

1 Fortify Legal Services
2 3707 E Southern Avenue Mesa, AZ 85206
3 Phone: [REDACTED] | www.FortifyLS.com
4 Kyle O'Dwyer [REDACTED]
5 *Attorney for Plaintiff*

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

8 Case No: CV2021-052893

9 Laura Owens,

10 Plaintiff,

11 vs.

12 Gregory Gillespie,

13 Defendant.
14

**PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT
OF ALL DEFENDANT'S
COUNTERCLAIMS**

15 Plaintiff hereby files this motion for partial summary judgment, requesting that the
16 Court issue an order dismissing Defendant's counterclaims for fraud and intentional
17 infliction of emotional distress. The counterclaims must be dismissed because, as to the
18 fraud claim, there are no genuine issues of material fact as to the issues that Defendant did
19 not suffer a consequent proximate injury and did not suffer any damages stemming from
20 his allegations and, as to the claim for intentional infliction of emotional distress, there are
21 no genuine issues of material fact regarding the issues that he did not suffer severe
22 emotional distress and did not suffer damages. He did not provide any information
23 regarding these issues in his disclosure statements in any fashion and therefore is
24 precluded from providing any evidence regarding the same.

25 This motion is supported by the statement of facts and the Court file generally.
26

INTRODUCTION





1 This case concerns the relationship between Plaintiff and Defendant and the
2 communications they had with each other that led to Defendant coercing Plaintiff into
3 having an abortion and the severe emotional distress the parties allegedly suffered during
4 that time. Defendant alleges that although he was present on a video call with Plaintiff's
5 nurse, has seen medical records of a urine test showing that Plaintiff was pregnant, and
6 although he virtually witnessed Plaintiff administer to herself abortion pills, his
7 counterclaim is that she was never pregnant to begin with and that he suffered severe
8 emotional distress as a result of what he calls a fraud. Defendant claims that he missed
9 work as a result of severe emotional distress, but never disclosed any actual facts in
10 support of his claim that he suffered "severe emotional distress." He further never
11 disclosed any documentation or information regarding the work he allegedly missed and
12 damages he allegedly incurred thereby. He further never disclosed any facts or
13 information regarding what damages he would be seeking at all. Due to these complete
14 failures, and the fact that Defendant's failures thereby preclude him from providing any
15 evidence regarding these essential issues of his claims, he cannot succeed on his
16 counterclaims and the Court should grant Plaintiff's motion for summary judgment.

17 **I. FACTS**

18 Defendant filed a counterclaim against Plaintiff, alleging that Plaintiff intentionally
19 inflicted emotional distress on Defendant and committed fraud against Defendant.
20 Answer and Counterclaim. In his Second Supplemental Disclosure Statement, which was
21 his final disclosure statement, Defendant gave no specific factual support for his claims.
22 Plaintiff's Statement of Facts Supporting Her Motion for Partial Summary Judgment
23 ("PSOF"), ¶¶ 1, 3. Instead, he referenced his motions to dismiss and answer and
24 counterclaim. *See* Exhibit A to PSOF, at 2. None of the documents cited in his Second
25 Supplemental Disclosure Statement contained any information regarding the alleged
26 emotional distress Defendant suffered or the alleged injury he suffered. *See generally*



1 Exhibit A to PSOF, Answer and Counterclaim, Motion to Dismiss, filed 9/24/2021, and
2 Motion to Dismiss/Motion for Judgment on the Pleadings, filed 2/15/2022. Further,
3 Defendant’s Second Supplemental Disclosure Statement contained no actual disclosure
4 of what damages Defendant would seek at the arbitration hearing or how Defendant
5 calculated those specific damages. PSOF, ¶¶ 2, 4.

6 **II. LEGAL ANALYSIS**

7 **A. Summary Judgment Standard**

8 The legal standard for summary judgment is well known: “[t]he court shall grant
9 summary judgment if the moving party shows that there is no genuine dispute as to any
10 material fact and the moving party is entitled to judgment as a matter of law.” Ariz. R.
11 Civ. P. 56(a). Further, metaphysical doubts as to the facts do not suffice to deny summary
12 judgment; summary judgment should be granted if no rational trier of fact could find in
13 favor of the party opposing the motion if the case were at trial; and the non-moving party
14 may not rest upon mere allegations or denials in pleadings but must show from the record
15 that there are specific facts presenting genuine issue for trial. *Matsushita Elec. Indus. Co.,*
16 *v. Zenith Radio Corp.*, 475 U.S. 574, 586 (1986).

