

Exhibit E

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

LAURA OWENS,)
)
) Petitioner,)
)
) and) FC2023-052114
)
CLAYTON ECHARD,)
)
) Respondent.)
_____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS
EVIDENTIARY HEARING
BEFORE THE HONORABLE JULIE MATA

Phoenix, Arizona
June 10, 2024

CERTIFIED COPY

Prepared for: PETITIONER
Reported by: Nicole Tatlow, RPR
Certified Reporter No. 50671

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P R O C E E D I N G S

1
2
3 THE COURT: Good morning, everyone. This is the
4 time set in FC2023-052114.

5 Appearances, please, beginning first with
6 Petitioner's counsel.

7 MR. GINGRAS: Good morning, Your Honor.
8 David Gingras on behalf of Laura Owens.

9 Ms. Owens is present with me in court today,
10 along with her -- her mother and our medical expert,
11 Dr. Michael Medchill.

12 THE COURT: Good morning to you all.

13 And from the Respondent, please?

14 MR. WOODNICK: Good morning, Judge.
15 Gregg Woodnick. I'm here for Clayton Echard.

16 And also with me is my cocounsel, Deandra Arena
17 and Isabel Ranney.

18 THE COURT: Good morning to all of you.

19 Is that, by chance our expert, maybe?

20 THE COURTROOM ASSISTANT: Yes.

21 THE COURT: Oh, no. I wasn't talking to the
22 media. You're fine. I was talking to Leala.

23 All right. So, Counsels, I know we discussed in
24 chambers whether the rule's going to be invoked or not.

25 What did we decide?

1 MR. GINGRAS: We're not invoking it.

2 MR. WOODNICK: We're good.

3 THE COURT: Okay. All right. So then as I told
4 the parties, that extends your time by five minutes. Each
5 party will be given 50 minutes.

6 We will take a ten-minute break roughly halfway
7 through. I allow ten minutes for technical difficulties
8 because they just happen to everybody.

9 Are either counsel using a laptop that may kick
10 you out on Wi-Fi? No? All right. So that won't be an
11 issue, then, this morning.

12 And then the additional ten minutes has now been
13 absorbed into the parties' time.

14 Counsel, I note that you wish to make a record
15 before we begin. Did you wish to make that now?

16 MR. GINGRAS: I do, Your Honor, as quickly as I
17 possibly can.

18 THE COURT: Okay.

19 MR. GINGRAS: So we object to Mr. Michael
20 Marraccini being called as a witness. There are two bases
21 for this objection. The first is nondisclosure. I raised
22 this before in a motion in limine, if the Court would
23 remember. I don't think the Court had all the facts at that
24 time, and I don't know that I had an opportunity to present
25 them, so I just want to briefly explain what the basis is

1 for the nondisclosure objection.

2 I got involved in this case on March 25th, 2024.
3 Two days after that, Mr. Woodnick served a -- a second
4 supplemental disclosure statement. That was the first time
5 that Mr. Marraccini was identified as a witness. The entire
6 disclosure was a single sentence long, and I'll -- I'll read
7 it. "This witness is expected to testify about his prior
8 interactions with the petitioner, her two alleged
9 pregnancies during their relationship, and the subsequent
10 litigation." That was the entirety of the disclosure as to
11 Mr. Marraccini.

12 As I would in any case, Your Honor, once I got a
13 copy of the file, I started to investigate, and I reached
14 out to the contact person listed for Mr. Marraccini, who was
15 a lawyer in California named -- named Randy Sue Pollock. I
16 spoke to Ms. Pollock. She expressed extreme surprise. She
17 had never heard of this case, she'd never heard of
18 Mr. Woodnick, she had no idea why I was calling her. I told
19 her that her client had been listed as a witness and that I
20 wanted to know if he was going to come to trial or not. If
21 he was, I may want to speak to him, may want to depose him.
22 She said that she would get back to me and let me know.

23 She sent me an e-mail the next day, dated
24 April 19th, which I have a copy of, and I'll put it into
25 record if -- if Your Honor would allow. She said to me in

1 writing, "My client will not be testifying." Referring to
2 Mr. Marraccini. I thought, great, one less person, one less
3 time issue to deal with.

4 That remained my understanding until the morning
5 of April 30th, when I received a new disclosure from
6 Mr. Woodnick that totally changed the -- the landscape.
7 This was the first time that I'd heard there was an issue of
8 fake medical records with Mr. Marraccini and my client in
9 California some eight years ago. That's why I -- literally
10 within an hour of seeing that information, I filed an
11 emergency motion for a court hearing. The Court,
12 unfortunately, took two and a half weeks and then denied
13 that, so I was not given an opportunity to explain the
14 problem.

15 Here we are, Your Honor, the morning of trial. I
16 still don't know what Mr. Marraccini is going to say. That
17 is a complete violation of Rule 49. The whole purpose of
18 the disclosure rules is to avoid surprise. And yet here we
19 are, surprised, waiting to see what he's going to say.
20 That's improper.

21 The second issue, Your Honor, deals with this
22 California court restraining order. I think you have a copy
23 of it. It's one of our trial exhibits. We have a court
24 record from the State of California that prohibits
25 Mr. Marraccini from being within a hundred yards of

1 Ms. Owens. He's in violation of it right now. There is no
2 exception for court appearances. She is so terrified that
3 she may not be able to sit here during this trial.

4 Under the full faith and credit cause of the U.S.
5 Constitution and also under federal law, this Court is
6 required to enforce that order as it is written. You can't
7 change it, you can't modify it, you can't disregard it. And
8 yet here we are.

9 So for those two reasons, I would ask the Court
10 to exclude Mr. Marraccini.

11 THE COURT: Thank you.

12 Response?

13 MR. WOODNICK: I can do it in 30 seconds, Judge.

14 Number one, you already ruled on this. And
15 number two, there's a lack of transparency in the comments
16 because, number one, Your Honor already saw Mr. Marraccini's
17 correspondence to Mr. Gingras as to why he didn't want to
18 talk to him, and number two, Mr. Marraccini is here and is
19 available, and certainly Mr. Gingras could have walked out
20 in the hallway and talked to him, but instead, he called
21 9-1-1.

22 THE COURT: Thank you.

23 MR. GINGRAS: Your Honor, just --

24 THE COURT: Any response?

25 MR. GINGRAS: Very briefly.

1 The whole point here is I wanted to talk to
2 Mr. Marraccini. I wanted to interview him either
3 informally, which I would do in any case, or depose him if
4 he wouldn't participate. I couldn't do that because I
5 didn't have contact information from him, and his attorney
6 told me he wasn't coming. So somebody lied to me. I don't
7 know who it was, but I don't care. The disclosure rules
8 require him to disclose everything to me so that I am not
9 surprised. That was not done. He shouldn't be allowed to
10 testify.

11 THE COURT: Thank you.

12 Okay. The Court did previously rule on this. My
13 ruling will stand. But I appreciate the record.

14 So at this point, Counsel, on your client's
15 behalf, how many people will be testifying, and are they in
16 the courtroom right now?

17 MR. GINGRAS: We have three, and they are -- they
18 are all here.

19 THE COURT: Okay.

20 Do we have the expert available virtually?

21 THE COURTROOM ASSISTANT: Yes.

22 THE COURT: Okay.

23 And then, Counsel, from your perspective, which
24 witnesses are you calling, and are they all here?

25 MR. WOODNICK: We have Mr. Echard,

1 Mr. Marraccini, Mr. Gillespie, and Dr. Deans, who is by
2 phone -- or by video.

3 THE COURT: Okay. All right.

4 All right. So what we're going to do at this
5 time is we're going to swear everybody in. That gives the
6 parties a little bit more time. So I'm going to have anyone
7 who is being called as a witness to please raise your right
8 hand to be sworn in.

9 And I apologize, Dr. Deans. I can't see you.
10 But if you would, please, raise your right hand.

11 (WHEREUPON, the witnesses were duly sworn by the
12 Court Clerk.)

13 THE COURT: Dr. Deans?

14 DR. DEANS: I do.

15 THE COURT: Thank you.

16 All right. And counsel may or may not choose to
17 make an opening statement. Just as a strategic method,
18 sometimes attorneys choose to reserve their time for
19 testimony and evidence.

20 That being said, does either party wish to make
21 an opening statement?

22 MR. GINGRAS: I do, Your Honor. I'll take about
23 15 seconds.

24 THE COURT: Okay. When you're ready.

25 MR. GINGRAS: Your Honor, the file

1 notwithstanding, I'm actually a fan of keeping things
2 simple. I believe that simple is better. That means
3 focusing on what matters and filtering out what does not
4 matter.

5 We're here on a petition to establish paternity.
6 Unless I'm missing something, the only possible outcomes of
7 that petition are that paternity is established or it is
8 not. There is no baby in this case. There is nothing to
9 establish. Our position is that the petition's moot, that
10 the Court can simply deny it, dismiss it; use whatever
11 verbiage you want to.

12 The only remaining issue is, I guess, this issue
13 of Mr. Echard's request for a judgment of non-paternity. My
14 position is he bears the burden of proving that. There's
15 absolutely no evidence to support that. And Ms. Owens, at
16 the end of the day, she was pregnant, Your Honor. The fact
17 that she was pregnant negates everything else that you're
18 about to hear. Whether she lied to an ex-boyfriend eight
19 years ago has nothing to do with whether she was pregnant
20 last year. Nothing. It does affect credibility, but as
21 you're about to hear from our medical expert, there's
22 objective proof of pregnancy that does not require relying
23 on her credibility. It's that simple.

24 So we would like the Court to dismiss, deny the
25 petition. There's no basis for fees. There's no fee

1 request in front of you right now, so -- I -- I -- I guess
2 you could offer some guidance on what the Court would do in
3 the future, but there is no -- there is no sanctions request
4 to grant, there's no fee motion to grant.

5 THE COURT: Thank you.

6 Counsel, did you wish to make an opening
7 statement?

8 MR. WOODNICK: Generally, no, but today, yes.

9 Judge, we stand by our pretrial statement and
10 detail as verified by Mr. Echard. I'll remind the Court
11 that the Court not only has the establishment of paternity
12 matter, which was filed woefully inappropriately, as you'll
13 hear today and as you know from prior pleadings in this
14 matter; but we've got the collateral protective order
15 proceedings and the orders of protection related to that
16 that Your Honor indicated that you'd already watched or were
17 watching the videos related. That's all before the Court
18 today.

19 And Your Honor has authority to make the findings
20 today that the petition was filed in bad faith, that there
21 was pervasive fraud on this Court in multiple proceedings,
22 and that attorney's fees and sanctions can be ordered in
23 this matter.

24 THE COURT: Thank you.

25 All right. So now we'll begin.

1 Yes, Counsel?

2 MR. GINGRAS: Oh, sorry.

3 THE COURT: That's okay. Did --

4 MR. GINGRAS: I was going to call my first
5 witness.

6 THE COURT: Oh. Okay. Yeah.

7 So as -- as witnesses come up to the witness
8 stand, you can bring water with you. The exhibits will be
9 displayed for you. Please let us know if you can't see it.

10 And, Counsels, you should each be made a
11 presenter when it's your turn, but if you haven't, please
12 let Leala know.

13 MR. WOODNICK: Judge, are you keeping time, and
14 what's our time-check?

15 THE COURT: Yeah. Sure. Petitioner's at 4
16 minutes, 34 seconds. Respondent's at 1 minute, 11 seconds.

17 MR. WOODNICK: Thank you.

18 THE COURT: Uh-huh.

19 When you're ready.

20 MR. GINGRAS: Your Honor, I call Laura Owens.

21 THE COURT: All right.

22

23

24 LAURA OWENS,
25 called as a witness herein, having been first duly sworn,
was examined and testified as follows:

DIRECT EXAMINATION

1
2 BY MR. GINGRAS:

3 Q. Laura, how are you feeling?

4 A. Nervous.

5 Q. Okay. Just breathe and we'll get through this
6 really quick. Okay?

7 Laura, we've talked about the timeline of events,
8 and I want to just really quickly run through.

9 When did you first meet Mr. Echard?

10 A. May the 17th, I believe, we connected on
11 LinkedIn.

12 Q. Okay. And did you -- were you intimate with him
13 at some point?

14 A. Yes.

15 Q. When was -- what day was that?

16 A. May 20th.

17 Q. At some point after you were intimate with him,
18 did you test positive for pregnancy?

19 A. Yes.

20 Q. Do you remember the first time that happened?

21 A. It was the evening of May 31st.

22 Q. Okay. After you tested positive the first time,
23 did you do anything to confirm the pregnancy?

24 A. Yes.

25 Q. What did you do?

1 A. I went to Banner Health Urgent Care the next day,
2 and I took a test there.

3 Q. On June 1st?

4 A. Yes.

5 Q. If you can look at the screen in front of you
6 there, is Ex- -- it says Exhibit 2. That's actually the
7 wrong number. But that's a -- a printout of the -- the
8 positive pregnancy test you received from Banner?

9 A. Yes.

10 Q. On June 1st?

11 A. Yes.

12 Q. Okay. And after you got the second positive
13 test, what did you do?

14 A. I told Mr. Echard.

15 Q. All right. Did you go see him at some point to
16 talk about it?

17 A. Yes.

18 Q. What day was that?

19 A. June 17th.

20 Q. When you -- and you went over to his house, I
21 understand?

22 A. Yes.

23 Q. When you showed up at his house, did he ask you
24 to take a pregnancy test?

25 A. He did.

1 Q. Did you know in advance that he was going to give
2 you that test?

3 A. I did not.

4 Q. Did you take the test in front of him?

5 A. Yes, I did.

6 Q. Did he actually watch you pee on a stick?

7 A. Yes, he did.

8 Q. What was the result of that?

9 A. It was positive.

10 Q. After you had the third test that was positive
11 with him, did he send you an e-mail at some point to talk
12 about the -- the situation?

13 A. Yes.

14 Q. All right. Looking at the screen in front of
15 you, is this the e-mail that Mr. Echard sent you on, it
16 looks like, June 21st?

17 A. Yes.

18 Q. The third paragraph down has some highlighted
19 text, and I'll just read it.

20 "Considering you only performed oral sex on me,
21 and no vaginal penetration occurred, the chances of you
22 being pregnant seem considerably low. Although, again,
23 maybe rubbing up against one other allowed a sperm to make
24 its way inside you, it's a very low probability.
25 Nevertheless, it is one."

1 First of all, Clayton wrote that to you. Yes?

2 A. Yes.

3 Q. And did you have conversations with him where he
4 told you that he thought you were pregnant?

5 A. Yes.

6 Q. Is that verbal conversations or text or e-mail or
7 all three?

8 A. All three.

9 Q. Okay. Moving right along, after you got this
10 e-mail on --

11 MR. GINGRAS: And I'll move to admit, Your Honor,
12 Petitioner's Exhibit A2.

13 THE COURT: Any objection?

14 MR. WOODNICK: No.

15 THE COURT: A2's received.

16 BY MR. GINGRAS:

17 Q. After the e-mail of June 21st, what happened next
18 in terms of your proceeding to verify the pregnancy?

19 A. I took additional tests.

20 Q. Did you have a sonogram done in California?

21 A. Yes, I did.

22 Q. And where was that done?

23 A. Planned Parenthood.

24 Q. And you understand -- and I'm sure Mr. Woodnick
25 will ask you about this. Planned Parenthood has not been

1 able to verify that you were ever seen there. You
2 understand that?

3 A. Yes.

4 Q. Can you explain that?

5 A. Yes. I went under a fake name when I went there.

6 Q. Okay. And you had a sonogram done. Did you ever
7 present that sonogram as evidence in any court proceeding
8 anywhere?

9 A. No.

10 Q. We have, obviously, presented it in this case.
11 But you -- you've admitted already that you changed the name
12 at the top or the location --

13 MR. WOODNICK: Objection. Leading.

14 BY MR. GINGRAS:

15 Q. Did you --

16 THE COURT: Sustained.

17 BY MR. GINGRAS:

18 Q. Did you change the name at the top of the
19 sonogram?

20 A. Of the location, yes.

21 Q. Why did you do that?

22 A. I changed it because Mr. Echard was being
23 threatening towards me, and I didn't want him to know where
24 I had gone and try to track down my providers.

25 Q. Okay. After the Planned Parenthood sonogram --

1 do you remember approximately what date that was? I know
2 you signed a declaration, I think, that said July 2nd, and
3 then there may be a conflict. Do you remember what date
4 that was that you went?

5 A. It was actually the end of June.

6 Q. Okay. Did you -- were you in California both
7 weekends? Is that what the confusion was?

8 A. Yes.

9 Q. All right. After the sonogram in California,
10 around July 23rd, did something happen in terms of you
11 passing tissue or anything like that?

12 A. Yes.

13 Q. Can you explain briefly what happened on
14 July 23rd?

15 A. Yeah. I wasn't having any symptoms at all, but I
16 did pass tissue that looked like it could have potentially
17 been a miscarriage.

