

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/Defendant

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
7
8 **IN AND FOR THE COUNTY OF MARICOPA**

9 In Re the Matter of:
10 **LAURA OWENS,**
11
12 Petitioner,
13
14 And
15 **CLAYTON ECHARD,**
16
17 Respondent.

Case No.: FC2023-052114

**RESPONSE/OBJECTION TO
PETITIONER'S EMERGENCY
MOTION TO STRIKE AND REQUEST
FOR IMMEDIATE SCHEDULING
CONFERENCE**

(Assigned to the Honorable Julie Mata)

18 Defendant/Respondent, **CLAYTON ECHARD**, by and through counsel undersigned,
19 hereby files his Response and Objects to Plaintiff/Petitioner, **LAURA OWENS**, Emergency
20 Motion to Strike and Request for Immediate Scheduling Conference.
21

22 There is *neither* an emergency *nor* cause to strike any part of the Reply to Petitioner's
23 Response filed on April 30, 2024. Not only does Laura's Motion fail to conform to procedural
24 Rules (*neither* Rule 29(e) *nor* Rule 35(a)(3)), but it also fails to acknowledge that when Laura
25 filed a *Response* that (contrary to explicit court orders) appended her medical records and
26 proclaimed "there is objective medical proof Ms. Owens was, in fact pregnant" and "Ms.
27
28

1 **Owens Was Pregnant,”** (emphasis in original), she opened the door for Respondent to reply
2 to the same. Put simply, Laura’s own medical records are *not* new evidence to Laura and only
3 continue to demonstrate that this process has been predicated on *duplicity*.
4

5 As and for his Response/Objection, Clayton states as follows:

6 1. **Laura’s Motion to Strike does not comply with Rule 29(e) nor requests the**
7 **relief afforded by Rule 35(a)(3), Arizona Rules of Family Law Procedure.** A Motion to
8 Strike is governed by Rule 29(e), which permits a party to move to strike from a motion “*an*
9 *insufficient claim or defense or any redundant, immaterial, impertinent, or scandalous*
10 *matter.*” Laura’s Motion does not reference this Rule, nor does it allege any facts that would
11 justify a “strike” consistent with this Court’s authority. Laura’s Motion also does not comply
12 with the Rule it *does* cite. Rule 35(a)(3) provides that, if a party believes they need to respond
13 to matters raised in a Reply, it “*may not respond to a reply unless authorized by the court.*” If
14 Laura is asking this Court to allow her to respond to the *Reply to Petitioner’s Response to*
15 *Respondent’s Amended Motion for Relief Based on Fraud*, she needs to request this relief and
16 Clayton will respond (and object) as his verified Reply was appropriate and there is no cause
17 for a sur-reply.
18
19
20
21

22 The disclosed material was neither “*untimely*” nor “*new*.” The “*untimely*” material—
23 Laura’s own medical records—were properly disclosed to her¹ consistent with this Court’s
24 disclosure deadline² (which Laura is aware of per her counsel’s personal Tweets, blog posts
25
26

27 ¹ Specifically, in Respondent’s 7th Supplemental Disclosure Statement.

28 ² See Minute Entry dated 2/21/24 (“**IT IS FURTHER ORDERED** setting a discovery & disclosure deadline (30) days prior to trial”) (emphasis in original).

1 and emails regarding the same) and within 24 to 48 hours of receiving the disclosure. The
2 “new” material—Laura’s medical records from 2016, her emails and texts regarding the same,
3 yet *another* sonogram she shared with the media (well after the date she now seems to claim
4 to have miscarried), a letter from an actual person whose ultrasound she allegedly pirated, and
5 *her* own communications with her prior victims and the media—is *not* new to Laura.
6

7 The information Laura claims is “new” are her medical records and a third sonogram
8 she dispatched via email to the media. [Parenthetically, the first two (2) sonograms were
9 already addressed in court proceedings as well as in the underlying *Motion for Relief* and are
10 therefore not “new” to anyone, nor is the general topic of improperly tampered sonograms].
11

12 Moreover, Laura testified about being treated by Dr. Chan and that he was “a
13 *specialist, one for [...] cancer, because they thought I might have precancerous for ovarian-*
14 *...*” Trans. at 56-57 (**Exhibit 1**). That Laura, upon information and belief, failed to disclose
15 her relevant medical history to her expert is not Clayton’s doing. It would be *paradoxical* if
16 Laura being provided with her *own* medical records (which she now seems to deny, as is
17 consistent with her believed *modus operandi* of denying any conflicting data) constituted
18 “new” information.
19
20

21 2. Clayton’s *Reply* appropriately responded to the allegations in Laura’s
22 *Response*. To the extent that this Court believes that the *Motion to Strike* (despite being
23 procedurally improper) warrants further attention, Clayton’s *Reply* complied with the
24 requirement that a “reply may address only those matter raised in the response.” Rule 35(a)(3).
25
26

27 In Laura’s *Response*, she stated, “*there is objective medical proof Ms. Owens was, in*
28 *fact pregnant,*” “*Ms. Owens Was Pregnant,*” attached both expert reports and an affidavit by

1 Laura,³ and acknowledged that Clayton's *Motion* alleges Clayton believes Laura was "never
2 pregnant," and that he asserts she "lied about things such as the authenticity of a sonogram
3 image and other aspects of her pregnancy." Clayton's Reply concerns the same scope as
4 Laura's Response, namely Laura's repeated assertions that she was pregnant. It is not
5 "sandbagging" to provide the Court information directly responsive to, and conflicting with,
6 the crux of Laura's Response. Rule 35(a)(3) is intended to prevent requesting a *different* form
7 of relief or raising a claim that would deny the other party an opportunity to respond, not to
8 prevent a party from elaborating on and replying to allegations in the response.
9

