SUPERIOR COURT OF ARIZONA

Subpoena: MC0000071721 (05/07/2024 10:43 AM)

Your Duties In Responding To This Subpoena

ATTENDANCE AT A TRIAL: If this subpoena commands your attendance at a deposition, hearing, or trial, you must appear at the place, date and time designated in the subpoena unless you object (see below, procedures for objecting). Unless a court orders otherwise, you are required to travel to any part of the state to attend and give testimony at a trial.

ATTENDANCE AT A HEARING OR DEPOSITION: If this subpoena commands you to appear at a hearing or deposition, you must appear at the place, date and time designated in this subpoena unless either:

(1) you timely object (see below, the procedures for objecting); or

(2) you are not a party or a party's officer and this subpoena commands you to travel to a place other than:

  (1) the county where you reside or you transact business in person; or

  (2) the county in which you were served with the subpoena or within forty (40) miles from the place of service; or

  (3) such other convenient place fixed by a court order.

PRODUCTION OF DOCUMENTARY EVIDENCE: If this subpoena commands you to produce and permit inspection, copying, testing or sampling of designated documents, electronically stored information, or tangible things, you must make the items available at the place, date and time designated in this subpoena, and in the case of electronically stored information, in the form or forms requested, unless you provide a good faith written objection to the party or attorney who served the subpoena. You may timely object to the production of documentary evidence (see below, the procedures for objecting).

You may object to the production of electronically stored information from sources that you identify as not reasonably accessible because of undue burden or expense, including sources that are unduly burdensome or expensive to access because of the past good-faith operation of an electronic information system or good faith or consistent application of a document retention policy.

If this subpoena does not specify a form for producing electronically stored information, you may produce it in native form or in another reasonably usable form that will enable the receiving party to have the same ability to access, search, and display the information as the responding person, but you need not produce the same electronically stored information in more than one form.

If the subpoena commands you to produce documents, you have the duty to produce the designated documents as they are kept by you in the usual course of business, or you may organize the documents and label them to correspond with the categories set forth in the subpoena.

INSPECTION OF PREMISES: If this subpoena commands you to make certain premises available for inspection, you must make the designated premises available for inspection on the date and time designated in this subpoena unless you provide a timely, good faith written objection to the party or attorney who served the subpoena.

COMBINED SUBPOENA: You should note that a command to produce certain designated materials, or to

You do not, however, need to appear in person at the place of production or inspection unless the subpoena also states that you must appear for and give testimony at a hearing, trial, or deposition.

Your Right To Object To This Subpoena

I. If you have concerns or questions about this subpoena, you should first contact the party or attorney who served the subpoena. The party or attorney serving the subpoena has a duty to take reasonable steps to avoid imposing an undue burden or expense on you. The Superior Court enforces this duty and may impose sanctions upon the party or attorney serving the subpoena if this duty is breached.

- You may object to this subpoena if you feel that you should not be required to respond. You must make any objection within 14 days after the subpoena is served upon you, or before the time specified for compliance, by providing a written objection to the party or attorney serving the subpoena. *
- If you object to the subpoena in writing, you do not need to comply with the subpoena until a court orders you to do so. It will be up to the party or attorney serving the subpoena to seek an order from the court to compel you to provide the documents or inspection requested, after providing notice to you. *

Unless otherwise ordered by the Court for good cause, the party seeking discovery from you must pay your reasonable expenses incurred in responding to a subpoena seeking the production of documents, electronically stored information, tangible things, or an inspection of premises.