18 I'm not sure if you're going to pull that up, or
19 if I was looking for something.

20 Q. I'll wait till --

21 A. Okay. Yeah.

22 It looked like it could potentially be
23 miscarriage tissue, but I -- I wasn't sure.

24 Q. Did you seek any medical care after July 23rd
25 after the tissue passed?

1 A. Yes.

2 Q. Related to that?

3 A. Yes.

4 Q. What did you do?

5 A. I texted a hotline for pregnancy and miscarriage
6 questions, and I also did an appointment with a telemedicine
7 doctor as well.

8 Q. Okay. And what did they tell --

9 A. Video visit.

10 Q. I'm sorry.

11 What did they tell you?

12 MR. WOODNICK: Objection. Hearsay.

13 THE WITNESS: They --

14 MR. GINGRAS: Effect on listener.

15 THE COURT: Hold on one second.

16 Overruled.

17 BY MR. GINGRAS:

18 Q. Go ahead.

19 A. Oh. That means go ahead? Okay.

20 What was the question? What did they tell me?

21 Q. Yeah. What -- what information did they give
22 you, if any?

23 A. They told me that I needed to monitor myself, but
24 that they felt like unless I had more symptoms, I didn't
25 need to worry that it was a miscarriage.

1 Q. Okay. And after July 23rd, did you take any
2 other pregnancy tests shortly after that date?

3 A. Yes, I did.

4 Q. What date?

5 A. I believe the 27th and then also August 1st
6 before I filed this case.

7 Q. Okay. So the day that you filed -- before you
8 filed this case, how many pregnancy tests did you have?

9 A. Five.

10 Q. So you had one on May 31st, you had one on
11 June 1st at Banner, you had another one on June 17th with
12 Clayton, you took one -- I have -- my notes say July 25th,
13 but I think you just testified maybe a little -- day or two
14 differently. August 1st also. So five positive tests
15 before you filed this case?

16 A. Yes.

17 Q. Did you have any -- any negative tests before you
18 filed this case?

19 A. No.

20 Q. Laura, Clayton has argued -- let me -- let me go
21 back to the night of May 20th.

22 You have -- in your deposition you said that
23 Clayton actually had sexual intercourse with you. Do you
24 recall that?

25 A. Yes.

1 Q. And was that true?

2 A. Yes.

3 Q. Did you tell him that night that you did not want
4 to have sex?

5 A. Yes.

6 Q. And did he honor that request?

7 A. No.

8 Q. Laura, you've heard Clayton argue at various
9 places in this case that you were trying to trap him in some
10 way by what happened here.

11 Can you explain, if you were trying to trap him,
12 why did you tell him that you didn't want to have sex?

13 MS. ARENA: Objection. Leading.

14 THE WITNESS: I wasn't trying to trap him.

15 THE COURT: Hold on one second.

16 THE WITNESS: Sorry.

17 THE COURT: Sustained.

18 BY MR. GINGRAS:

19 Q. Okay. But you never -- that first night with
20 Clayton, you never said to him, "Let's" -- "Let's do it all
21 night long," anything like that?

22 MS. ARENA: Objection. Leading.

23 THE COURT: Sustained.

24 BY MR. GINGRAS:

25 Q. Did you -- did you tell Clayton that you wanted

1 to have sex that night?

2 A. No.

3 Q. Okay. Laura, let's switch very quickly.

4 Actually, let's go back to our timeline.

5 After you filed the case on August 1, did you do
6 anything in terms of DNA testing to verify -- again, verify
7 the pregnancy and verify that Clayton was the father?

8 A. Yes.

9 Q. What did you do to verify that?

10 A. We took a test -- well, I paid for a test in
11 August at Ravgen, which was the lab that he chose to conduct
12 the test. And I paid for it, and he did not schedule his
13 part of the test.

14 Q. So according to my notes, August 15th was Ravgen,
15 the initial booking for \$725 you paid. Is that accurate?

16 A. Yes.

17 MS. ARENA: Objection. Leading.

18 THE COURT: Sustained.

19 BY MR. GINGRAS:

20 Q. What -- what date did you initially book the
21 Ravgen test for?

22 A. August 15th.

23 Q. And what you pay for it?

24 A. \$725.

25 Q. Okay. And why didn't that test go forward? Or

1 did it go forward?

2 A. Clayton did not schedule his part of the test.

3 Q. Okay. So you had to cancel?

4 A. Yes.

5 Q. You eventually successfully completed testing?

6 A. Yes.

7 Q. What were the out- -- what was the result of
8 that?

9 A. It was inconclusive. Little to no fetal DNA.

10 Q. Okay. And do you remember when that result came
11 back?

12 A. I believe we took the test September 28th, so
13 shortly thereafter.

14 Q. All right. After the Ravgen results came back,
15 did you have any further pregnancy tests?

16 A. Yes.

17 Q. Do you remember the date, when and where that
18 happened?

19 A. Yeah. It was October the 16th, I believe, and it
20 was at Any Lab Test Now.

21 Q. And was that a quantitative test? Was it -- did
22 it involve a blood draw?

23 A. It was a blood draw, yes.

24 Q. And do you remember the results of that test?

25 A. It still showed that I was pregnant.

1 Q. Okay. At some point, did you eventually learn
2 that you were no longer pregnant?

3 A. Yes.

4 Q. What date did that happen?

5 A. November 15th, I believe.

6 Q. And was that -- did you go to a facility called
7 MomDoc?

8 A. Yes.

9 Q. And did you take -- how many -- did they give you
10 a pregnancy test then?

11 A. Yes.

12 Q. Was it more than one test?

13 A. They just gave me one test.

14 Q. Okay. And -- and the results were both negative?

15 A. Yes.

16 Q. Okay. After you learned that you were no longer
17 pregnant November 14th [sic], did you file anything further
18 in this case?

19 A. No.

20 Q. Did you -- what was your intent -- if we go back
21 to the -- Any Lab Test Now, October 16th, you filed a
22 request for mediation two days after that, correct?

23 A. Correct.

24 Q. What was your intent in doing that?

25 A. I wanted to dismiss the case. Or I wanted to go

1 over the test results.

2 Q. Did you -- did you know how to dismiss the case?

3 A. No.

4 Q. So you were -- you were making an effort to let
5 Clayton know that you weren't -- you thought the pregnancy
6 was probably ending badly, and you wanted to drop the case?

7 MS. ARENA: Objection. Leading.

8 THE COURT: Sustained.

9 BY MR. GINGRAS:

10 Q. All right. Laura, let's -- let's switch topics
11 briefly.

12 Clayton lie- -- did Clayton ever lie to you about
13 real estate contracts?

14 A. Yes.

15 Q. Can you briefly explain what happened with that?

16 A. Yeah. I first met him as a Realtor, and I had
17 him make two offers on two different properties on the same
18 day and found out he never submitted those offers.

19 Q. When --

20 A. I signed them.

21 Q. When were the offers submitted?

22 A. May 24th.

23 Q. And when did you find out that they -- that
24 Clayton didn't send them to the -- to the seller?

25 A. May 25th. Because they were only good for 24

1 hours.

2 Q. So he lied to you and said that he had sent
3 offers in that he didn't?

4 A. Correct.

5 MS. ARENA: Objection, argumentative, and
6 objection, relevance.

7 MR. GINGRAS: Goes to --

8 THE COURT: Overruled.

9 BY MR. GINGRAS:

10 Q. Go ahead.

11 A. Correct.

12 Q. Did -- at some point, did you file a complaint
13 against Clayton with the real estate board?

14 A. Yes, I did.

15 Q. Did you receive a response from the board
16 regarding your complaint?

17 A. Yes.

18 Q. What was that response?

19 A. They found him in professional violation of a
20 couple of things, but I can't remember what they were.

21 Q. Laura, that issue with the real estate contracts
22 happened before you tested positive for pregnancy, if I --
23 if I'm understanding the timeline correctly. Is that right?

24 A. Yes.

25 Q. Did you ever learn why Clayton did not submit

1 those offers, or why he said he didn't?

2 A. He said I [sic] didn't because he said I
3 wasn't -- I had no intention of purchasing real estate.

4 Q. Were you -- did you have an intention of
5 purchasing real estate?

6 A. Yes.

7 Q. Did you wind up purchasing real estate?

8 A. Yes.

9 Q. Okay. Let's talk about proof of pregnancy again.
10 So did you take a photo of the test that you took on
11 May 31st?

12 A. Yes, I did.

13 Q. All right. I think attached -- if you -- do you
14 still have -- yeah, you still have that exhibit?

15 A. Yeah, I still have the exhibit in front of me.

16 Q. So attached to this e-mail are a couple of photos
17 here. One -- one's right there. Day 11, it says. Is
18 that -- is this a photograph that you took?

19 A. Yes. Day 11 is one I took. And I believe the
20 one above is one Clayton took.

21 Q. Okay. So -- so the one that says Day 11 is a
22 photo that you took, and you sent that to Clayton at or
23 around that time?

24 A. Yes.

25 Q. And then the one above that is -- it says Day 21,

1 and it also appears to show positive. And that's the test
2 that Clayton gave you?

3 A. Yes.

4 Q. And he sent that picture back to you?

5 A. Yeah. He took it right after the test at his
6 place.

7 Q. All right. And the test that you took at Banner
8 and the results that you received there on June 1st, did you
9 send that to Clayton?

10 A. Yes.

11 Q. And that's Exhibit -- it's our Exhibit A1.

12 MR. GINGRAS: And I'll move to admit that one as
13 well, Your Honor.

14 THE COURT: Any objection?

15 MS. ARENA: No objection to A1, Your Honor.

16 THE COURT: A1's received.

17 BY MR. GINGRAS:

18 Q. Okay. Laura, did you do -- regarding the Banner
19 test, the Day 11 test, or the Day 21 test, those three
20 tests, did you do anything at all to tamper with the results
21 of those tests?

22 A. No.

23 Q. Did you take any drugs, hormones, or any
24 substance at all to -- to affect the outcome?

25 A. No.

1 Q. Did you use someone else's urine to change the
2 outcome?

3 A. No.

4 Q. Laura, in Clayton's deposition, this exact issue
5 came up about him giving you the test and wanting you to
6 take it in front of him. And he testified -- I'll just --
7 I'll just read from his deposition.

8 "Yeah, I wanted to make sure she didn't bring
9 anything into the bathroom, but she couldn't pee right in
10 front of me because she said she had stage fright, so I
11 closed the door so she would -- so she would be able to
12 pee."

13 Is that deposition testimony truthful?

14 A. I did have stage fright. He was right, I did
15 tell him that. But I did pee in front of him because he
16 insisted that I did that.

17 Q. Okay. And when he sent you the e-mail on
18 July 19th, two days after -- I'm sorry -- June 19th, two
19 days after you went to his house and took that third test in
20 front of him, did he say anything at all about the fact that
21 you closed the door and couldn't pee in front of him?

22 A. No.

23 Q. Okay. And Clayton -- he obviously saw the first
24 pregnancy test that you took; he saw the second one that you
25 took, or the results of it, anyway; and the third one that

1 you took in front of him.

2 If we go back to Exhibit A2, at the end of this
3 e-mail, Clayton says -- at the very top of the page, he
4 says, "I say all this" -- and in the e-mail, he talks about
5 the fact he thought you might be on some medication that
6 affected the results, I guess. But he says -- at the top
7 paragraph, he's --

8 MS. ARENA: Your Honor, I'm going to object.
9 He's reading information off of a -- a potential piece of
10 evidence that hasn't been admitted, and he's giving quite a
11 narrative.

12 MR. GINGRAS: It has been admitted.

13 THE COURT: Yeah, 2's been received. If you look
14 in the top left-hand corner, if there's a green sticker,
15 that means it's been received. If --

16 MS. ARENA: My apologies, Your Honor.

17 THE COURT: -- it's brown, it means it was
18 declined.

19 Go ahead, Counsel.

20 BY MR. GINGRAS:

21 Q. Laura, the question I have for you regarding the
22 first paragraph at the top of the page there, Clayton wrote,
23 or the e-mail says, "This is why it's important for us to do
24 the paternity test because there's no question that if it
25 comes back positive, it is mine."

1 Did Clayton ever tell you that he wanted you to
2 have a paternity test done?

3 A. Yes.

4 Q. Did he ever say to you that if you didn't file
5 this case, that he would?

6 A. Yes.

7 Q. How many times?

8 A. I don't know how many times. A bunch of times.

9 Q. At some point before you filed this case, did you
10 hire a lawyer to help you?

11 A. Yes.

12 Q. And who was that?

13 A. Bonnie Platter.

14 Q. And she never appeared in any case for you, is my
15 understanding. Is that right?

16 A. Yeah, she never appeared.

17 Q. Okay. But what did you have her do with regard
18 to Clayton and -- and the pregnancy issue?

19 A. I wanted to prevent filing a case publicly in
20 court. For both of our sakes, I didn't want it to be public
21 and thought that we could come up with a parenting plan.
22 If, in fact, the pregnancy was Clayton's, I thought we could
23 come up with it on our own without having to involve the
24 court.

25 Q. Okay. So you -- before you filed this case, you

1 made an effort to work with him to get the test done
2 privately without the court being involved?

3 A. Yes. And I -- I hired the attorney. I said I
4 would pay for it.

5 Q. Did he hire anyone?

6 A. No.

7 Q. To your knowledge?

8 Laura, let's move forward to look at Exhibit A3,
9 which -- have you ever seen this before?

10 A. Yes.

11 Q. Do you -- can you tell us what it is?

12 A. This is the -- this is a message in my patient
13 portal for -- I'm part of a domestic violence brain injury
14 program in -- at Barrow, and this is a conversation with my
15 doctor there.

16 Q. Okay. Did you send this e-mail? Looks like it's
17 an e-mail dated June -- June 28th from you to a
18 Dr. Glynnis Zieman, Z-I-E-M-A-N. Did you write that e-mail?

19 A. Yes.

20 MR. GINGRAS: Your Honor, I move to admit
21 Exhibit -- whatever that is. A -- A3.

22 THE COURT: Any objection?

23 MS. ARENA: No objection, Your Honor.

24 THE COURT: A3's received.

25 ////

1 BY MR. GINGRAS:

2 Q. Laura, in this e-mail, at the very top there, you
3 write to Dr. Zieman that you went to Planned Parenthood
4 while in California. And you said they did a scan there, it
5 was confirmed that you were pregnant, and that they saw --
6 they saw a sac.

7 Does that refresh your recollection about the
8 date that you went to see Planned Parenthood?

9 A. Yes.

10 Q. And is the statement that you made to Dr. Zieman
11 truthful?

12 A. Yes.

13 Q. Did you -- when you wrote that, did you know that
14 anyone would ever see that in the light of day other than
15 you and Dr. Zieman?

16 A. Nope. I had no idea.

17 Q. Okay.

18 Okay. Can you explain why you changed the name
19 at the top of the sonogram that we talked about before from
20 Planned Parenthood? I think -- I don't know if you answered
21 that before.

22 A. Yeah. I just didn't want Clayton to know where I
23 had gone to get the -- the sonogram because he had been
24 intimidating before.

25 MR. GINGRAS: If the Court can help me switch

1 from my exhibits to Clayton's.

2 THE COURT: Sure. If you scroll down to where --
3 yeah. That -- exactly. Now go all the way to the bottom.
4 There should be an R.

5 Keep going if you're able to.

6 MR. GINGRAS: I -- yeah, it stopped there.

7 THE COURTROOM ASSISTANT: Sir? Sir? You're just
8 going to go to the very top where it says "Change."

9 MR. GINGRAS: I don't see that.

10 THE WITNESS: It's --

11 THE COURTROOM ASSISTANT: Right above where it
12 says your -- your -- sorry -- your exhibits.

13 MR. GINGRAS: Oh. Right. It's tiny. I'm
14 blind -- I'm blind.

15 THE COURTROOM ASSISTANT: Yeah.

16 MR. GINGRAS: There it is. Yup.

17 THE COURTROOM ASSISTANT: And then "Share
18 Window."

19 MR. GINGRAS: Yup. Got it. And we're going to
20 go . . .

21 THE COURTROOM ASSISTANT: And then scroll all the
22 way down.

23 MR. GINGRAS: Yeah. Okay.

24 Oop.

25 I want to see Clayton's exhibits, though.

1 THE COURTROOM ASSISTANT: Yeah. You're going to
2 scroll all the way down.

3 MR. GINGRAS: Ah. Respondent's. Gotcha.
4 Gotcha, gotcha, gotcha.

5 BY MR. GINGRAS:

6 Q. Okay. Laura, looking at Respondent's
7 Exhibit 31 --

8 Oh. I don't know why that doesn't match.
9 This -- no, that's not it either.

10 These are not the same as . . .

11 THE COURT: So what you want to do is -- it may
12 not be the exhibit numbers that the attorneys labeled it as
13 being. Those are the Court --

14 MR. GINGRAS: Uh-huh.

15 THE COURT: -- designations. So --

16 MR. GINGRAS: I'm looking for -- I'm looking for
17 his Exhibit 31.

18 THE COURT: All right. So if you look for his
19 Exhibit 31, that does show that it is Exhibit 31.

20 MR. GINGRAS: Exhibit 31 on -- on his exhibit
21 list is listed, "Petitioner faking ultrasound."

22 Ah. I'm sorry. I -- I didn't realize it -- it
23 was a video.

24 There we go. That's what I wanted to see right
25 there.

1 BY MR. GINGRAS:

2 Q. Laura, Exhibit -- Clayton's Exhibit 31 is a --
3 appears to be an e-mail from you to Clayton. It says
4 "Ultrasound Video Proof." "Clayton, here's my 100
5 billion percent real" -- "real ultrasound video."

