

BEFORE THE PRESIDING DISCIPLINARY JUDGE

**IN THE MATTER OF A MEMBER OF THE
STATE BAR OF ARIZONA,**

**GREGG R. WOODNICK,
Bar No. 020736**

Respondent

PO No. 2024-011

PROTECTIVE ORDER

[State Bar File: 24-0263]

The State Bar of Arizona filed, on behalf of Complainant, a Request for Protective Order sealing information protected by the attorney-client privilege and/or ER 1.6, as well as login credentials for medical records, from Respondent and the public. The State Bar does not object to the request, and no timely objection was received from Respondent. Good cause appearing,

IT IS ORDERED granting the request.

IT IS FURTHER ORDERED that Complainant's login credentials for her medical records and email communications with former counsel be sealed and kept confidential from Respondent and the public pursuant to Rule 70(g), Ariz. R. Sup. Ct.

Sealed material shall be opened and viewed only by order of the committee, the presiding disciplinary judge, a hearing panel, the board, or the court for use by such body and the parties in pending proceedings, and otherwise only upon notice to and an opportunity to be heard by the parties and the witness or other person who is the subject of the information.

DATED this 8th day of April, 2024.

Margaret H. Downie
Margaret H. Downie
Presiding Disciplinary Judge

Original filed this 8th day of
April, 2024, with:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 N. 24th Street, Suite 100
Phoenix, Arizona 85016-6266

Copy of the foregoing mailed/mailed
this _____ day of April, 2024, to:

Gregg R. Woodnick
Woodnick Law PLLC
1747 E. Morten Ave Ste 205
Phoenix, AZ 85020-4691
Email: Office@WoodniocLaw.com

Copy of the foregoing hand-delivered
this ____ day of April, 2024, to:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 N. 24th Street, Suite 100
Phoenix, Arizona 85016-6266

by: _____

Reid Potter, Bar No. 027815
Intake Bar Counsel
State Bar of Arizona
4201 N. 24th Street, Suite 100
Phoenix, Arizona 85016-6266
Telephone 602-340-7253
Email: LRO@staff.azbar.org

BEFORE THE PRESIDING DISCIPLINARY JUDGE

**IN THE MATTER OF A MEMBER
OF
THE STATE BAR OF ARIZONA,**

**GREGG R. WOODNICK
Bar No. 020736**

Respondent.

PO No. 2024-011

**REQUEST FOR PROTECTIVE
ORDER SEALING THE RECORD**

State Bar File: 24-0263

The State Bar of Arizona, through undersigned counsel, hereby forwards to the Presiding Disciplinary Judge of the Supreme Court of Arizona (PDJ), Complainant's Request for Protective Order, pursuant to Rule 70(g) of the Rules of the Supreme Court.

Complainant requests that the following information be sealed from the Respondent and the public:

- Complainant's initial charge, "Immediate Assistance and Guidance Needed in Response to Ethical Concerns and Intimidation in Legal Case" received

via email on Sunday, January 7, 2024 at 9:59 AM, contains Complainant's login credentials (username, password, and hyperlink) to medical records.

- Email communications attached in Complainant's initial charge: 12-29-23 conversation with Lexi Lindvall, 1-2-24 – Lexi's withdrawal, [REDACTED] Letter to [REDACTED] (1), 12-31-23 – email to Lexi addressing any concerns, 12-27-23 – Lexi pressure to sign affidavit, 1-5-24 correspondence with Lindvall & Woodnick, the email communications are between Complainant, Shane Ross, and Alexis (Lexi) Lindvall, Complainant's former counsel. Complainant asserts these communications are confidential and protected by attorney-client privilege.

- Complainant's request for protective order/"Request for Confidentiality"

The reason for sealing the information is that the Complainant provided information in her initial charge that may be considered "individually identifiable health information" (PHI) pursuant to the HIPAA Privacy Rule, specifically login credentials that would access Complainant's medical records. Additionally, the information shared in the email correspondence between Complainant and her former counsel would be confidential per ER 1.6 and also includes Complainant's login

credentials to medical records. The State Bar does not object to Complainant's request and requests that the request be granted.

Letter from Complainant requesting protective order is attached as Exhibit A.

A Proposed Order is attached as Exhibit B.

DATED this 21st day of March, 2024.

STATE BAR OF ARIZONA

/s/Reid P. Potter
Reid P Potter
Intake Bar Counsel

Original filed with the Disciplinary Clerk of the Office of the Presiding Disciplinary Judge of the Supreme Court of Arizona this 21st day of March, 2024.

Copy of the foregoing emailed this 21st day of March, 2024, to:

The Honorable Margaret H. Downie
Presiding Disciplinary Judge
Supreme Court of Arizona
1501 West Washington Street, Suite 102
Phoenix, Arizona 85007
E-mail: officepdj@courts.az.gov

Copy of the foregoing emailed
this 21st day of March, 2024, to:

Gregg R Woodnick
Woodnick Law PLLC
1747 E Morten Ave Ste 205
Phoenix, AZ 85020-4691
Email: Office@WoodnickLaw.com
Respondent

Copy of the foregoing hand-delivered
this 21st day of March, 2024, to:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 N. 24th St., Suite 100
Phoenix, Arizona 85016-6266

by:/s/Mandy Fitzgerald
RPP/mf

EXHIBIT A

[REDACTED]

[REDACTED]

EXHIBIT B

BEFORE THE PRESIDING DISCIPLINARY JUDGE

**IN THE MATTER OF A MEMBER
OF
THE STATE BAR OF ARIZONA,**

**GREGG R. WOODNICK
Bar No. 020736**

Respondent.

PO -

PROTECTIVE ORDER

State Bar File: 24-0263

The Presiding Disciplinary Judge of the Supreme Court of Arizona having reviewed Complainant's Request for Protective Order and there being no objection by the State Bar, accordingly:

IT IS ORDERED Complainant's request for Protective Order is granted.

IT IS FURTHER ORDERED that Complainant's login credentials for her medical records and email communication with former counsel be sealed and kept confidential from Respondent and the public pursuant to Rule 70(g), Ariz. R. Sup. Ct.

Pre-complaint orders sealing material do not seal such material post-complaint if the material is sought to be used or referred to in subsequent pleadings or in any hearing. In such circumstance, the parties are reminded a formal request

for protective order with specificity must be filed with the material sought to be sealed and submitted for in-camera review.

Sealed material shall be opened and viewed only by an order of the committee, the presiding disciplinary judge, a hearing panel, the board or the court for use by such body and the parties in pending proceedings, and otherwise only upon notice to and an opportunity to be heard by the parties and the witness or other person who is the subject of the information. A party aggrieved by an order relating to a request for a protective order may seek review by filing a petition for special action with the court.

DATED this _____ day of March, 2024.

Margaret H. Downie,
Presiding Disciplinary Judge

Original filed this _____ day of
March, 2024 with:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 N. 24th St., Suite 100
Phoenix, Arizona 85016-6266

Copy of the foregoing emailed
this _____ day of March, 2024, to:

Gregg R Woodnick
Woodnick Law PLLC
1747 E Morten Ave Ste 205
Phoenix, AZ 85020-4691
Email: Office@WoodnickLaw.com
Respondent

Copy of the foregoing hand-delivered
this _____ day of March, 2024, to:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 N. 24th St., Suite 100
Phoenix, Arizona 85016-6266

by:_____

Hannah Guertin

From: Mandy Fitzgerald
Sent: Thursday, March 21, 2024 10:00 AM
To: Presiding Disciplinary Judge Office
Cc: Reid Potter; LR Court Filings; Amy Ralston; Lori Palmer; Office@WoodnickLaw.com
Subject: 24-0263 - Woodnick; [REDACTED]
Attachments: Protective Order.docx; Protective Order Request and Order.pdf

Good Morning,

Attached for filing today is a Request for Protective Order Sealing the Record.

A Word version of the Proposed Order is also attached.

Thank you,

Sandra Montoya

From: Reid Potter
Sent: Tuesday, February 27, 2024 1:19 PM
To: [REDACTED]@gmail.com
Cc: Mandy Fitzgerald
Subject: SBA File 24-0263

Good afternoon, Ms. [REDACTED]

I was in the process of leaving you a voicemail but believe it was cut off. I reviewed your detailed submissions. As previously stated, you are currently involved in ongoing litigation. The basis for your allegations are mostly from the pleadings themselves, which is why I am suggesting speaking to your current counsel, Mr. Keith. The issues at this stage are more appropriately raised with the Court. The court is the most familiar with the facts, rules, statutes, and caselaw for your case. It is inappropriate for the State Bar to get involved in active cases, except under certain circumstances not applicable here. If the court concludes that Mr. Woodnick acted inappropriately, please provide us with a copy of that written finding for further consideration, until then we consider this matter dismissed and will take no further action. Pursuant to Arizona Supreme Court Rule 71, the State Bar file may be expunged in three years.



Reid Potter, Intake Bar Counsel
State Bar of Arizona

4201 N. 24th St., Suite 100 | Phoenix, AZ 85016-6266

T : 602.340.7246 F : 602.416.7419

EMAIL: Reid.Potter@staff.azbar.org

www.azbar.org

Serving the public and enhancing the legal profession.

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

Sandra Montoya

From: Gregg Woodnick <Gregg@woodnicklaw.com>
Sent: Tuesday, February 27, 2024 1:15 PM
To: Reid Potter; GRW Office
Cc: Mandy Fitzgerald
Subject: RE: SBA File 24-0263

Thanks, Reid. Safe guess it was from [REDACTED] [REDACTED]

I appreciate you closing this.

Gregg

WOODNICK LAW, PLLC

1747 E. Morten Ave., Suite 205

Phoenix, AZ 85020

Phone: (602) 449-7980

Fax: (602) 396-5850

www.woodnicklaw.com

Email: gregg@woodnicklaw.com

From: Reid Potter <Reid.Potter@staff.azbar.org>
Sent: Tuesday, February 27, 2024 1:10 PM
To: GRW Office <Office@woodnicklaw.com>
Cc: Mandy Fitzgerald <Mandy.Fitzgerald@staff.azbar.org>
Subject: SBA File 24-0263

The State Bar recently received a bar charge against you. I have determined that further investigation is not warranted at this time and our file has been closed. The charge is dismissed.

Pursuant to Rule 70(a)(4), Ariz. R. Sup. Ct., the record of this charge will be public for six months from the date of this email. This charge has no adverse impact on your standing with the State Bar. The record shows a consumer charge that was dismissed. Pursuant to Rule 71, Ariz. R. Sup. Ct., the State Bar file may be expunged in three years.



Reid Potter, Intake Bar Counsel

State Bar of Arizona

4201 N. 24th St., Suite 100 | Phoenix, AZ 85016-6266

T : 602.340.7246 F : 602.416.7419

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Sandra Montoya

From: [REDACTED] [REDACTED] <[REDACTED]@[REDACTED].com>
Sent: Monday, February 26, 2024 3:07 PM
To: Reid Potter
Subject: Re: Complaint against Gregg Woodnick

Mr. Potter,

I wanted to add to my complaint and articulate my deep-seated concerns regarding the conduct of Attorney Gregg Woodnick, and, by extension, the actions of his associate, Isabel Ranney, at Woodnick Law.

1. Misrepresentation and Offensive Allegations by Gregg Woodnick

In an email sent to my sister, [REDACTED] [REDACTED] Mr. Woodnick made several baseless and deeply offensive allegations. He stated, *"multiple men have alleged that your sister fabricated pregnancies and medical documents to support her pregnancy fiction"* and continued to defame my character by suggesting a pattern of deceitful behavior, including *"faked pregnancies as a ruse to force relationships"*. These allegations not only *completely* misrepresent my personal and medical history but also appear to contravene the ethical standards regarding truthfulness in statements to others (Rule 4.1) and misconduct involving dishonesty (Rule 8.4(c)). I saw my sister daily on Zoom as well as in person throughout my pregnancy, she knows better than just about anyone that I was legitimately pregnant.