17 For a moving party to prevail on a motion for summary judgment regarding the
18 non-moving party’s claim, the moving party

19 need merely point out by specific reference to the relevant
20 discovery that no evidence existed to support an essential
21 element of the claim. Conclusory statements will not suffice
22 but the movant need not affirmatively establish the negative of
23 the element. If the party with the burden of proof on the claim
24 or defense cannot respond to the motion by showing that there
is evidence creating a genuine issue of fact on the element in
question, then the motion for summary judgment should be
granted.

25 *Orme School v. Reeves*, 166 Ariz. 301, 309-10, 802 P.2d 1000, 1008-09 (1990)
26 (internal citations omitted).



1 **B. Defendant’s counterclaim for fraud must be dismissed because**
2 **Defendant cannot assert and/or prove a consequent proximate injury and**
3 **damages when he did not disclose any information or documentation**
4 **showing that he suffered any injury or damages.**

5 “[C]harging fraud is a serious matter, and it should never be alleged routinely, as a
6 makeweight or as a hoped-for panacea for an otherwise imperfectly perceived remedy.”
7 *Trollope v. Koerner*, 106 Ariz. 10, 19 (1970). A plaintiff cannot prevail on its fraud claim
8 absent proof of clear and convincing evidence of all nine required elements. *Servs.*
9 *Holding Co., Inc. v. Transamerica Occidental Life Ins. Co.*, 180 Ariz. 198, 208 (Ct. App.
10 1994). The elements of a fraud claim are “(1) a representation; (2) its falsity; (3) its
11 materiality; (4) the speaker’s knowledge of its falsity or ignorance of its truth; (5) his
12 intent that it should be acted upon by and in the manner reasonably contemplated; (6); the
13 hearer’s ignorance of its falsity; (7) his reliance on its truth; (8) his right to rely thereon;
14 and (9) his consequent proximate injury.” *Id.* The “failure to prove any one of the
15 essential elements is fatal to the cause of action.” *Fridenmaker v. VNB*, 23 Ariz. App. 565,
16 569 (Ct. App. 1975). “Fraud may never be established by doubtful, vague, speculative,
17 or inconclusive evidence.” *Enyart v. Transamerica Ins. Co.*, 195 Ariz. 71, 77, 985 P.2d
18 556, 562 (App. 1998).

19 In this case, there are no genuine issues of material fact as to the fact that Defendant
20 did not suffer consequent proximate injury and in fact cannot assert any damages because
21 he failed to disclose any calculation of the damages he would assert. Defendant failed to
22 disclose the amount he would seek at trial, or how to calculate that amount, in violation
23 of Ariz. R. Civ. P. 26.1(a)(7), which is clearly incorporated into the arbitration proceeding
24 by Rule 74(b). Failing to disclose what damages you are seeking is fatal to any attempt
25 to collect those damages. *SWC Baseline & Crismon Investors, L.L.C. v. Augusta Ranch*
26 *Ltd. Partnership*, 228 Ariz. 271, 284-85, 265 P.3d 1070 (App. 2011) (reversing the denial
 of a motion for directed verdict when the damages asserted and awarded after a trial were



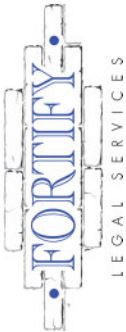
1 not specifically disclosed in violation of Rule 26.1(a)(7)); *see also Hoffman v.*
2 *Construction Protective Services, Inc.*, 541 F.3d 1175, 1179-80 (9th Cir. 2008) (affirming
3 the district court’s grant of a motion in limine to preclude evidence of damages for
4 plaintiffs for which no damages calculation was disclosed under the Federal Rules of Civil
5 Procedure, and indicating the appropriateness of the “even when a litigant’s entire cause
6 of action... [will be] precluded.”).

7 Defendant further did not disclose any facts, circumstances, documentation or
8 information regarding work that he allegedly missed as alleged in the counterclaim, which
9 assumedly would have included W-2s, pay stubs, emails, text messages, actual dates
10 missed, hourly pay, etc. He similarly failed to disclose any facts or information regarding
11 what alleged emotional distress he suffered from. In sum, he disclosed nothing regarding
12 his alleged damages and therefore cannot seek them.

13 Based on his failure to properly disclose any documentation or information in
14 accordance with the disclosure Rules, Defendant cannot meet his burden of proof of
15 proving that he suffered any consequent proximate injury or any damages at all and
16 summary judgment on this claim is appropriate.