6 Do you recognize that?

7 A. It's not an e-mail that I sent, but I've seen it
8 since.

9 Q. Okay. Did -- well, you answered my question. Do
10 you know what, first of all, what that -- what this shows?
11 Do you know what it shows?

12 A. I do now.

13 Q. Laura, did you -- if this -- assuming that what
14 we're looking at here is -- is meant to be an e-mail from
15 you, did you send this to Clayton?

16 A. I did not.

17 Q. Did you ever send Clayton an e-mail with an
18 ultrasound video attached to it?

19 A. I did not.

20 Q. Do you have any idea why Clayton would think that
21 you sent him an e-mail like this?

22 A. Well, yeah. It has my signature on it.

23 Q. Well, that's a fair statement. But you didn't
24 send this. Do you know who did?

25 A. I have sus- -- my suspicions, but I can't

1 be . . .

2 Q. No, let's hear it. I'd like to hear it.

3 A. I have a suspicion that an ex of mine sent this
4 to Clayton.

5 Q. Who? Which ex?

6 A. Greg Gillespie.

7 Q. Is he in the courtroom today?

8 A. Yes.

9 Q. Okay. Why do you think Greg Gil- --
10 Greg Gillespie sent this?

11 A. Because Greg has hacked my e-mail before and has
12 admitted to hacking other people's e-mails.

13 Q. Okay. So you're -- you're, obviously, under
14 oath. Under penalty of perjury, you did not send that
15 e-mail, and you don't know who did?

16 A. Correct.

17 Q. Okay. Let's talk about --

18 Going back to our Exhibit A5.

19 Got it.

20 Whoops.

21 So can you tell us what Exhibit A5 is? Do you
22 recognize this?

23 A. Yes.

24 Q. Is this a receipt that -- well, it's an e-mail,
25 but does -- does it reflect the Ravgen that you talked about

1 before?

2 A. Yes.

3 Q. Okay. And that was August 15th that you made
4 that payment?

5 A. Yes.

6 Q. And then later on here, at the bottom, you
7 indicate -- let's see here. Fri- -- this appears to be an
8 e-mail from you Friday, August 18th. Did you write that
9 e-mail?

10 A. Yes.

11 Q. You send that to, it looks like, to Clayton and
12 also cc'd Ravgen?

13 A. Yes.

14 Q. And it states here that, "Unfortunately, Clayton
15 has refused to take the prenatal paternity test." Is that
16 accurate?

17 A. Yes.

18 Q. And is that the reason why the test didn't happen
19 in mid August?

20 A. Yes.

21 MR. GINGRAS: Okay. Your Honor, I move to admit
22 Exhibit A5.

23 THE COURT: Any objection?

24 MS. ARENA: No objection, Your Honor.

25 THE COURT: A5's received.

1 BY MR. GINGRAS:

2 Q. Okay. Let's look at Clayton's Exhibit 9.

3 Hopefully -- there we go.

4 Laura, do you recognize this exhibit, Exhibit 9?

5 A. Yes.

6 Q. This appears to be an e-mail from you to Clayton
7 dated October 14th, 2023. And this is an e-mail that you
8 sent him?

9 A. Yes.

10 Q. All right. In this e-mail, first of all,
11 you're -- you're saying some -- a reference to a sonogram
12 video, and you said, "It matches up with a still video that
13 Dave sent me." I assume that we're talking about Dave Neal?

14 A. Yes.

15 Q. And you told him, "This was not my ultrasound. I
16 stand by that a hundred percent."

17 Did -- did Dave Neal ever -- did Dave --

18 Well, first of all, who's Dave Neal?

19 A. Dave Neal's a content creator.

20 Q. And at some point, did Dave send you a sonogram
21 video and ask if it was yours?

22 A. Yes.

23 Q. What did you say to him?

24 A. I said it was not mine.

25 Q. Did you ever have a sonogram video of any kind

1 with Clayton?

2 A. No.

3 Q. Did you ever send a sonogram video to anyone
4 claiming that it showed the pregnancy with Clayton?

5 A. No.

6 Q. If we go down to the second paragraph, Laura, I'm
7 going to see if I can highlight here. And again, this is
8 you ta- -- I can't highlight.

9 The second sentence in the second paragraph.
10 I'll read it.

11 "I think you were very, very high that night, and
12 you forgot that when you were on top of me" -- "top of you
13 on the cou-" -- "on your couch, you were begging me to let
14 you put it in for 30 seconds, then 25, then 20, 15, 10, and
15 I said no each time. Then I thought you were just fingering
16 me, but you stuck it in briefly."

17 First of all, you wrote those words to Clayton,
18 right?

19 A. Yes.

20 Q. And were those words accurate?

21 A. Yes.

22 Q. Is that what happened that night on -- on
23 May 20th?

24 A. Yes.

25 Q. When you sent this e-mail to Clayton, did he ever

1 respond back to you and deny that that's what happened?

2 A. No.

3 Q. Okay.

4 Let's talk now about the last positive test that
5 you took.

6 Let me see here. It says Exhibit A9, but that's
7 not it.

8 The -- you went to Any Lab Test Now at some
9 point; is that correct?

10 A. Yes, I did.

11 Q. And -- and when did that happen?

12 A. On October 16th, I believe.

13 Q. Okay. I don't know why -- again, these aren't
14 matching up. That's not it. Because we're -- are we on --
15 yeah, we're on his. That's why. Okay. I need new glasses.

16 There it is. Okay.

17 So, Laura, looking at Exhibit A9, do you
18 recognize what this is?

19 A. Yes.

20 Q. What is it?

21 A. It's the results from the test I took at Any Lab
22 Test Now.

23 Q. And is it your understanding that that result --
24 it says 102H -- is it your understanding that you were
25 testing pregnant at -- still in October, mid October, 2023?

1 A. Yes.

2 MS. ARENA: Objection. Misstates the evidence.

3 THE COURT: Overruled. It can be addressed in
4 cross-examination.

5 BY MR. GINGRAS:

6 Q. So did you -- again, did you do anything at all
7 to tamper with this test, take any drugs, inject yourself
8 with anything at all to effect this?

9 A. No, I did not.

10 Q. And this was a blood draw that came out of your
11 arm?

12 A. Yes.

13 Q. Did you -- did you supply them with the blood
14 yourself, or did a phlebo- -- phlebotomist take it out of
15 your arm?

16 A. A phlebotomist took it.

17 Q. Okay. So two days after this is when you filed
18 the request for mediation, I think, in this case. Right?

19 A. Yes.

20 Q. And -- and after that date, you filed nothing
21 further?

22 A. This was two days -- two days prior to when I
23 filed for mediation.

24 Q. Did -- did you pretty much understand that when
25 you got this test, that that was probably not going to be a

1 viable pregnancy?

2 A. That it was probably not, yeah. But I still saw
3 that it said anything over 4 was pregnant, so . . .

4 MR. GINGRAS: Your Honor, I move to admit
5 Exhibit A9.

6 MS. ARENA: No objection, Your Honor.

7 THE COURT: A9's received.

8 BY MR. GINGRAS:

9 Q. And A11 is going to be -- can you -- can you tell
10 us if you recognize what this is?

11 A. The records from MomDoc.

12 Q. Okay. And this is an OB-GYN facility that you
13 visited?

14 A. Yes.

15 Q. And according to the date here, it says
16 November 14th, 2023. Is that accurate?

17 A. Yes.

18 Q. And so this is when you went in and had a test
19 done that came back negative, correct?

20 A. Yes.

21 Q. Okay.

22 MR. GINGRAS: Move to admit A11 if we haven't.

23 MS. ARENA: No objection.

24 THE COURT: A11's received.

25 ////

1 BY MR. GINGRAS:

2 Q. All right. Laura, let's look at Exhibit A6.

3 Hang on.

4 Okay. There we go.

5 Can you tell us what Exhibit A6 is?

6 A. Yes. That's me showing my pregnant stomach.

7 Q. And when did you create that video? Do you know?

8 A. September the 19th.

9 Q. Okay. Did you -- let me see here.

10 MR. GINGRAS: Your Honor, I'll move to admit A6.

11 MS. ARENA: No objection, Your Honor.

12 THE COURT: A6 is received.

13 BY MR. GINGRAS:

14 Q. And let's look -- look at A7. It's a similar
15 video.

16 Did you -- did you take this video yourself? Or
17 it looks like -- you're obviously --

18 A. Yeah.

19 Q. -- not holding the camera, but, what, you put it
20 on a little stand?

21 A. Yeah, I put it on the stand. Yeah.

22 Q. You took this video. Do you remember the date of
23 this?

24 A. October the 9th.

25 Q. Okay. I don't know if it even showed anything

1 there, but -- it's real short.

2 Okay. Laura, between May 20th and
3 November 14th -- we've established November 14th you were no
4 longer pregnant -- did you experience any pregnancy
5 symptoms?

6 A. Yes.

7 Q. Can you explain what those symptoms were?

8 A. Yeah. I had very bad morning sickness and
9 nausea, and my breasts were very tender.

10 Q. Do you remember how much you weighed when you
11 went to see MomDoc?

12 A. I believe it was 121.

13 Q. Mm --

14 A. I'm sorry. No, not MomDoc. I thought you were
15 meaning in -- in May.

16 I was 133 at -- at MomDoc. I'm sorry about that.

17 Q. So around the time that this was taken, your
18 weight was 133. What do you weigh today?

19 A. 91 pounds.

20 MS. ARENA: Objection. Relevance.

21 THE COURT: Overruled.

22 BY MR. GINGRAS:

23 Q. Will you stand up and show the Court and everyone
24 what you look like now compared to the picture behind you?

25 Can you turn -- can you come out from behind the

1 screen there?

2 And just -- just do a little turn for us.

3 Laura, you --

4 That's enough. Thanks.

5 For the last time, were you pregnant with
6 Clayton?

7 A. Yes.

8 Q. Did you think that you were pregnant with
9 Clayton?

10 A. Yes.

11 Q. Did you have any reason to think that you weren't
12 when you filed this case?

13 A. No.

14 Q. Did you lie about being pregnant with Clayton?

15 A. No.

16 MR. GINGRAS: No further questions, Your Honor.

17 THE COURT: Okay, Counsel. You've used 29
18 minutes and 30 seconds.

19 When you're ready.

20 MS. ARENA: And, Your Honor, is it okay if I
21 proceed from the podium? Will the Court be able to hear me?

22 THE COURT: Yeah, no, that's -- that's absolutely
23 fine.

24 And we have a -- we have a media cam -- we have a
25 media microphone on the podium, correct?

1 THE COURTROOM ASSISTANT: I believe so.

2 THE COURT: Okay. All right.

3 When you're ready.

4 MR. WOODNICK: Thank you, Your Honor.

5

6

CROSS-EXAMINATION

7 BY MS. ARENA:

8 Q. Good morning, Ms. Owens.

9 A. Good morning.

10 Q. You understand that you're currently under oath
11 and must testify truthfully today, correct?

12 A. Correct.

13 Q. And you understand the difference between the
14 truth and a lie, right?

15 A. Obviously, yes.

16 Q. And you would agree with me that fabricating or
17 doctoring evidence is dishonest and unreasonable behavior,
18 right?

19 A. Right.

20 Q. And you're aware that lying under oath is a crime
21 in the state of Arizona, correct?

22 A. Correct.

23 Q. And the reason I'm asking you these questions,
24 Mr. Owens, is because I've cross-examined you before, right?

25 A. Right.

1 Q. I cross-examined you in the injunction against
2 harassment hearing before Commissioner Gialketsis on
3 November 2nd of 2023, right?

4 A. Right.

5 Q. And during this hearing, that hearing, you'd
6 recall that I gave you the opportunity to correct the record
7 and come clean about any false information or testimony you
8 may have provided, right?

9 A. Right.

10 Q. And you told me you had nothing to correct,
11 right?

12 A. Correct.

13 Q. And then you proceeded to lie to the Court,
14 correct?

15 MR. GINGRAS: Objection. Argumentative,
16 Your Honor.

17 THE COURT: Sustained.

18 BY MS. ARENA:

19 Q. You testified that you were a hundred percent
20 pregnant on November 2nd, correct?

21 A. Correct.

22 Q. And you testified that you were 24 weeks
23 pregnant, specifically?

24 A. Correct.

25 Q. I'd like you to take a look at your Exhibit A11,

1 please.

2 MS. ARENA: And they're on the screen behind her,
3 Your Honor, so I'm not sure if --

4 THE COURT: She's got them in front of her.

5 THE WITNESS: I can see. Yeah.

6 BY MS. ARENA:

7 Q. Ms. Owens, this appointment that you attended at
8 MomDoc on November 14th of 2023 was 12 days after I
9 cross-examined you, right?

10 A. Correct.

11 Q. And during that cross-examination, I pointed out
12 that you had no legitimate medical records to support the
13 pregnancy, right?

14 A. I mean, you said that, but I don't agree with it,
15 no.

16 Q. At this appointment, Ms. Owens, it was confirmed
17 that you were not pregnant, correct?

18 A. Correct.

19 Q. These MomDoc records also indicate that you were
20 diagnosed with PCOS, which is polycystic ovarian syndrome,
21 right?

22 A. I've had that since I was 17. Yes.

23 Q. Okay. And you'll recall at the hearing on
24 November 2nd, I specifically questioned you about any
25 physical health diagnoses that you had, right?

1 A. I don't remember, but if you say so, I -- then
2 yes.

3 Q. You failed to testify that you had PCOS, right?

4 A. I -- I can't say one way or the other if I did or
5 didn't. I'll take your word for it, but it's not something
6 that I --

7 Q. Ms. Owens --

8 A. -- live with daily.

9 Q. -- you also --

10 THE COURT REPORTER: One at a time.

11 BY MS. ARENA:

12 Q. Ms. Owens, you also failed to tell me that in
13 2016, Drs. Chan and Yee diagnosed you with cancer and
14 apparently removed one of your ovaries.

15 A. They did not.

16 Q. Okay. So as you sit here today, you're denying
17 that that happened?

18 A. I will absolutely deny that that happened.

19 Q. Now, per what you reported, what you
20 self-reported to MomDoc, they listed a spontaneous abortion
21 date of August 12th of 2023 at eight weeks pregnant,
22 correct?

23 A. They listed a lot of things that were inaccurate
24 here. I never told them that I had an abortion that date.

25 Q. Okay. Well, a spontaneous abortion, if I were to

1 tell you, is consistent with a miscarriage. Would you agree
2 with me that they listed a miscarriage date of August 12th
3 of 2023 at 8 weeks pregnant?

4 A. Yes, but they -- I also never was pregnant in
5 2019, so I don't know where that came from.

6 Q. And, Ms. Owens, based on what you know about
7 pregnan- -- pregnancy, as someone who's allegedly been
8 pregnant three or four times in the past, if you miscarried
9 at eight weeks pregnant, that wouldn't line up with your
10 alleged conception date with Mr. Echard, would it?

11 A. I don't know, and I'm telling you I never told
12 them that I was eight weeks pregnant and lost that on -- on
13 August 12th.

14 Q. We'll move on, Ms. Owens.

15 In your MomDoc records and also in your
16 deposition, you self-reported that you passed two sacs which
17 appeared to have a membrane, correct?

18 A. Correct.

19 Q. And I'd like you to take a look at what we've
20 marked as Exhibit 49. This is your deposition transcript.

21 And, Ms. Owens, you recall sitting for a
22 deposition on March 1st of 2024, correct?

23 A. Correct.

24 Q. And your counsel at the time, following that
25 deposition, was provided with a copy of this transcript as

1 well as you, correct?

2 A. Correct.

3 Q. And you didn't take any opportunity to correct
4 this transcript --

5 A. I actually didn't see it until you guys sent it
6 to us. I -- my former counsel never showed this to me.
7 So . . .

8 Q. Okay. Well, you're aware that this has been
9 marked as a copy of your deposition transcript for March 1st
10 of 2024, correct?

11 A. Correct.

12 Q. And this is a true and accurate copy of the
13 transcript that you received, correct?

14 A. From your office, yes. I did not get one prior
15 to that.

16 MS. ARENA: I move for the admission of
17 Exhibit 49, Your Honor.

18 THE COURT: Any objection?

19 MR. GINGRAS: No objection.

20 THE COURT: Is that A or B, Counsel? I
21 apologize.

22 MS. ARENA: I -- I guess it would be B, Your
23 Honor.

24 THE COURT: B49 is received.

25 ////

1 BY MS. ARENA:

2 Q. And, Ms. Owens, during your deposition,
3 specifically on page 149, lines 18 through 21, you testified
4 that you started spotting, meaning you were having a light
5 period, in August or September of 2023, correct?