2. Inappropriate Direct Communication by Gregg Woodnick

Mr. Woodnick's email to my sister (sent to both her personal and business emails) bypasses standard legal protocols and directly involves a family member in a distressing manner, stating, *"Laura's actions are about to land her with very unpleasant legal consequences, including possible criminal perjury charges"*. This direct communication, laden with undue pressure and threats, raises concerns under Rule 4.2 (Communication with Person Represented by Counsel) and Rule 4.4 (Respect for Rights of Third Persons).

The nature of this communication could be seen as a violation of Rule 4.4, which requires respect for the rights of third persons. By involving my sister in this manner and using language that could be construed as threatening, Mr. Woodnick's actions may have the effect of harassing or maliciously injuring another party, which is expressly prohibited under the rule.

The actions and statements of Attorney Gregg Woodnick, compounded by the public remarks made by Isabel Ranney, represent a pattern of behavior that is deeply concerning and, I believe, in violation of multiple rules of professional conduct. I hope that the Arizona State Bar will conduct a thorough investigation into these matters, ensuring accountability and adherence to the ethical standards expected of legal professionals.

3. Unsubstantiated Public Statements by Woodnick Law in Media

Isabel Ranney, an attorney at Woodnick Law, has further compounded my concerns regarding the firm's ethical conduct. As reported by Jimmy Jenkins in the Arizona Republic, Ms. Ranney publicly commented on the ongoing legal proceedings between myself and their client. Her statement, "[REDACTED] has a pattern of falsely claiming to be pregnant... The premise of our motion for sanctions is that this was all a fraud," was made in a context that suggests an attempt to prejudice public opinion and the legal process against me.

a. **Violation of Confidentiality and Prejudice to Administration of Justice:** Such public allegations could potentially violate Rule 3.5 (Impartiality and Decorum of the Tribunal) by undermining the decorum and impartiality of judicial proceedings. It raises concerns about the influence of extrajudicial statements on the administration of justice, particularly when made during ongoing legal disputes.

b. **Misconduct Involving Dishonesty and Misrepresentation:** By publicly asserting a supposed pattern of fraudulent behavior on my part without conclusive evidence, Ms. Ranney's statements may breach Rule 8.4(c), which prohibits conduct involving dishonesty, fraud, deceit, or misrepresentation. The public dissemination of unverified claims could be seen as an attempt to misrepresent facts to the detriment of my character and case.

c. **Improper Trial Publicity:** According to Rule 3.6 (Trial Publicity), attorneys are restricted from making public statements that could materially prejudice an adjudicative proceeding. Ms. Ranney's comments to a widely-read publication like the Arizona Republic risk influencing the perceptions of potential jurors, the public, and other parties involved in the legal process, potentially jeopardizing the fairness of the trial.

The actions and statements of Attorney Gregg Woodnick, compounded by the public remarks made by Isabel Ranney, represent a pattern of behavior that is deeply concerning and, I believe, in violation of multiple rules of professional conduct. I hope that the Arizona State Bar will conduct a thorough investigation into these matters, ensuring accountability and adherence to the ethical standards expected of legal professionals.

Thank you!

All the best,



[Redacted Name]

[Nobody Told Me!](#) / [Redacted] / [LizMax Investments](#) / [TEDx Talk](#)

Phone [Redacted]

Email [Redacted].com

On Fri, Feb 16, 2024 at 11:14 AM [Redacted] <[Redacted].com> wrote:

Mr. Potter,

I appreciate your patience and understanding regarding my complaint against Gregg Woodnick. Despite my hopes for a cessation of personal attacks in his filings, the situation has deteriorated further, with the attacks becoming increasingly vitriolic. Such behavior, I believe, is highly uncharacteristic of a legal professional.

I am enclosing documents of three of his most recent filings, which I find contain egregious violations. While there are numerous instances I could point out, I have chosen a few quotes that I find particularly offensive and unbecoming of an attorney, which have added hours to the preparation of this complaint. These quotes underscore the personal nature of his attacks against me and heighten my apprehension about facing him in a deposition:

1. "Petitioner initiated the underlying action when she filed her Petition... alleging that she was pregnant with Respondent's twins after one night of oral sex... This time Petitioner chose a television personality on which to perpetrate this fraud and not only faked the pregnancy but attempted to extort him to date her in exchange for an 'abortion' (of fictional twins)."[128†source].

2. "This entire action by Petitioner is predicated on fraud upon the Court. Petitioner continues to seek out media attention and exhaust all her procedural remedies to evade basic discovery and disclosure obligations. Perhaps if Petitioner provided the statutorily required fetal death certificate and verifiable medical records to support that she was ever pregnant with twins she would look less like as stated by Petitioner's attorney 'a crazed woman who fabricated a pregnancy.'"[132†source].

These statements not only misrepresent the truth but also serve to unjustly malign my character in a public and professional forum. It is imperative to note that I have provided ample proof of my pregnancy in my filings prior to Mr. Woodnick's involvement in the case, which he can see for himself, countering his baseless claims of deception.

For verification of my pregnancy, you may access my patient portal at Banner Health, where my pregnancy was initially confirmed. [REDACTED]

[REDACTED] It is crucial that this information remains confidential and not be disclosed to Mr. Woodnick, should this communication need to be shared as part of the complaint process.

I trust that these examples illustrate the gravity of Mr. Woodnick's conduct and the impact it has had on me. I look forward to your guidance on how to proceed with this matter.

All the best,



[REDACTED]

[REDACTED] / [REDACTED] / [LizMax Investments](#) / [TEDx Talk](#)

Phone [REDACTED]

Email [REDACTED].com

Beware External Email - Think Before You Act

Links and attachments should not be opened unless expected or verified

Sandra Montoya

From: [REDACTED] <[REDACTED]@[REDACTED].com>
Sent: Friday, February 16, 2024 11:15 AM
To: Reid Potter
Subject: Complaint against Gregg Woodnick
Attachments: Motion Continue.pdf; Motion Sanctions.pdf; Motion Status Conference.pdf; Woodnick potential violations.pdf

Mr. Potter,

I appreciate your patience and understanding regarding my complaint against Gregg Woodnick. Despite my hopes for a cessation of personal attacks in his filings, the situation has deteriorated further, with the attacks becoming increasingly vitriolic. Such behavior, I believe, is highly uncharacteristic of a legal professional.

I am enclosing documents of three of his most recent filings, which I find contain egregious violations. While there are numerous instances I could point out, I have chosen a few quotes that I find particularly offensive and unbecoming of an attorney, which have added hours to the preparation of this complaint. These quotes underscore the personal nature of his attacks against me and heighten my apprehension about facing him in a deposition:

1. "Petitioner initiated the underlying action when she filed her Petition... alleging that she was pregnant with Respondent's twins after one night of oral sex... This time Petitioner chose a television personality on which to perpetrate this fraud and not only faked the pregnancy but attempted to extort him to date her in exchange for an 'abortion' (of fictional twins)."[128†source].
2. "This entire action by Petitioner is predicated on fraud upon the Court. Petitioner continues to seek out media attention and exhaust all her procedural remedies to evade basic discovery and disclosure obligations. Perhaps if Petitioner provided the statutorily required fetal death certificate and verifiable medical records to support that she was ever pregnant with twins she would look less like as stated by Petitioner's attorney 'a crazed woman who fabricated a pregnancy.'"[132†source].

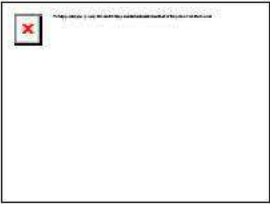
These statements not only misrepresent the truth but also serve to unjustly malign my character in a public and professional forum. It is imperative to note that I have provided ample proof of my pregnancy in my filings prior to Mr. Woodnick's involvement in the case, which he can see for himself, countering his baseless claims of deception.

For verification of my pregnancy, you may access my patient portal at Banner Health, where my pregnancy was initially confirmed. [REDACTED]

[REDACTED] It is crucial that this information remains confidential and not be disclosed to Mr. Woodnick, should this communication need to be shared as part of the complaint process.

I trust that these examples illustrate the gravity of Mr. Woodnick's conduct and the impact it has had on me. I look forward to your guidance on how to proceed with this matter.

All the best,



[Redacted]

[Redacted] / [Redacted] / [LizMax Investments](#) / [TEDx Talk](#)

Phone [Redacted]

Email [Redacted].com

Beware External Email - Think Before You Act

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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**
Attorney for Respondent

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

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

8
9 In Re the Matter of:

Case No.: FC2023-052114

10
11 **EXPEDITED MOTION TO**
CONTINUE TRIAL
12 **AND**
MOTION FOR ADDITIONAL TRIAL
13 **TIME**

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Petitioner,

And

CLAYTON ECHARD,

Respondent.

[Expedited Ruling Requested]

(Assigned to the Honorable Julie Mata)

Respondent, **CLAYTON ECHARD**, by and through counsel undersigned and pursuant to Rule 34(c), *Arizona Rules of Family Law Procedure* (ARLFP) hereby requests that this Court continue the Evidentiary Hearing on sanctions and attorney's fees currently set for 2/27/2024 at 4 p.m. Respondent also requests that this Court allow an additional 75 minutes for this hearing, for a total of two (2) hours. This Motion is expedited, as trial is currently scheduled for the end of February and Petitioner has failed to provide any disclosure (see below) and has engaged in what appears to be a concerted effort to undermine the judicial process.

1 As repeatedly stated in Respondent’s prior filings, Petitioner has wantonly and
2 willfully failed to provide *any* Rule 49 disclosure, respond to *any* Requests for Production,
3 and *refused* to attend a properly noticed Rule 57 deposition. Petitioner has further refused to
4 sign fetal death certificates or basic HIPAA releases related to any form of medical care she
5 testified to receiving for her alleged “*high-risk*” pregnancy. Notwithstanding this conduct,
6 Respondent appeared at Petitioner’s noticed video deposition at her most recent counsel’s
7 office and fully participated last Friday (2/2/2024).
8
9

10 The issues of sanctions and attorney’s fees cannot be adequately adjudicated without
11 disclosure and discovery from Petitioner, including the opportunity for Respondent to depose
12 Petitioner (again, Petitioner video deposed Respondent on February 2, 2024, after
13 intentionally failing to appear at her own properly noticed deposition). Additionally, the forty-
14 five (45) minutes currently allocated for this Hearing will not allow Respondent to fully
15 present his position on the issues.
16
17

18 **As and for his Motion to Continue Trial, Respondent states as follows:**

19 1. On August 1, 2023, Petitioner initiated the underlying action when she filed her
20 Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support,
21 alleging that she was pregnant with Respondent’s twins after one night of oral sex.
22

23 2. Respondent maintains that this alleged pregnancy was a *hoax/con* much like the
24 previously litigated matters involving Petitioner and other men similarly situated. Here, as
25 with the prior matter, Petitioner faked medical records as her supposed “proof of pregnancy.”
26
27
28

1 This time, Petitioner chose a television personality¹ on which to perpetrate this fraud, and not
2 only faked the pregnancy but attempted to extort him to date her in exchange for an “abortion”
3 (of fictional twins). Respondent refused to date Petitioner, who then continued to promote the
4 false narrative that she was pregnant to the media and the court system (including during the
5 subsequent Injunction Against Harassment proceeding, where she appeared on video in court
6 wearing an ostensibly fake pregnant stomach and asked Judge Gialketsis to allow her to
7 “show” Respondent that she was pregnant). She then continued to contact the media,
8 including the tabloid *The Sun*, Reddit, Medium.com, podcasters Dave Neal and Reality Steve,
9 etc., furthering her entirely fraudulent fake pregnancy narrative.
10
11

12 3. On August 21, 2023, Respondent filed his Answer, denying that Petitioner
13 could scientifically be pregnant with his twins after they engaged only in oral sex on May 20,
14 2023.
15

16 4. Petitioner seems to acknowledge that no sex occurred in her bevy of (500)
17 emails and texts, which resulted in Judge Gialketsis granting an Injunction Against
18 Harassment against Petitioner after a two (2) day trial on the same.
19

20 5. **Nearly seven (7) months have passed** since Petitioner initiated this action,
21 during which NO disclosure has been provided by Petitioner, despite the requests made to her
22 numerous counsels in accordance with Rule 49.
23

24 6. **Petitioner has willfully and wantonly failed to comply with Rule 49.** Rule
25 49 provides, in pertinent part, as follows: “*Unless the parties agree in writing or the court*
26
27

28 _____
¹ Respondent previously appeared on ABC’s *The Bachelorette* and was the star of *The Bachelor*.