- If you seek payment of expenses other than routine clerical and per-page costs as allowed by A.R.S. §12-351, you must object on the grounds of undue burden to producing the materials without the subpoenaing party's payment, and send an advanced estimate of those expenses to the subpoenaing party before the time specified for compliance or within 14 days after the subpoena is served, whichever is earlier. *
- You need not comply with those parts of the subpoena that are the subject of the objection, unless the Court orders you to do so. The court may enter an order conditioning your response to the subpoena on payment of your additional expenses, including ordering payment of those expenses in advance. *

II. PROCEDURE FOR OBJECTING TO A SUBPOENA FOR ATTENDANCE AT A HEARING, TRIAL OR DEPOSITION:

A. Form and Time for Objection.

(i) A person commanded to comply with a subpoena may object to the subpoena in writing on the basis that the information requested is not reasonably accessible or because complying with the subpoena would cause an undue burden or expense. The objection must state the basis for the objection, and must include the name, address, and telephone number of the person, or the person's attorney, serving the objection. The objection must be served on the party or attorney serving the subpoena before the time specified for compliance or within 14 days after the subpoena is served,

III. COURT MODIFIES or VOIDS (quashes) CIVIL SUBPOENA

A. The court must quash or modify a subpoena if . . .

(1) the subpoena does not provide a reasonable time for compliance;

(2) unless the subpoena commands your attendance at a trial, if you are not a party or a party's officer and if the subpoena commands you to travel to a place other than:

a. the county in which you reside or transact business in person;

b. the county in which you were served with a subpoena, or within forty (40) miles from the place of service; or

c. such other convenient place fixed by a court order; or

(3) the subpoena requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(4) the subpoena subjects you to undue burden.

B. The court may quash or modify a subpoena if . . .

(1) the subpoena requires you to disclose a trade secret or other confidential research, development or commercial information;

(2) you are an unretained expert and the subpoena requires you to disclose your opinion or information resulting from your study that you have not been requested by any party to give on matters that are specific to the dispute;

(3) you are not a party or a party's officer and the subpoena would require you to incur substantial travel expense; or

(4) the court determines that justice requires the subpoena to be quashed or modified.

In these last four circumstances a court may instead of quashing or modifying a subpoena, order your appearance or order the production of material under specified conditions if:

a. the party or attorney serving the subpoena shows a substantial need for the testimony or material that cannot otherwise be met without undue hardship; and

b. the person's travel expenses or the expenses resulting from the production are at issue, the party or attorney serving the subpoena assures that the subpoenaed person will be reasonably compensated for those expenses.

ADA Notification

Requests for reasonable accommodation for persons with disabilities must be made to the division assigned to the case by the party needing accommodation or his/her counsel at least three (3) judicial days in advance of a scheduled proceeding.

Interpreter Notification

Requests for an interpreter for persons with limited English proficiency must be made to the division assigned to the case by the party needing the interpreter and/or translator or his/her counsel at least ten (10) judicial days in advance of a scheduled court proceeding.

SIGNED AND SEALED this 7th day of May, 2024

[redacted]

[redacted]

By: The State Bar of Arizona on behalf of the clerk pursuant to ARCP 45(a)(2)

Gregg R Woodnick, State Bar Number: [redacted]
Woodnick Law PLLC
1747 E Morten Ave Ste 205
Phoenix, AZ 85020-4691
[redacted]

Representing: Respondent

SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY

In the matter of:

LAURA OWENS
Petitioner(s)

CLAYTON ECHARD
Respondent(s)

Case No.: FC2023-052114

AFFIDAVIT OF SERVICE FOR SUBPOENA in a Family Case

Arizona Rules of Family Law Procedure, Rule 52

I received the subpoena addressed to: MICHAEL MARACCINI, c/o Randy Sue Pollock, Attorney at Law [redacted]
which was dated 05/07/2024 I personally served the subpoena as follows:

On this date: _____ At this time: _____

At this location: _____

To (Name): _____

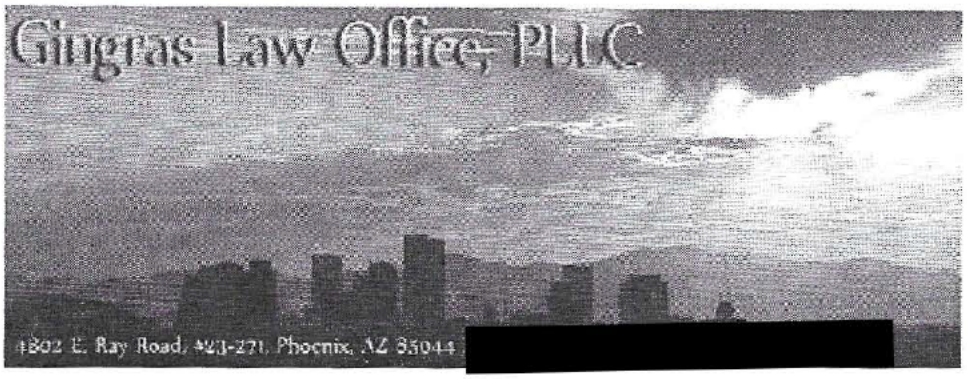
Manner of Service: _____ (how served)

☐ I was over the age of 18 at the time the subpoena was served. I am not a party to the case.

UNDER PENALTY OF PERJURY:
By signing below, I state to the Court under penalty of perjury that the contents of this document are true and correct.

Date: _____ _____
Signature:

EXHIBIT "3"



From: Michael Marraccin
Sent: Thursday, May 9, 2024 8:15 AM
To: David Gingras
Subject: Owens v Echard

Mr. Gingras,

Gregg Woodnick reached out to me and gave me your contact number because you have expressed a desire to speak to me. I want you to know that I was about to call you and tell you about my harrowing experience with Laura Owens and all the lies she told including, but not limited to, lying about being pregnant with twins, telling me she had cancer, threatening suicide, and emotionally terrorizing me to coerce me into a relationship with her. But before I could pick up the phone, I saw that you tweeted out a photograph of me and Laura and audio from a radio show we did together from that traumatic time in my life. I cannot express to you how inappropriate and offensive that action was. You have accused me of fabricating evidence and lying which led me to take my laptop directly to an expert for analysis.

I had moved on with my life and had no interest in opening up old wounds that have so injured me but you made it impossible for me to sit quietly. You posted my deposition online to accuse me of lying and you humiliated me purposefully. I deeply resent the allegations, which is why I decided to turn over my laptop as evidence in the Clayton Echard case against Laura. We both know that she sent those doctored medical records to me and now you have the proof. I could not in good conscience remain quiet and watch Laura use this same playbook against another innocent man.

I have decided that I will not speak with you on the phone. I will speak in a court of law on June 10th, under oath, and I will tell the truth about the horrors that Laura visited on my life. You may ask me any question you want and I will answer with the whole truth. You do not understand, or willfully refuse to accept, how traumatizing my interaction with Laura Owens has been. She has destroyed my reputation and ruined background checks by taking out a fraudulent order of protection against me based on lies that have affected me personally & professionally. She accused me of horrific acts of domestic abuse that never happened. She fabricated medical evidence and held threats of suicide over my head to keep me locked in a relationship that was toxic and deeply disturbing.

But perhaps the worst thing you have done is to suggest that I should talk to Laura, the woman who attempted to, and in many ways did, destroy me. This is the same woman who continues to renew the false order of protection against me and pretends to be terrified I'll be in the same courtroom as she. Why would someone so afraid of me want to speak to me and violate that order she insists she needs? This, just a day after you threatened to have me arrested if I showed up at the courthouse to be a witness. The fact you would suggest such an inappropriate call between me and my abuser proves to me you have no idea how inappropriate it would be to speak to the woman who fabricated

wild tales about me and turned them into a TedX talk and an entry in Chicken Soup for the Soul that will live on forever.

This letter, which has been painful for me to write, has addressed everything you wanted to speak to me about by phone.