17 **C. Defendant’s counterclaim for intentional infliction of emotional**
18 **distress must be dismissed because Defendant did not disclose any**
19 **calculation of damages and did not disclose any facts that would support**
20 **his contention that he suffered severe emotional distress.**

21 The elements for a claim of intentional infliction of emotional distress are “*first* the
22 conduct by the defendant must be ‘extreme’ and ‘outrageous’; *second*, the defendant must
23 either intend to cause emotional distress or recklessly disregard the near certainty that such
24 distress will result from his conduct; and *third*, severe emotional distress must indeed
25 occur as a result of defendant’s conduct.” *Ford v. Revlon*, 153 Ariz. 38, 43, 734 P.2d 580,
26 585 (1987) (citing *Watts v. Golden Age Nursing Home*, 127 Ariz. 255, 258, 619 P.2d 1032,
1035 (1980)) (emphasis in original).




1 Initially, as mentioned above, Defendant will not be able to assert any damages in
2 this case and therefore he cannot be successful at trial. Summary judgment is appropriate
3 for that reason alone. However, even apart from his inability to seek damages, Defendant
4 has failed to disclose any facts relating to any emotional distress he allegedly suffered,
5 which precludes him from being able to meet his burden to prove that he suffered from
6 not only any emotional distress but severe emotional distress. He therefore cannot prove
7 that he suffered severe emotional distress, which is an essential element of that claim.
8 Therefore, summary judgment on the claim is appropriate.

9 **III. CONCLUSION**

10 Because Defendant cannot meet his burden to prove he suffered consequent
11 proximate injury, that he suffered severe emotional distress, or that he suffered any
12 damages at all, the Court should find there are no genuine issues of material fact and render
13 summary judgment in Plaintiff's favor regarding all of Defendant's claims.

14
15 RESPECTFULLY SUBMITTED this 26th day of July, 2023.

16 **FORTIFY LEGAL SERVICES**

17 */s/ Kyle O'Dwyer*
18 Kyle O'Dwyer
19 3707 E Southern Avenue
20 Mesa, AZ 85206
21 
22 *Attorney for Plaintiff*

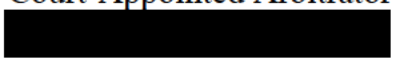
23 Filed this 26th day of July 2023
24 with Maricopa County Clerk of Court and
25 served this 26th day of July 2023
26 by TurboCourt on the following:

1 Fabian Zazueta
2 Garret Respondek
3 Zazueta Law Firm, PLLC
4 2633 East Indian School Road, Suite 370
5 Phoenix, Arizona 85016

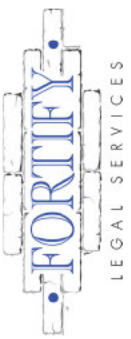


6 With COPY to the following by email:

7 Devina Jackson
8 Court-Appointed Arbitrator



9
10 By: Kyle O'Dwyer



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1 Fortify Legal Services
2 3707 E Southern Avenue Mesa, AZ 85206
3 Phone: [REDACTED] | www.FortifyLS.com
4 Kyle O'Dwyer [REDACTED]
Attorney for Plaintiff

5
6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
7 **IN AND FOR THE COUNTY OF MARICOPA**

8 Case No: CV2021-052893

9 Laura Owens,

10 Plaintiff,

11 vs.

12 Gregory Gillespie,

13 Defendant.
14

**PLAINTIFF'S STATEMENT OF
FACTS SUPPORTING HER MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

15 Plaintiff hereby files this statement of facts in support of her motion for partial
16 summary pursuant to Arizona Rules of Civil Procedure Rule 56(c)(3)(A).

17 1. Defendant did not suffer a consequent proximate injury due to the alleged
18 fraud. *See* Exhibit A, Defendant/Counterclaimant Gregory Gillespie's Second
19 Supplemental Rule 26.1 Disclosure Statement, dated March 4, 2022, at 2 (noting that the
20 factual bases for the defenses and counterclaims can be found in the Motion to Dismiss
21 filed 9/24/2021, Answer and Counterclaim filed 1/4/2022, and Motion to Dismiss/Motion
22 for Judgment on the Pleadings of Plaintiff's Abortion Coercion Claim, filed 2/15/2022.
23 None of these documents refer to any specific consequent proximate injury allegedly
24 suffered by Defendant but only contain a conclusory statement of such).

25 2. Defendant did not incur damages due to the alleged fraud. *See* Exhibit A,
26 at 5 (showing no calculation of damages).