6 A. I wasn't having a light period. It didn't -- I
7 didn't end up getting a period until November.

8 Q. Well, in your deposition --

9 A. I said light spotting, but --

10 THE COURT REPORTER: Excuse me. One at a time.

11 THE WITNESS: Sorry.

12 I said light spotting, but that wasn't a period.

13 BY MS. ARENA:

14 Q. Okay. In your deposition, page 151, line 24, you
15 claim you passed the two sacs which appeared to have a
16 membrane in September or October, correct?

17 A. Correct.

18 Q. But in the MomDoc records, you claim you passed
19 the two sacs a few weeks after your alleged ultrasound at
20 Planned Parenthood, right?

21 A. Several weeks after.

22 Q. Okay. Well, you would agree with me there's an
23 inconsistency there, right?

24 A. Right. I wasn't sure --

25 Q. Ms. Owens --

1 A. -- what the date with.

2 Q. -- no OB-GYN or qualified medical professional
3 conducted an ultrasound, performed a physical examination,
4 or performed a blood test to confirm your alleged pregnancy
5 on or before August 1st of 2023, right?

6 A. Wrong.

7 Q. Okay. Let's talk about that. Because I
8 suspected you would answer that this way.

9 You claim that you had an alleged ultrasound at
10 Planned Parenthood in Southern California, correct?

11 A. Correct.

12 Q. And you testified during your deposition that the
13 alleged ultrasound with Planned Parenthood was in
14 Mission Viejo, California, on July 7th of 2023 --

15 A. Mm-hm.

16 Q. -- right?

17 A. I did say it was there. That's where I was
18 staying at the time, at -- in Mission Viejo.

19 Q. And while being examined by your attorney,
20 Mr. Gingras, you said that you went to Planned Parenthood
21 under a fake name, right?

22 A. Right.

23 Q. But you didn't bother to provide our office with
24 the alleged name that you went to Planned Parenthood under,
25 right?

1 A. Right.

2 Q. And you knew that we were seeking your records
3 from Planned Parenthood specifically because of the alleged
4 ultrasound that you had there, right?

5 A. Right.

6 Q. So wouldn't it have made sense for you to provide
7 our office with a copy -- or of the name that you allegedly
8 went to Planned Parenthood under?

9 A. I felt like the whole purpose of going to
10 Planned Parenthood is to remain anonymous and that that's
11 one of my protections.

12 Q. Okay. I want you to take a look at Exhibit 28.

13 MS. ARENA: And this is B28, Your Honor.

14 BY MS. ARENA:

15 Q. Is this a true and accurate picture of the
16 ultrasound you claim you received at Planned Parenthood in
17 California in July of 2023?

18 A. That looks like it, yes.

19 MS. ARENA: I'd move to admit Exhibit B28,
20 Your Honor.

21 THE COURT: Any objection?

22 MR. GINGRAS: No objection.

23 THE COURT: B28's received.

24 BY MS. ARENA:

25 Q. And, Ms. Owens, this ultrasound image does not

1 say Planned Parenthood. It says SMIL, which I'll call
2 "smile" for purposes of court today, correct?

3 A. Correct.

4 Q. And in your deposition, you admitted you altered
5 this ultrasound picture to say SMIL instead of
6 Planned Parenthood, right?

7 A. Correct.

8 Q. And you admitted in your deposition to altering
9 this picture on the Adobe Acrobat program at your house,
10 right?

11 A. Correct.

12 Q. During your deposition, you testified that the
13 date listed here of July 7th of 2023 was correct and hadn't
14 been edited by you, right?

15 A. Correct.

16 Q. But you later admit that you lied about this
17 July 7th ultrasound date, right?

18 A. Correct.

19 Q. And you executed an affidavit on April 16th of
20 2024 claiming the correct date for this already doctored
21 ultrasound was actually July 2nd of 2023, correct?

22 A. Correct.

23 Q. So I want to get this straight, Ms. Owens. You
24 initially claimed you had an ultrasound at
25 Planned Parenthood on July 7th, which you doctored to say it

1 was from SMIL, right?

2 A. Correct.

3 Q. Then the story changes again, and you claim that
4 the ultrasound image should actually be dated July 2nd of
5 2023, right?

6 A. Correct.

7 Q. So you changed the date on the ultrasound from
8 July 2nd to July 7th, correct?

9 A. Correct.

10 Q. And you utilized this altered or fake ultrasound
11 to try to convince Mr. Echard and the Court and the media
12 that you were pregnant with Mr. Echard's twins, correct?

13 A. This was -- this was never submitted to the
14 Court.

15 Q. You're aware that Planned Parenthood has no
16 record of an ultrasound for you, correct?

17 A. Under my real name, yes, and more.

18 Q. Okay. And again, we've established you didn't
19 provide our office with the name of your -- that you
20 allegedly went to Planned Parenthood under, correct?

21 A. Correct.

22 Q. You never attended an appointment with
23 Planned Parenthood in this case, Ms. Owens.

24 A. Yes, I did.

25 Q. Can you take a look at Exhibit B29?

1 This is a true and accurate copy of our request
2 and the response from Planned Parenthood regarding your
3 records dated April 26th of 2024, correct?

4 A. Correct. I don't believe I've seen this, but I
5 have no idea.

6 THE COURT: And, Counsel, I'm so sorry. I'll
7 stop the clock, like I've done for the others.

8 We're going to give you a microphone because, as
9 I anticipated, there was a problem picking up your -- your
10 cross-examination.

11 MR. WOODNICK: Audio-check?

12 THE COURTROOM ASSISTANT: I think it's just if
13 it's on there. That would be great.

14 THE COURT: We work with what we have. Right?

15 THE COURTROOM ASSISTANT: Yeah.

16 THE COURT: All right. Go ahead. Thank you.

17 MS. ARENA: And I'll ask that question one more
18 time, Your Honor.

19 BY MS. ARENA:

20 Q. Ms. Owens, Exhibit 29 is a copy of our request
21 and the response from Planned Parenthood regarding your
22 records dated April 26th of 2024, correct?

23 A. Correct.

24 MS. ARENA: Move for the admission of
25 Exhibit B29, Your Honor.

1 THE COURT: Any objection?

2 MR. GINGRAS: No objection.

3 THE COURT: B29's received.

4 BY MS. ARENA:

5 Q. And while you've indicated today that you went to
6 Planned Parenthood under a fake name, this letter actually
7 indicates that you had scheduled an appointment for
8 July 2nd, but that you failed to attend?

9 A. Correct.

10 Q. It also indicates that the ultrasound image that
11 you claimed was from Planned Parenthood was not from
12 Planned Parenthood because it was not consistent with
13 ultrasound images generated by their practice, right?

14 A. Not by the one in Mission Viejo, correct.

15 Q. Ms. Owens, these are yes or no questions.

16 This document states that the ultrasound image
17 you have claimed is from Planned Parenthood is not
18 consistent with ultrasound images generated by their
19 practice, right?

20 A. By that practice. But as they said, it -- I
21 could have been seen by another -- different ent- -- entity.

22 Q. Ms. Owens, you're well aware that this request
23 covered all of Orange County and San Bernardino, Cal- --

24 A. It didn't cover Los Angeles, though.

25 Q. So now you're saying you went to

1 Planned Parenthood in Los Angeles?

2 A. Yes.

3 Q. So you're telling us you went to
4 Planned Parenthood in Los Angeles on the day of trial,
5 today?

6 A. Yes.

7 Q. Okay. When did you go to Planned Parenthood in
8 Los Angeles?

9 A. Exactly when I said I went.

10 Q. When was that?

11 A. July 2nd.

12 Q. Okay.

13 I'd like to go back to the two sacs you passed.
14 So again, in your deposition, you claimed you passed them in
15 September or October, right?

16 A. Yes.

17 Q. But then you changed the date and claimed that
18 you passed these two sacs on July 23rd of 2023, right?

19 A. Right.

20 Q. And you actually had an appointment scheduled
21 with Dr. Makhoul, who you've claimed is your high-risk
22 perinatologist, for July 24th of 2023, right?

23 A. Right. That I canceled days prior.

24 Q. Okay. So you canceled that appointment --

25 A. Days prior.

1 Q. -- and then you rescheduled it to August 7th,
2 right?

3 A. Yes, if that's the date that I did.

4 Q. So wouldn't you agree with me that for someone
5 who has had miscarriages in the past and who has an alleged
6 high-risk pregnancy, it would be prudent to attend an
7 in-person appointment shortly after passing two sacs?

8 A. Well, that's why I asked the doctors online.

9 Q. Ms. Owens, these are yes or no questions.

10 A. I'm -- I'm --

11 Q. I see you're looking at your attorney, but you
12 need to look at --

13 A. He's shaking --

14 Q. -- me and answer the question for me.

15 A. Okay. Can you ask the question again?

16 Q. Wouldn't you agree that as someone who has a
17 high-risk pregnancy, that allegedly passed two sacs on
18 July 23rd of 2023, it would have been important for you to
19 see your high-risk perinatologist immediately after that
20 happening?

21 A. Well, that's why I scheduled the -- that's why I
22 immediately contacted telemedicine.

23 Q. You would --

24 A. It was at night.

25 Q. You contacted a telemed provider instead of

1 attending the appointment with your high-risk
2 perinatologist?

3 A. It had already been canceled days prior.

4 Q. Ms. Owens, you had four appointments scheduled
5 with Dr. Makhoul that you never attended, right?

6 A. Correct.

7 Q. And you intentionally failed to attend those
8 appointments because all of those appointments would have
9 resulted in a medical record that stated you were not
10 pregnant, right?

11 MR. GINGRAS: Objection. Argumentative.

12 THE COURT: Sustained. To the form of the
13 question, but you can ask the question a different way.

14 MS. ARENA: I'll move on, Your Honor.

15 BY MS. ARENA:

16 Q. During the November 2nd hearing, you denied that
17 the DNA test results came back with little to no fetal DNA,
18 right?

19 A. What?

20 Q. During the November 2nd hearing --

21 A. I said that the -- the -- the test --

22 Q. Can I finish the question, Ms. Owens?

23 During the November 2nd hearing, you denied that
24 the DNA test results came back with little to no fetal DNA.

25 Ms. Owens, I see you continue to --

1 A. No.

2 Q. -- look to your attorney.

3 A. I didn't -- I never said it didn't --

4 MR. GINGRAS: I'm confused --

5 THE WITNESS: I said it came back inconclusive.

6 MR. GINGRAS: I'm confused about what date she's
7 referring to. What --

8 MS. ARENA: November 2nd.

9 MR. GINGRAS: November 2nd hearing?

10 MS. ARENA: Yes. The November 2nd hearing.

11 MR. GINGRAS: Okay. Again, before my time, so
12 that's why I'm confused. I apologize.

13 BY MS. ARENA:

14 Q. You can answer the question.

15 A. I said it was inconclusive and it was little to
16 no fetal DNA. I never said it came back anything but that.

17 Q. Okay. Well, today you've admitted that there was
18 little to no D- -- little to no fetal DNA, right?

19 A. I've never said it was anything else.

20 Q. You also ordered and took a blood hCG test
21 through Any Lab Test Now on October 16th of 2023, correct?

22 A. Correct.

23 Q. And I'd like you to take a look at Exhibit 36,
24 Bates page 201.

25 Actually, this has already been admitted, so

1 we'll move past that.

2 By the time of this test on November 16th, you
3 had claimed you were previously seen at Banner,
4 Planned Parenthood, Dr. Makhoul, Dr. Hidley -- Higley, and
5 even Dr. Zieman, right?

6 MR. GINGRAS: Your Honor, objection. She
7 misstated the date. She said September [sic] 16th, I
8 believe. It's October 16th.

9 THE COURT: That can be addressed in redirect.

10 THE WITNESS: I -- I said that Dr. Makhoul's my
11 doctor. I did not say that I had seen him. I said I had
12 seen Dr. Higley and the rest, correct.

13 BY MS. ARENA:

14 Q. Okay. And we'll talk about Dr. Higley soon here.
15 But your answer is --

16 Would you like me to repeat the question,
17 Ms. Owens?

18 A. Sure.

19 Q. Okay. I'm going to stand here because it seems
20 like you're looking at Mr. Gingras quite a bit for guidance.
21 So --

22 A. No, I don't need -- I don't need guidance
23 from Mis- -- from my attorney. I know how to answer the
24 questions.

25 Q. By the time of your appointment, or this test, on

1 October 16th of 2023, you claimed you were previously seen
2 at Banner, Planned Parenthood, Dr. Higley, and even
3 Dr. Ziemman, right?

4 A. Yes.

5 Q. But instead of going to any of those providers
6 for this test, you went to an entirely new provider,
7 correct?

8 A. I just went on my way home from taking the Ravgen
9 test, actually.

10 Q. These are yes or no questions, Ms. Owens.

11 A. Well, I didn't -- it wasn't a provider. It was a
12 self-paid test, so . . .

13 Q. Okay. So you didn't go to any of your prior
14 listed providers for this test, right?

15 A. Correct.

16 Q. Okay. By your own admission in your affidavit
17 signed April 16th of 2024, this result of an hCG level of
18 102 was not consistent with pregnancy, right?

19 MR. GINGRAS: Objection. Misstates the
20 testimony.

21 THE COURT: Overruled.

22 You can answer.

23 THE WITNESS: Oh.

24 Can you say it again? I'm sorry.

25 ////

1 BY MS. ARENA:

2 Q. By your own admission, the test result of 102 for
3 the level for hCG was not consistent with a pregnancy?

4 MR. GINGRAS: Objection.

5 THE WITNESS: I -- I --

6 MR. GINGRAS: Withdrawn.

7 Go ahead.

8 THE WITNESS: I learned that it was.

9 BY MS. ARENA:

10 Q. You learned that it was consistent with pregnancy
11 or was not consistent with pregnancy?

12 A. Well, the test results said anything above 4 was
13 pregnant, so I thought 102 was pregnant. But then I learned
14 it was not.

15 Q. Okay. So you would agree with me that this was
16 not consistent with pregnancy?

17 A. No, I wouldn't.

18 Q. Okay. You doctored this particular test twice,
19 Ms. Owens, correct?

20 A. I doctored the test once.

21 Q. Okay. And when was that?

22 A. When I tried to send it to Dave Neal to get him
23 to stop creating harassing videos of me.

24 Q. And what amount did you doctor the hCG level to
25 for that particular --

1 A. I -- it was, like, 102,000, I believe.

2 Q. Okay.

3 MS. ARENA: Isabel, can you please pull up
4 Exhibit 17, Bates page 113?

5 BY MS. ARENA:

6 Q. Ms. Owens, you'll recognize this, as it looks
7 like the same test from October 16th, but it has an hCG
8 level different than what you just indicated, and it says
9 131,902.

10 A. Okay.

11 Q. Correct?

12 A. Yes, that's --

13 Q. So you also doctored this test?

14 A. No. I didn't know what the number was that I had
15 made it to.

16 Q. Well, Ms. Owens, I agree with you. You doctored
17 this test twice. One to say 102,000 and again to say
18 131,902, right?

19 A. I doctored it, I guess, to say 131,902.

20 Q. Okay. As of October 17th, 2023, when you
21 received this test result, you had reason to believe you
22 were not pregnant, right?

23 A. Yes. After doing some research, yes.

24 Q. Okay. But then you proceeded to lie under oath
25 at hearings before this Court on October 24th, October 25th,

1 and November 2nd, correct?

2 A. That's not correct, no.

3 Q. Instead of telling the truth, you tampered with
4 this hCG test to increase the level and offered that as
5 support for a pregnancy?

6 A. To a content creator. Not to the Court.

7 Q. You also testified on November 2nd unequivocally
8 that your OB-GYNs were Dr. Makhoul and Dr. Higley, right?

9 A. Right.

10 Q. In fact, you went so far as to state that your
11 main OB-GYN is the perinatologist Dr. Makhoul, right?

12 A. Correct.

13 Q. You further testified on November 2nd that you
14 had last seen Dr. Higley on last Friday, right?

15 A. Right.

16 Q. You lied to the Court when you made those
17 statements?

18 A. I had the appointment scheduled, which --

19 Q. Ms. Owens --

20 A. -- you guys have.

21 Q. -- these are yes or no questions.

22 A. I know, but they -- it needs to be answered
23 correct- -- it needs to be answered.

24 I had an appointment scheduled with him that I
25 did not attend, but I did have an appointment scheduled.

1 Q. Okay. So when you say you were seen by a doctor,
2 that's not the same as having an appointment sche- -- an
3 appointment scheduled, correct?

4 A. Correct.

5 Q. So we would agree that you were dishonest when
6 you said you were physically seen by Dr. Higley the Friday
7 before the November 2nd hearing?