All the best,

Michael Marraccini

Maribeth Burroughs

From: David Gingras [redacted]
Sent: Thursday, May 9, 2024 9:27 AM
To: Gregg Woodnick
Cc: Isabel Ranney
Subject: FW: Owens v Echard

Gregg,

See the email below from Marraccini. I haven't responded to him, since I still don't know if he's represented by counsel. I don't really consider Randy Pollock to be representing him with respect to the AZ case since she's not licensed in AZ and hasn't done anything to appear in the case on his behalf. Still, I don't want to communicate directly with Mike unless/until someone confirms he is not represented, or if he is, that I have consent from counsel to talk to him.

I realize Mike isn't actually your "client" (to my knowledge), so I don't know how much control you have with him, but I'm hopeful maybe you can get Mike to change his mind.

He's apparently unhappy about something I tweeted yesterday (which I removed after seeing his email). This doesn't seem fair – Laura is being attacked relentlessly on a daily (virtually constant) basis by people on Clayton's side, but somehow if I say or do *anything* to respond, this is somehow deemed outrageous. It's really frustrating. There are two sides to the story here, and one side seems to be monopolizing the narrative, often with less than total candor.

Anyway, I want to keep the lines of communication open with you, and I promise to keep things on the same professional level as the conversation yesterday, but I just need to let you know – if Mike won't speak to me, then I have to go back to my previous position that I'm going to ask the court to exclude him from the trial. That's just what the rules require here, so if Mike it's willing to be flexible, then neither can I.

Again, this is NOT any sort of criticism directed at you. It's just hard when I'm dealing with people who demand that ONLY their side of the story can be told.

Because time is so short, I need to know ASAP if Mike is standing on this position. If he is, I will need to file another short MIL seeking to exclude him for nondisclosure.

P.S. I sincerely do appreciate you talking the time to talk yesterday, and I'm hopeful that if you need anything or want to talk further, you can just pick up the phone and give me a call. Those direct conversations are so helpful; emails just don't have the same benefits.

David Gingras, Esq.
Gingras Law Office, PLLC
[redacted]

EXHIBIT "4"

Maribeth Burroughs

From: David Gingras [redacted]
Sent: Monday, April 22, 2024 12:36 PM
To: Gregg Woodnick; Isabel Ranney
Cc: Maribeth Burroughs
Subject: RE: Owens v. Echard - Witness Stuff

Some comments back in RED...

From: Gregg Woodnick [redacted]
Sent: Monday, April 22, 2024 11:29 AM
To: David Gingras [redacted]; Isabel Ranney [redacted]
Cc: Maribeth Burroughs [redacted]
Subject: RE: Owens v. Echard - Witness Stuff

David,

1. Video testimony: I agree that all witnesses (not parties) can appear virtually if they are not local. That seems to work well with bench trials. To be clear, we are not stipulating to the admission of your expert's report but his testimony can certainly be done via video.

My preference is to have everyone testify in person, if possible, but I'm just not 100% sure about Dr. Medchill's travel plans. He lived in Phoenix for the last 30+ years and just recently retired and moved to Florida, but he has family here in AZ and he comes here regularly. Given a choice, I'd like him to appear personally at trial, but if he can't make it, I guess video will be fine assuming the court allows it. I don't object to you calling anyone by video, but again, I don't know Judge Mata's policy on this stuff (which is why I asked). To the extent it matters, I'll stipulate to video if you want it.

2. Trial Time: I will streamline my presentation to fit into our allotted hour. Laura invoked Rule 2 with one of her prior lawyers. *Maybe we can maximize our court time if we stipulate to proceeding without Rule 2?* I think that also helps keep costs down.

I always favor streamlining and simplification, but we need to follow the rules of evidence, so I won't agree to waive Rule 2. That just isn't appropriate in light of the allegations here. There is WAY too much inappropriate stuff being brought in by your side, so we need the evidentiary rules to help narrow things down.