1 orders otherwise, every party must serve an initial disclosure of information required under
2 sections (d) through (k) **not later than 40 days after the filing of the first responsive pleading**
3 **to a petition.**” (Emphasis added). As Respondent filed his Response on August 21, 2023,
4 Petitioner’s Rule 49 disclosure was due not later than September 30, 2023. As of filing, no
5 disclosure has been provided. Respondent intends on filing a Motion to Compel in short order.
6

7 7. On January 17, 2023, Petitioner failed to appear at a properly noticed
8 deposition. *See Respondent’s Notice of Non-Appearance at Deposition Pursuant to Rule*
9 *57(g)*. Notably, Respondent appeared and cooperated with Petitioner’s video deposition on
10 February 2, 2024.
11

12 8. Respondent is unable to fully and meaningfully present his argument for which
13 he should be awarded attorney’s fees and sanctions and a finding that the petition was filed in
14 bad faith against Petitioner without disclosure from Petitioner. She seems to know that after
15 the myriad of conversations had with Petitioner’s attorneys and is flaunting her failure to
16 provide the same.
17
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19 Petitioner’s convenient claim and effort to get the case dismissed without full
20 adjudication by now saying she is “*no longer pregnant,*” does not indemnify her from
21 providing Rule 49 disclosure or participating in discovery in accordance with the rules, as
22 fully detailed in Respondent’s *Response/Objection to Petitioner’s Motion for Confidentiality*
23 *and Preliminary Protective Order*. To date, Petitioner has provided no verifiable proof of
24 pregnancy by Respondent, the foundational basis of her original Petition to Establish (and
25
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1 despite her invocation of **Rule 2**).² If she did have a miscarriage (seemingly impossible, as
2 she could not have been pregnant from oral sex) it does not explain her under oath testimony
3 with Judge Gialketsis where she displays her “pregnant stomach” and confirms in her
4 testimony that she is not only pregnant (24 weeks at the date of testimony), but under the care
5 of multiple medical providers for her high-risk condition.
6

7 **Simply said, Petitioner’s pregnancy was faked.** The bump displayed in Judge
8 Gialketsis’ courtroom was ostensibly purchased, as evidenced by Petitioner clearly *adjusting*
9 what appears to be a fake belly and guzzling a Monster Energy drink. (Curious for someone
10 claiming to have a high-risk pregnancy). Her entire Petition was predicated on either lies or
11 delusions and mirrors prior litigation involving Ms. [REDACTED] and a growing list of other victims
12 (at least three (3) known men, including Respondent).
13
14

15 9. Respondent has complied with all requests for disclosure and participated in a
16 video deposition as required by the Rules and requested by Petitioner. Petitioner has provided
17 none and continues to flout the Rules of the Court she invoked.
18

19 10. **There is good cause for a continuance given the wholesale lack of disclosure**
20 **and discovery by Petitioner.** As no disclosure has been received in relation to *any* claims
21 made by Petitioner, including the original claim of paternity on which this underlying matter
22 was filed, Respondent has been left with an incomplete picture of the full extent to which
23
24
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27 ² Petitioner’s counsel did offer to provide only limited disclosure at Respondent’s deposition, but not in a manner than
28 would satisfy the evidentiary standards of Rule 2 (which petitioner invoked) and Respondent is unwilling to accept any
disclosure that is not provided from the source itself due to Petitioner’ history arts-and-crafts medical evidence
(including faking sonograms).

1 Petitioner's baseless accusations and myriad of filings have harmed him. As such, Respondent
2 requests that the Hearing be continued to allow for disclosure to be received.

3
4 **11. Respondent has been patiently waiting for Petitioner to provide any**
5 **disclosure for over seven (7) months.** The original claim on which this Petition was filed
6 was brought in bad faith over seven (7) months ago, and no disclosure with which to verify it
7 has been provided. Since then, Petitioner has involved several attorney's and Respondent has
8 engaged in significant efforts to facilitate disclosure and discovery but to no avail. As such a
9 continuance at this stage is appropriate and Respondent has made diligent efforts to avoid
10 having to file a Motion to Continue, including several discussions with Petitioner's
11 attorney(s).

12
13
14 12. Neither party will be prejudiced by a continuance.

15 13. This continuance is sought in good faith and not for delay, as Respondent needs
16 access to critical disclosure in order to properly litigate.

17
18 **As and for his Motion for Additional Trial Time, Respondent States as Follows:**

19 14. The Evidentiary Hearing before this Court currently scheduled for 2/27/2024 is
20 set for forty-five (45 minutes). This allows each party less than twenty-five minutes each to
21 present their arguments for the issues of sanctions and attorney's fees.

22
23 15. As this case has been ongoing since August 2023, the issues for the Hearing
24 include, but are not limited to:

- 25
26
27
28
- Petitioner's bad faith in bringing the underlying paternity action (despite not being pregnant by Respondent, as was impossible from oral sex);

- 1 • Petitioner’s factual contentions/assertions of pregnancy not supported by any
2 verifiable evidence from the onset of this action;
- 3 • Petitioner’s wholesale refusal to participate in discovery and disclosure;
- 4 • Petitioner’s repeated filings (including a Motion to Dismiss once she alleged
5 she was “no longer pregnant”) being unsupported by existing law;
- 6 • Petitioner’s unreasonable behavior throughout this matter, culminating in
7 Respondent’s *Motion for Sanctions* under Rule 26(b) and (c);
- 8 • Petitioner’s continued perpetration of fraud upon the court, including falsifying
9 “medical evidence;”
- 10 • Petitioner’s appearance in a separate court proceeding (CV2023-053952) and
11 testimony that she was “24 weeks,” due on “February 14, 2024” and being
12 treated for a “high risk” pregnancy by “Dr. Makhoul” and “Dr. Higley;”
- 13 • Petitioner’s failure to appear at a properly noticed deposition pursuant to Rule
14 57;
- 15 • Petitioner’s unreasonable behavior justifying Respondent’s request for his
16 reasonable attorney’s fees and costs, consistent with A.R.S. § 25-324;
- 17 • All other false and fraudulent behavior revisited in every filed motion/pleading
18 in this matter pursuant to Rule 26(b).

19 Respondent’s position on these issues cannot be adequately addressed with less than
20 twenty-five (25) minutes being allocated to each party during the upcoming Hearing.
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1 Therefore, Respondent respectfully requests that this Court allow the parties an additional
2 seventy-five (75) minutes of trial time, for a total of two (2) hours.

3
4 16. Undersigned reached out to Petitioner's counsel regarding their position on the
5 above but no response was received (**Exhibit 1**). In light of the quickly approaching deadlines,
6 expedited ruling is requested.

7 **WHEREFORE, Respondent respectfully requests the Court:**

- 8
9 A. Vacate the evidentiary hearing scheduled for 2/27/24 at 4:00 p.m.;
- 10 B. Reset the evidentiary hearing for sixty (60) days to allow time for Petitioner to
11 engage in discovery and disclosure;
- 12
13 C. Set the evidentiary hearing for at least two (2) hours;
- 14 D. Order such further relief as the Court deems just.

15 **RESPECTFULLY SUBMITTED** this 6TH day of February, 2024.

16 **WOODNICK LAW, PLLC**

17 

18
19 _____
20 Gregg R. Woodnick
Isabel Ranney
Attorneys for Respondent

21 **ORIGINAL** of the foregoing e-filed
22 this 6th day of February, 2024 with:

23 Clerk of the Court
24 Maricopa County Superior Court

25 **COPY** of the foregoing document
26 delivered this same day to:

27 The Honorable Julie Mata
28 Maricopa County Superior Court

1 **COPY** of the foregoing document
2 emailed this same day to:

3 Cory Keith
4 The Valley Law Group, PLLC
5 3101 N. Central Ave, Ste 1470
6 Pheonix, AZ 85012
cory@thevalleylawgroup.com
7 *Attorney for Petitioner*

8 By: /s/MB
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VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Expedited Motion to Continue Trial and Motion For Additional Trial Time* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.



Clayton Echard (Feb 6, 2024 13:32 MST)

CLAYTON ECHARD

02/06/2024

Date

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EXHIBIT “1”

From: [Gregg Woodnick](#)
To: [Cory Keith](#)
Cc: [Isabel Sissel](#); [Isabel Ranney](#)
Subject: Echard, [REDACTED]
Date: Monday, February 5, 2024 11:41:59 AM

Cory,

It was nice seeing you on Friday.

Since we have not received any disclosure from [REDACTED] the RFPs remain outstanding, the HIPAAs have not been executed (provided 3x), the Fetal Death Certificates (provided 2x) also ostensibly not executed *and* we still need to depose [REDACTED] after she failed to appear at her deposition, we are going to file a Motion to Continue and request additional trial time.

I assume you agree, but let me know so I can note it in the MTC.

Gregg

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Phoenix, AZ 85020

Phone: (602) 449-7980

Fax: (602) 396-5850

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

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**

**REPLY TO PETITIONER'S
RESPONSE TO MOTION FOR
SANCTIONS PURSUANT TO RULE
26**

13  Petitioner,

(Assigned to The Honorable Julie Mata)

14 and

15 **CLAYTON ECHARD,**

16 Respondent,
17

18
19 Respondent, **CLAYTON ECHARD**, by and through undersigned counsel, hereby
20 replies to Petitioner's Response to Motion for Sanctions Pursuant to Rule 26. Petitioner
21 *continues* to cause Respondent to incur unnecessary attorney's fees and costs delaying
22 discovery.
23

24 The very crux of this frivolous litigation is easily resolved by Petitioner disclosing
25 nonconfidential and uncontroversial evidence of her claimed "*miscarriage*" as well as the
26 statutorily required fetal death certificate affirming the same. That Petitioner continues to refuse
27 to provide this easily obtainable evidence (*after* she invoked Rule 2) begs the question that this
28

1 entire pregnancy narrative was nothing more than a fraudulent ruse to coerce Respondent into
2 dating Petitioner.

3
4 To the extent applicable, Respondent incorporates all his pending filings. As and for his
5 Reply, Respondent states as follows:

6 1. **The requirements of Rule 9(c) have been met and/or were impossible to meet**
7 **due to Petitioner’s refusal to acknowledge Respondent could not have made her pregnant.**

8
9 As fully detailed in Respondent’s *Response/Objection to Petitioner’s Motion to Dismiss*
10 *Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support*
11 *With Prejudice* (filed January 3, 2024), Respondent clearly informed Petitioner in writing that
12 she could not be pregnant by him as they only had oral sex. Respondent even offered to meet
13 in person with Petitioner (with witnesses present in light of her concerning behavior) to discuss
14 these rudimentary facts. Petitioner refused to meet with him if he did not agree to her bizarre
15 request to date and “*explore intimacy*” with her (*see* Exhibit 2, Respondent’s
16 *Response/Objection to Petitioner’s Motion for Confidentiality and Preliminary Protective*
17 *Order*).
18
19

20 Petitioner bringing this *entire* action knowing that she was not and could not be pregnant
21 by Respondent is the conduct that violates Rule 26(b). That Petitioner is now claiming that she
22 was somehow not given notice of her sanctionable conduct is patently absurd. As conveyed to
23 her directly by Respondent, through Respondent’s granted Injunction Against Harassment
24 (CV2023-053952), through three (3) paternity tests and through counsel, Petitioner’s filing was
25 based on fiction. This is not an instance where Petitioner may have mistakenly alleged
26 something that needed to be corrected through an amended filing. This is a uniquely disturbing
27
28

1 case where Petitioner expended judicial resources to fabricate a pregnancy narrative to force
2 Respondent into a relationship with her, invited media attention, and is now desperately
3 grasping at procedural straws to evade providing simple and uncontroversial disclosure like a
4 government certificate confirming the alleged miscarriage.
5

