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2 Garrett Respondek, [REDACTED]
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5 Phoenix, AZ 85016
6 Office: [REDACTED]
7 [REDACTED]
8 *Attorneys for Gregory Gillespie*

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

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

11 **LAURA OWENS,**

12 **Plaintiff,**

13 **v.**

14 **GREGORY GILLESPIE,**

15 **Defendant.**

16 **Case No.: CV2021-052893**

17 **SEPARATE STATEMENT OF FACTS**

18 (Assigned to the Hon.
19 Michael Gordon)

20 Defendant Gregory Gillespie (“Defendant”) provides the following Statement of
21 Facts in support of his concurrently filed Motion for Summary Judgment.

22 1. This Action concerns, in relevant part, Plaintiff Laura Owens’ (“Plaintiff”) claim for intentional infliction of emotional distress. [See Complaint (“Compl.”) at ¶ 3].

23 2. Plaintiff claimed that Defendant owed Plaintiff the sum of \$45,000.00 based on the following allegations:

- 24 a. The Plaintiff became pregnant with Defendant’s child on either June [sic].
- 25 b. Plaintiff became pregnant on her second date with Defendant on or around June 20 2021 [sic] after only 2 dates.
- 26 c. Plaintiff informed Defendant of the pregnancy and he denied it, after which he forced Plaintiff to have multiple pregnancy tests and a doctor’s appointment.

LAW

ZAZUETA

1 d. Once Defendant finally learned the pregnancy was real, Defendant employed
2 false promises, and verbal and emotional abuse to coerce Plaintiff into
3 getting an abortion.

4 e. Upon Plaintiff’s first attempt to terminate the pregnancy, Defendant blocked
5 Plaintiff from all communication.

6 f. When Plaintiff informed Defendant of her failed attempt at termination,
7 Defendant again employed false promises, and verbal and emotional abuse
8 to coerce Plaintiff again.

9 g. During this entire time, Plaintiff clearly expressed her desire to not terminate
10 the pregnancy. (See attachment for more). [*Id.*].

11 3. In relevant part, the Complaint also contained a recitation of the elements of
12 an intentional infliction of emotion distress claim. [*Id.*]

13 4. Plaintiff also claimed her attorneys’ fees and costs. [*Id.* at ¶ 4].

14 5. Otherwise, the Complaint does not describe any injuries associated with
15 Plaintiff’s claim for intention infliction of emotional distress. [*See generally* Compl.].

16 6. The Complaint also attaches text messages between Plaintiff and Defendant,
17 most or all of which were not disclosed pursuant to Ariz.R.Civ.P. 26.1. [*See generally*
18 Compl.; *see also* 2023-04-17 Plaintiff’s Initial Disclosure Statement and Supporting
19 Documentation, (“IDS”) attached hereto as **Exhibit “A”**].

20 7. Under Plaintiff’s IDS, Plaintiff alleges that she suffered “severe emotional
21 distress..., severe anxiety, depression, shock, and utter guilt...” [*See* Exh. A at 2:20–24].

22 8. Plaintiff also alleges that Defendant’s intentional infliction of emotional
23 distress exacerbated Plaintiff’s pre-existing mental health conditions but failed to specify
24 which mental health conditions were exacerbated. [*See* Exh. A at 2:24].

25 9. Notably, Plaintiff does not allege in her Complaint or IDS that her severe
26 emotional distress manifested into physical symptoms or that she sought treatment for any

1 physical symptoms. [*See generally* Compl. and Exh. A].

2 10. Per the IDS, Plaintiff does not seek any expenses associated with any
 3 expenses or treatment she sought in connection with her claim for intentional infliction of
 4 emotional distress. [*See* Exh. A at 5:14–17].

5 11. Plaintiff also does not seek any damages associated with a physical
 6 manifestation of symptoms connected to her claim. [*Id.*].