8 A. Correct. That's a very minor thing.

9 MR. WOODNICK: Hey. Stop. Stop.

10 THE WITNESS: Yeah. Really.

11 BY MS. ARENA:

12 Q. Ms. Owens --

13 A. You know --

14 Q. -- you've never been seen by --

15 A. -- I mean, if this is going to -- I -- I'm not
16 comfortable if this -- if the JFC crew is going to be --

17 Q. Ms. Owens --

18 A. -- having reactions, honestly.

19 THE COURT: Okay. I'm going to stop the clock at
20 this time.

21 Counsel, you ask questions. Ma'am, you answer
22 the questions.

23 I could ask the gallery to please keep your --

24 THE WITNESS: You know, I think I can't --

25 THE COURT: -- reactions --

1 I'm still talking, ma'am.

2 Keep your comments to a minimum, or you will be
3 asked to leave.

4 Go ahead, Counsel.

5 BY MS. ARENA:

6 Q. Ms. Owens, you've never been seen by Dr. Makhoul
7 or Dr. Higley for any medical appointment, correct?

8 A. Correct.

9 Q. And the records from Dr. Makhoul's office
10 indicate that you made four appointments that you never
11 attended, correct?

12 A. Correct.

13 Q. And the records from Dr. Higley's office that we
14 obtained indicate that they have no records for you from
15 August 2020 through the present, right?

16 A. I'm -- I'm sorry. You said Dr. Higley or
17 Dr. Makhoul? I'm --

18 Can I, like, take a minute?

19 MR. GINGRAS: Your Honor, can we have just a -- a
20 five-minute recess?

21 THE COURT: Sure. At this time --

22 MS. ARENA: Your Honor, I --

23 THE COURT: Oh. No, go ahead. What were you
24 going to say, Counsel?

25 MS. ARENA: I -- I'm just concerned about our

1 time constraint. That's all, Your Honor. So --

2 THE COURT: Well, we factored in a ten-minute
3 break, so what we'll do is we'll take it now. And then when
4 we come back, there will be no further breaks, so that's
5 just something for the parties to keep in mind.

6 We'll stand in recess.

7 (WHEREUPON, a recess was taken.)

8 THE COURT: All right. Welcome back, everybody.
9 I do remind our witnesses that you are still
10 under oath.

11 Counsel, if your client would like to resume the
12 witness stand.

13 MR. WOODNICK: Can we get a quick time-check,
14 Judge?

15 THE COURT: Sure. Petitioner's at 29 minutes and
16 30 seconds. Respondent's at 22 minutes and 1 second.

17 You ready?

18 MS. ARENA: I'm ready, Your Honor. Thank you.

19 BY MS. ARENA:

20 Q. Ms. Owens, you testified at the November 2nd
21 hearing that you had a due date of February 14th of 2024,
22 which is Valentine's Day, correct?

23 A. Correct.

24 Q. But you don't have a single medical record to
25 support that alleged due date, right?

1 A. No. I do. I was -- I was trying to say I do
2 have a record. That's what I was told by Tamara Lister at
3 Banner Health, was that it would be Valentine's Day.

4 Q. And you're aware that the record that you've
5 provided from Banner does not indicate any due date, right?

6 A. It was in conversation with her as to when the
7 due date would be.

8 Q. Ms. Owens, these are yes or no questions.

9 You're aware that the record you provided from
10 Banner lists no such due date, right?

11 A. It can't be answered in a yes or no manner.
12 It's -- I'm saying I --

13 THE COURT: You can answer "yes," "no," or "I
14 don't know."

15 THE WITNESS: So then can you please repeat the
16 question?

17 BY MS. ARENA:

18 Q. Ms. Owens, you're aware that the record from
19 Banner that you provided that your attorney just admitted
20 into evidence does not have an alleged due date of any kind
21 on it, right?

22 A. Okay. Then yes.

23 Q. I want you to take a look at what's our
24 Exhibit 17, page 110. And this is the same as your
25 Exhibit A1.

1 This is a picture you took of a portion of a page
2 from Banner, correct?

3 A. Correct.

4 Q. Where is the rest of the document, Ms. Owens?

5 A. Clayton had it.

6 Q. I'm asking you, where is the rest of the document
7 in this particular exhibit?

8 A. I -- I don't know, but there's nothing I was
9 trying to hide from it. Clayton got the entire thing.

10 Q. Ms. Owens, you recognize you've been accused of
11 faking records in this case, right?

12 A. Yes.

13 Q. And you expect the Court to accept a picture of a
14 portion of an alleged record?

15 A. You guys got the results yourselves, so --

16 Q. Ms. Owens, these are yes or no questions. Your
17 attorney --

18 A. That's not fair.

19 Q. -- is going to have --

20 A. That's --

21 Q. -- the opportunity to conduct redirect
22 examination, and you can elaborate then.

23 THE COURT REPORTER: And again, one at a time.

24 THE WITNESS: I mean, that's not fair. You guys
25 know that you have the results of this that show the same

1 thing. So I wasn't hiding anything here. That's not --
2 that's not fair.

3 MS. ARENA: Your Honor, I have to move on, so I'd
4 ask that the Court find this nonresponsive.

5 THE COURT: Court will designate it as
6 nonresponsive.

7 BY MS. ARENA:

8 Q. For someone who's been involved in court cases
9 nonstop since at least 2016 --

10 A. You know what? That's not accurate. I have not
11 been involved nonstop since 2016.

12 Q. Ms. Owens --

13 THE COURT: I'm going to stop the clock for a
14 moment, and I'm going to remind the parties.

15 Counsel, you ask a question. Ma'am, you answer
16 the question. Otherwise, we -- we move into a different
17 area that I don't think anyone wants to go into.

18 Counsel, resume.

19 BY MS. ARENA:

20 Q. Ms. Owens, you have been involved in court cases
21 since at least 2016, correct?

22 A. Nonstop or are you saying since 2016?

23 Q. Ms. Owens --

24 A. Can you just rephrase the question?

25 Q. -- please answer the question as I've asked it.

1 You've been involved in court cases since 2016,
2 correct?

3 A. No.

4 Q. Okay. This particular document, Exhibit A1, has
5 three different types of highlighting on it, correct?

6 A. I see two.

7 MS. ARENA: And, Isabel, if you can please put
8 our Exhibit 17, page 110.

9 BY MS. ARENA:

10 Q. You'll see this is the same document, but I
11 believe maybe when your office scanned it in, you can't see
12 all the highlighting. So I'm going to show you ours.

13 Do you see there's three different types of
14 highlighting?

15 A. Yes.

16 Q. And you highlighted this on the same Adobe
17 Acrobat program that you used to alter the other records,
18 correct?

19 A. This was -- the doctor highlighted "point of
20 care," "test results," and then I highlighted "first
21 trimester pregnancy" and "encounter for pregnancy test" on
22 my iPhone, but it wasn't Adobe Acrobat.

23 Q. Okay. But you would agree with me there's three
24 different types of highlighting on this document, correct?

25 A. Yes.

1 Q. And I want to talk to you about the date of this
2 alleged hCG test.

3 We can agree that a woman typically takes a
4 pregnancy test when they've missed their menstrual period,
5 right?

6 A. Well, my case was different.

7 Q. Ms. Owens, these are yes or no questions.

8 A. I think the answer depends. I don't get a
9 period, so I don't -- I don't know how to answer that.

10 Q. Okay. So you don't get a regular period, right?

11 A. I don't.

12 Q. So you took this test before even missing a
13 period, right?

14 A. Correct.

15 Q. And between 2014 and the present, you have
16 alleged that you were pregnant by four different men,
17 correct?

18 A. Correct.

19 Q. And all four of those men told you, one way or
20 another, that they believed you fabricated those
21 pregnancies, right?

22 A. The first was not so specific about that.

23 Q. And three of them are here today, right?

24 A. Correct.

25 Q. And they also believe that you doctored medical

1 records, right?

2 MR. GINGRAS: Objection. Foundation.

3 THE COURT: Sustained.

4 MS. ARENA: I'll move on, Your Honor.

5 BY MS. ARENA:

6 Q. Ms. Owens, each time that one of these three men
7 refused to be in a relationship with you and questioned your
8 preg- -- pregnancy narrative, you obtained an order of
9 protection against them, right?

10 A. False.

11 Q. Okay. Well, you have an order of protection
12 against Mr. Greg Gillespie, correct?

13 A. Correct.

14 Q. And he didn't believe that you were ever pregnant
15 with his child, right?

16 MR. GINGRAS: Objection.

17 THE WITNESS: No, that's wrong.

18 MR. GINGRAS: Foundation --

19 THE WITNESS: That's --

20 MR. GINGRAS: -- and hearsay.

21 THE WITNESS: He had me -- I went to a doctor.
22 He had me -- he told me I needed to go to the specific
23 doctor to confirm a pregnancy, which I did, who spoke to
24 him.

25 THE COURT: Okay. Stop. I'm striking that

1 response.

2 The court reporter has been very clear.
3 Everyone's talking over each other. For appellate purposes,
4 and the fact that one of the parties is paying for the court
5 reporter, implore you, please, to talk one at a time.

6 With regards to the objection, it's overruled.

7 Go ahead, Counsel.

8 MS. ARENA: And, Your Honor, I'll move on in the
9 interest of time.

10 BY MS. ARENA:

11 Q. Ms. Owens, you didn't file an affidavit of
12 financial information in this case, did you?

13 A. I did.

14 Q. When did you file that?

15 A. August or September. It's with the Court.

16 Q. Okay.

17 A. It's on the record.

18 Q. Well, consistent with your deposition testimony
19 and your April 16th affidavit, you would agree with me that
20 you make approximately \$200,000 a year and then have
21 approximately \$500,000 in, like, a money market account,
22 right?

23 A. I don't have \$500,000 in a money market account.

24 Q. Okay. But you would agree with me that you make
25 approximately \$200,000 a year?

1 A. It's with businesses I have with my mom, so it's
2 proportional to us.

3 Q. Okay.

4 A. With our companies. Yeah.

5 Q. Ms. Owens, I want to give you one more
6 opportunity. The media is here. You know that this case
7 has gone viral. You have an opportunity right now to come
8 clean and start fresh. So I'm going to ask you one final
9 time.

10 You were never pregnant by Clayton Echard,
11 correct?

12 A. That is absolutely incorrect.

13 MS. ARENA: I have no further questions,
14 Your Honor.

15 THE COURT: Okay.

16 MR. WOODNICK: Time, Judge?

17 THE COURT: Time-check, 28 minutes, 46 seconds.
18 Redirect when you're ready.

19 MR. GINGRAS: Your Honor, I've got about three
20 questions.

21

22 REDIRECT EXAMINATION

23 BY MR. GINGRAS:

24 Q. First of all, Laura, looking at Exhibit A0 --

25 MR. GINGRAS: Are we on -- on my screen?

1 THE COURTROOM ASSISTANT: Yeah.

2 BY MR. GINGRAS:

3 Q. -- this is the timeline that we talked about
4 before. Can you just go back over that real quick?

5 And does that accurately reflect the testimony
6 you gave earlier regarding the -- your version of the
7 events?

8 A. Yes.

9 MR. GINGRAS: Your Honor, I move to admit
10 Exhibit A0 under -- it's a Rule 1006. It's a summary of
11 testimony.

12 MS. ARENA: Your Honor, I would object. I don't
13 believe this is an accurate summary of her testimony today.

14 MR. GINGRAS: That's for the find- -- sorry.

15 THE COURT: Over objection, the Court will
16 receive what's been marked as A30 [sic], giving it the
17 weight that it deserves.

18 MR. GINGRAS: Okay.

19 THE COURT: It does appear to be a
20 demonstratively --

21 MR. GINGRAS: Right.

22 BY MR. GINGRAS:

23 Q. Laura, regarding Banner, there was some comment
24 just a minute ago that -- that you didn't produce records
25 from Banner.

1 To your knowledge, did you authorize Mr. Woodnick
2 or his firm to gets records from Banner?

3 A. Yes.

4 Q. And looking at Exhibit A1, it's not just a photo
5 of -- the first page is a photo of something, but can you
6 tell us what the second page here is?

7 A. That's from my patient portal showing that I was
8 positive through -- for Banner.

9 Q. Okay. And to your knowledge, did Mr. Woodnick
10 actually receive records from Banner? Did he ask for them?

11 A. Yes.

12 Q. And did he get them?

13 A. Yes.

14 Q. Okay.

15 One final thing. You said before on dir- -- on
16 cross-examination that when you saw that hundred -- 102 hCG
17 test from -- from October 16th, that you believed that meant
18 you were not pregnant.

19 Do you understand the difference between a viable
20 pregnancy and a nonviable one?

21 A. Yes.

22 Q. Do you believe that the 102 number that you got
23 in -- October 16th of 2023 meant that you were not pregnant
24 at all?

25 MS. ARENA: Objection. Leading.

1 THE COURT: Sustained.

2 BY MR. GINGRAS:

3 Q. What was your understanding of that 102 number?
4 What did it mean to you?

5 A. That I was still pregnant, as it was over 4, was
6 what it said.

7 Q. Okay.

8 MR. GINGRAS: No further questions, Your Honor.

9 THE COURT: Okay.

10 All right, ma'am. You can go sit back down.

11 MR. WOODNICK: One more time-check, Judge.

12 THE COURT: Sure. Respondent's at 28 minutes, 46
13 seconds. Petitioner is at 31 minutes, 14 seconds. Of the
14 50.

15 You can call your next witness when you're ready.

16 MR. GINGRAS: Your Honor, Petitioner calls
17 Dr. Michael Medchill.

18 THE COURT: All right.

19 Doctor, if you'd like to bring water with you,
20 you may.

21 MR. GINGRAS: Did we swear him already? We did.

22

23 MICHAEL MEDCHILL,

24 called as a witness herein, having been first duly sworn,

25 was examined and testified as follows:

DIRECT EXAMINATION

1
2 BY MR. GINGRAS:

3 Q. Good -- good morning, Dr. Medchill.

4 State your name, please.

5 A. Dr. Michael Medchill.

6 Q. We have -- we have about 15 minutes, so I've got
7 to go really, really quick here.

8 I know you're retired now. Can you tell the
9 Court what you did before you retired?

10 A. I was the chairman of the department of
11 obstetrics and gynecology at St. Joseph's Hospital. I was
12 in private practice at the same time, and I was also on the
13 teaching faculty of the Phoenix integrated residency program
14 in obstetrics and gynecology.

15 Q. Okay. So you have a medical doctorate degree?

16 A. Yes.

17 Q. And you practiced medicine in Arizona for about
18 30 years; is that right?

19 A. That's correct.

20 Q. And according to the Arizona Medical Board, it --
21 it says that you were first licensed in Arizona in 1992, and
22 your medical license expired on March 7th, 2022. Is that
23 accurate?

24 A. Yes.

25 Q. It was about two years ago?

1 And you -- you retired from medicine in good
2 standing with the medical board?

3 A. That's correct.

4 MR. GINGRAS: Your Honor, I tender Dr. Medchill
5 as an expert in the area of obstetrics and gynecology.

6 MR. WOODNICK: No objection.

7 THE COURT: All right. So stipulated.

8 BY MR. GINGRAS:

9 Q. Okay. Dr. Medchill, in front of you there, we've
10 got your CV, I guess. This is Exhibit A12.

11 And everything in your CV is accurate?

12 A. Yes.

13 Q. Is that up-to-date and current?

14 A. Yes.

15 Q. Okay. And like you said, you served as the
16 chairman of the obstetrics -- obstetrics and gynecology
17 department at St. Joseph's Hospital in Phoenix?

18 A. Yes, for four years.

19 Q. In that capacity, how many children did you
20 personally deliver?

21 A. I delivered over 20,000 babies.

22 Q. And I think when we were talking, you explained
23 that the success rate of a pregnancy when a woman becomes
24 pregnant and then delivers a baby, not all of them make it;
25 is that right?

1 A. Almost half of all pregnancies end in a
2 miscarriage.

3 Q. Okay. And so if you delivered 22- -- or 20,000
4 children, how many patients did you see that didn't deliver
5 healthy babies?

6 MR. WOODNICK: Objection. Relevance, Judge.

7 THE COURT: Sustained.

8 MR. GINGRAS: Goes directly to the -- I'm sorry?

9 THE COURT: Sustained.

10 BY MR. GINGRAS:

11 Q. In addition to women that did not deliver a
12 healthy baby, did you -- or I'm sorry. In addition to women
13 who delivered healthy children, did you have patients who
14 had miscarriages?

15 A. Thousands.

16 Q. And -- and so you have extensive training and
17 experience with -- with regard to women that have non-normal
18 pregnancies?

19 A. Correct.

20 Q. All right. Dr. Medchill, in -- in your report
21 here, which, again, is Exhibit A12, you summarize --

22 There's a -- there's a written report, and it's
23 going slow. Let me see here.

24 Did you -- did you review some records as part of
25 your retention in this case?

1 A. Yes.

2 Q. And your report has an index of exhibits that you
3 looked at. There's a Banner pregnancy test, an image of
4 some tissues. They're all attached to your report.

5 Other than what is listed there, did you review
6 anything else?

7 A. Just the ones that I've listed.

8 Q. Okay. And after you performed that initial
9 review, you asked for some records. You had a question
10 regarding medications?

11 A. Yes.

12 Q. And did you get those records?

13 A. Yes, I did.

14 Q. Do you recall where they're from?

15 A. From Barrow Neurologic Institute.

16 Q. And you're familiar with Barrow?

17 A. Very familiar. They're at St. Joseph's Hospital.

18 Q. That's part of the same hospital where you used
19 to work?

20 A. Yes.

21 Q. Dr. Medchill, based on your review of Laura's
22 medical records that you've identified in your report, did
23 you form any opinions at all regarding whether or not she
24 was pregnant in 2023 at any time?