6 2. **All of Petitioner’s filings arguably violate Rule 26(b)**. Petitioner’s underlying
7 Petition to Establish was filed without merit and for the sole purpose of coercing Respondent
8 into dating Petitioner, as Petitioner was not and could not have been pregnant by Respondent
9 after oral sex. Without belaboring the point, every single filing in this action since by Petitioner
10 has been presented for an “*improper purpose[], such as to harass, cause unnecessary delay, or*
11 *needlessly increase the costs of litigation,*” includes claims that are frivolous and unwarranted
12 by existing law, is entirely lacking in evidentiary support, and contains factual contentions that
13 are unwarranted based on the evidence. *See* Rule 26(b) (1) – (4). *See also* Respondent’s *Motion*
14 *for Sanctions Pursuant to Rule 26(b)*. As has been the crux of Respondent’s filings, Petitioner
15 **could not have been pregnant by Respondent** as they did not have sexual intercourse and
16 she has provided no verifiable medical evidence to support her claims, ostensibly because none
17 exists. (Notably, Petitioner again reasserts in her unverified Response that she was pregnant
18 with “*twins*” despite providing *no evidence to support this claim*, other than a sonogram stolen
19 from a seven (7) year old YouTube video and positive hCG tests, which are discussed below).
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24 Put simply, Petitioner’s filings are predicated on bad faith and contain allegations that
25 cannot be supported by verifiable medical evidence that complies with Rule 2. That Petitioner
26 now claims she has “witnesses” to support her claims that allegedly “fear coming forward” is
27 illogical and irrelevant. All Petitioner needs to do is sign basic HIPAA forms to allow
28

1 Respondent to obtain her medical records and sign the form provided by Respondent to permit
2 Arizona Vital Records to release a fetal death certificate to confirm twin fetuses miscarried.
3
4 Petitioner’s refusal to follow basic procedural Rules for the litigation *she* initiated is the sole
5 reason this litigation continues. Petitioner cannot now claim that discovery is “*ongoing*” while
6 simultaneously failing to comply with *any* discovery (including a willful failure to appear at a
7 properly noticed deposition). Sanctions consistent with Rule 26(c) are clearly warranted and
8 necessary.
9

10 3. **Petitioner wanting to be pregnant and being pregnant are two (2) different**
11 **things.** Despite her repeated assertions, positive hCG tests are not verifiable medical evidence
12 of pregnancy. (Parenthetically, per the Office on Women’s Health, a blood test, which
13 Petitioner ostensibly never underwent, is the best way for a doctor to confirm pregnancy).¹
14 Causes other than pregnancy can trigger false positives for hCG, including fertility treatments
15 and various medications (especially those associated with epilepsy and infertility)² (*see also*
16 **Exhibit 1**). Moreover, according to the American Pregnancy Association, the presence of hCG
17 is only a “*sign*” of pregnancy. Ultimately, that Petitioner was ostensibly able to produce a
18 positive urine HCG test is not conclusive because, to date, Petitioner has provided no Rule 49
19 disclosure to support her claims that she was pregnant by Respondent, pregnant with twins,
20 pregnant at “*24 weeks*” on November 2, 2023, pregnant with a boy and a girl, due on “*February*
21 *14, 2024,*” being treated for a “*high risk*” pregnancy by “*Dr. Makhoul*” and “*Dr. Higley*” or
22
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26
27 ¹ <https://www.womenshealth.gov/a-z-topics/pregnancy-tests>.

28 ² See generally *Id.*; <https://health.clevelandclinic.org/false-positive-pregnancy-test>;
<https://www.clearblue.com/pregnancy-tests/false-positive-results#cause-false-positive>. Further, Petitioner testified under
oath that she was being treated for a high-risk pregnancy by Dr. Higley at Women’s Care, which provides fertility
treatments (*see* <https://www.womenscareobgyn.com/services>).

1 that she ultimately had a miscarriage. Petitioner’s hCG tests prove nothing, and her reliance on
2 them when she could provide simple and basic evidence to dissolve the claim that she
3 wrongfully filed this action begs many questions about her credibility and motivations.
4

5 4. **Petitioner’s behavior in this litigation is unreasonable and predicated on bad**
6 **faith, such that Respondent should be entitled to his reasonable attorney’s fees and costs**
7 **pursuant to A.R.S. § 25-324.** Petitioner’s baseless allegations that Respondent is using the
8 Court as a “publicity stunt” and that he is *leaking information* serve no purpose other than to
9 deflect from her own culpable actions. As detailed extensively in Respondent’s
10 *Response/Objection to Petitioner’s Motion for Confidentiality and Preliminary Protective*
11 *Order* (filed 1/19/24), Petitioner initiated this action, reached out to the media, publicly shared
12 a Dropbox of her personal “medical” information, and *continues* to harass/sue media
13 personalities who do not share her “side” of the story. Respondent has had to come forward to
14 respond to Petitioner’s public claims to protect his image and reputation and to rectify the
15 damage she has done.
16
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18

19 Rather than comply with simple discovery requests (or provide even an *iota* of Rule 49
20 disclosure), willfully ignore Deposition Notices, continues to file meritless motions and force
21 Respondent back into Court. Respondent has had to rely on community support to defend
22 himself against Petitioner’s meritless claims and to prevent her from making another TEDx
23 talk to claim that she was somehow “*cyberbullied*” into a miscarriage. Respondent continues
24 to incur significant attorney’s fees and costs because Petitioner’s unreasonable conduct. As
25 such, he should be awarded his reasonable costs and fees in having to file this Reply consistent
26 with A.R.S. § 25-324(A).
27
28

1 **ORIGINAL** of the foregoing e-filed
2 This 25th day of January, 2024 with:

3 Clerk of Court
4 Maricopa County Superior Court

5 **COPY** of the foregoing document
6 delivered/mailed this 25th day of January, 2024, to:

7 The Honorable Julie Mata
8 Maricopa County Superior Court

9 Cory Keith
10 The Valley Law Group, PLLC
11 3101 N. Central Ave, Ste 1470
12 Pheonix, AZ 85012
13 cory@thevalleylawgroup.com
14 *Attorney for Petitioner*

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By: /s/ MB

VERIFICATION

I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing *Reply To Petitioner's Response To Motion For Sanctions Pursuant To Rule 26* and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.



Clayton Echard (Jan 25, 2024 08:27 MST)
CLAYTON ECHARD

01/25/2024
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EXHIBIT “1”

10:45



Thu, May 25 at 10:00 AM

I have one final thing to say that I think you might find important and have nothing to lose by sharing it with you.

I have been in "a dark place" as I said yesterday and emotionally tortured since we hooked up because I felt like I didn't know how to bring this up to you, but at this point I might as well. I have not been on birth control since what happened to me about fifteen months ago. There hasn't been a reason, since as I said, I hadn't done anything with anyone since then.

Being sexually responsible was not on my radar after taking the gummy and our clothes coming off. When I went to the bathroom afterwards, some of your fluids were "down there". In all honesty, I was planning to take Plan B when I got home, but then when you said you were going to church, I realized you had a strong faith base as well and questioned whether or not it was a sign that I should. Then, after we talked in the car, I felt even more so like both of us had a deep belief in God and like it was a sign I should just leave it up to Him and not buy it.

Obviously, my mind has ping-ponged about this since then and you were



iMessage



CE0013



Obviously, my mind has ping-ponged about this since then and you were emphatic about me not bringing up anything that wasn't professional or friend-like, of which this situation is neither. I desperately wanted to figure out how to bring it up to you and thought that if we could just get together and talk openly, we could, but you didn't want that until a deal closed, which would be too late to take it. I wanted to ask you how you felt about me taking it from a religious standpoint, but we didn't get a chance to. Clearly, I was factoring in things that you weren't that made me panic and led to a total breakdown in communication.

My podcast had a fertility-test kit as a sponsor, and so yes, I know I am fertile. At this point, from my overwhelming research on Plan B since Sunday, it's most effective three days after but can still work five days out, meaning this is the last day I could take it and have a hope of it working if it needs to. If you have any thoughts about this, I'm open to hearing you out if and only if you are kind and respectful. This has been extremely stressful on me.

If I don't hear back from you, I'm not going to take Plan B. You're obviously free to think that I'm full of shit, but I'm not. I'll take it as a sign that you don't



iMessage



10:45



< 10



If I don't hear back from you, I'm not going to take Plan B. You're obviously free to think that I'm full of shit, but I'm not. I'll take it as a sign that you don't care what happens either way and will just allow God's will, whatever that is, to be the determining factor. If I do test positive in a few weeks, though, there is a ZERO percent chance of it being anyone's but yours (I'd take any test to prove it), and at that point, any input from you won't matter.

Take the plan B. I support that.

You have been really dismissive of my thoughts and feelings, and it's a bigger thing for me to think about now than it was when this originally happened. After all, I do want to have kids. I'm not basing what I'm doing off a two sentence response.

Thu, May 25 at 5:12 PM

Let me tell you how serious I am about all of this since you think it was a plot to "hold on" to you. If you were to tell me that we could date if I admitted to "making it up", as you called it before....I would tell you no-can-do. None of this is made up and I am genuinely panicked.

I cannot be more serious about this.



iMessage



CE0015

10:45



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I cannot be more serious about this.
Please be there for me. Thank you.

I'm debating filing a police report.
Please leave me alone.

If you file a police report because a)
I'm trying to figure out about plan B
tonight and b) I'm trying to figure out
the status of my offers I made last
night and you won't even tell me if they
are active or not, I will file a report with
the AAR, which I am absolutely entitled
to do but don't want to.

Can you please simply help me figure
out's these issues? At least you said
you would be part of the child's life if
I'm pregnant and pay CS which makes
me feel better not taking it. Thank you.

No, I would file a police report for
harassment and would get a protection
order. These messages alone would be
enough to enact one.

There has not been a response to
either offer. So, in 2 hours, they will be
inactive. But again, I have texts trying
to transfer you over to my brokerage
and you declined, so you have no case
against me for the AAR. I did my due
diligence.



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CE0016

10:45



And I looked into the rules for what a father has to provide and at the minimum, he would have to pay child support, but have no involvement other than financial. Which is exactly what I would do. Be completely absent. You would get a check in the mail and that's it. You'd never see me and I would never help other than financially. But again, you're not pregnant because I did not precum, so this is all hypothetical. It's funny you're trying to get me to believe I precame 😂😂. I can feel it when it happens and I know without a doubt that it didn't. So again, one more thing you're just making up.

I didn't know that you didn't withdraw my offers. You said I would have to resign or resubmit, which I didn't want to do because then I wouldn't be taken seriously. I wanted to keep them active since we signed a contract. I emailed you this afternoon to get an update. No response. I just emailed your agency prior to your response to ask the status. Please keep me posted on it and tell me how I can make a counter offer. I have also checked into it with an attorney so if you want to challenge me on it being an AAR violation, go ahead. It is.

That's pretty awful about what you said you would do as a 30 year old



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CE0017

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That's pretty awful about what you said you would do as a 30 year old man to an innocent child, especially since I know your reputation is important to you. Mine is too and I would be a great mom. All I have asked you for is kindness as I figure it out tonight. And it was cum of some sort. I don't know the difference between types of cum, but I know what I felt years ago when I was on the pill and my ex came inside me and it felt like that to me. I know the what I felt in and around my vagina, which would be the ultimate landing spot for it. Don't try to portray me as some nut job just because it makes you feel better.

I understand that we are both fired up because this is a highly emotional topic, but this doesn't need to be a nasty fight. We can talk civilly about this.

4 Photos

I legitimately hate you right now. My mindset is not to change. I've never had someone put me through so much stress before. You've made my life so stressful. I've known you and if you decide to not take pills, in the wild event that you are pregnant, I would hate you even more. I would pay the CS, but I would never do it with you. Because I would be so mad that you would just take the pill in the first place and instead double my life. Which is what I would feel that you would do because I was in a vulnerable position being insanely vulnerable. I would have never had you over. I regret all of this and I want it to go away. I ask that you just let this all go away.



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CE0018



I would not do it unless you filed something against me, but if anyone had right to file for an order of protection/had reason for worry, it would be me. You are being nothing but cruel. You were saying that if I said I made this all up, fine, but if I said I actually was worried about being pregnant, you would block me. And then you're telling me you would be this horrible father to try to convince me to not take Plan B. All while you're still technically my realtor for another 45 min and I doubt you'd even tell me if my offer was accepted.