7 12. Instead, Plaintiff effectively seeks an award of her reasonable attorneys’ fees
 8 and costs as her damages. [*Id.*] (“The award Plaintiff seeks shall be computed by accurate
 9 accounting of all costs and fees associated with this case, billed at reasonable rates. It is
 10 anticipated that the damages will amount to at least \$40,000.00 due to the trauma that
 11 [Plaintiff] suffered.”)

12 13. Plaintiff has not disclosed a computation of her damages. [*Id.*].

13 14. In support of her claim, Plaintiff disclosed the following:

- 14 a. Gynecologic Test Report from Sonora Quest Laboratories, dated February
 15 16, 2022 [*See* Exh. A at LO000001–LO000002].;
- 16 b. A positive COVID-19 Antigen Test from SeaBio Diagnostics, dated January
 17 22, 2022 [*Id.* at LO000003];
- 18 c. An unspecified receipt, dated March 2, 2022 [*Id.* at LO000004];
- 19 d. Medication instructions from Choix pertaining to the administration of
 20 mifepristone and misoprostol [*Id.* at LO000005–LO000011];
- 21 e. A letter from Choix and an informed consent form [*Id.* at LO000012–
 22 LO000014];
- 23 f. Communications with representatives from Choix [*Id.* at LO000015–
 24 LO000019];
- 25 g. A urine pregnancy test from One Medical, and a letter concerning the same,
 26 dated July 16, 2021 [*Id.* at LO000020–LO000021]



- 1 h. A communication with Defendant, dated July 17, 2021 [LO000022].
2 i. Medical Record from a visit with Julie Ahlrich, NP, dated July 16, 2021
3 [LO000023];
4 j. A medical bill from Bright HealthCare, dated July 27, 2021 [LO000024];
5 k. An Order of Protection and Petition for Order of Protection in the matter of
6 *Owens v. Gillespie* (Case No. FN2021-004799) [LO000025–LO000029];
7 and
8 l. Messages with Circa Lighting [LO000030].

9 15. Notably, none of Plaintiff’s disclosed documents relate to her alleged
10 damages or her claim for intentional infliction of emotional distress.

11 **RESPECTFULLY SUBMITTED** this 26th day of July 2023.

12 **ZAZUETA LAW, PLLC**

13 /s/Fabian Zazueta
14 Fabian Zazueta, Esq.
15 Garrett Respondek, Esq.
16 2633 E. Indian School Rd., Ste. 370
17 Phoenix, AZ 85016

Attorneys for Defendant

18 **ELECTRONICALLY** filed this same day
19 via AZTurboCourt.com.

20 **COPY** emailed this same day on:

21 Kyle O’Dwyer, Esq.
22 **FORTIFY LEGAL SERVICES**
23 3707 E. Southern Ave.
Mesa, AZ 85206

24 *Attorney for Plaintiff*

25 /s/ Garrett Respondek
26

EXHIBIT A



1 Fortify Legal Services
2 3707 E Southern Avenue
3 Mesa, AZ 85206

4 Kyle O'Dwyer
5
6

7 *Attorney for Plaintiff*

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

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

10 Laura Owens,

11 Plaintiff,

12 vs.

13 Gregory Gillespie,

14 Defendant.

Case No: CV2021-052893

**PLAINTIFF'S INITIAL DISCLOSURE
STATEMENT**

15
16 Plaintiff Laura Owens, by and through counsel undersigned, does hereby submit her Initial Rule
17 26.1 Disclosure Statement, pursuant to the Arizona Rules of Civil Procedure.

18 The contents of this Disclosure Statement are provisional and subject to supplementation,
19 amendment, explanation, change and amplification. This Disclosure Statement is based upon information
20 currently known and believed to be accurate and may change as further information is obtained from
21 investigation and discovery.

22 **I. FACTUAL BASIS**

23 Ms. Owens became pregnant with Mr. Gillespie's child not long after knowing each other. Mr.
24 Gillespie demanded confirmation of the pregnancy first by demanding access to Ms. Owens' confidential
25 patient portal, which Ms. Owens granted, by requesting a video appointment with one of Ms. Owens'
26 health care providers to confirm the pregnancy, which also occurred, and a note written by Dr. Jones,

1 which was also provided to him. In all instances, the pregnancy was confirmed by lab results and verbal
2 confirmation by a healthcare provider.

