoked Rule 2 so she should be more than cooperative with signing releases so we can get the records from the source.

I am disappointed but certainly not surprised that the deposition is not proceeding today.

Gregg

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[www.woodnicklaw.com](http://www.woodnicklaw.com)  
Email: [REDACTED]

**From:** Cory Keith [REDACTED]  
**Sent:** Tuesday, January 16, 2024 4:08 PM  
**To:** Gregg Woodnic [REDACTED]  
**Cc:** Isabel [REDACTED]; Isabel [REDACTED]  
Maribet [REDACTED]  
**Subject:** RE: FC2023-052114, [REDACTED]

Gregg,

I appreciate your understanding of the interesting situation I walked into in this case. I know you and I are in opposition on this one, but I hope we can represent our clients with the understanding that we are both simply representing our clients and not take issue with each other for doing so. Let's hope our next case together isn't so contentious.

After speaking with my client, we will be filing a Motion for a Protective Order relating to both parties' depositions of each other. I will have this filed by the time of the deposition tomorrow. My client will be awaiting further Order from the Court with relation to this before subjecting herself to [REDACTED] deposition of her and she will not be present for the deposition tomorrow. To be clear, this is not my client saying she does not want to be deposed - I believe her Motion to Quash adequately stated and put [REDACTED] notice of this - but instead that the deposition should be confidential to avoid continued embarrassment and annoyance as she has undergone thus far in and outside of these proceedings. In order to allow the Court to weigh in on this deposition and request for confidentiality appropriately, [REDACTED] must seek this leave prior to the deposition.

Thank you,



Please include my paralegal Isabel [REDACTED] in all emails and correspondence. Her email is [REDACTED]

Cory Keith  
Managing Attorney  
**The Valley Law Group, PLLC.**  
3101 N. Central Avenue, Ste. 1470  
Phoenix, AZ 85012  
Phone: [REDACTED]  
Fax: 480-781-0722  
Email: Cory [REDACTED]

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**From:** Gregg Woodnick [REDACTED] >

**Sent:** Tuesday, January 16, 2024 2:06 PM

**To:** Cory Keith [REDACTED]

**Cc:** Isabel [REDACTED]; Isabel [REDACTED]  
Maribet [REDACTED]

**Subject:** RE: FC2023-052114 [REDACTED]

Cory,

1. [REDACTED] will not be agreeing to a Protective Order or filing this case under seal. Your client went to *The Sun*, *People* magazine, TMZ, Reddit, Medium etc and *continues* to post and contact the media to date. Also, it is highly *doubtful* that you will be able to meet the high burden to have a case sealed. (Note, your client already tried this and was denied relief).
2. As you are aware from the pleadings, we will absolutely be addressing the malignancy of her allegations including her historic prior allegations as they are directly relevant to her bad faith motivation to file this matter. Note, your client also repeatedly refers to her prior "pregnancies" in her emails and text messages to Clayton, which we disclosed. Moreover, her prior allegations are entirely relevant to our Motion for Sanctions, as she has a history of fabrications and her playbook in this underlying matter is almost identical (some of texts read like they are cut and paste) from the [REDACTED] matter. We appreciate that subject matter of fabricating pregnancies is embarrassing, but her responses to the questions are absolutely relevant to the pending action in the court.
3. Your objections at deposition are obviously limited by law. [REDACTED] attempts to terminate deposition because we are asking questions that are directly related to her sanctionable actions, that is obviously your choice. I am fairly confident that Judge Mata is *not* going to agree with you and she will be exposed to consequences including attorney's fees and paying for the reporter costs for yet another deposition so that the discovery process can be completed.
4. I have zero intention of asking questions that do not serve a legitimate purpose. Much of our time is going to be spent confirming foundation issues because your client (after she claimed



she was no longer pregnant) insisted on exercising Rule 2.

5. Last, No matter what questions we ask, your client will claim they are meant to harass. I assure you that is not the case.
6. I trust [REDACTED] you that she had the opportunity to avoid this by acknowledging that she was never pregnant to [REDACTED]. That offer still stands.

Last, this deposition was properly set 3 weeks ago and I have spoken to two (2) other lawyers for [REDACTED] that window. If [REDACTED] is now refusing to participate without her demands being met, it is not only an unreasonable request (based on the history here and her publications) but a late one.

You are more than welcome to call me to discuss. I appreciate you are in a difficult situation having taken this case in this posture.

Gregg

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[www.woodnicklaw.com](http://www.woodnicklaw.com)  
Email: [gregg@woodnicklaw.com](mailto:gregg@woodnicklaw.com)

---

**From:** Cory Keith [REDACTED]  
**Sent:** Tuesday, January 16, 2024 12:22 PM  
**To:** Gregg Woodnick <[REDACTED]>  
**Cc:** Isabel [REDACTED]; Isabel [REDACTED]  
Maribeth [REDACTED]  
**Subject:** RE: FC2023-052114; [REDACTED]

Mr. Woodnick,

Thank you for your email.