I watched about half an hour of clips today from The Bachelor for the first time. I didn't know that you had such a cold side until today and was truly stunned at what I saw and experienced firsthand. You can turn this around and be nice. If you saw my message, I said I likely have until tomorrow if you want to sleep on it. I'm not taking it unless it is for good reason and don't even have it to trade tonight. Does that sound reasonable?

Thu, May 25 at 8:37 PM

And can you also please tell me what happened with my offers? I see that N 76th is sale pending at \$425k....couldn't that be our offer? If



iMessage



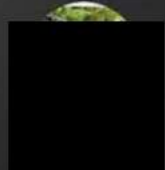
I'll wait until 9:30 to be sure because I don't want to email them if it makes you look bad, but the EMD lender is on me now to let him know if he needs to send money. I want to close on these houses if I got them and need to know how to do that if you're not willing to help. I emailed your agency a few hours ago and have not gotten a response.

Fri, May 26 at 6:54 AM



Can you please explain what he's talking about? You never sent in the

10:46



Fri, May 26 at 9:18 AM

Clayton, if you can't answer me on 7609 N Lynn Oaks, please connect me with your broker to ask him what happened and what the status is.

Fri, May 26 at 3:55 PM

You might want to check your email regarding what I was told about Saturday night. Told you I wasn't crazy. No, I have not taken Plan B. Not responding won't change whether or not I'm pregnant and there are more public avenues to alert you to it if I am, which I don't want to use. I would rather deal with it just between us.

Re. The properties...I don't even know what to say, honestly. I feel like this whole week has been a nonstop panic attack. You are so damn talented and smart with real estate, so it crushes me to see that you self-sabotaged here when you could have done \$1.124m in deals in a week. I've had everything ready to go and you dropped the ball.

I don't want to see this happen to someone else and will report you to the AAR and your company unless you give me an explanation as to why you
a) didn't submit an offer on 7609 N Lynn Oaks after you claimed you did,
b) didn't tell me that you had spoken to



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CE0021

10:46



b) didn't tell me that you had spoken to the realtor on N 76th Street about being a backup, c) left me in the lurch about whether or not you had withdrawn my offers or were representing me in the first place, and d) refused to respond to my requests for your broker's info so I could get on top of these days.

I made offers based on your input and now I don't know even know what to do. I think I will pull out if I am going to be repped by the seller's agent and need to make a decision right now. This is just all too much.

The last thing I want to do is make you look bad and report you as a realtor, but I would be a bad human not to try to help others who want their dream home in case you decide to sabotage them as well. You tried to work against me. I know you are going through a tough time and I will listen if you want to explain why you acted as you did because despite your personal issues with me, I was owed duties from my realtor that were not provided. If you choose to ignore me, that's fine, but know that I will be taking action.

Fri, May 26 at 5:20 PM

As a courtesy, I just sent you what I am going to send to your boss Austin if I



iMessage



CE0022



Fri, May 26 at 5:20 PM

As a courtesy, I just sent you what I am going to send to your boss, Austin, if I don't hear from you by 6 because I need to figure out how to proceed from here.

I can't get myself to send it right now. I'm just extremely upset and disappointed right now and for some bizarre reason I still believe in you despite how you have acted.

Fri, May 26 at 7:21 PM

Never mind, I'm sending it. I need help with properties and you said your broker is the best. You have been so cold and left me in the lurch. With the way you are acting, I would never consider getting an abortion if I'm pregnant because you can't even treat me or listen to me like I'm a human being. Being kind and understanding would have gone a long way.

Thu, Jun 1 at 3:46 PM

Please check your email.

Thu, Jun 1 at 4:47 PM

I'm pregnant. I went to the doctor today and have explained everything in the email that confirms it's yours.



iMessage





Patient Name [REDACTED]

Medical Record Number [REDACTED]
 Sex: F
 Date of Birth: 05/1
 Phone Number: (4

Appointment Information

Appointment Type: CT Head/Neck w/ Con SJHPPHX
 Appointment Date: 05/30/23
 Primary Resource: SJHMC CT OP Rm 1
 Current Status: Scheduled

and please, with this acid count, 95 mg, 06/01/23 11:25:02 MST...

Encounter for pregnancy test

Follow-up
 0100: Visit Pregnancy: POC test, 06/01/23 11:17:00 MST, Encounter for pregnancy test.

Point of Care Test Results
 0100: POC Test Results

What You Were Seen for Today

First trimester pregnancy
 Encounter for pregnancy test

Vital Signs

BP: 96/60 mmHg (Transthoracic) HR: 87 (beats/min)
 RR: 18 bpm (30-60) SpO2: 98%
 Wt: 55 kg
 Weight (kg): 121.25 lb
 Temperature (F): 98.28 (normal)

Allergies

No known allergies

Your Care Team

Attending Physician - JUSTIN M. TAMMARA, MD
 Primary Care Physician - TERRY DOX

What Happened Today

Test Results from Today

Results not available today will be available in your Banner Health patient account on the patient app. This app is coming.

Scheduled Appointments

See how 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!

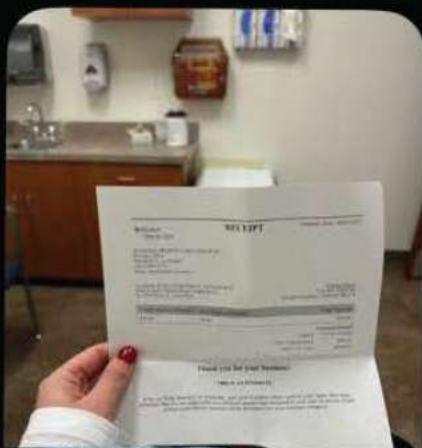
Scheduled Appointments

No future appointments scheduled



As you can see, I wasn't two days ago, but was today.

Thu, Jun 1 at 9:18 PM



iMessage



1 **WOODNICK LAW, PLLC**
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office@woodnicklaw.com

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



6
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 **EXPEDITED MOTION TO**
11 **SET VIRTUAL STATUS**
12 **CONFERENCE**

13  
Petitioner,

[Expedited Ruling Requested]

14 And

(Assigned to the Honorable Julie Mata)

15 **CLAYTON ECHARD,**

16 Respondent.

17 Respondent, **CLAYTON ECHARD**, by and through counsel hereby requests that this
18 Court set an expedited thirty (30) minute virtual status conference. This Motion is expedited,
19 as trial is currently scheduled for the end of February and myriad pretrial issues must be
20 addressed prior to the scheduled Evidentiary Hearing, including addressing the Motion to
21 Continue/Additional Trial Time.
22

23
24 Petitioner has grossly exploited the judicial process by refusing to comply with the
25 Rules and legal process that she invoked when she initiated the underlying Petition. To date,
26 Petitioner has willfully and wantonly refused to provide any Rule 49 disclosure, respond to
27 any Requests for Production, and failed to attend a properly noticed deposition.
28

1 Simultaneously, Petitioner filed a *Motion for Confidentiality and Preliminary Protective*
2 *Order* (filed 1/18/2024) to seemingly shield herself from any further criticism for her
3 noncompliance and deposed Respondent when she refused to participate in the same.
4
5 Petitioner's perpetual disregard for Court Rules is exhausting.

6 Respondent's *Expedited Motion to Continue Trial and Motion for Additional Trial*
7 *Time* (filed 2/6/2024) is pending before the Court. Consistent with her historical disregard
8 for court process, Petitioner failed to respond to the email inquiry asking her position on the
9 same and has still not done so.

11 While due process requires the Court to grant the continuance and provide for
12 additional trial presentation time (for the reasons detailed in the still unopposed motion), there
13 is an urgency for a status conference to be held prior to this eventual hearing date. The antics
14 from Petitioner continue to proliferate, and it is clear from the communication as appended,
15 that Petitioner's most recently retained counsel (approximately the 12th in this series of cases)
16 is having challenges with client control that impact Respondent's ability to access requisite
17 disclosure.
18
19

20 **As and for his Expedited Motion to Set Virtual Status Conference, Respondent**
21 **states as follows:**

23 1. On August 1, 2023, Petitioner initiated the underlying action when she filed her
24 *Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support*,
25 alleging that she was pregnant with Respondent's twins after only oral sex. Respondent has
26 consistently maintained that this alleged pregnancy was entirely fraudulent and that oral sex
27 does not result in babies.
28

1 2. Petitioner’s blatant refusal to provide any disclosure or engage in discovery
2 must be addressed prior to the evidentiary hearing. During the nearly seven (7) months since
3
4 initiating this action, Petitioner’s only evidence provided in support of her alleged pregnancy
5 has consisted of faked sonograms and positive hCG tests (there is a history of the same in
6 CV2021-052893). No medically verifiable proof of pregnancy that would satisfy the
7 requirements of Rule 2, which Petitioner herself invoked, has been provided (likely because
8 no such proof exists). *See also Respondent’s Reply to Petitioner’s Response to Motion for*
9 *Sanctions Pursuant to Rule 26* (explaining that a positive hCG test is merely a *sign* of
10 pregnancy and false positives can be caused by mediations, such as those associated with
11 epilepsy and infertility).
12

13
14 3. Petitioner has provided no disclosure and continues to flout the Rules of the
15 Court she invoked. Instead of providing basic discovery, she has filed Bar complaints, Board
16 complaints, and sued journalists who have covered the story that she reported and with whom
17 she actively communicates. Meanwhile, Respondent has complied with all requests for
18 disclosure as required by the Rules and requested by Petitioner. More offensively, Petitioner
19 has alluded to having the records Respondent requested multiple times but has refused to
20 provide access under the guise of “protection from public scrutiny.” (Parenthetically, while
21 claiming she needs “*protection*,” Petitioner continues to reach out to the media and self-
22 published two (2) more Medium.com articles on 2/9/24 and 2/10/24) **(Exhibit 1). To be very**
23 **clear, Petitioner is claiming she cannot disclose records to Respondent, but as recently**
24 **as days ago is publishing apocryphal articles about the situation.**
25
26
27
28

1 Notably, during Respondent's video deposition on 2/2/2024, Petitioner's counsel
2 presented a highly redacted (+/80% of words blacked out) copy of a medical record
3 purportedly containing "proof" of alleged pregnancy. When Respondent's counsel asked to
4 see the unredacted document (not to make copies or otherwise distribute, only view it in
5 person to verify it actually existed), Petitioner refused. This refusal to allow Respondent's
6 counsel to view a document ostensibly central to the foundation of this case only further
7 exhibits Petitioner's sanctionable conduct and wholesale inability to support the fiction of her
8 alleged pregnancy. Petitioner claiming that she had access to verifiable medical records to
9 support her allegations of pregnancy but then refusing to make them available for
10 Respondent's inspection is a blatant act of disrespect to the court and judicial process.

11
12
13
14 4. Although Respondent believes the alleged pregnancy was a con/scam/rerun, he
15 needs access to disclosure and documents ostensibly in Petitioner's possession. Petitioner's
16 blatant refusal to comply with the rules of the Court and instead push her own narrative has
17 required further legal involvement in obtaining this information, which Petitioner claims to
18 possess. Respondent has continuously provided Petitioner with ample opportunity for her to
19 admit she fabricated this entire pregnancy or to comply with Court Rules, only to be rebuffed
20 or outright ignored (**Exhibits 2-4**). As a sample of Respondent's efforts:

21
22
23 *2/5/2024: Since we have not received any disclosure from [REDACTED] the RFPs remain*
24 *outstanding, the HIPAAs have not been executed (provided 3x), the Fetal Death*
25 *Certificates (provided 2x) also ostensibly not executed and we still need to depose*
26 *[REDACTED] after she failed to appear at her deposition, we are going to file a Motion to*
Continue and request additional trial time.