3 Ms. Owens and Mr. Gillespie discussed the pregnancy and whether or not Ms. Owens should
4 obtain an abortion. Mr. Gillespie coerced Ms. Owens to obtain an abortion by threatening to call law
5 enforcement on her, threatening to withhold financial support from her, threatening to destroy her
6 reputation, and emotionally and mentally abusing her into submitting to his will. See the Complaint,
7 which is incorporated herein for additional facts relevant to this analysis.

8 Mr. Gillespie claims that the pregnancy was falsified, that correspondences with Joseph Cotchett
9 and assistants and attorneys at his firm were falsified, and that the complaint was filed in an attempt to
10 coerce Mr. Gillespie into a relationship with Ms. Owens. Ms. Owens vehemently denies the allegation
11 that she has falsified any documents and denies that Mr. Gillespie was damaged in any way. Mr. Gillespie
12 falsified multiple documents. Ms. Owens did not have an ultrasound. She further denies that Mr. Gillespie
13 had any loss of income due to her actions.

14 **II. LEGAL THEORIES**

15 ***A. Intentional Infliction of Emotional Distress- By Plaintiff***

16 A cause of action for intentional infliction of emotional distress is proven if a party can show (1)
17 extreme and outrageous conduct; (2) the opposing party intends or recklessly disregards the near
18 certainty that distress will result from the conduct; (3) severe emotional distress occurs as a result of the
19 defendant's conduct; and (4) damages due to that emotional distress. *Ford v. Revlon*, 153 Ariz. 38, 43
20 (1987). Mr. Gillespie's conduct, as described above, meets this definition. Further, Ms. Owens suffered
21 severe emotional distress as a result, in that she suffered, and continues to suffer from, severe anxiety,
22 depression, shock, and utter guilt due to the decision defendant coerced her to make to terminate the
23 pregnancy and his other actions in pretending to be other individuals in order to continue discussions
24 with her. Any pre-existing mental health conditions were exacerbated by Defendant's conduct.

25 ***B. Intentional Infliction of Emotional Distress- By Defendant***

1 Defendant cannot establish extreme and outrageous conduct, severe emotional distress, or that he
2 has suffered any damages. The counterclaim is devoid of any factual allegations regarding these issues
3 and the disclosure statements likewise include no factual allegations as to how Defendant has suffered
4 any emotional distress or damages. Further, Plaintiff believes Mr. Gillespie continued to be employed
5 and therefore did not suffer damages. Further, any emotional distress that Defendant may have suffered
6 was not from Plaintiff's actions but other causes in his life.

7 **III. WITNESSES**

- 8 **1. Laura Owens**
9 c/o Fortify Legal Services

10 [REDACTED]
11 [REDACTED]
12 Ms. Owens is expected to testify as to her knowledge of the subject matter of the Complaint; her
13 conversations with the parties and witnesses and the damages sustained by her.

- 14 **2. Gregory Gillespie**
15 c/o Woodnick Law

16 [REDACTED]
17 [REDACTED]
18 Mr. Gillespie is expected to testify as to his knowledge of the subject matter of the Plaintiffs'
19 Complaint; his conversations with the parties and witnesses and the defenses alleged by the Defendant.

- 20 **3. Joseph Cotchett**
21 Cotchett, Pitre, & McCarthy, LLP
22 840 Malcolm Road, Suite 200
23 Burlingame, CA 94010

24 [REDACTED]
25 [REDACTED]
26 Mr. Cotchett is expected to testify as to his knowledge of the subject matter of the Plaintiffs'
Complaint; his conversations with the parties and witnesses and the defenses alleged by the Defendants.

- 4. Dr. John Jones, DO**
One Medical Group
15210 N. Scottsdale Road, Suite 275
Scottsdale, AZ 85254

1 Dr. Jones is expected to testify as to his knowledge of the subject matter of the Plaintiffs'
2 Complaint; his conversations with the parties and witnesses and the defenses alleged by the Defendants.