1 3. Defendant did not suffer from severe emotional distress. *See* Exhibit A, at
2 2 (noting the pleadings referenced therein, none of which discuss any facts or
3 circumstances showing what emotional distress Defendant suffered from, severe or
4 otherwise).

5 4. Defendant did not incur any damages due to the alleged intentional
6 infliction of emotional distress. *See* Exhibit A, at 5 (showing no calculation of damages).

7
8 RESPECTFULLY SUBMITTED this 26th day of July, 2023.

9 **FORTIFY LEGAL SERVICES**

10 /s/ Kyle O'Dwyer
11 Kyle O'Dwyer
12 3707 E Southern Avenue
13 Mesa, AZ 85206
14 ██████████
15 Attorney for Plaintiff

16 Filed this 26th day of July 2023
17 with Maricopa County Clerk of Court and
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20 Fabian Zazueta
21 Garret Respondek
22 Zazueta Law Firm, PLLC
23 2633 East Indian School Road, Suite 370
24 Phoenix, Arizona 85016
25 ██████████

26 With COPY to the following by email:

Devina Jackson
Court-Appointed Arbitrator
██████████

By: Kyle O'Dwyer



EXHIBIT A

1 **WOODNICK LAW, PLLC**
1747 E. Morten Avenue, Suite 205
Phoenix, Arizona 85020
2 Telephone: [REDACTED]

3 [REDACTED]
4 **Gregg R. Woodnick, #20736**
5 **Kaci Y. Bowman, [REDACTED]**
6 *Attorneys for Defendant*

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

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

9 In Re the Matter of:

10 **LAURA OWENS,**

11 Plaintiff,

12 v.

13 **GREGORY GILLESPIE,**

14 Defendant.

Case No.: CV2021-052893

DEFENDANT/COUNTERCLAIMANT
GREGORY GILLESPIE'S SECOND
SUPPLEMENTAL RULE 26.1
DISCLOSURE STATEMENT

(Additions in bold)

(Assigned to the Hon. Alison Bachus)

15 Pursuant to Rule 26.1, *Arizona Rules of Civil Procedure*,
16 Defendant/Counterclaimant, (hereinafter "Mr. Gillespie"), by and through undersigned
17 counsel, hereby submits his **Second Supplemental** Rule 26.1 Disclosure Statement. Mr.
18 Gillespie reserves the right to supplement his disclosure statement as discovery progresses,
19 and as the parties continue to disclose information pursuant to Rule 26.1, *Arizona Rules of*
20 *Civil Procedure*.

21 ///

22 ///

23 ///

1 **I. FACTUAL BASIS OF DEFENSES AND COUNTERCLAIMS**

2 *See* Motion to Dismiss filed 09/24/21, Answer and Counterclaim filed 01/04/22
3 and Motion to Dismiss/Motion for Judgment on Pleadings of Plaintiff's Abortion
4 Coercion Claim filed 02/15/22. **In addition, and critically notable, Plaintiff has**
5 **reportedly fabricated a pregnancy and subsequent abortion in the past during a**
6 **relationship with Michael Marraccini in 2016.**

7
8 **II. LEGAL THEORIES UPON WHICH DEFENSES AND**
9 **COUNTERCLAIMS ARE BASED**

10
11 *See* Motion to Dismiss filed 09/24/21, Answer and Counterclaim filed 01/04/22
12 and Motion to Dismiss/Motion for Judgment on Pleadings of Plaintiff's Abortion
13 Coercion Claim filed 02/15/22.

14
15 **III. NAMES, ADDRESSES AND TELEPHONE NUMBERS OF WITNESSES**
16 **DEFENDANT/COUNTERCLAIMANT EXPECTS TO CALL AT TRIAL**

- 17 1. Gregory Gillespie
18 c/o Gregg R. Woodnick
19 WOODNICK LAW, PLLC

20 [REDACTED]
21 [REDACTED]

22 Mr. Gillespie is expected to testify regarding the extent of his relationship with
23 Plaintiff, all communications with Plaintiff and the emotional distress and monetary
24 damages he has suffered as a result.

- 25 2. Laura Owens

26 [REDACTED]
27 [REDACTED]

1 Plaintiff is expected to testify regarding her allegations against Mr. Gillespie and
2 the alleged damages she has suffered as a result.

3 3. Plaintiff's current and former medical providers.