27 *2/8/2024: You have not yet responded to our motion to continue and for additional*
28 *time nor have we received a written response. I am guessing that you are having*

1 *significant client control issues as evidenced by Laura’s recent behavior in*
2 *California and online...*

3 *I appreciate that [REDACTED] is going to refuse (contrary to law and Court Rules) to*
4 *provide actual medical records (as there are none that support her under oath*
5 *statements). Assuming we will continue to receive no disclosure from your client,*
6 *our motion to compel is forthcoming.*

7 **2/9/2024:** *Things just keep getting more ridiculous. Even after my email yesterday,*
8 *there is another article by your client... Since Laura’s bag of tricks tends to fit a*
9 *pattern, we suspect that the postings were a contrived ploy to yet again request a*
10 *Motion to Seal. I appreciate that your client wants to view herself as a victim by the*
11 *press that she incited and continues to stoke with her articles, but these postings*
12 *should be viewed with several grains of salt. (We personally tried to find the alleged*
13 *postings, but to no avail.)*

14 *Should you be inclined to file anything further regarding the opacity of the legal*
15 *proceedings that [REDACTED] instigated, please promptly disclose the alleged postings in a*
16 *manner that complies with Rule 2 so we can assess the same and properly respond to*
17 *the court in kind.*

18 Petitioner now says she is “no longer pregnant” but has failed to identify if it this is a
19 result of fetal death or the alleged babies have been put up for adoption.¹ This is the *nexus* of
20 her conduct in choosing to continually refuse to engage in discovery or disclose records, and
21 precisely the reason Respondent is entitled to relief including sanctions, attorneys fees and a
22 finding that the action was not filed in good faith.

23 Based on her testimony before Judge Gialketsis on 11/2/2023 that she was “100%”
24 pregnant and “24 weeks” (and appearance with a moon bump on 10/24/24), Petitioner must
25 answer for what allegedly happened to the fictitious twin fetuses. Both fetal death certificates

26 ¹ Notably, Respondent attempted to register himself on Arizona Putative Father’s
27 Registry in the event that Petitioner actually delivered twins and/or claimed to have put them
28 up for adoption as a reason for explaining their nonexistence (*see Respondent’s Notice of*
 Filing Affidavit of Non-Paternity).

1 (as required per statute) and blank HIPAA releases have been provided to Petitioner three (3)
2 times, which have gone unacknowledged (*see Exhibit 2*).

3
4 *If* (impossible from oral sex) Petitioner was actually pregnant, delivered twins and/or
5 suffered a miscarriage (post twenty-four (24) weeks gestation) at any point during this
6 proceeding, she would have verifiable medical evidence. To date, no fetal death certificates
7 have been executed, no confirmable medical evidence has been presented, and Petitioner has
8 continued to claim “protection” while reaching out to the media directly. For all Respondent
9 knows, the imaginary twins are buried at a horse ranch.
10

11 5. To discuss the outstanding Motions as well as the blatant absence of
12 disclosure/discovery by Petitioner, Respondent requests this Court set an expedited status
13 conference for thirty (30) minutes.
14

15 6. Respondent also requests this reasonable attorney’s fees and costs pursuant to
16 A.R.S. § 25-324 as a result of Petitioner’s noncompliance with Court rules, continued
17 disregard for her Rule 49 disclosure obligation, and her wholesale unreasonable behavior in
18 bringing this litigation despite providing no verifiable proof she was ever pregnant.
19

20 **WHEREFORE, Respondent respectfully requests the Court:**

21 A. Schedule a thirty (30) minute virtual status conference to address pretrial issues
22 prior to the evidentiary hearing scheduled for 2/27/24 at 4:00 p.m.;

23 B. Award Respondent his reasonable attorney’s fees and costs due to Petitioner’s
24 unreasonableness pursuant to A.R.S. § 25-324;

25 C. Order such further relief as the Court deems just.
26

27 //

EXHIBIT “1”



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From Plea to Persecution: The Harsh Reality of My Appeal for Justice



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1



The aftermath of my article has unfolded in a manner I can scarcely believe, yet can't say I am totally surprised by. The notion that I would be the mastermind behind threats to my own family defies logic, yet some have latched onto this theory with a fervor that's both bewildering and painful. *"There's nothing that will convince me she didn't concoct all this herself,"* echoes a sentiment that feels like a knife twist, turning my quest for safety into an absurd spectacle. Another accusation hits: *"Yup, 100% catfished profile created by [REDACTED]...She is beyond sick."* The speed with which these unfounded claims spread is not just reckless; it's soul-crushing.

The personal attacks that follow cut even deeper, warping my reality into something unrecognizable: *"It's hysterical that [REDACTED] thinks she can try to cover her tracks now with that fake profile. It's too late [REDACTED] — AND we also see clearly*

how you weaponize and use race to fit into your disgusting victim narrative.”


Such assertions are a bitter pill to swallow, particularly when contrasted with the diversity of my own family. My half-Asian nephew stands as a living contradiction to these baseless claims of racism, making them not just wrong, but deeply hurtful.

The insinuation of deceit is relentless. *“Makes [content creator] sign a ‘I will not incite violence’ clause, then days later drops an article about a [content creator] fan threatening her there’s nothing that will convince me she didn’t concoct all this herself,”* accuses one commenter, suggesting a calculated orchestration of events that couldn’t be further from my truth.


It’s a bizarre twist of fate, where those who claim to seek justice are the very ones perpetuating injustice. By pointing fingers at me without proof, by calling for the FBI to investigate me (*“she’s actually committing federal crimes now by catfishing and posting death threats to herself”*), they are not only

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I've been forced to break my silence. Last night, something happened that I never imagined could be a part of my reality. Threats against me and those I hold dear were articulated with chilling specificity and malice, all stemming from a smear campaign orchestrated by a content creator who has turned my life into a spectacle for profit. "Crazy c***, I'll find u and all my n***** will shoot u! #justicefor***** (name of content creator)," one message read, another ominously targeting my mother. These threats were not mere acts of internet cruelty; they were the direct outcome of his relentless use of my story for financial gain. The safety of my family, once taken for granted, is now compromised, our lives overturned by a narrative spun by a total stranger.

Six Months of Turmoil

For six excruciating months, this content creator has been the conductor of a relentless smear campaign against me, pulling strings and painting me as the villain in a story so twisted from reality it's unrecognizable. He has made


videos about me at least once daily and sometimes more than that. He has leveraged lies sourced from those with vendettas against me — men I have restraining orders against — and told their stories as if *they* were the victims. He's spun these fabrications into hundreds of hours of content, with each video, each post, not just an attack on my reputation but a considerable source of revenue for him. My attempts to seek help, including desperate 911 calls, have been obtained by his cult-like following and have been twisted into entertainment for an audience that revels in my distress.

This relentless assault has devastated my mental health and halted my professional life. His refusal to halt his attacks or remove the harmful content, my sole request, has left me with no choice but to pursue legal action for defamation, invasion of privacy, and intentional infliction of emotional distress. But the real wake-up call came last night, proving that the stakes are far higher than reputational damage or court battles; this is about survival.


A Desperate Plea

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EXHIBIT “2”

From: [Gregg Woodnick](#)
To: [Cory Keith](#)
Cc: [Isabel Sissel](#); [Isabel Ranney](#)
Subject: Echard, [REDACTED]
Date: Monday, February 5, 2024 11:41:59 AM

Cory,

It was nice seeing you on Friday.

Since we have not received any disclosure from [REDACTED] the RFPs remain outstanding, the HIPAAs have not been executed (provided 3x), the Fetal Death Certificates (provided 2x) also ostensibly not executed *and* we still need to depose [REDACTED] after she failed to appear at her deposition, we are going to file a Motion to Continue and request additional trial time.

I assume you agree, but let me know so I can note it in the MTC.

Gregg

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EXHIBIT “3”

From: [Gregg Woodnick](#)
To: [Cory Keith](#); [Isabel Sissel](#)
Cc: [Isabel Ranney](#)
Subject: Echard, [REDACTED]
Date: Thursday, February 8, 2024 12:02:03 PM

Cory,

You have not yet responded to our motion to continue and for additional time *nor* have we received a written response. I am guessing that you are having significant client control issues as evidenced by [REDACTED]'s recent behavior in California and online (not including the recent bar complaints on your watch).

I appreciate that [REDACTED] is going to refuse (contrary to law and Court Rules) to provide *actual* medical records (as there are none that support her under oath statements). Assuming we will continue to receive *no* disclosure from your client, our motion to compel is forthcoming.

Notwithstanding the severe lack of discovery/discovery, please disclose a copy of your fee agreement by end of business tomorrow along with the same from all of the prior counsel in this matter (Barreda/Platter, Lexie/Teracio and any others I may be forgetting).

Gregg

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Email: gregg@woodnicklaw.com

EXHIBIT “4”

From: [Gregg Woodnick](#)
To: [Cory Keith](#); [Isabel Sissel](#)
Cc: [Isabel Ranney](#)
Subject: [REDACTED] Echard
Date: Friday, February 9, 2024 12:15:10 PM

Cory,

Things just keep getting more ridiculous. Even after my email yesterday, there is *another* article by your client. She appears to be focusing her efforts on the video journalist, Dave Neal. I trust Dave is a big boy and he can deal with this nonsense, but her allegations against him (after dismissing her ridiculous attempt at an Injunction) are concerning to say the least. She is now alleging that Dave somehow incited violence against her and that she is now facing “death threats” (note, the few videos I have seen by Dave repeatedly condemn violence against [REDACTED])

Since [REDACTED]’s bag of tricks tends to fit a pattern, we suspect that the postings were a contrived ploy to yet again request a Motion to Seal. I appreciate that your client wants to view herself as a victim by the press that she incited and continues to stoke with her articles, but these postings should be viewed with several grains of salt. (We personally tried to find the alleged postings, but to no avail.)

Should you be inclined to file anything further regarding the opacity of the legal proceedings that [REDACTED] instigated, please promptly disclose the alleged postings in a manner that complies with Rule 2 so we can assess the same and properly respond to the court in kind.

As always, I am happy to discuss this offline and appreciate that you may be having client control issues.

Here is link to her most recent Medium article is: [https://medium.com/@\[REDACTED\] the-night-things-changed-605e8ae698dc](https://medium.com/@[REDACTED] the-night-things-changed-605e8ae698dc).

Gregg

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Expedited Motion to Set Virtual Status Conference

Accusation of Fabricating a Pregnancy and Misconduct:

- **Quote:** "Petitioner initiated the underlying action when she filed her Petition...alleging that she was pregnant with Respondent's twins after only oral sex... Respondent has consistently maintained that this alleged pregnancy was entirely fraudulent...".
- **Potential Violation:** This could potentially violate Rule 4.1 (Truthfulness in Statements to Others) by making potentially unfounded allegations about the Petitioner's honesty and intentions. Mr. Woodnick was not there the night that the Respondent and I hooked up and cannot make it seem like a fact that we only had oral sex, when that is not the truth.

Insinuation of Dishonesty Without Proof:

- **Quote:** "Petitioner's only evidence provided in support of her alleged pregnancy has consisted of faked sonograms and positive hCG tests...".
- **Potential Violation:** This could infringe on Rule 8.4(c) (Misconduct involving dishonesty, fraud, deceit, or misrepresentation), depending on the veracity and intent behind these claims.

Misrepresentation of Facts to the Court

- **Quote:** "No medically verifiable proof of pregnancy that would satisfy the requirements of Rule 2 has been provided...".
- **Potential Violation:** Rule 3.3(a) (Candor Toward the Tribunal), if there is a suggestion that I am lying without clear evidence.

Allegations of Avoiding Disclosure and Manipulating Legal Processes:

- **Quote:** "Instead of providing basic discovery she has filed Bar complaints, Board complaints, and sued journalists...Petitioner is claiming she cannot disclose records to Respondent but is publishing articles about the situation.".
- **Potential Violation:** Could be seen as a violation of Rule 3.3 (Candor Toward the Tribunal), if these statements are misleading or manipulate the legal process for an unfair advantage.

Claiming Petitioner's Actions Are Sanctionable Without Sufficient Justification:

- **Quote:** "Petitioner's sanctionable conduct and wholesale inability to support the fiction of her alleged pregnancy...".
- **Potential Violation:** Might violate Rule 3.1 (Meritorious Claims and Contentions), if the claims of sanctionable conduct are not substantiated by evidence.