- 3 5. **Julie Ahlrich, NP**
4 One Medical Group
5 15210 N. Scottsdale Road, Suite 275
6 Scottsdale, AZ 85254

7 Ms. Ahlrich is expected to testify as to her knowledge of the subject matter of the Plaintiffs'
8 Complaint; her conversations with the parties and witnesses and the defenses alleged by the Defendants.

- 9 6. **A [REDACTED] S [REDACTED]**
10 Contact Information unknown but will be supplemented.

11 Ms. S [REDACTED] is expected to testify as to her knowledge of the subject matter of the Plaintiffs'
12 Complaint and her own personal history with Defendant; her conversations with the parties and witnesses
13 and the defenses alleged by the Defendants.

- 14 7. **D [REDACTED] H [REDACTED]**
15 Contact Information unknown but will be supplemented.

16 Mr. H [REDACTED] is expected to testify as to his knowledge of the subject matter of the Plaintiffs'
17 Complaint; his conversations with the parties and witnesses and the defenses alleged by the Defendants.

- 18 8. **Circa Lighting Employees**
19 [REDACTED]
20 Scottsdale, AZ [REDACTED]
21 [REDACTED]

22 These employees are expected to testify as to their knowledge of the subject matter of the
23 Defendant's counterclaim; their conversations with the parties and witnesses and employment information
24 of the Defendant.

- 25 9. All witnesses listed by all other parties.
26 10. All witnesses listed in any reports previously disclosed.
11. Foundational witnesses as necessary.

IV. **PERSONS WITH KNOWLEDGE OR INFORMATION**

1. **C [REDACTED] S [REDACTED]**
2. **B [REDACTED] P [REDACTED]**

1 Plaintiff will supplement this information if and when applicable.

2 **V. PERSONS WHO HAVE GIVEN STATEMENTS**

3 Plaintiff is unaware of any persons who have given statements other than those already disclosed.

4 Plaintiff will supplement this information if and when applicable.

5 **VI. POTENTIAL AREAS OF EXPERT TESTIMONY**

6 A. Emotional distress expert;

7 B. Valuation of damages incurred by Plaintiff;

8 C. Forensic computer expert;

9 D. Any area identified by any other party in this case, regardless of whether those areas are
10 later de-listed or withdrawn;

11 E. Any area necessary to rebut any expert opinions issued by the Defendant; and,

12 F. Any area of expertise that may become relevant following additional discovery and
13 investigation.

14 **VII. COMPUTATION AND MEASURE OF DAMAGES**

15 The award Plaintiff seeks shall be computed by accurate accounting of all costs and fees associated
16 with this case, billed at reasonable rates. It is anticipated that the damages will amount to at least \$40,000
17 due to the trauma that Ms. Owens suffered.

18 **VIII. EXHIBITS**

19 1. Medical Records (LO000001-14, 20-21, 23-24);

20 2. Text Messages (LO000015-19, 22);

21 3. Order of Protection (LO000025-29);

22 4. Messages with Circa Lighting (LO000030);

23 5. All pleadings, disclosure statements or matters of record, including any exhibits attached
24 thereto.

25 6. The responses of any party to any interrogatory, request for production, or request for
26 admission.

1 7. The transcript and exhibits of deposition testimony given by any party or witnesses.

2 8. Any document produced with a disclosure statement, in response to a request for
3 production of documents, or pursuant to subpoena.

4 9. Any document identified by any party in any disclosure statement, pre-hearing statement
5 or list of witnesses and exhibits.

6 10. Any report, diagram or similar document pre- statement or list of witnesses and exhibits.

7 11. Any report, diagram or similar document prepared by any experts retained in connection
8 with this litigation.

9 12. Any and all exhibits listed/utilized by any other party.

10 **IX. DOCUMENTS WHICH MAY BE RELEVANT OR WHICH MAY LEAD TO THE**
11 **DISCOVERY OF ADMISSIBLE EVIDENCE**

12 Plaintiff will supplement this information if and when applicable.

13
14 RESPECTFULLY SUBMITTED this 17th day of April, 2023.