4 4. Any other witness found to have relevant information regarding the subject
5 matter of this lawsuit.
6

7 5. In the absence of an agreement about the admissibility of documents, any
8 and all custodians of records, and any other witnesses required to authenticate or lay
9 proper foundation for documents presented.
10

11 6. Without waiving any objections, any and all experts, if any, listed by any
12 party.
13

14 **IV. PERSONS WHOM DEFENDANT/COUNTERCLAIMANT BELIEVES**
15 **MAY HAVE KNOWLEDGE OR INFORMATION RELEVANT TO THE**
16 **EVENTS THAT GAVE RISE TO THIS ACTION**

17 1. Joseph W. Cotchett, Alison E. Cordova, Toni Stevens and Patrice O'Malley
18 of Cotchett, Pitre & McCarthy, LLP, 840 Malcolm Road, Suite 200, Burlingame, CA
19 94010, [REDACTED] are believed to have knowledge or information regarding Plaintiff's
20 seemingly fraudulent emails purportedly authored by Joseph Cotchett and lawyers that
21 have not worked at the firm for quite some time.
22

23 2. Michael Marraccini, [REDACTED]
24 [REDACTED] is believed to have knowledge or information
25 regarding allegations Plaintiff lodged against him in the past and alleged emotional distress
26 and damages Plaintiff allegedly sustained as a result (as alleged in FDV-18-813693) and
27 Plaintiff's admissions regarding her fabrication of a pregnancy and subsequent
28

1 abortion during their relationship in 2016. S [REDACTED] M [REDACTED] and C [REDACTED] S [REDACTED]
2 are also believed to have knowledge or information regarding allegations Plaintiff
3 lodged against Michael Marraccini in FDV-18-813693 and Plaintiff's admissions
4 regarding her fabrication of a pregnancy and subsequent abortion during her
5 relationship with Michael Marraccini in 2016. Upon information and belief,
6 S [REDACTED] M [REDACTED] and C [REDACTED] S [REDACTED] live in [REDACTED]
7

8 3. Plaintiff's family members including, but not limited to, R [REDACTED] C [REDACTED], J [REDACTED]
9 B [REDACTED], S [REDACTED] N [REDACTED] and C [REDACTED] N [REDACTED] may have knowledge or information relevant
10 to the allegations that gave rise to this action as well as Plaintiff's actions against Michael
11 Marraccini and defendants in Case No. CGC-19-575032 and alleged resulting damages.
12 Upon information and belief, Mr. C [REDACTED] and Ms. B [REDACTED] live in [REDACTED]
13 and S [REDACTED] and C [REDACTED] N [REDACTED] live in [REDACTED].
14
15

16 Any and all persons identified through on-going discovery and/or disclosure. Mr.
17 Gillespie reserves the right to supplement as discovery progresses.
18

19 **V. NAMES OF ALL PERSONS WHO HAVE GIVEN STATEMENTS**

20 1. S [REDACTED] M [REDACTED] gave a written statement under penalty of
21 perjury on or about March 26, 2018 in FDV-18-813693 indicating knowledge of
22 Plaintiff's admissions regarding her fabrication of a pregnancy and subsequent
23 abortion during her relationship with Michael Marraccini in 2016.
24

25 2. C [REDACTED] S [REDACTED] gave a written statement under penalty of perjury on or
26 about March 27, 2018 in FDV-18-813693 indicating knowledge of Plaintiff's
27
28

1 **admissions regarding her fabrication of a pregnancy and subsequent abortion**
2 **during her relationship with Michael Marraccini in 2016.**

3 Any and all persons identified through on-going discovery and/or disclosure. Mr.
4 Gillespie reserves the right to supplement as discovery progresses.
5

6 **VI. ANTICIPATED SUBJECT AREAS OF EXPERT TESTIMONY**

7 Mr. Gillespie reserves the right to supplement as discovery progresses.

8 **VII. DAMAGES**

9
10 Mr. Gillespie has sustained significant monetary damages as a result of being unable
11 to work due to the extreme amount of emotional distress he experienced while being
12 subjected to Plaintiff's fraudulent representations and intentional infliction of emotional
13 distress and is therefore seeking to be compensated for the same in addition to an award of
14 his attorneys' fees and costs pursuant to A.R.S. §§ 12-341, 12-349 and Rule 11, *Arizona*
15 *Rules of Civil Procedure.*
16