After reviewing this case more thoroughly, I am writing to request your position on both parties signing a Protective Order under Rule 53 with relation to the deposition. Specifically, we will be requesting that the deposition transcript, testimony, and any supporting video is documented as highly confidential and kept under seal. We will also request that the deposition scope is limited to matters relevant to this proceeding. Assuming your client does not intend to annoy, embarrass, oppress, harass, or leak the information, I am hopeful that they would be able to sign this agreement for same and move forward with the deposition



tomorrow. Please let me know your client's position as soon as possible. If we are unable to reach an agreement, I will be seeking court intervention prior to my client being present for any deposition.

Thank you,



Please include my paralegal Isabel Sissel on all emails and correspondence. Her email is [REDACTED]

Cory Keith  
Managing Attorney  
**The Valley Law Group, PLLC.**  
3101 N. Central Avenue, Ste. 1470  
Phoenix, AZ 85012  
Phone: [REDACTED]  
Fax: 480-781-0722  
Email: Cory [REDACTED]

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**From:** Gregg Woodnick [REDACTED]  
**Sent:** Tuesday, January 16, 2024 11:37 AM  
**To:** Cory Keith [REDACTED]  
**Cc:** Isabel [REDACTED] Isabel [REDACTED]  
Maribeth [REDACTED]  
**Subject:** FC2023-052114 [REDACTED]

Cory,

As a professional courtesy, I wanted to let you know (as I am sure [REDACTED] expecting) there may be a police presence at my office tomorrow for the deposition.

I am also attaching the Vital Records form for a fetal death certificate. Please encourage [REDACTED] to populate and bring to the deposition (my staff can notarize it for her here). She also needs to bring her Rule 49 and Exhibit A (per Rule 62).

The depo-videographer is not inexpensive and we just confirmed with John. [REDACTED] needs to be here at 1:00p for a prompt start. I do anticipate needing most of the 4 hours.

We look forward to meeting you both in person tomorrow.

Gregg

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1747 E. Morten Ave., Suite 205

Phoenix, AZ 85020

Phone: [REDACTED]

[REDACTED]

[www.woodnicklaw.com](http://www.woodnicklaw.com)

Email: [REDACTED]

---

**From:** Gregg Woodnick <[REDACTED]>  
**Sent:** Monday, January 15, 2024 1:19 PM  
**To:** [REDACTED]  
**Cc:** Isabel Ranney <[REDACTED]> Maribeth Burroughs  
<[REDACTED]>  
**Subject:** FC2023-052 [REDACTED]

Cory,

I am a bit confused as we were contacted by a different firm indicating they would be taking over as representation of [REDACTED]. Under normal circumstances I would have brushed that off as maybe wires being crossed, but I think you will be the 12<sup>th</sup> or 13<sup>th</sup> lawyer in this melee, so I want to make sure you are not *already* withdrawing (it has been a pattern here.)

Regardless, I am just happy [REDACTED] has counsel, as it will keep our deposition on Wednesday productive. As a reminder [REDACTED] remiss in her discovery obligations (to date, she has provided none). Per Rule 62, she needs to bring the requested documents to the deposition (attached as Exhibit A along with the Notice). I am also happy to resend blank HIPAA releases (they were ignored previously) for her to execute.

Also as to your date request to depose [REDACTED] of course we can make that work...and yes we are available on Groundhog Day (2/2). I am just glad to hear [REDACTED] agrees that further discovery is critical, so we welcome the formal Notice (please dispatch) for the record. I am requesting that we start a bit earlier (8:00 a.m. at your office) because it is on a Friday and I have other commitments in the afternoon. Isabel (copied) will be there with me as, in light of your client's history, we don't

engage with her without witnesses.

Happy to talk off-line today if you have a few minutes.

Gregg

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Fax: (602) 396-5850

Email

---

**From:** Cory [REDACTED]  
**Sent:** Friday, January 12, 2024 5:00 PM  
**To:** GRV [REDACTED]  
**Cc:** Isabel [REDACTED]  
**Subject:** RE: FC2023-052114; Owens vs. Echard

Mr. Woodnick,

I intend to depose [REDACTED] at my office. Please let me know yours and your client's availability on the following dates:

February 1, 2024 @ 1:00pm

February 2, 2024 @ 9:00am

February 8, 2024 @ 9:00am

Thank you,



Please include my paralegal Isabel Sissel on all emails and correspondence. Her email is

[REDACTED]  
Cory [REDACTED]  
Managing Attorney



[REDACTED]  
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---

**From:** Isabel [REDACTED]  
**Sent:** Thursday, January 11, 2024 2:41 PM  
**To:** [REDACTED]  
**Cc:** Cory [REDACTED]  
**Subject:** FC2023-052114; Owens vs. Echard

Good Afternoon,

In regard to the above referenced matter, please see the attached Notice of Appearance that has been filed on behalf of Petitioner, [REDACTED] ns. A physical copy will not follow unless otherwise requested.

Sincerely,

Isabel [REDACTED]

Paralegal

The Valley Law Group, PLLC  
3101 N. Central Ave., Suite 1470

Phoenix, Arizona, 85012

Phone [REDACTED]  
Fax: 480-781-0722  
[REDACTED]



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