15 **FORTIFY LEGAL SERVICES**

16 */s/ Kyle O'Dwyer* _____

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

1 VERIFICATION

2
3 I, the undersigned party in this action declare under penalty of perjury of the laws of the
4 State of Arizona that the foregoing Disclosure is true and correct and that this verification is
5 executed by me on 04 / 17 / 2023.

6
7 Laura Owens
8 Laura Owens

9
10
11
12
13
14 COPY of the foregoing emailed
15 this 17th day of April, 2023, to

16 Gregory Gillespie
17 [REDACTED]
18 Phoenix, AZ [REDACTED]
19 [REDACTED]

20 /s/ Kyle O'Dwyer

Report Status FINAL

Route 2005

Kathleen T Jordan MD PC

Scottsdale, AZ



**Sonora Quest
Laboratories™**

A Subsidiary of Laboratory Sciences of Arizona

Stephanie McClellan, MD

Patient Information:

OWENS, LAURA

Account: [REDACTED]
ID/MR#: [REDACTED]
Patient Lab ID: [REDACTED]

Collected: 02/08/2022 09:21 AM
Received: 02/08/2022 11:19 PM
Reported: 02/16/2022 08:02 PM

Order #: [REDACTED]
DOB: [REDACTED] Age: 31Y
Sex: F
Patient Phone: [REDACTED]

TEST	RESULTS	REFERENCE RANGES	UNITS	PL
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GYNECOLOGIC TESTING

Pap ThinPrep

Accession #:

SG220017379

Source:

Cervix

Clinician Provided Information:

Z113, Z124

Pap Diagnosis:

Negative for Intraepithelial Lesion or Malignancy

Specimen Adequacy:

Satisfactory for evaluation.
Endocervical/transformation zone component present.

Cytotechnologist:

TLP SCT(ASCP)

Report Statement:

This ThinPrep Pap Test has been evaluated with the assistance of the ThinPrep Imaging System.

HPV DNA, High/Low Risk

HPV DNA High Risk	NOT DETECTED*	NOT DETECTED	AM
HPV DNA Low Risk	NOT DETECTED*	NOT DETECTED	AM

*HPV DNA High Risk: Tested for High-Risk Types 16,18,31,33,35,39,45,51, 52,56,58,59,68.

*HPV DNA Low Risk: Tested for Low-Risk Types 6,11,42,43,44.
Methodology: Hybrid Capture with Signal Amplification.
The analytical performance characteristics of this assay have been determined by Quest Diagnostics Nichols Institute, Chantilly, VA. The modifications have not been cleared or approved by the FDA. This assay has been validated pursuant to the CLIA regulations and is used for clinical purposes.

Chlamydia trachomatis/N. gonorrhoeae, ThinPrep Vial*

Source: Cervix

Chlamydia trachomatis	Negative	Negative
N. gonorrhoeae	Negative	Negative

*Chlamydia trachomatis/N. gonorrhoeae, ThinPrep Vial: Chlamydia trachomatis and N. gonorrhoeae: Organism viability cannot be inferred since target rRNA will be detected in the absence of live organisms. This test cannot be used to assess therapeutic success. Although rare, false-reactions can occur. Any positive result should be interpreted cautiously and correlated to the patient's clinical considerations; repeat or additional testing may be warranted if any question of validity of diagnosis exists.

OWENS, LAURA Order #: [REDACTED]

- FINAL Report

L=Low, H=High, C=Critical Abnormal, CL=Critical Low, CH=Critical High, *=Comment

Distribution #: [REDACTED]

Autolims Version 4.8.0 On 02/16/2022

All Rights Reserved

Report Status FINAL

Route 2005

Kathleen T Jordan MD PC

Scottsdale, AZ

Stephanie McClellan, MD



Patient Information: **OWENS, LAURA**

Account: [REDACTED]
ID/MR#: [REDACTED]
Patient Lab ID: [REDACTED]

Collected: 02/08/2022 09:21 AM
Received: 02/08/2022 11:19 PM
Reported: 02/16/2022 08:02 PM

Order #: [REDACTED]
DOB: [REDACTED] Age: 31Y
Sex: F
Patient Phone: [REDACTED]

A negative result does not preclude infection since results are dependent on adequate specimen collection, absence of inhibitors, and the presence of sufficient nucleic acids. Correlate results with other clinical considerations.