17 **VIII. EXHIBITS**

- 18
- 19 1. Text messages between parties' cell phones from 06/29/21 through
20 08/24/21 [GG0001-GG0216];
 - 21 2. Communications between Plaintiff's work phone and Mr. Gillespie's cell
22 phone dated 08/02/21 [GG0217-GG0217];
 - 23 3. Communications between Plaintiff ([REDACTED]@gmail.com) and
24 Mr. Gillespie's cell phone dated 08/02/21 [GG0218-GG0218];
25
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- 1 4. Communications between Plaintiff ([REDACTED]@aol.com) and Mr.
2 Gillespie's cell phone dated 08/02/21 through 08/05/21 [GG0219-
3 GG0343];
- 4 5. Communications between Plaintiff [REDACTED]) and
5 Mr. Gillespie's cell phone dated 08/06/21 [GG0344-GG0352];
6
- 7 6. Communications between Plaintiff
8 [REDACTED]) and Mr. Gillespie's cell phone
9 dated 08/06/21 [GG0353-GG0353];
10
- 11 7. Communications between Plaintiff [REDACTED]@gmail.com) and Mr.
12 Gillespie's cell phone dated 08/06/21 [GG0354-GG0355];
13
- 14 8. Communications between Plaintiff [REDACTED] and
15 Mr. Gillespie's cell phone dated 08/07/21 through 08/08/21 [GG0356-
16 GG0401];
- 17 9. Communications between Plaintiff [REDACTED]@gmail.com) and Mr.
18 Gillespie's cell phone dated 08/09/21 through 08/10/21 [GG0402-
19 GG0403];
20
- 21 10. Communications between Plaintiff [REDACTED]@gmail.com) and Mr.
22 Gillespie's cell phone dated 08/16/21 [GG0404-GG0404];
23
- 24 11. Letter from Plaintiff to Mr. Gillespie [GG0405-GG0412];
- 25 12. Email from Plaintiff to Mr. Gillespie dated 08/22/21 regarding Urgent:
26 copy of conversation with Joe Cotchett & contract [GG0413-GG0420];
27
- 28 13. Plaintiff's Instagram posts [GG0421-GG0431];

1 14. Email from Plaintiff to undersigned counsel dated 02/06/22 and attached
2 screenshot [GG0432-GG0433];

3 15. Plaintiff's Complaint for Damages Based Upon: Negligence, Negligent
4 Entrustment, Negligent Hiring, Supervision or Retention in Case No. CGC-
5 19-575032 [GG0434-GG0449];
6

7 16. 'Vanishing' blogpost on I Still Believe - Our story and journey after the
8 stillbirth of our son and our faith in the Lord [GG0450-GG0452];
9

10 17. https://www.youtube.com/watch?v=UIOX-_VDIfo (The Lifesaving Power
11 of Kindness to Strangers | Laura Owens | TEDxMercerIslandHSWomen -
12 YouTube);

13 18. **All public records obtained regarding FDV-18-813693 [GG0453-**
14 **GG0672];**
15

16 19. Plaintiffs' current and former medical records from all providers (*will*
17 *supplement*);
18

19 20. Without waiving available objections, any and all transcripts of depositions
20 or statements taken of any person in this matter and any exhibits or attachments thereto.

21 21. Without waiving available objections, any and all admissible portions of
22 discovery responses and disclosure statements served by any party in this matter and any
23 exhibits or attachments thereto.
24

25 22. Without waiving available objections, any and all expert reports and
26 attachments thereto provided in this matter.
27
28

1 23. Without waiving available objections, any and all exhibits and or evidence
2 disclosed and/or listed by Plaintiffs.

3 **IX. INSURANCE POLICIES**

4 Not applicable.
5

6 **X. RELEVANT DOCUMENTS**

7 Mr. Gillespie reserves the right to supplement as discovery progresses.

8 **DATED** this 4th day of March, 2022.
9

10 **WOODNICK LAW, PLLC**

11 

12 _____
13 Gregg R. Woodnick

14 Kaci Y. Bowman

Attorneys for Defendant

15 **COPY** of the foregoing document e-mailed
16 this 4th day of March, 2022 to:

17 Laura Owens

18 

19 *Plaintiff Pro Per*

20
21 By: /s/Sara Seeburg
22
23
24
25
26
27
28

VERIFICATION

GREGORY GILLESPIE, being first duly sworn upon his oath, deposes and says:

That he is the Defendant/Counterclaimant in the foregoing cause of action; that as such, he is authorized to make this Verification; that he has read the foregoing *Second Supplemental Disclosure Statement* and knows the contents thereof to be true of his own knowledge, except as to those matters stated on information and belief, and as to such, he believes the same to be true.

DocuSigned by:

F68541EEEBEC422...

GREGORY GILLESPIE

3/4/2022

Date