Personal Attacks on Petitioner's Character:

- **Quote:** "For all Respondent knows the imaginary twins are buried at a horse ranch."
- **Potential Violation:** This statement could be considered as violating Rule 8.4(d) (Conduct Prejudicial to the Administration of Justice), as it seems to serve no purpose other than to demean me in a personal and distressing manner.

Insinuation of Unlawful Behavior Without Proof

- **Quote:** "Instead of providing basic discovery she has filed Bar complaints, Board complaints, and sued journalists..."
- **Potential Violation:** Rule 8.4(d) (Conduct prejudicial to the administration of justice), suggesting misuse of legal processes without evidence. I have not filed Board complaints nor sued journalists.

Disparaging Remarks About Petitioner's Credibility

- **Quote:** "Petitioner claiming that she had access to verifiable medical records to support her allegations of pregnancy but then refusing to make them available..."
- **Potential Violation:** Rule 3.4(e) (Fairness to opposing party and counsel), by suggesting I am not being forthcoming without substantial proof, when I submitted it with my filings prior to Woodnick coming on. I have never refused to provide information, I just asked for a Protective Order because he has been releasing everything filed and every communication to the media and I wanted to make sure he didn't do that with my medical records.

Failure to Maintain Dignity and Respect of the Court

- **Quote:** "Petitioner's perpetual disregard for Court Rules is exhausting."
- **Potential Violation:** Rule 3.5(d) (Impartiality and Decorum of the Tribunal), through comments that may undermine respect for the court's authority.

Inappropriate Commentary on Legal Strategy

- **Quote:** "Petitioner now says she is 'no longer pregnant' but has failed to identify if this is a result of fetal death or the alleged babies have been put up for adoption."
- **Potential Violation:** Rule 4.4(a) (Respect for Rights of Third Persons), by using sensitive personal circumstances to question my integrity or legal strategy inappropriately.

Dismissive Reference to Legal Concerns

- **Full Quote:** "The antics from Petitioner continue to proliferate and it is clear from the communication as appended that Petitioner's most recently retained counsel (approximately the 12th in this series of cases) is having challenges with client control that impact Respondent's ability to access requisite disclosure." As shown in the docket, Mr. Cory Keith is my *second* attorney, not 12th.

- **Potential Violation:** Rule 3.4 (Fairness to Opposing Party and Counsel), suggesting a lack of respect for my legal concerns and diminishing the seriousness of my claims without due consideration. **Inappropriate Allegation of Pregnancy Fraud**
- **Full Quote:** "Petitioner's blatant refusal to provide any disclosure or engage in discovery must be addressed prior to the evidentiary hearing. During the nearly seven (7) months since initiating this action Petitioner's only evidence provided in support of her alleged pregnancy has consisted of faked sonograms and positive hCG tests."
- **Potential Violation:** ARPC Rule 8.4(c), suggesting misconduct involving dishonesty, fraud, deceit, or misrepresentation, through unproven allegations of falsifying medical evidence.

Accusation of Fabricating Pregnancy and Extortion

- **Full Quote:** "This time Petitioner chose a television personality on which to perpetrate this fraud and not only faked the pregnancy but attempted to extort him to date her in exchange for an 'abortion' (of fictional twins)."
- **Potential Violation:** Rule 8.4(c), as Mr. Woodnick accuses me of fraud and extortion without substantiated evidence, implying dishonesty and misrepresentation on my part. This obviously damages my reputation.

Misrepresentation of Medical Evidence

- **Full Quote:** "Petitioner has willfully and wantonly failed to provide any Rule 49 disclosure, respond to any Requests for Production, and refused to attend a properly noticed Rule 57 deposition."
- **Potential Violation:** Rule 3.4, suggesting that I deliberately obstructed the legal process and discovery, despite my compliance with procedural rules and efforts to provide requested information.

Claim of Fraudulent Court Behavior

- **Full Quote:** "Petitioner then continued to contact the media... furthering her entirely fraudulent fake pregnancy narrative."
- **Potential Violation:** Rule 3.3, as Mr. Woodnick asserts I perpetuated a false narrative to the media and court, challenging my candor towards the tribunal, when I have been entirely honest.

Misleading Accusations of Pregnancy Fabrication

- **Full Quote:** "Respondent maintains that this alleged pregnancy was a hoax/con much like the previously litigated matters involving Petitioner and other men similarly situated."
- **Potential Violation:** Rule 8.4(c), for suggesting without proof that I fabricated my pregnancy, indicating dishonesty, fraud, deceit, or misrepresentation.

Unsubstantiated Claim of Extortion

- **Full Quote:** "This time Petitioner chose a television personality on which to perpetrate this fraud and not only faked the pregnancy but attempted to extort him to date her in exchange for an 'abortion' (of fictional twins)."
- **Potential Violation:** Rule 4.1, for asserting without evidence that I attempted to extort someone under false pretenses

Accusations of Deceptive Court Behavior

- **Full Quote:** "Petitioner then appeared in court wearing an ostensibly fake pregnant stomach, furthering her fraudulent narrative."
- **Potential Violation:** Rule 8.4(d), for claiming without substantiation that I engaged in deceptive behavior in court, prejudicial to the administration of justice. I did not appear with a fake pregnancy stomach.

Bad Faith Litigation

- **Full Quote:** "Petitioner's baseless accusations and myriad of filings have harmed him."
- **Potential Violation:** ARPC Rule 3.1 regarding meritorious claims and contentions, by suggesting my legal actions lack legitimacy without evidence.

Accusations Without Proof

- **Full Quote:** "Petitioner's factual contentions/assertions of pregnancy not supported by any verifiable evidence from the onset of this action."
- **Potential Violation:** ARPC Rule 1.0 on maintaining integrity, by accusing me of lying without presenting clear evidence.

Claims of Unreasonable Filings

- **Full Quote:** "Petitioner's repeated filings (including a Motion to Dismiss once she alleged she was 'no longer pregnant') being unsupported by existing law."
- **Potential Violation:** ARPC Rule 3.1 on filing non-meritorious claims and contentions, by alleging my motions are baseless when they are not. I wanted to Dismiss the case after I had a miscarriage since there was no longer Paternity to determine.

Offensive and Speculative Remarks

- **Full Quote:** "If (impossible from oral sex) Petitioner was actually pregnant delivered twins and/or suffered a miscarriage (post twenty-four (24) weeks gestation) at any point during this proceeding she would have verifiable medical evidence. To date no fetal death certificates have been executed no confirmable medical evidence has been presented and Petitioner has continued to claim "protection" while reaching out to the media directly.
- **Potential Violation:** ARPC Rule 8.4(d), suggesting conduct prejudicial to the administration of justice through speculative and offensive remarks regarding the outcome of a pregnancy. This comment not only trivializes the serious matter of pregnancy and potential loss but also ventures into making unfounded and speculative assertions about highly personal and sensitive circumstances without any substantiating evidence, which could be deeply distressing and seen as an attempt to demean or harass. And, as stated before, Mr. Woodnick was not there the night that the Respondent and I hooked up and cannot make it seem like a fact that we only had oral sex, when that is not the truth.

Inflammatory and Disrespectful Remarks

- **Full Quote:** "For all Respondent knows the imaginary twins are buried at a horse ranch."
- **Potential Violation:** ARPC Rule 8.4(d), suggesting conduct prejudicial to the administration of justice through the use of insensitive and speculative language about a highly personal matter.
- **Full Quote:** "Her entire Petition was predicated on either lies or delusions and mirrors prior litigation involving Ms. [REDACTED] and a growing list of other victims."
 - **Potential Violations:** This rule prohibits conduct involving dishonesty, fraud, deceit, or misrepresentation. Mr. Woodnick's definitive statement that my entire petition is based on "lies or delusions" directly accuses me of fraudulent and deceitful behavior without prefacing these allegations as opinions or unproven claims. His failure to use qualifiers like "allegedly" suggests an unusual certainty in these serious accusations, which could be seen as a direct attack on my character and integrity. The men that he refers to as my "victims" are men that I have orders of protection against.
- **Rule 3.1 - Meritorious Claims and Contentions**
 - **Explanation:** Attorneys must not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a basis in law and fact for doing so that is not frivolous. By stating without qualification that my petition is based on "lies or delusions," Mr. Woodnick not only dismisses the legitimacy of my claims without a fair evaluation but also implies that my legal actions are entirely without merit, potentially misleading the court.
- **Rule 3.4(e) - Fairness to Opposing Party and Counsel**
 - **Explanation:** This rule underscores the importance of respect towards the legal rights of others. The direct and unqualified manner in which Mr. Woodnick discredits my entire petition goes beyond legal argumentation into the realm of personal vilification, which is contrary to the spirit of fairness and civility mandated by the ARPC.
- **Rule 4.4(a) - Respect for Rights of Third Persons**
 - **Explanation:** In representing a client, a lawyer must not use means that have no substantial purpose other than to embarrass, delay, or burden a third person, or use methods of obtaining evidence that violate the legal rights of such a person. Mr. Woodnick's assertion about my petition being based on "lies or delusions" can be seen as an attempt to embarrass or burden me, rather than a constructive legal argument.

- **Rule 8.4(d) - Conduct Prejudicial to the Administration of Justice**
 - **Explanation:** Lawyers are prohibited from engaging in conduct that is prejudicial to the administration of justice. By categorically stating that my petition is founded on fabrications and likening it to past litigation in a manner that suggests a pattern of deceit on my part, Mr. Woodnick's comments could be interpreted as undermining the judicial process and prejudicing the court against me without due cause.

Derogatory Speculation and Accusation

- **Full Quote:** "Simply said Petitioner's pregnancy was faked. The bump displayed in Judge Gialketsis' courtroom was ostensibly purchased as evidenced by Petitioner clearly adjusting what appears to be a fake belly and guzzling a Monster Energy drink. (Curious for someone claiming to have a high-risk pregnancy)."
- **Potential Violations:**
 - **ARPC Rule 8.4(d)**, suggesting conduct prejudicial to the administration of justice. This rule addresses behavior that undermines the integrity of the judicial process. The statement not only questions the veracity of my medical condition in a derogatory manner but also implies deceit in a way that could prejudice the court and public perception unjustly.
 - **ARPC Rule 4.4(a)**, regarding respect for the rights of third persons. It mandates that a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person. The remarks about the pregnancy being faked and the condescending tone regarding the consumption of a Monster Energy drink could be seen as intending to embarrass or demean me, which is inappropriate.
 - **ARPC Rule 3.4(e)**, on fairness to opposing party and counsel, which obligates lawyers to refrain from making unfounded allegations that do not have a factual basis. The assertion that the pregnancy was faked, without providing concrete evidence, directly undermines the principle of fairness in litigation.

Reply to Petitioner's Response to Motion Motion for Sanctions Pursuant to Rule 26

Accusation of Fabricating a Pregnancy Narrative

- **Full Quote:** "The entire pregnancy narrative was nothing more than a fraudulent ruse to coerce Respondent into dating Petitioner."
- **Clarification:** I vehemently deny fabricating any pregnancy narrative. This baseless accusation is not only damaging to my reputation but also undermines the integrity of the legal process.
- **Violation:** This allegation by the respondent's attorney could be seen as a violation of Rule 8.4(c) of the Arizona Rules of Professional Conduct, which prohibits conduct involving dishonesty, fraud, deceit, or misrepresentation.

Baseless Claims of Coercion

Full Quote: "Petitioner's underlying Petition to Establish was filed without merit and for the sole purpose of coercing Respondent into dating Petitioner."

Potential Violation: The claim that my filings were aimed at coercion is not only false but also an affront to my character. My actions have been driven by a pursuit of justice and truth, not by any ulterior motives as suggested. This could be seen as a violation of Rule 3.1, which requires that a lawyer shall not bring a proceeding unless there is a basis in law and fact for doing so that is not frivolous. Accusations of using legal filings as a form of personal coercion without evidence are unusual and disparaging.

Unfounded Allegations of Misuse of Judicial Resources

Full Quote: "This entire action by Petitioner is predicated on fraud upon the Court."