This nucleic acid amplification test (NAAT) has been FDA-cleared only for gynecological liquid based cytology samples (i.e., ThinPrep) using the appropriate collection methods. The analytical performance with other specimen types in this transport media has not been validated.

Tests Ordered: Pap ThinPrep with HPV DNA, Low/High Risk; Chlamydia trachomatis/N. gonorrhoeae, ThinPrep Vial

Unless otherwise noted, testing performed by: Sonora Quest Laboratories, [REDACTED]
Testina noted as AM performed by: Quest Diagnostics Nichols Institute (Chantilly), [REDACTED]

End of Report

OWENS, LAURA Order #: [REDACTED] - FINAL Report

L=Low, H=High, C=Critical Abnormal, CL=Critical Low, CH=Critical High, *=Comment

Distribution #: [REDACTED]

Autolims Version 4.8.0 On 02/16/2022

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ORDER INFORMATION:

Patient Name: Laura Owens
Date of Birth: [REDACTED]
Sex: Female
Ordering Party: Customer

Specimen Collected: 01-22-2022 14:42
Specimen Received: 01-22-2022 14:42
Result Date: 01-22-2022 15:01

Access Bio Carestart COVID-19 Antigen Test

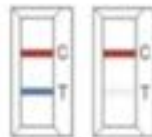
RESULT: Positive

Interpretation of Results

NOTE: The test results should be read and interpreted at 10 minutes after the sample application and the reading and interpretation of the results should not exceed 15 minutes. The test results should not be interpreted using any instruments.

Positive: two distinct colored lines appear.

One red-colored line next to "C" and one blue-colored line next to "T" indicates COVID-19 positive result.



NOTE: The color intensity in the test region will vary depending on the amount of SARS-CoV-2 nucleocapsid protein antigen present in the sample. Any faint colored line(s) in the test region(s) should be considered as positive.

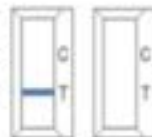
Negative:

One red-colored line only next to "C" indicates a negative result.



Invalid:

If the red-colored line in the control region "C" is not visible, the result is invalid. Re-run the test one time using the remaining specimen in the extraction vial if an invalid result is obtained during initial testing.



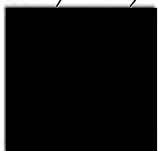
Test Limitations:

- False negative results may occur in patient who have indicated or whose clinical status or history would indicate they are currently taking high doses of biotin (>10mg/day).
- Negative results, should be treated as presumptive and confirmation with a molecular assay, if necessary for patient management, may be performed.
- Failure to follow the instructions for use may adversely affect test performance and/or invalidate test results
- If the differentiation of specific SARS viruses and strains is needed, additional testing, in consultation with state or local public health departments, is required
- Clinical performance using VTM was established on frozen specimens and performance may be different with fresh clinical specimens
- Results from Antigen testing should not be used as the sole basis to diagnose or exclude SARS-CoV-2 infection or to determine infection status
- This test will indicate the presence of SARS-CoV-2 nucleocapsid protein antigen in the specimen from both viable and non-viable SARS-CoV-2 virus. Test performance depends on the amount of virus in the sample and may or may not correlate with viral culture results performed on the same samples.
- Results from the device should be correlated with the clinical history, epidemiological data and other data available to the clinician evaluating the patient
- This device has been evaluated for use with human specimen material only
- False-negative results may occurs if the concentration of the target of the target antigen in the clinical specimen is below the detection limits of the device
- This device is a qualitative test and does not provide information on the viral concentration present in the specimen
- This test cannot rule out diseases caused by other bacterial or viral pathogens.