25 A. Absolutely, I believe she was pregnant, with over

1 99 percent probability.

2 Q. Okay. And can you explain what facts support
3 that conclusion? That you -- the facts that you considered,
4 anyway?

5 A. I am kind of -- of the Sergeant Friday of
6 Dragnet. I only take in the facts, the bare facts, that
7 I -- are known to be proveable.

8 Number one, there was intimacy of some -- some
9 type. Disputed what exactly it was.

10 Number two, she had a positive pregnancy test at
11 a lab at Banner, which means that there's a 99 percent
12 chance that that's a positive pregnancy.

13 Number three, she had a negative test, or little
14 or no fetal DNA, found on a test in late September looking
15 for fetal DNA in the blood. What that tells me is that by
16 that point, at the end of September, the pregnancy had
17 failed. That even though she still had a positive pregnancy
18 test, it was no longer a viable pregnancy.

19 The fourth thing is, is that she still had a
20 positive pregnancy test in the blood of 102 on October 16th,
21 which, again, greater than 99 percent positive that she was
22 pregnant.

23 And the fact that between June 1st and
24 October 16th, she's got two laboratory-proven pregnancy
25 tests. That indicates that all of the urine pregnancy

1 tests, any other pregnancy tests that she had done, likely
2 are also demonstrably positive.

3 And the final thing is, is when she had bleeding
4 in Sep- -- in November and then a couple of days later had a
5 negative pregnancy test at the MomDoc, it also illustrates,
6 one, that the pregnancy finally was completed. So what
7 happened was she had a pregnancy. It failed at some point.
8 There's no way of knowing exactly when. Frequently, very
9 frequently, when people miscarry, they're incomplete. Some
10 of it miscarries, the fetus is no longer alive, but you
11 still contain -- continue to have a positive pregnancy test
12 because there's still tissue there that hasn't been
13 expelled. That finally happened in November when that
14 pregnancy was completed, when that miscarriage was
15 completed.

16 Q. Okay. Dr. Medchill, Mr. Echard has said that he
17 doesn't believe that a pregnancy was possible here because
18 there was no intercourse.

19 Do you have an opinion about that? Regarding
20 general. Not regarding him or her, but in general.

21 A. Well, it's said that men are like basketball
22 players. They dribble before they shoot. They also dribble
23 afterwards. And if you are rubbing genitalia together, it
24 is possible to get pregnant.

25 Q. How much weight would you assign to the fact that

1 Mr. Echard denied sexual intercourse? Is that -- is that
2 significant to the question of whether she was pregnant or
3 is it a minor point?

4 A. It has nothing to do with whether she was
5 pregnant.

6 Q. Okay.

7 THE COURT: Hold on one second, Counsel.

8 MR. WOODNICK: I'll withdraw it.

9 THE COURT: Withdrawn? Okay.

10 MR. WOODNICK: I'll withdraw it.

11 BY MR. GINGRAS:

12 Q. Dr. Medchill, I think you said earlier that it's
13 impossible to know for sure when Laura's pregnancy ended.

14 Do you have an opinion about -- based on the
15 records that you've seen and the information that's been
16 provided to you, do you have a theory about when?

17 A. It -- it actually ended in November when her
18 pregnancy test was negative. When it failed -- in other
19 words, when it was no longer viable -- there's no way of
20 knowing exactly when that happened.

21 Q. Okay. Dr. Medchill, somebody online, I think,
22 made a comment -- it's just a theory, obviously -- that --
23 that Laura may have injected herself with hCG. I think that
24 we talk- -- we talked about a trigger shot or something like
25 that.

1 First of all, what is an hCG trigger shot?

2 A. It's used in trying to help somebody get
3 pregnant. And it's by prescription. It's an injection.

4 And I saw no records that indicated that anybody
5 would have given her a prescription for hCG.

6 Q. Okay.

7 A. Nor would there be a reason to give her one.
8 Especially if she was already pregnant.

9 Q. Right.

10 Dr. Medchill, Clayton in his pretrial statement
11 objected to your testimony on a couple of grounds. And I
12 know you and I talked about this. I'll -- I'll just read
13 one of his objections: That you have relied on an
14 admittedly-tampered-with data set.

15 Do you feel that you've relied on admittedly
16 tampered data in any way, shape, or form in forming your
17 conclusions?

18 A. Absolutely not. All I've included were the fact
19 that they both admitted that there was some type of
20 intimacy, that there were -- all the other things that I
21 used to make my decision was based on laboratory tests.

22 Q. And -- and the Planned Parenthood sonogram that
23 we've spoken about -- and I think you -- you were sitting
24 here and saw and heard that testimony -- did you rely on
25 that Planned Parenthood sonogram in any way?

1 A. No.

2 Q. And the -- the hCG test from Any Lab Test Now
3 that Laura did not send to any Court, the one that said
4 130-something-thousand, did you rely on that in any way?

5 A. No.

6 Q. Does the fact that Laura has those credibility
7 problems and that she did some things that we all agree are
8 dumb, does that change your opinion on whether or not she
9 was pregnant?

10 A. No.

11 Q. Why not?

12 A. The lab tests, like I said, are 99-plus percent,
13 and they were repeated over and over and over. And so she
14 was pregnant.

15 Q. One other objection that Clayton made to your
16 testimony, Dr. Medchill, is that you, with zero scientific
17 or DNA basis, made a conclusion that Clayton was the father
18 of twins. Have you reached that opinion at all?

19 A. No. That's preposterous.

20 Q. I mean, I don't -- I don't see it in your report.
21 I'm just wondering if you -- you agree that you can't make
22 any conclusions at all because we don't have DNA?

23 A. Correct.

24 Q. And you're -- you're familiar with the Ravgen
25 test process?

1 A. Yes.

2 Q. Can you think of any reason why a woman who is
3 not pregnant would want to take a test like that?

4 MR. WOODNICK: Objection. Foundation.

5 THE COURT: Sustained.

6 BY MR. GINGRAS:

7 Q. Dr. Medchill, if Laura was not pregnant and she
8 took -- and she submit- -- submitted a sample to Ravgen,
9 would Ravgen be able to confirm that she wasn't pregnant?

10 MR. WOODNICK: Objection. Foundation.

11 THE COURT: Sustained.

12 BY MR. GINGRAS:

13 Q. Dr. Medchill, you're -- you're familiar with
14 Ravgen. You just said that.

15 A. Yes.

16 Q. Did you -- did you ever use them in your practice
17 or something like that? A similar service?

18 A. Yes.

19 Q. And as part of using a DNA testing service like
20 that, does the service confirm that the woman is or isn't
21 pregnant? Can they come back and say, "This woman's not
22 pregnant"?

23 MR. WOODNICK: Objection. Foundation.

24 THE COURT: Sustained.

25 ////

1 BY MR. GINGRAS:

2 Q. Did you ever have that happen? Did you -- when
3 you used DNA testing as a doctor, did you ever have a test
4 come back that said a woman was not pregnant?

5 MR. WOODNICK: Objection. Foundation. And also,
6 Ravgen's only been around for a few years, and I think he's
7 been retired for a few.

8 MR. GINGRAS: I'm asking about the process
9 generally, Your Honor.

10 THE COURT: Overruled. He can answer the
11 question.

12 THE WITNESS: Free-cell DNA, which Ravgen is a
13 type, has been around for a number of years. I used it
14 frequently. It not only tells you if you're pregnant, it
15 tells if it's a boy or a girl, it'll tell you if it has
16 genetic defects. It's incredib- -- it's the biggest, best
17 new technology that we've had in the last 20, 30 years.

18 BY MR. GINGRAS:

19 Q. I -- I was looking at my notes when you answered.
20 So a Ravgen-type test, or Ravgen itself, can tell whether
21 it's a boy or girl?

22 A. Yes.

23 Q. And tell -- then necessarily can tell whether the
24 woman's pregnant at all?

25 A. Yes, obviously.

1 Q. Okay.

2 Dr. Medchill, one -- one final question. One
3 series.

4 Can you see the picture behind you there --

5 A. Yes.

6 Q. -- of Laura's body?

7 As a physician and as a man -- or a doctor who's
8 delivered lots of healthy babies and maybe some that didn't
9 end healthy, can you explain how Laura's body could be that
10 size, and she never said that she passed any dead fetus?

11 MR. WOODNICK: Objection. Exceeds the scope of
12 his presentation. He didn't review the photo as part of the
13 exhibits.

14 THE COURT: Overruled. He can answer if he has
15 an opinion. The Court will give it the weight it deserves,
16 which could be a little, a lot, or none at all.

17 MR. GINGRAS: That -- that photo's actually one
18 of the things that --

19 BY MR. GINGRAS:

20 Q. Did you look at this photo as part of your
21 review?

22 A. I saw that photo earlier, yes.

23 Q. And regarding the size of Laura's belly, which
24 clearly is not here anymore, is that -- does that show you
25 anything regarding whether or not she was pregnant?

1 A. It could indicate that she was pregnant. Could
2 indicate other things.

3 Q. The fact that Laura didn't -- didn't claim to
4 pass a large fetus, is that something surprising to you, or
5 is that something that could logically be explained
6 medically?

7 A. The fact that this pregnancy, in all likelihood,
8 was no longer viable early in this -- this pregnancy,
9 doesn't surprise me that she didn't pass much tissue at all.

10 Q. How -- how does that happen? Does the body --

11 A. What happens is the fetus starts to grow. At
12 some point, the fetus stops growing, there's no longer a
13 heartbeat. If it's very early, they may just get a period.
14 If it's -- if they miscarry, they may pass a little tissue.
15 Maybe not. And some of that tissue remains enough that it
16 continues to produce hCG. That's why she continued to have
17 the positive pregnancy tests. And that's why we call it an
18 incomplete abortion once we know that there's no longer a
19 viable pregnancy there, but the pregnancy doesn't end until
20 that -- all that tissue is gone, at which time it is a
21 completed miscarriage.

22 Q. Okay. Two more questions, Dr. Medchill.

23 Have you reviewed the expert report of Dr. Deans,
24 who's Clayton's expert?

25 A. Yes.

1 Q. Do you disagree with anything that Dr. Deans
2 said?

3 A. Not really. The only thing that was amusing to
4 me was the fact that they're relying on a clinical
5 pregnancy. There's an old adage, either you're pregnant or
6 you're not. The adage isn't you're either clinically
7 pregnant or not. And the reason for that is because to be
8 clinically pregnant, that means that you have to have
9 prenatal care. Laura did not have prenatal care.

10 I took care of hundreds of women who had no
11 prenatal care, so technically were not clinically pregnant,
12 walked into the hospital, and I delivered a nine-pound baby.
13 Even though they weren't clinically pregnant.

14 Clinical pregnancy only means that they've gotten
15 prenatal care that you could see on ultrasound or you could
16 hear with an instrument. And so a clinical pregnancy is not
17 relevant here. It's either you're pregnant or you're not.

18 Q. And -- and your opinion is that Laura was
19 pregnant? Even if it wasn't a clinical pregnancy, she was
20 pregnant?

21 A. Correct.

22 MR. GINGRAS: Thank you. No further questions.

23 THE COURT: All right, Counsel. You're at 45
24 minutes and 43 seconds.

25 Counsel, you have 28 minutes, 46 seconds.

CROSS-EXAMINATION

1
2 BY MR. WOODNICK:

3 Q. Thank you, Doctor.

4 You consider yourself a scientist, correct?

5 A. Yes.

6 Q. And so you know that when collecting data, it's
7 garbage in, garbage out. If you're not relying on good
8 data, the opinion you're going to give is not going to be
9 credible. Is that correct?

10 A. I -- that's why I only re- -- relied on the data
11 that I thought was totally credible.

12 Q. And that was the data that Mr. Gingras gave you,
13 correct?

14 A. That was the data that was presented to me.

15 Q. I saw when you drove into the parking lot you
16 walked in with Laura's mom in the parking lot. Are you
17 friendly with -- with her mother?

18 A. That -- I just met her this morning.

19 Q. Okay. That's nice.

20 Did you -- in -- well, let's go here.

21 Mr. Gingras asked you whether or not you relied
22 on the ultrasound, but you're aware that the ultrasound was
23 a fake, correct?

24 A. I've been told that, and that's why I didn't rely
25 on it.

1 Q. Okay. But knowing that the ultrasound was a
2 fake, doesn't that cause you to be incredulous about the
3 other data that Ms. Owens presented you?

4 A. That's precisely why I only used the data that
5 was laboratory-proven.

6 Q. Well, you actually sat in here and are relying on
7 a photocopy or a picture of a medical record that Laura
8 gave. That was the Banner with the three colors of
9 highlighter. Do you remember seeing that?

10 You were just sitting here. That exam.

11 A. Yeah, I -- I saw that. Yes.

12 Q. And you understand Laura has admitted to faking
13 medical records in this case?

14 A. Yes.

15 Q. She faked ultrasounds by putting other lab names
16 on them; she faked the two versions of the hCG test that you
17 relied on, correct?

18 MR. GINGRAS: Objection. Misstates the
19 testimony.

20 MR. WOODNICK: That's exactly what --

21 THE COURT: Overruled.

22 MR. WOODNICK: -- she testified to.

23 THE COURT: It can be addressed -- it can be
24 addressed in redirect.

25 ////

1 BY MR. WOODNICK:

2 Q. You know she --

3 A. The -- the data that I relied on was stuff that
4 was verified from the laboratory itself.

5 Q. That's not true. You relied on a photocopy that
6 Laura took a picture of and provided you. It's in your
7 file.

8 A. The Sonora Quest test done October the 16th was,
9 I believe, derived directly from Sonora Quest.

10 Q. Okay. Let me --

11 A. I think the --

12 Q. -- pause you.

13 Does it concern you as a scientist if three men
14 have accused Laura of fabricating medical doctor --
15 documents?

16 A. That has nothing to do with the data.

17 Q. Does it concern you as a --

18 Doesn't have anything to do with the data?
19 Doesn't -- doesn't it mean that you should do a deeper dive
20 to verify the authenticity of the data?

21 A. If you have proof that the -- the tests from
22 Banner or from Ravgen or from the quantitative hCG were
23 fake, I -- I'm willing to take a look at them, but --

24 Q. We --

25 A. -- that's what I have.

1 Q. But, Doctor, we have proof. She changed the
2 sonogram and she changed the hCG levels in one of the tests
3 that you relied on.

4 A. I didn't rely on the h- -- on the ultrasound, and
5 I didn't rely on the faked 100-and-whatever-thousand.

6 Q. Okay. You know that Laura testified that she --
7 Well, we can agree you reviewed absolutely zero
8 records from Laura's PCP, correct?

9 A. I don't know who her PCP is.

10 Q. Well, that's a problem. Wouldn't you have wanted
11 to talk to her PCP and see what drugs she was on?

12 A. I saw what drugs she was on from -- on Barrow.

13 Q. No, you saw what drugs she was on from a
14 neurologist that she had telemed visits with. You didn't
15 request, Doctor, records from her PCP, correct?

16 A. I did not.

17 Q. And you would agree that --

18 Thank you.

19 You would agree that it would have been helpful
20 had you reviewed her historic gynecological records,
21 correct?

22 Correct?

23 A. The testing of -- of her -- whether she was
24 pregnant or not had nothing to do with her gynecological
25 records.

1 Q. Well, you have no idea whether or not she had
2 elevated hCG in her system in the years before with any of
3 the other litigation, do you?

4 A. The fact that she had a negative hCG at the end
5 of her pregnancy tells me that she didn't have familial hCG
6 in her system.

7 Q. Okay, Doctor. Let's really quickly talk about
8 other things that could have caused Laura's hCG to be
9 elevated.

10 As a physician and a scientist, you would agree
11 that hCG could be elevated due to pituitary gland issues,
12 correct?

13 A. Yes.

14 Q. It could be elevated due to cancer, correct?

15 A. Yes.

16 Q. Ovarian cysts?

17 A. Depending on if it was cancer.

18 Q. And you're aware that Dr. Yee and Dr. Chan both
19 provided medical record- -- well, both indicated that Laura
20 had ovarian cancer?

21 A. I saw those records.

22 MR. GINGRAS: Objection. Foundation.

23 THE WITNESS: I didn't --

24 MR. GINGRAS: Objection. Foundation.

25 MR. WOODNICK: I'll move on.

1 THE COURT: Sustained.

2 BY MR. WOODNICK:

3 Q. Let's go back.

4 It could be -- elevated hCG could be caused by
5 weight loss drugs?

6 A. I'm not aware of weight loss, but there are drugs
7 that can alter hCG results.

8 Q. Let's talk about that a little bit more.
9 How about anxiety medications?

10 A. Yes.

11 Q. How about antidepressants?

12 A. Yes.

13 Q. And you -- you have no idea whether or not Laura
14 was on any of those medications because you didn't review
15 her historic medical records other than what was provided to
16 you by telemed at Barrow's, correct?