3. Witnesses: [redacted] Mike, and Greg would (time permitting and consistent with the disclosure, will testify that they experienced false pregnancy claims, altered medical records, suicidal threats of breakups, behavior with their families and abortions contingent on relationship contracts etc.) Our disclosure statement is reattached for your convenience and includes a summary of their testimony. I am not sure what happened with your call with Randy but she likely did not recognize your name, as you are not the first attorney Laura has had in this melee. I have spoken to her but it was months ago and before your involvement. I have confirmation that Mike fully supports this process. Of course I can subpoena him, but that won't be necessary. If you call [redacted] she will confirm what happened with Mr. [redacted] I sent Greg Gillespie your contact information so hopefully you connected. If you feel you need more information per Rule 49j that is not included in the attached, let me know.

Just FYI – based on the comments above, I'm going to file a motion in limine to preclude the testimony of [redacted] Mike, and Greg. This is classic prior bad act evidence that is not admissible under 404(b). In addition, you have

never disclosed the substance of any of these people's expected testimony, and it's clear you had that information more than 30 days ago, so the MIL will argue both 404(b) and untimely disclosure (and, frankly, relevance – an unproven allegation from an angry ex boyfriend is literally meaningless in this situation).

4. Experts/Doctors: I forwarded your expert's draft to our experts. I am a little confused by your expert report and, while ours (forthcoming) will certainly not align and was delayed because we are giving planned parenthood a second chance at providing the ultrasound, I don't think your doctor's testimony (if accepted by the court) addresses the fundamental problem of your client's behavior in the litigation. Once we receive the final version we will be making specific content objections permitted by law. I am not going to engage in a debate over the facts as we can do that in court or with a mediator as was previously suggested. Parenthetically, I would point out that your theory about "weight gain" is quickly refuted by your client's own medical records (per her Banner record, she weighed 121 lbs on June 1st 2023).

I'm hoping to get you Medchill's final report today, and this will include more information that you don't yet have (such as an affidavit that Laura gave to Medchill, as well as my cover letter to him which explains the scope of the testimony I asked for, as well as some specific questions I asked him to consider). You obviously need that additional information to provide context, so this will be sent to you today, if possible.

Since I don't have your expert reports, I can't really speculate about what they are going to say, but based on the limited info in your 3rd disclosure statement, I'm probably going to bring a motion to exclude your experts based on 702/Daubert and relevance. I'll let you know once I see their reports and have a chance to discuss them with Dr. Medchill.

SIDE NOTE – your 3rd disclosure statement says Dr. Deans is going to testify that "HCG tests were never *dispositive* of pregnancy". Assuming she says this (which is hardly a contested issue), I think it's important to remind you that you are applying exactly the *wrong* standard here.

The ONLY remaining issue is whether Laura should be sanctioned for bringing a claim she knew was false. While you are going to lose that argument for other reasons, to obtain sanctions you seem to believe that Laura has some obligation to show to a 100.000000000% degree of medical certainty that she was pregnant. That is what the JFC crew has been claiming for weeks.

That is exactly backwards – Laura simply has to show she had SOME reason to think she MIGHT be pregnant. If she had that basis, she cannot be sanctioned, even if her belief was wrong. At no point is she obligated to establish the pregnancy was confirmed in some "dispositive" manner, whatever that even means.

This is just another reason why I will probably move to exclude Dr. Deans' testimony about HCG not being "dispositive". Who cares? That is simply not relevant to any issue in this case. Honestly, I'm guessing Dr. Deans would agree that a positive HCG test DOES give a woman a reason to believe she probably was pregnant, which would make her a strong witness for Laura's side.

I guess I'll ask her when I see her report.

5. Motion for Judgment on the Pleadings and intention to file for sanctions against me personally: If this is how you choose to litigate (and to relitigate things that have already been addressed and denied) then a phone call to discuss is not going to impact anything. It will be more posturing and I don't think it is helping our clients. File what you must and we will respond in kind.

I don't understand what you mean by this: "things that have already been addressed and denied". I think you must be referring to the fact that Laura's prior counsel ask the court to dismiss the case, and then the judge apparently granted that and then changed her mind?