CONDITIONS of AUTHORIZATION for LABORATORY

The CareStart™ COVID-19 Antigen test Letter of Authorization, along with the authorized Fact Sheet for Healthcare Providers, the authorized Fact Sheet for Patients, and authorized labeling are available on the FDA website: <https://www.fda.gov/medical-devices/coronavirus-disease-2019-covid-19-emergency-use-authorizations-medical-devices/vitro-diagnostics-euas>.

SAN FRANCISCO
400 WALL ST F 200
SAN FRANCISCO, CA 94102
CREDIT CARD
VISA
1234 5678
9101 1011
1212 1313
1414 1515
1616 1717
1818 1919
2020 2121
2222 2323
2424 2525
2626 2727
2828 2929
3030 3131
3232 3333
3434 3535
3636 3737
3838 3939
4040 4141
4242 4343
4444 4545
4646 4747
4848 4949
5050 5151
5252 5353
5454 5555
5656 5757
5858 5959
6060 6161
6262 6363
6464 6565
6666 6767
6868 6969
7070 7171
7272 7373
7474 7575
7676 7777
7878 7979
8080 8181
8282 8383
8484 8585
8686 8787
8888 8989
9090 9191
9292 9393
9494 9595
9696 9797
9898 9999



SLEAKOUT #1234

GETTING COPY

L0000004

Medication Instructions & Schedule

This contains information about preparing for your abortion, a medication schedule, side effects, and when to seek urgent care. Please read through the entire handout before starting your abortion. Feel free to print this for your records.

Preparation for medication:

- **Medications:** You will receive 1 package mailed from our partner pharmacy, HoneyBee Health. This package will contain a total of 4 medications that you will use for the abortion process: mifepristone, misoprostol, ibuprofen (for pain), and ondansetron (for nausea/vomiting prevention, either due to pregnancy or caused by misoprostol).
- **Shipping:** HoneyBee will ship your medications via UPS, and they will email you the tracking number from support@honeybeehealth.com once your package has shipped. Packages are shipped via UPS and should arrive within 1-2 business days. If it has been 2 full business days (M-F) since your order has been processed, please let us know.
- **Pharmacy Consult:** If you would like to request a pharmacy consultation, a HoneyBee pharmacist can be reached at 833-466-3979: M-F: 6 AM-6 PM. Saturday: 7 AM-3:30 PM (PST). Closed Sundays. *This is OPTIONAL.
- **Other medication information:** All patients will receive 2 doses of misoprostol in your package. This second dose will be reserved for patients 9 to 10 weeks along in pregnancy OR in case you need it. Our Medication Instructions and Side effects & Referral handout will provide further instructions (or we will tell you when to use it).
- **And...**Make sure you have everything else you may want or need at home--menstrual pads/pantiliners, heating pad, soothing foods (your

favorite snacks, sufficient clear liquids, anything you'd want to eat or drink if you weren't feeling well).

Medication Instructions

Step 1:

You will take **mifepristone** first, one pill swallowed with a big glass of water. This medication should not cause any or many side effects, and you can go about your normal life this day. Some people may experience vaginal bleeding with this medication, but it is not expected. **Even if you have bleeding after mifepristone, you will continue on to Step 2.**

Step 2:

You will take **misoprostol 6-48 hours later**, depending on the route you choose: **vaginal or buccal** (see below). You will also take some medication to manage side effects of misoprostol. Cramping and bleeding normally occur a few hours after misoprostol, indicating the abortion is in process. **If you are between 9-10 weeks of pregnancy, you will take 2 doses of misoprostol 4 hours apart.**