Potential Violation: This statement is not only deeply insulting but also undermines the integrity of the legal process by making unfounded accusations of fraud and fabricating evidence. It also includes a personal attack that is both disrespectful and unprofessional. Such allegations could breach Rule 3.3, which mandates candor towards the tribunal. Claiming an entire legal action is fraudulent without substantiated evidence undermines the integrity of the judicial system and is a serious accusation. This could also be seen as a violation of Rule 8.4(c) of the Arizona Rules of Professional Conduct, which prohibits conduct involving dishonesty, fraud, deceit, or misrepresentation. Furthermore, it may also violate Rule 8.4(d), which prohibits conduct that is prejudicial to the administration of justice, given the disparaging and unfounded nature of the comments made.

Claims of Evading Discovery Without Merit

Full Quote: "Petitioner continues to seek out media attention and exhaust all her procedural remedies to evade basic discovery and disclosure obligations."

Potential Violation: This might infringe on Rule 3.4, which involves fairness to opposing party and counsel. Suggesting evasion of discovery without proof is not only inappropriate but also undermines the procedural fairness of the legal process. I have been desperate to *stop* media attention, which is why I filed for a Protective Order since Mr. Woodnick has leaked every document to the press. This is provable because what has been leaked is in full color, which court documents ordered properly would not be and they are released to a content creator who Mr. Woodnick went to dinner a few weeks ago before they are even in ECR.

Accusations of Harassment Through Litigation

Full Quote: "Petitioner's behavior in this litigation is unreasonable and predicated on bad faith."

Potential Violation: This could potentially violate Rule 3.1 regarding bringing or defending a proceeding only on a basis that is not frivolous. Accusing someone of bad faith litigation without solid evidence can be seen as an attempt to tarnish their reputation unjustly.

Unjust Character Attacks

Full Quote: "Perhaps if Petitioner provided the statutorily required fetal death certificate...she would look less like... 'a crazed woman who fabricated a pregnancy.'"

Potential Violation: This personal attack could be seen as a breach of Rule 8.4(d), which prohibits conduct that is prejudicial to the administration of justice. Such derogatory comments are not only inappropriate but also demean the legal and judicial process by introducing unfounded personal attacks into legal filings.

Misleading Claims About Legal Filings

Full Quote: "Every single filing in this action by Petitioner has been presented for an 'improper purpose such as to harass, cause unnecessary delay or needlessly increase the costs of litigation.'"

Potential Violation: This could contravene Rule 3.1, which mandates that a lawyer shall not bring or defend a proceeding unless there is a basis in law and fact for doing so that is not frivolous. Accusing all filings of being for an improper purpose without evidence is misleading and injurious.

Inappropriate Speculation on Medical Evidence

Full Quote: "Despite her repeated assertions positive hCG tests are not verifiable medical evidence of pregnancy."

Potential Violation: This statement could potentially violate Rule 8.4(c) by insinuating dishonesty or misrepresentation regarding medical evidence without proper basis, which is disrespectful and could mislead the tribunal.

Unsubstantiated Claims of Deceptive Court Behavior

Full Quote: "Petitioner then appeared in court wearing an ostensibly fake pregnant stomach, furthering her fraudulent narrative."

Potential Violation: If such a claim were made without substantiation, it would constitute a violation of Rule 8.4(c) for conduct involving dishonesty, fraud, deceit, or misrepresentation, given the seriousness of accusing someone of deceiving the court in such a manner.

Groundless Accusations of Manipulating Media

Full Quote: "Petitioner's baseless allegations that Respondent is using the Court as a 'publicity stunt' serve no purpose other than to deflect from her own culpable actions."

Potential Violation: This could potentially breach Rule 8.4(d) by suggesting manipulation of media for personal gain without evidence, which can be seen as prejudicial to the administration of justice.

Claims of Unfounded Litigation Motives

Full Quote: "Petitioner's filings are predicated on bad faith and contain allegations that cannot be supported by verifiable medical evidence."

Potential Violation: This might violate Rule 3.1, which requires that legal proceedings have a basis in law and fact and are not frivolous. Claiming filings are based on bad faith without evidence is a grave accusation that undermines the legitimacy of the legal process.

Allegations of Unreasonable Legal Conduct

Full Quote: "Petitioner continues to file meritless motions and force Respondent back into Court."

Potential Violation: This could infringe on Rule 3.1, which mandates that a lawyer must not make a claim unless there is a basis for doing so that is not frivolous. Alleging that all motions filed are meritless without thorough judicial review is unusual and disparaging.

Baseless Accusation of Fabricating a Pregnancy Narrative

Full Quote: "Petitioner expended judicial resources to fabricate a pregnancy narrative to force Respondent into a relationship with her invited media attention and is now desperately grasping at procedural straws to evade providing simple and uncontroversial disclosure like a government certificate confirming the alleged miscarriage."

Clarification: This accusation is not only hurtful but entirely baseless. I have always acted in good faith and with respect to the court's time and resources. The suggestion that I fabricated a pregnancy narrative for personal gain is offensive and without merit.

Expedited Motion to Continue Trial and Motion for Additional Time

Unsubstantiated Claims of Extortion

Full Quote: "Not only faked the pregnancy but attempted to extort him to date her in exchange for an 'abortion' (of fictional twins)."

Potential Violations: Such a serious accusation without evidence could breach Rule 8.4(c) for suggesting conduct involving dishonesty and potentially Rule 4.1 regarding truthfulness in statements to others.

Inappropriate Comments on Court Appearance

Full Quote: "She appeared on video in court wearing an ostensibly fake pregnant stomach."

Potential Violations: This could contravene Rule 8.4(d), which prohibits conduct that is prejudicial to the administration of justice, by making unfounded personal attacks within a legal document.

Derogatory Speculation on Medical Conditions

Full Quote: "Petitioner's hCG tests prove nothing and her reliance on them when she could provide simple and basic evidence... begs many questions about her credibility and motivations."

Potential Violations: This speculative and demeaning comment could be seen as a violation of Rule 8.4(d) for conduct that is prejudicial to the administration of justice and Rule 4.4(a) regarding respect for the rights of third persons. An hCG test is what any doctor uses to test for pregnancy.

Unfounded Allegations of Court Misuse

Full Quote: "Petitioner's behavior in this litigation is unreasonable and predicated on bad faith such that Respondent should be entitled to his reasonable attorney's fees and costs."

Potential Violations: Claiming bad faith litigation without substantiation, which he doesn't have since I have ample proof of pregnancy (as even provided to you), could violate Rule 3.1 for asserting claims without merit and potentially Rule 8.4(c) for suggesting dishonest conduct.

Disregard for Petitioner's Rights

Full Quote: "Petitioner wanting to be pregnant and being pregnant are two (2) different things."

Potential Violations: This statement could violate Rule 4.4(a) by disrespecting my dignity and personal situation, and Rule 8.4(d) for potentially prejudicial conduct.

Defamatory Statements About Legal Motivations

Full Quote: "Her entire Petition was predicated on either lies or delusions and mirrors prior litigation involving Ms. [REDACTED] and a growing list of other victims."

Potential Violations: This could infringe upon Rule 8.4(c) by alleging dishonesty without evidence, and Rule 8.4(d) for conduct prejudicial to the administration of justice by making personal attacks within a legal filing. The men that he refers to as *my victims* are men I have orders of protection against.

Sandra Montoya

From: [REDACTED] [REDACTED] <[REDACTED]@[REDACTED].com>
Sent: Sunday, January 7, 2024 9:59 AM
To: RCwebsite
Subject: Immediate Assistance and Guidance Needed in Response to Ethical Concerns and Intimidation in Legal Case

Attachments: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Arizona State Bar,

I am writing to you under circumstances of extreme urgency and distress, relating to my ongoing paternity case and the conduct of two attorneys, Mr. Gregg Woodnick and Ms. Lexi Lindvall. Due to the immediate nature of the issues at hand, particularly an upcoming deposition on the 17th, I am unable to follow the standard procedure for filing a formal claim and thus seek your immediate intervention via this communication.

Background: My paternity case, involving Mr. Clayton Echard, was initially heading towards dismissal after my miscarriage, with both parties self-represented. However, the trajectory of the case shifted drastically when Mr. Woodnick entered the case as soon as it appeared on the dismissal calendar. His involvement, seemingly motivated by a personal vendetta against me based on a prior case, has added a contentious and distressing dimension to the proceedings. In a call that I am attaching, Ms. Lindvall explains to me after her first phone call with Mr. Woodnick that this case is "personal" for him and describes how he and his co-counsel, Isabel Raney, were yelling at her on the phone.

Context of Innocence and Ethical Implications of Ms. Lindvall's Actions:

I have provided incontrovertible evidence of my pregnancy to Ms. Lindvall, including access to my Banner Health Patient Portal. Despite this, she pressured me to sign a statement falsely declaring that I was never pregnant with Mr. Echard's child. This demand for perjury, which I repeatedly refused in our attached call conversation, represents a clear ethical violation, particularly under Rule 1.2(d) (Scope of Representation and Allocation of Authority Between Client and Lawyer). She also encouraged me to sign the same affidavit after that conversation in the attached email correspondence. Her insistence on this false declaration and her subsequent decision to withdraw under threat of a Rule 3.3 filing have left me in a vulnerable state without representation when there are many filings that need to be responded to very soon.

Additional Ethical Violations by Ms. Lindvall:

Rule 1.4 (Communication): Her failure to properly communicate the implications and alternatives to her withdrawal and the advice she provided might also constitute a violation of the duty to communicate effectively with a client.

Rule 1.16 (Declining or Terminating Representation): Her decision to withdraw from representation seems to conflict with the responsibilities outlined in this rule, particularly in ensuring that the client is not unfairly impacted by the withdrawal.

Mr. Woodnick's Unwillingness to Allow Extension as a Potential Violation: Mr. Woodnick's refusal to grant an extension for the deposition, especially given the pending motion to dismiss and the motion to quash the deposition, may constitute a violation under Rule 3.4(d) (Fairness to Opposing Party and Counsel). This refusal has obstructed my ability to secure new legal representation, further disadvantaging me in this case. I

have interviewed several attorneys who would love to take on the case but are unable to simply because of the tight deadlines that Ms. Lindvall has left me with to respond to numerous motions and Mr. Woodnick's refusal to extend any of them. One of the potential attorneys I spoke to said that I should reach out to the AZ Bar for assistance.

Ethical Violations by Mr. Gregg Woodnick:

Concerns Under Rule 3.4(d) (Fairness to Opposing Party and Counsel): His refusal to grant an extension for the deposition, especially with the pending motions to dismiss and to quash the deposition, has significantly disadvantaged me in securing new legal representation.

Rule 8.4 (Misconduct): Mr. Woodnick's conduct, particularly his refusal to provide extensions and his aggressive communication, might be construed as conduct prejudicial to the administration of justice.

Potential Violation of Rule 4.4(a) (Respect for Rights of Third Persons): The aggressive and personal nature of Mr. Woodnick's communication appears to be aimed more at harassing and intimidating me than at any legitimate legal strategy.

Fear and Panic Regarding the Upcoming Deposition: The prospect of facing a four-hour deposition without legal representation is daunting. Given the emotionally charged nature of this case, including the context of my miscarriage, I am deeply concerned that this deposition is being used as a tool for further intimidation and harassment.

Fear and Panic Regarding the Upcoming Deposition:

The prospect of facing a four-hour deposition without legal representation is daunting. Given the emotionally charged nature of this case, including the context of my miscarriage, I am deeply concerned that this deposition is being used as a tool for further intimidation and harassment.

Urgent Request for Guidance:

To demonstrate my innocence and refute claims that I have falsified a pregnancy, I am providing the login information to my Banner Health Patient Portal, where evidence of my pregnancy confirmation in June is available. [REDACTED] Given the immediate nature of this situation, I am seeking advice on immediate steps I can take to address these issues and secure my legal rights, particularly concerning Mr. Woodnick's refusal to provide extensions.

I appreciate your prompt attention and await your guidance on navigating these challenging circumstances.

Sincerely,

[REDACTED]



[REDACTED]

Now available! Read my story in the [30th Anniversary Edition of Chicken Soup for the Soul](#)

Phone [REDACTED]

Email lauraowens@nobodytoldmeshow.com



Beware External Email - Think Before You Act

Links and attachments should not be opened unless expected or verified