Those are two completely different issues. My motion for judgment on the pleadings is going to argue that you cannot get sanctions as a matter of law because you didn't follow the rules. I don't believe that issue was fully raised before, which is why I'm going to raise it now. As for the ARS 12-349 issue, that pretty much speaks for itself.

6. Meet and Confer: The purpose of a meet and confer is to discuss possible resolution of issues. If you have a proposed settlement you would like to discuss over the phone, I am happy to coordinate the call but I am not interested in the scorched earth Conor McGregor stuff. You apologized previously but reverted to the same behavior online via Twitter and your blog. If you really think the call would be productive, I am happy to coordinate it but your mind seems very made up (at least from your Blogs and whatnot). If you think a call would change your perspective about what you are going to file, I will find time to talk with you this afternoon.

Did Dave Neal ever share that LONG email I sent? If you haven't seen it, let me know and I'm happy to share it with you. The point is you misunderstood what I meant about Conor McGregor.

As I explained to Dave Neal, I have been involved in MANY cases that were MUCH more contentious than this one. And in many of those cases, opposing counsel ended up losing their licenses and, in more than one case, the lawyers ended up in jail.

The Conor McGregor reference simply means I've been dragged into a LOT of really nasty fights (never by my choice), and in many of those fights, my adversaries have ended up self-destructing, while I'm still here standing (that's what Conor McGregor means to me). It was never a suggestion that I *enjoy* violent confrontation or that I am out to gratuitously hurt anyone. My point was to say that I am veteran of many tough battles, and while I would prefer to avoid messy conflicts, I am not afraid of going there if given no other choice.

Having said that, I do think we should talk because there are so many moving parts here. Among other things, I just want to get a clear understanding of WHO is really coming to trial, and WHAT they are going to say (bearing in mind I'm still going to seek to exclude pretty much all your witnesses based on lack of timely disclosure). It's hard to have that conversation via email...and YES – I'm more than happy to give you a verbal summary of everything on my side as well.

Speaking of which, now that I fully understand the case (from Laura's side), I would *really* find it helpful if you could give me additional detail from Clayton's side, especially with regard to this claim that Laura faked pregnancies with other men.

Let me give you an example – in talking to Laura about all this, I asked her to explain the story of Gillespie. I was curious to know exactly WHAT basis he had for claiming that she "faked" being pregnant.

Laura's response was (paraphrased):

- She had a brief relationship with Gillespie (I think she said they had sex twice and went on like roughly 6 dates over a period of a few weeks).
- Laura tested positive for pregnancy. Gillespie asked her to terminate the pregnancy medically, which she did about 4 weeks later (by taking pills in Gillespie's presence).
- According to Laura, that is the entire story (aside from the later litigation, which went nowhere). There was never any ultrasound (why would there be?) and there were basically no other medical records involved other than the initial pregnancy test and the later medical abortion.

Assuming Laura has accurately communicated the above facts, I'm guessing that Gillespie's only basis for claiming that Laura faked the pregnancy is because.....what?.....he just doesn't think she actually got pregnant?

Pure speculation like that is clearly inadmissible, and if you tried to call Gillespie as a witness and ask him whether he thinks Laura faked being pregnant with him, I'd object due to a lack of foundation and calls for speculation.

After this many years of legal practice, you should know this by now – you can't just call a witness and ask them to guess about whether something happened. The witness must first prove they have personal knowledge of the matter in question. I see no basis to establish that Gillespie has personal knowledge of Laura *NOT* being pregnant. Same thing with Marraccini (his lawyer also told me he is not testifying at trial). Same thing with [redacted].