10
11 Of course, it is understandable *if* Laura does not want conflicting information surfacing
12 in litigation that, at its core, is about allegations that she fabricated medical records and faked
13 claims that she was pregnant by Clayton. Laura attached her own medical records, expert
14 reports, and made statements regarding the "truthfulness" of her alleged pregnancy in her
15 Response. Clayton responded in kind and with properly disclosed (and redacted) data, as he
16 was permitted to do under the Rules.⁴
17

18
19 **3. It appears that Ms. Owens is unable to keep track of her story as the fiction**
20 **compounds. This is the carnage of what, upon information and belief, is serial pregnancy**
21 **fraud in efforts to compel relationships.** Notably, as more controverting data comes out, it
22 is anticipated, based on Laura's counsels' emails and blogs, that Laura will claim that voice
23

24
25 ³ Which *included* the sonogram that has been confirmed not to have originated in SMIL or Planned Parenthood.

26 ⁴ Note, Clayton redacted medical records consistent with this court's orders, notwithstanding the fact that Laura
27 continues to unilaterally publish filings and musings regarding the case and court via Twitter, including "affidavits" that
28 have not been admitted to this Court. At trial, the Court will be provided with the unredacted ultrasounds, in addition to
the one already confirmed to be tampered with. The ultrasound video was already admitted as an exhibit during Laura's
deposition and the alleged "new" sonogram that shows Laura' being twenty-one (21) weeks along was sent to the
media. The medical records from Drs. Chan and Yee are on letterhead and contemporaneous with communication from
Laura in 2016.

1 recordings are the product of Artificial Intelligence (AI) and her emails and texts were hacked.
2 She can address these alleged (and highly disputed) concerns at trial. Despite what she may
3 claim to explain away these “new” records, they came *from Laura* – her email, her texts, her
4 claimed medical records. Whether she *now* claims they are real or not does not change the
5 fact that she sent them. It does beg the question of the extent of fraud consistent with someone
6 who already admitted to tampering with medical records. See A.R.S. § 13-2809.
7

8
9 **4. The Order of Protection at issue in the *Motion for Relief* was procured**
10 **based on a fraudulent sonogram.** Once again, in Laura’s *Motion to Strike*, she fails to
11 acknowledge that the very sonogram that was the basis for Judge Doody granting the Order
12 of Protection has been proven not to have originated from Planned Parenthood or SMIL. Laura
13 has since admitted she tampered with it. That there may be *more* records that are believed to
14 be fraudulently created by Laura is problematic for her, but she published these “records” and
15 sent them to members of the media. Those actions have consequences.
16

17
18 The fraud in the procurement of the Order of Protection matters requires it to be
19 dismissed on the pleadings. The remaining issues in the establishment matter will be
20 adjudicated on June 10th, notwithstanding her anticipated efforts to continue that hearing.
21

22 **5. There is no need for any scheduling conference.** Trial is set in more than a
23 month – June 10, 2024. The deadline for discovery and disclosure is May 10, 2024. If Laura
24 has what, upon information and belief, will be a new excuse for *why* her medical records from
25 2016 and the sonogram she sent to the media in 2023 are somehow “fake” or the product of
26 an AI/technology, she is welcome to allege that at trial. This case is not complicated as the
27
28



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COPY of the foregoing document delivered this same day to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the foregoing document emailed this same day to:

David Gringas
Gringas Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85004
David@GringasLaw.com
Attorney for Petitioner/Plaintiff

By: /s/ MB

VERIFICATION

1
2 I, **CLAYTON ECHARD**, declare under penalty of perjury that I am the Respondent
3 in the above-captioned matter; that I have read the foregoing *Response/Objection to*
4 *Petitioner's Emergency Motion to Strike and Request for Immediate Scheduling Conference*
5 and I know of the contents thereof; that the foregoing is true and correct according to the best
6 of my own knowledge, information and belief; and as to those things stated upon information
7 and belief, I believe them to be true.
8
9

10
11 Clayton Echard


May 2, 2024

12 **CLAYTON ECHARD**

Date

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Signature:


Clayton Echard (May 2, 2024 16:07 PDT)

Email: claytonechard@gmail.com
||






Verification - Response to Mx to Strike

Final Audit Report

2024-05-02

Created:	2024-05-02
By:	Isabel Ranney (isabel@woodnicklaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAUcNSOH6XOIInO_X1PmzaQv-y1lyCccdxz

"Verification - Response to Mx to Strike" History

-  Document created by Isabel Ranney (isabel@woodnicklaw.com)
2024-05-02 - 9:31:47 PM GMT
-  Document emailed to Clayton Echard (claytonechard@gmail.com) for signature
2024-05-02 - 9:32:21 PM GMT
-  Email viewed by Clayton Echard (claytonechard@gmail.com)
2024-05-02 - 11:07:35 PM GMT
-  Document e-signed by Clayton Echard (claytonechard@gmail.com)
Signature Date: 2024-05-02 - 11:07:52 PM GMT - Time Source: server
-  Agreement completed.
2024-05-02 - 11:07:52 PM GMT

1 A. Yea, for cancer, because they thought
2 that I might have precancerous for ovarian -- I just
3 can't --

4 Q. Do you recall the last time you saw
5 Dr. Chan?

6 A. Maybe 2016?

7 Q. Do you recall what street he was on,
8 because he's going to be a tough name to track down.

9 A. He was with -- I know what practice, he
10 was with CPM, California Pacific Medical, and, yeah,
11 you would just look up for, I guess it would be a
12 gynecologic oncologist. That's the word I was
13 looking for.

14 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]