17 A. I saw that she was on some of those medicines.

18 Q. What medicines?

19 A. The antianxiety med- -- medicines.

20 Q. An antianxiety medicine that you just said could
21 elevate her hCG.

22 A. (No oral response.)

23 Q. Last, Doctor. IVF drugs also cause escalated
24 hCG, do they not?

25 A. Certain types.

1 Q. Laura could have been on Novarel or Pregnyl,
2 correct? Pregnyl?

3 A. I saw no records of that, and there would be no
4 reason why, if she was pregnant, that she'd be on those.

5 Q. One last question, Doctor. The antipsychotic
6 clozapine causes elevated hCG, does it not?

7 A. It's been reported to.

8 MR. WOODNICK: Thank you, Judge.

9 THE COURT: All right.

10 Redirect?

11 MR. GINGRAS: One question.

12

13 REDIRECT EXAMINATION

14 BY MR. GINGRAS:

15 Q. Dr. Medchill, regarding the potential of some
16 issue other than pregnancy being the source of Laura's hCG
17 in her blood, her -- are you aware that after November 14th,
18 she -- or on November 14th, she tested negative twice?

19 A. Yes.

20 Q. If Laura had drugs or tumors or cysts or anything
21 else that was causing an elevated hCG level, would she have
22 tested negative for pregnancy twice on November 14th?

23 A. No. They would have still been positive.

24 MR. GINGRAS: That's it.

25 THE COURT: Okay.

1 Before you sit down, Doctor, I just have a few
2 questions.

3 So you said that hCG requires a prescription,
4 correct?

5 THE WITNESS: The injection, yes.

6 THE COURT: Okay. Does Planned Parenthood have
7 the authorization to write those prescriptions, as far as
8 you know? In Arizona, anyway?

9 THE WITNESS: I can't imagine any reason why they
10 would. It's a drug that's used to induce ovulation, so it's
11 in -- used in infertility patients.

12 THE COURT: Okay.

13 THE WITNESS: Planned Parenthood doesn't normally
14 do infertility.

15 THE COURT: I understand, but that wasn't my
16 question. My question was: At -- are the medical doctors
17 there able to write a prescription for it if they chose to,
18 if they deemed it medical -- medically necessary?

19 THE WITNESS: Yes.

20 THE COURT: Okay.

21 Did you review either the Planned Parenthood
22 records from Mission Viejo or Los Angeles?

23 THE WITNESS: No.

24 THE COURT: Okay.

25 Follow-up to the Court's questions?

1 MR. WOODNICK: Nothing. Thank you, Judge.

2 THE COURT: Follow-up to Court's questions?

3 MR. GINGRAS: No.

4 THE COURT: Thank you, Doctor. You can step
5 down.

6 And, Counsels, before we call the next witness
7 up, just so that I'm -- I point this out to the parties,
8 we've explored B9, B31, and A12 that have not been moved.
9 So I don't know if that was just an oversight or if the
10 parties are intending to move those.

11 MR. GINGRAS: I'm sorry. Could I have those
12 numbers again?

13 THE COURT: Sure. B9, B31, and A12 were
14 addressed but not moved.

15 MR. GINGRAS: I would move to admit A- -- A12 is
16 Dr. Medchill's report.

17 THE COURT: Okay.

18 MR. WOODNICK: And no objection to that.

19 And we move to admit B9 and B31.

20 THE COURT: All right.

21 Any -- and I assume no objection, Counsel?

22 MR. GINGRAS: I just wanted to look what they
23 were. I didn't --

24 THE COURT: You explored them with your client on
25 direct.

1 MR. WOODNICK: Those are his, actually, so --

2 MR. GINGRAS: Yup. No objection there.

3 THE COURT: Okay. The Court will receive what's
4 been marked as B9, B31, and A12. Thank you.

5 You can call your next witness.

6 MS. ARENA: And, Your Honor, if we can get a
7 time-check again, if you don't mind.

8 THE COURT: Sure. Respondent's at 34 minutes, 36
9 seconds. Petitioner is at 46 minutes and 6 seconds.

10 MR. GINGRAS: Your Honor, I'm going to reserve
11 the rest of my time, so I'm done.

12 THE COURT: Okay. All right.

13 Counsel?

14 MR. WOODNICK: Judge, with some technological
15 help, and hopefully we're not on the clock, we're going to
16 call Dr. Deans.

17 THE COURT: Okay. All right. So you're on the
18 clock for her testimony, but getting her set up is not.

19 MR. WOODNICK: Thank you.

20 THE COURT: Okay. Dr. Deans, are you able to
21 hear me?

22 THE WITNESS: Yes, I can.

23 THE COURT: Okay.

24 Counsel?

25 MR. WOODNICK: Before we go on the clock,

1 Dr. Deans, can you hear me? It's the voice of
2 Gregg Woodnick.

3 THE WITNESS: Yes. I can see you too.

4 MR. WOODNICK: Oh.

5 THE COURT: Counsel --

6 MR. WOODNICK: There you are. Thank you.

7 All right. We're ready, Judge. Thank you.

8 THE COURT: Hold on one second. I want to make
9 sure she can hear everybody.

10 Counsel, will you do a test, please?

11 MR. GINGRAS: Hi, Dr. Deans. Good morning.

12 THE COURT: Okay.

13 THE WITNESS: Good morning. I can hear you.

14 MR. GINGRAS: Can you see me?

15 THE WITNESS: I can.

16 THE COURT: All right. And, Doctor, before we
17 get started -- and I -- I give this advisory whenever we
18 have virtual witnesses -- is if you need -- I understand
19 we've all got multiple screens going. If you need to look
20 at a report or your notes or something different, I need you
21 to let me know that you're going to do that. We'll give you
22 an opportunity to do it. Wherever that document is located,
23 once your reflect- -- once your recollection has been
24 reflected, please look away from that screen and let us know
25 that you're ready.

1 A. Just one fellowship.

2 Q. Thank you.

3 Do you teach?

4 A. I do.

5 Q. Medical students and -- and physicians?

6 A. Medical students and resident doctors, yes.

7 Q. You teach them gynecological and early family
8 planning?

9 A. Yes. Complex family planning, yes.

10 Q. All right. Thank you, Professor Deans.

11 You've provided us with your CV, which is
12 Exhibit 39.

13 MR. WOODNICK: I'd move to admit.

14 THE COURT: Any objection?

15 MR. GINGRAS: No objection.

16 THE COURT: B39's received.

17 BY MR. WOODNICK:

18 Q. You also did a report for us. It's Exhibit 41,
19 which we'll pull on the screen.

20 Did you have an opportunity to review the medical
21 records for Laura Owens?

22 A. Yes, the ones I was provided with.

23 Q. Exhibit No. 41, did you know that that was
24 published online on a website?

25 A. Just to confirm, I'm looking at my report. And,

1 no, I did not know that was published on a website.

2 Q. Did you -- did you give Ms. Owens permission to
3 publish your report on a website?

4 A. I did not.

5 Q. Okay.

6 MR. WOODNICK: Judge, I'm tendering Dr. Deans as
7 a -- as an expert here.

8 THE COURT: Any objection?

9 MR. GINGRAS: I -- no. I have one voir dire
10 question for her.

11 THE COURT: Sure. Go ahead.

12

13 VOIR DIRE EXAMINATION

14 BY MR. GINGRAS:

15 Q. Dr. Deans, hi. Good morning. How many doc- --

16 A. Good morning.

17 Q. How many children have you delivered as an
18 OB-GYN?

19 A. Probably too many to count, but I would say at
20 least 3,000 at this point.

21 MR. GINGRAS: Okay. I stipulate to her
22 expertise.

23 THE COURT: All right. So stipulated.

24

25 ////

1 DIRECT EXAMINATION CONTINUED

2 BY MR. WOODNICK:

3 Q. All right. Basic question, Dr. Deans. I'm going
4 to go fast here.5 Do you have concerns regarding the legitimacy of
6 some of the records you reviewed?

7 A. I do.

8 Q. If this Court were to assume that the June 1st
9 hCG test actually came from Laura, would that confirm
10 pregnancy?

11 A. No.

12 Q. What is the medical standard of care to confirm a
13 pregnancy?14 A. That would have to be either serial hCG's,
15 showing a trend over time, or a pregnancy test and/or an
16 ultrasound, or a physical exam that confirms an intrauterine
17 pregnancy.

18 Q. And we had none of that here, correct?

19 A. Correct.

20 Q. All right. I'm showing you Exhibit No. 28.

21 Are you aware that -- that's the ultrasound from
22 Laura. Are you aware that that was altered?

23 A. Yes, I am.

24 Q. Laura claimed it was anonymous and from Plan --
25 Planned Parenthood. Any thoughts about that?

1 A. Patients cannot be seen anonymously at
2 Planned Parenthood. Planned Parenthood -- I -- having been
3 a former medical director of Planned Parenthood, PPFA, which
4 is our national guidelines, require identification at the
5 time of a visit to confirm the identity of the patient. The
6 patient can't be seen anonymously.

7 Q. Thank you.

8 Laura claims she was pregnant with twins.
9 Anything you reviewed in any of the medical records confirm
10 that Laura was pregnant with twins?

11 A. No.

12 Q. Laura claimed that the twins were boy- and
13 girl-gendered. Anything that you reviewed that confirms
14 that?

15 A. No.

16 Q. Do you recall reviewing the October 16th hCG
17 test? I think it had a hundred, or three-digit, hCG level
18 on it.

19 A. I do.

20 Q. Do you -- are you aware that there's actually two
21 other versions of that exact same test in circulation?

22 A. I've heard that. I have not seen them.

23 Q. If I told you there was another version with a
24 thousand times higher hCG level, would that cause you
25 concern?

1 A. Yes, it would.

2 Q. Are there alternate causations for a positive hCG
3 test, as we have here?

4 A. Yes, there are.

5 Q. Did you review the --

6 Well, I'm going to skip over the photos.

7 Did you review Dr. Medchill's report?

8 A. I did.

9 Q. You're aware that Laura first claimed she
10 miscarried in September, October, and then the photos that
11 are in your report indicate that it happened in the third
12 week of July, correct?

13 A. Correct.

14 Q. Pursuant to Dr. Medchill's report, he
15 concluded -- well, do you agree with his conclusion that the
16 data here warrants that Laura was 99 percent pregnant?

17 A. No, I do not agree with that assessment.

18 Q. Do you agree with Dr. Medchill that the record
19 confirms -- this is from his report -- a May 20th conception
20 date?

21 A. Absolutely not. There's no data to confirm a
22 conception date at this point. That would require an
23 ultrasound, dating of a pregnancy.

24 MR. WOODNICK: Professor Deans, thank you.

25 Judge, I just move to admit Exhibit 41 if I

1 didn't already.

2 THE COURT: Any objection?

3 MR. GINGRAS: No objection.

4 THE COURT: B41's received.

5 Cross-examination when you're ready.

6

7

CROSS-EXAMINATION

8

BY MR. GINGRAS:

9 Q. Dr. Deans, you reviewed records that showed that
10 Laura had hCG in her blood October 16th, 2023. Are you
11 familiar with those?

12 A. Yes.

13 Q. Where did that hCG come from?

14 A. It could come from a variety of sources.

15 Q. Okay. And your report mentions some of those
16 sources. I -- I'm just going to ask about specific things.

17 Exogenous injection. I'm assuming that's a fancy
18 word -- way of saying sticking yourself with a needle.

19 A. Correct. Exogenous would be an hCG source from
20 outside of the body.

21 Q. And do you have any information or have you seen
22 any records that suggest that that happened here?

23 A. I don't.

24 Q. Okay.

25 Heterophilic antibodies, which I did a little

1 reading on that. Some sort of allergic response, it sounds
2 like, maybe?

3 A. Correct. An autoimmune response can be triggered
4 by exposure to animals and create positive tests.

5 Q. Okay. But the fact that Laura tested po- --
6 te- -- sorry -- tested negative for pregnancy November 14th
7 would appear to be inconsistent with at least the
8 heterophilic antibody theory. Would you agree with that?

9 A. I -- it depends on the type of test. A urine
10 pregnancy test might be positive, but a blood test could
11 still be positive. It depends on the assessment and the --
12 the level of hCG at the time of the test.

13 Q. Okay. And I think Dr. Medchill said, and I think
14 you also said, that cancer can cause elevated hCG levels.
15 That -- that's a fact, right?

16 A. Correct.

17 Q. And have you seen any records to suggest that
18 Laura has cancer presently or that she did in 2023?

19 A. Not presently, no. I know there's a discussion
20 of a prior history of ovarian cancer.

21 Q. I understand that. But regarding 2023, if Laura
22 had cancer in 2023 that caused positive pregnancy te- --
23 false positive pregnancy tests between May and October, when
24 the last one was, how can you explain her testing negative
25 in November?

1 A. I mean, I think it makes that less likely, unless
2 she had treatment in the meantime.

3 Q. And -- and another option that you wrote about in
4 your report was something called familial hCG syndrome as
5 being a -- a way that someone could test positive, have hCG
6 in their blood not from pregnancy, correct?

7 A. Correct.

8 Q. Do you know how rare that is?

9 A. Very rare.

10 Q. I read that it was about ten cases in the planet.
11 Does that sound about --

12 A. Mm-hm.

13 Q. -- right to you?

14 A. That's correct.

15 Q. And again, if -- if Laura had familial hCG
16 syndrome, that would explain some false positive tests in
17 the middle of the year, but it wouldn't explain the negative
18 at the end, would it?

19 A. That is correct.

20 Q. Dr. Deans, in your report you talked about
21 objective evidence of pregnancy. On the first page in
22 particular, you said that the only objective evidence of
23 pregnancy is a Banner Urgent Care serum quantitative hCG
24 from -- well, I think that's actually a misstatement. The
25 October 16th wasn't at Banner. But there was a serum hCG.

1 And you've referred to that as objective evidence of
2 pregnancy. Is that true?

3 A. Correct.

4 Q. And in the absence of some other explanation --
5 cancer, familial, horse tranquilizers, or whatever -- in the
6 absence of some other explanation, you would agree, and
7 Dr. Medchill, I think, said, that hCG test from October 16th
8 is objective evidence of pregnancy, right?

9 A. It is objective evidence, and one of the
10 possibilities of that objective evidence is pregnancy.

11 Q. Right. And if a woman is pregnant, regardless of
12 how much or how little prenatal care she has, she's still
13 pregnant, right?

14 A. If they are pregnant, yes.

15 Q. I mean, a woman -- a woman could be pregnant and
16 have no ultrasound until the day the baby comes out, and
17 she's still pregnant, right?

18 A. Yes, and the objective data would be the baby
19 coming out of her body.

20 Q. Right. And, Dr. Deans, you worked -- or your
21 report and your resume indicated that you worked at Planned
22 Parenthood for a while?

23 A. That's correct.

24 Q. In that capacity, did you counsel women regarding
25 terminating their pregnancies?

1 A. Correct.

2 Q. And just for the record, I'm strongly pro-choice,
3 strongly Planned Parenthood.

4 If a woman was choosing or was thinking about
5 choosing to terminate her pregnancy, why would she have
6 prenatal care?

7 A. Oftentimes, patients seek care first to confirm
8 their pregnancy before they make their decision about how to
9 end it.

10 Q. But in a lot of states --

11 THE COURT: Counsel, I'm sorry to cut you off,
12 but you ran out of time.

13 MR. GINGRAS: I'm out of time?

14 Thank you very much. Thank you.

15 MR. WOODNICK: No redirect.

16 Thank you, Professor Deans. We appreciate your
17 help.

18 THE COURT: All right. Any --

19 THE WITNESS: Thank you.

20 THE COURT: -- objection to the professor
21 disconnecting?

22 MR. WOODNICK: No.

23 MR. GINGRAS: Nope.

24 THE COURT: All right.

25 Thank you, Dr. Deans. If you'd like to

1 disconnect, you may. If you'd like to stay and listen, you
2 absolutely may.

3 THE WITNESS: Thank you very much.

4 THE COURT: You're welcome.

5 MR. WOODNICK: Time-check, Judge?

6 THE COURT: 38 minutes, 57 seconds.

7 MR. WOODNICK: We're going to call Clayton
8 quickly.

9

10

CLAYTON ECHARD,

11 called as a witness herein, having been first duly sworn,
12 was examined and testified as follows:

13

14

DIRECT EXAMINATION

15 BY MR. WOODNICK:

16 Q. Clayton, I'm going to be lightning-fast.

17 State your name to the Court.

18 A. Clayton Echard.

19 Q. Did you participate and sign the pretrial
20 statement that we provided to Judge Mata?

21 A. Yes.

22 Q. Are those statements true and accurate?

23 A. Yes.

24 Q. Are we asking the Court, in light of our very
25 limited time today, to consider our pretrial statement as

1 part of your testimony today?

2 A. Yes.

3 Q. How did you meet Laura?

4 A. Laura targeted me on LinkedIn. She asked to do
5 real estate. We ended up exchanging contact info.
6 She became -- she became flirtatious, sent me a provocative
7 photo, I told her to come over, and then we saw homes the
8 next day.

9 Q. Did you have sex with Laura?

10 A. Absolutely not. I've said time and time again
11 she performed oral on me twice. That's it.

12 Q. Have you heard two other versions about what
13 happened?

14 A. Absolutely. Many versions. She's claimed that
15 she was raped by me. She also claims I was too high to
16 remember what happened that day.