7. Moving forward: I know Laura wants this to be over and candidly Clayton does too, but that requires her acknowledging how dishonest her behavior has been. I only speak for Clayton (via Rule 408) but he does not seem interested in more litigation both because Laura is probably judgment proof and because he has wanted the same thing since day one. He does not believe the pregnancy as they did not have sex and for all of the myriad reasons you already know, including the nearly identical stories from three (3) other men. All Clayton has ever wanted is an acknowledgment by Laura she has a pattern of lying about pregnancies to force relationships with guys who have rejected her. Even accepting (which we don't) that she was pregnant without intercourse and your expert's conclusion that she was pregnant with Clayton's twin children without *any* DNA testing and with a fabricated ultrasound, it does not change what has happened *since* her alleged miscarriage or her conduct predating this litigation. This ends either with trial in June or with Laura coming clean. This is her out.

I am happy to discuss settlement, but I also need to be honest – when Laura prevails in this case, she is going to sue Clayton and many other people for defamation and other torts. We can certainly avoid that if you want, but it's going to involve someone writing a very large check to Laura. If you offered $1 million right now, I'd advise her to reject that offer.

So yeah, happy to talk about settlement if you want, but I don't think that is likely to happen.

8. Progress: Assuming she wants to continue down this litigation path, are we agreeing that witnesses by video and no more Rule 2? (We can still preserve *Daubert*/702 issues with regard to the docs.)

I think we can at least agree on the video issue.

Gregg

From: David Gingras [redacted]
Sent: Friday, April 19, 2024 3:36 PM
To: Gregg Woodnick[redacted]; Isabel Ranney [redacted]
Cc: Maribeth Burroughs [redacted]
Subject: Owens v. Echard - Witness Stuff

Gregg,

We need to talk about witnesses. I'm asking because obviously it's not possible for you to call nine people in the 60 minutes your side has. I'm also asking because when I see newly disclosed witnesses (as here) and there isn't any disclosure about what the person is going to say (as here), I like to just pick up the phone and ask the witnesses.

So I just tried calling the contact person you had listed for Mike Marraccini (Randy Pollock). Randy really surprised me – she said she had never heard of this case, never heard of me, never heard of you, and as far as she was aware, Mr. Marraccini wasn't coming to testify as a trial witness.

I also tried calling the contact person you listed for [redacted] Got voicemail. Hopefully she will call me back.

I was going to call Greg Gillespie, but it's not clear to me whether he's represented by counsel (your disclosure does not say you're representing him, but I know you obviously had that prior relationship). So, please clarify whether it's OK for me to talk to him directly, or whether you want that to go through you.

If I don't get any response, I'm considering whether we should just depose these folks, but I'd like to avoid the extra costs if possible.

Anyway, the easiest thing to do here is for us to have a conversation about who you are actually planning to call at trial. Right now, my witnesses are 1.) Laura, 2.) Clayton, 3.) Laura's mom, and 4.) Dr. Medchill. I'm planning to send you an updated disclosure statement next week which includes summaries of all witnesses' expected testimony, plus all my trial exhibits, and if Dr. Medchill's report is ready by then, I will include it as well.

On that note, I'd also like your input on whether you are OK with having out-of-state folks appear by phone or Zoom or whatever. Medchill lives in Florida, but he has family in AZ so I think his first preference is appear remotely, but he can also be here in person if that's the only choice.

I'd appreciate getting the same info from you re: which people you actually plan to call, and what they are going to say. Obviously, it should come as no surprise that we are *not* expecting you to wait until the last minute (i.e., May 10th) to finally disclose the substance of what each witness is going to say. If that happens, I'll move to exclude all that info as untimely per Rule 49(b)(2)(B) since you didn't disclose it within 30 days of learning the information. I'm also considering a Rule 404(b) motion in limine as to Gillespie, Marracinni, and [redacted] but I can't really do that without knowing what you plan to have them talk about.

Look – despite all the animosity, there is still a lot of stuff we can do to get this thing ready for resolution. All I'm asking is for you guys to follow the rules. I'm trying to do that, and it's not unreasonable for me to ask the same from you.

David Gingras, Esq.
Gingras Law Office, PLLC
[redacted]