17 Q. I'm going to repeat what you just said. She
18 claimed you were -- she was raped by you and that you were
19 too high to remember?

20 A. That's correct.

21 Q. Were you too high to remember?

22 A. No, that's incorrect. I remember every single
23 thing from that night.

24 Q. Did you rape her?

25 A. No, I did not.

1 Q. You stated that -- that she had -- gave you oral
2 sex twice that evening; is that correct?

3 A. That's correct.

4 Q. Where did you complete?

5 A. Her mouth both times.

6 Q. What happened the second time?

7 A. She ran straight to the bathroom.

8 Q. Were your fluids ever down there, as Laura has
9 claimed?

10 A. No.

11 Q. What happened the next days?

12 A. The next day, we went and saw houses. I told her
13 that I crossed a professional boundary. I told her that
14 that was a one-time thing, it would not happen again. She
15 became very agitated at that point, was crying, and asked
16 for me to give her a chance.

17 Q. Hang on for a second. She came over to your
18 house, she gave you oral sex twice. The next day, you told
19 her you weren't interested in her?

20 A. That's correct. I rejected her, yes.

21 Q. And then four days later, what happened?

22 A. Four days later, she started making claims that
23 she could possibly be pregnant.

24 Q. Hang on. Did your penis ever go inside her
25 accidentally, inadvertently, or anything --

1 A. No.

2 Q. -- like that?

3 A. No.

4 Q. You're a public figure. You're the Bachelor.
5 That's why everyone's watching today.

6 Are you embarrassed to say who you've had sex
7 with, Clayton?

8 A. I think I'm the last person to -- to lie about
9 who I've been intimate with.

10 Q. Were you -- did you have penile-vaginal sex
11 whatsoever with Laura Owens?

12 A. No. Absolutely not.

13 Q. Has that been your story since day one?

14 A. It's been my story. My story's been consistent
15 since day one.

16 Q. I'm going to show you Exhibit No. 3.

17 MR. WOODNICK: Just put that up on the screen.
18 Thanks, Isabel.

19 BY MR. WOODNICK:

20 Q. Did Laura start communicating with you more after
21 she said she thought she was pregnant at four days?

22 A. Yes. Nonstop. She sent me over 500 e-mails and
23 text messages. Thirteen different phone numbers.

24 Q. Thirteen phone numbers?

25 A. Thirteen phone numbers.

1 Q. How many messages?

2 A. Over 500.

3 Q. Exhibit 3, is that a sample of those texts and
4 e-mails that were shown to Judge Gialketsis in the
5 injunction against harassment hearing from November 2nd,
6 2023?

7 A. Yes.

8 MR. WOODNICK: I move to admit Exhibit 3. And,
9 Judge, you already took notice because you watched the
10 videos.

11 THE COURT: I assume no objection?

12 MR. GINGRAS: No objection.

13 THE COURT: B3's received.

14 BY MR. WOODNICK:

15 Q. At some point, did she start calling your mom,
16 who's in the courtroom?

17 A. She started reaching out to my parents, she
18 started reaching out to my work organizations, she started
19 reaching out to people -- women I talked to in the past.
20 She went for everybody.

21 Q. Was she claiming anything in particular?

22 A. She was claiming that I was, yeah, a deadbeat
23 that's not supporting her through her pregnancy.

24 Q. Well, hang on. It was more than that, Clayton.
25 It was a deadbeat who was not supporting her through her

1 pregnancy of what?

2 A. With twins.

3 Q. Twins?

4 A. Yes.

5 Q. Did she reach out to the Sun Magazine?

6 A. She did, yes.

7 Q. Did she ever tell you what genders the imagined
8 twins were?

9 A. A boy and a girl.

10 Q. Did she ever tell you -- well, drawing your
11 attention to some motions Laura filed, and for purposes of
12 attorney's fees, she filed a motion to communicate on
13 August 8th; a motion to compel communication on August 23rd;
14 and August 29th, a few days later, an expedited motion to
15 communicate; and then shortly thereafter, she filed an order
16 of protection against you, correct?

17 A. Yes.

18 Q. And you're aware that she's filed orders of
19 protection against two other individuals seated in the back
20 of the courtroom, correct?

21 A. That's correct, yes.

22 Q. They are on the left?

23 A. Yes. Well, my right, but yes. Your left.

24 Q. Thank you. Greg Gillespie and?

25 A. Michael Marraccini.

1 Q. I want to look at Exhibit No. 7, Clayton.

2 Is that a true and accurate copy of e-mail
3 communication between you and Laura from July 1st, 2023?

4 A. Absolutely. Yes.

5 Q. You received it?

6 A. I did, yes.

7 Q. And she sent it?

8 A. She sent it, yes.

9 Q. You heard her testify with Ms. Arena from my
10 off- -- or excuse me -- with Mr. Gingras denying the e-mails
11 exchange were from her. She seems to be blaming, I guess,
12 Greg Gillespie, for faking her e-mails. Did you remember
13 her testimony?

14 A. Yes. Yeah, she said that. But nothing she says
15 is true.

16 Q. She's actually sent you e-mails with videos
17 attached to them, and you've had -- and you've responded
18 back to them, correct?

19 A. That's correct, yes.

20 Q. All right. Specifically, Exhibit No. 7. I think
21 you stated that it was a true and accurate copy.

22 I think the caption -- I'm going to try to read
23 it on the caption. The top. I think it says, "The final
24 opportunity to consider abortion."

25 Do you remember getting this from Laura?

1 A. Yes.

2 MR. WOODNICK: Move to admit Exhibit 7.

3 THE COURT: Any objection?

4 MR. GINGRAS: Yeah, no objection, Your Honor.

5 THE COURT: 7's received.

6 BY MR. WOODNICK:

7 Q. Further down in that e-mail, Clayton -- and
8 this'll get awkward. But further down in that e-mail on
9 July -- from July 1st, which was weeks after the alleged
10 encounter, Laura references her tight vagina. Why is that
11 both uncomfortable and relevant to the Court today?

12 A. Because she's stating that if I would have felt
13 how tight her vagina was, I might change my mind. Which is
14 her stating that I never penetrated her. We never had
15 penetrative sex.

16 Q. Wait. The exhibit that the Court just received
17 has Laura saying that her vagina was tight, as if you hadn't
18 been in there before?

19 A. That is correct.

20 Q. Well, had you been in there before?

21 A. I had not, no.

22 Q. All right. She also sent you communications in
23 Exhibit No. 7 talking about wanting to have sex with you
24 during a week. A trial week. What was that about?

25 A. Yeah. She said that she would be the safest

1 person to have sex with since she was already pregnant.

2 Q. Hang on for a second. She told you she wanted to
3 have sex with you because she was already pregnant?

4 A. That's correct.

5 Q. How did you feel when you read that e-mail,
6 Clayton?

7 A. I mean, sick to my stomach. All of this has made
8 me sick.

9 Q. Did you feel like she was trying to trap you?

10 A. Absolutely.

11 Q. You heard the testimony with Dr. Medchill
12 concerning that Laura was on IVF medications trying to get
13 pregnant. Is that consistent with those concerns?

14 A. Yeah, I believe that she was taking medications.

15 Q. I'm going to show you Exhibit No. 6.

16 And let me restate that question.

17 You heard my question to Dr. Medchill about IVF
18 medications, which are used to cause pregnancy. And -- and
19 you share concerns that she was using those to trap you; is
20 that correct?

21 A. Absolutely. Yes.

22 Q. All right.

23 MR. WOODNICK: Exhibit No. 6, Isabel.

24 BY MR. WOODNICK:

25 Q. Exhibit No. 6 is another e-mail dated June 28th,

1 2023. Is that a true and accurate copy of the
2 correspondence between you and Laura?

3 A. Yes, it is.

4 Q. You remember reading this?

5 A. I remember reading this, yes.

6 Q. Do you remember reading it on June 28th-ish when
7 you received it?

8 A. I do, yes.

9 Q. And the title of this -- can you read the title
10 of this out loud for the Court?

11 A. "Having the baby if I don't hear back tonight."

12 Q. "Having the baby if I don't hear back tonight."

13 MR. WOODNICK: Move to admit Exhibit 6.

14 THE COURT: Any objection?

15 MR. GINGRAS: No objection.

16 THE COURT: Exhibit 6 is received.

17 MR. WOODNICK: Thank you.

18 BY MR. WOODNICK:

19 Q. I'm going to show you Exhibit 11.

20 Did Laura send you ultrasounds during this time
21 period?

22 A. Yes, she did.

23 Q. Is Exhibit 11 an image of an ultrasound you
24 received from Laura?

25 A. Yes.

1 Q. She's going to claim that she didn't send this to
2 you, but how do you know this came from Laura?

3 A. Because I was interacting with her from that same
4 e-mail address. I also took a screen-record showing that it
5 was from her e-mail address, and that's where all my other
6 communications have come from her.

7 Q. Real quick, so on October No. 11, this one
8 says -- the caption on it says "Ultrasound Video Proof,"
9 correct?

10 A. That's correct.

11 Q. And the signature block on there and the picture
12 is the exact same signature block and picture from the other
13 e-mail, which is also not favorable to Laura, which she
14 claims is not hers, correct?

15 A. Yes, that's --

16 MR. WOODNICK: Move to admit Exhibit 11.

17 THE COURT: Any objection?

18 MR. GINGRAS: No objection.

19 BY MR. WOODNICK:

20 Q. On Exhibit 11 -- well, do you know where the
21 video came from on Exhibit No. 11?

22 A. Yeah. From a YouTube video from seven years ago.

23 Q. YouTube video from seven years ago?

24 A. Correct.

25 Q. On that -- this is the one that says SMIL, right?

1 A. Yes.

2 Q. Okay.

3 A. Yeah. Yeah.

4 Q. This one says GE.

5 A. Now this one's a different one, yes.

6 Q. Okay. Because how many are there? How many
7 ultrasounds have you seen?

8 A. Three.

9 Q. Okay. This one, I think, on the -- on the
10 caption says, "And here's my hundred million percent real
11 ultrasound"?

12 A. Yeah. A lot of zeros, yeah.

13 Q. Do you remember --

14 I don't know if my math is right on that.

15 Do you remember receiv- -- receiving that?

16 A. Yes. I received it from Laura, yes.

17 Q. Court already admitted it.

18 I'm going to show you Exhibit No. 28.

19 You recall receiving this ultrasound?

20 A. Yes. I saw this from Bonnie Platter.

21 Q. Okay. I'm going to be real clear about this.

22 Ms. Owens just testified that she did not use this
23 ultrasound in a court proceeding, but it was actually
24 admitted as an exhibit by Laura through her counsel at the
25 February 2nd, 2024, deposition of you, correct?

1 A. Correct.

2 Q. All right. That video deposition of you, have
3 you seen that recently?

4 A. Yes, I have.

5 Q. Where did you see the video deposition of
6 yourself, Clayton?

7 A. It was posted on YouTube by either her counsel or
8 herself.

9 Q. Wait. Laura or her counsel posted your video
10 deposition on YouTube?

11 A. That's correct.

12 Q. How many paternity tests did you take, Clayton?

13 A. Three.

14 Q. I'm going to show you Exhibit No. 36.

15 You know what? I'm going to skip past that.
16 That was the -- Dr. Medchill's -- I'll skip past that,
17 but --

18 Well, you know what? Real quickly, how many
19 versions of the -- of the hCG test have you seen?

20 A. I -- two, I believe. Yeah. The 102 and 102,000.

21 Q. The one with more digits on it?

22 A. Yes. Yes.

23 Q. All right.

24 I'm going to show you Exhibit No. 46.

25 Would you agree that Exhibit No. 46, for

1 attorney's fees, is a blog from Mr. Gingras where he
2 acknowledges his client faked some of the science tests?

3 A. Yes, that's correct.

4 Q. I'm going to show you, to move this along,
5 Exhibit No. 55.

6 Exhibit No. 55 was right before your March 1st
7 deposition. Or right before -- excuse me -- Laura's
8 March 1st deposition.

9 Actually, did she show up at her earlier
10 deposition?

11 A. No, she didn't.

12 Q. And the Court ordered her compel to attend, and
13 we're still waiting for the Court to order on attorney's
14 fees for that; is that correct?

15 A. Correct.

16 Q. But at her -- right before, what happened a day
17 or two, related to Exhibit 55, a day or two before your
18 deposition?

19 A. She threatened to extort me for -- to the tune of
20 \$1.4 million in order for me to drop the deposition and the
21 case entirely.

22 Q. Wait a minute. She sent you a letter a day
23 before, trying to get out of the deposition?

24 A. Yes. She threatened me.

25 Q. Threatened you with what?

1 A. Monetary -- monetary means.

2 Q. Is everything that we've talked about today so
3 far, other than the YouTube videos, which are more recent,
4 is everything addressed in prior pleadings already before
5 Judge Mata?

6 A. Yes.

7 Q. Really quickly, for attorney's fees purposes,
8 Exhibit No. --

9 Well, let me get in a few exhibits real quick.

10 MR. WOODNICK: Exhibit 29, 37, and 59, these are
11 the medical records from -- pursuant to subpoena from
12 Drs. -- for Planned Parenthood, Dr. Makhoul, and Dr. Higley.
13 We move to admit. They've all been considered by the
14 experts.

15 THE COURT: I'm sorry. You said 37?

16 MR. WOODNICK: Strike that. Sorry. 29, 37, and
17 59.

18 THE COURT: Any objection?

19 MR. GINGRAS: Not to those. Did we talk about
20 Exhibit 54 yet?

21 THE COURT: Hold on. One second.

22 29, 37, and --

23 What was the other one, Mr. Woodnick?

24 MR. WOODNICK: 59.

25 THE COURT: -- 59 are received.

1 We'll talk about that one after, Counsel.

2 MR. WOODNICK: And then I'll go back.

3 It's Exhibit No. 55, which is the letter that
4 Laura sent you suing you -- to sue you for \$1.4 million
5 before the deposition.

6 Move to admit.

7 MR. GINGRAS: I -- now, that one, I'll object to.
8 That's a Rule 408 settlement offer, Your Honor. He's
9 offering to prove that the claim's not valid. That's
10 absolutely inappropriate.

11 THE COURT: Over --

12 MR. WOODNICK: Judge, just -- sorry.

13 THE COURT: Over objection, the Court's going to
14 receive it for the purposes of attorney's fees only.
15 Counsel, you have run out of time.

16 MR. WOODNICK: I'm out of time?

17 THE COURT: You're out. You're at 50.

18 MR. WOODNICK: I'm at 50?

19 THE COURT: Sir, you can go sit back down.

20 Okay. So, Counsel, what exhibit were you asking
21 me about? You -- yeah, you said it has something, then
22 move.

23 MR. WOODNICK: 54. We just cured that, Judge.

24 THE COURT: Oh. All right. I just wanted to
25 make sure.

1 Okay. So at this time, what the Court's going to
2 do is I'll take this under advisement. What that means is
3 I'm going to go back, I'm going to review the notes that I
4 took today, I'm going to review the evidence that was
5 admitted to the Court, and then everyone will receive my
6 order in writing.

7 MR. GINGRAS: Your Honor, I -- I have one
8 housekeeping matter.

9 I'm leaving the country tonight. I am not back
10 until June 28th. If the Court issues something that
11 requires a quick response, I'm going to be on a boat, and I
12 may not have the ability to respond. So I would just ask
13 either -- that you grant me some extension if I need it. I
14 return back to the country June 28th. So just advising you.

15 THE COURT: Okay. And -- and I'm sorry, Counsel.
16 When do you leave?

17 MR. GINGRAS: Tonight.

18 THE COURT: Okay. All right. So June 10th to
19 the 28th --

20 MR. GINGRAS: Correct.

21 THE COURT: -- you will be unavailable. Okay.

22 MR. GINGRAS: I should have e-mail part of the
23 time, but not all of it.

24 THE COURT: Yeah. You can't really be held
25 accountable for that. I understand.

1 Any other thing -- anything else administrative?

2 MR. WOODNICK: No. Thank you, Judge.

3 THE COURT: All right.

4 So how this'll work now at this point is I have
5 relinquished all security to court security and any
6 underlying law enforcement that are present. They will be
7 escorting people out in the manner that they deem to be
8 appropriate. If there's competing orders against harassment
9 or orders of protection, then we can take those things into
10 consideration.

11 And I just ask that if the people in the gallery
12 are able, any conversations, if you could just take them out
13 into the hall, that would be great for our other people who
14 are here for other matters.

15 Thanks.

16 (Matter concluded.)

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C E R T I F I C A T E

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4 I, NICOLE TATLOW, Official Certified Reporter
5 herein, hereby certify that the foregoing is a full, true
6 and accurate transcript of all proceedings had in the
7 foregoing matter, all done to the best of my skill and
8 ability.

9
10 Dated at Phoenix, Arizona, this 5th day of
11 July, 2024.

12
13
14 _____/s/Nicole Tatlow_____
15 Nicole Tatlow, RPR
16 Certified Reporter No. 50671
17 Official Court Reporter
18 Maricopa County Superior Court
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