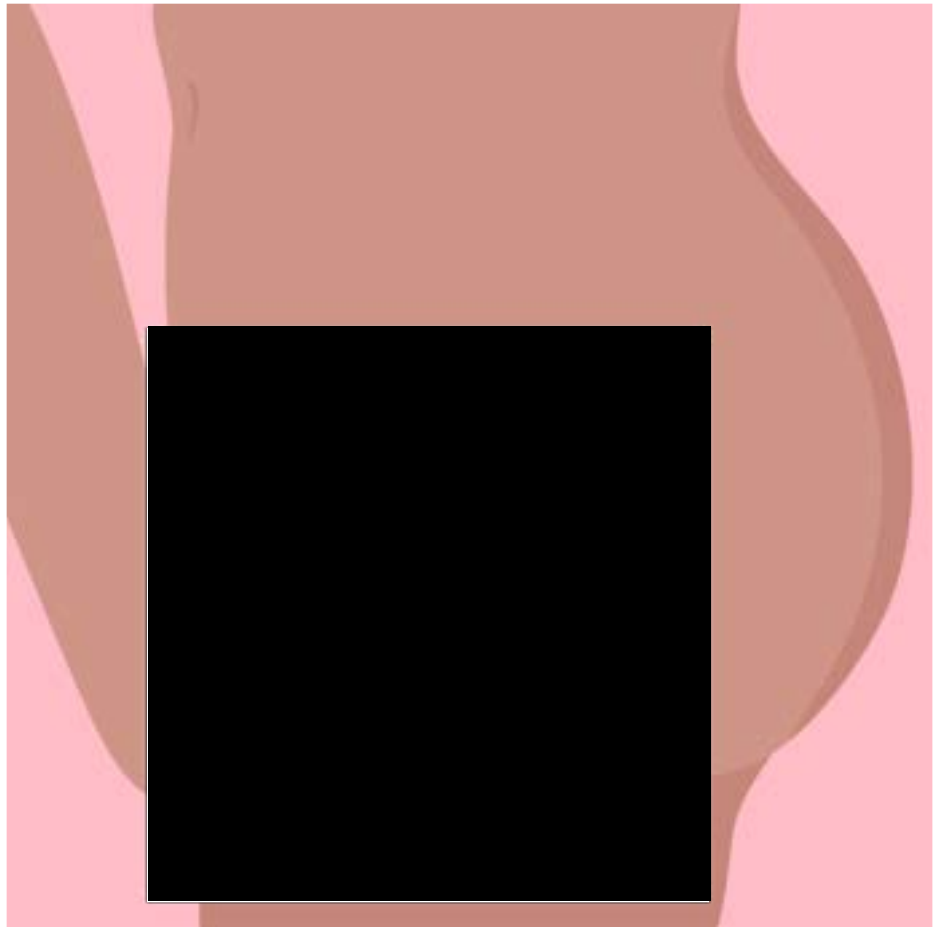
Below are instructions for the 2 preferred administration methods for misoprostol. After you've read through them, you will decide on the date/time.

Instructions for each route: Vaginal or Buccal Misoprostol

◆**Vaginal misoprostol** - This route is recommended if you are already experiencing nausea/vomiting related to pregnancy. **Can be done as soon as 6 hours after you swallow mifepristone, but no later than 48 hours (2 days).**

- Wash and dry hands well. Lie comfortably on the bed or floor in a position where your back is propped up against something.

- Place 4 tabs (800mcg) in vagina all the way at the back of your vagina near your cervix.



- Stay in that position for approximately 30 minutes (watch TV, scroll through Choix Instagram, read a book, take a nap) before getting up and moving, going to the bathroom, etc.
- The pills should begin to dissolve in your vagina. If they fall out of the vagina after the 30 minutes when you get up, it is okay to throw them away.

◆ **Buccal misoprostol** - Can only be done 24-48 hours *after* mifepristone.

Place 4 tabs between cheek and gums on either side of your mouth (top, bottom, or both). Let them dissolve for 30 minutes. After 30 minutes, swish

your mouth with water and swallow the remainder of the pills (most will dissolve in your cheeks). Please note, this method may cause more nausea.



Your Medication Schedule:

Please note this schedule is for your personal use.

Please make sure to **message your Choix provider** with the following information:

- 1) Date/time you take Mifepristone**
- 2) Date/Time/Route (vaginal or buccal) you take Misoprostol**

Example: Hi, I plan to take my mifepristone on 4/2 @ 10:00am, and my misoprostol 4/3 @ 12:00pm, buccal route. Thank you!

Step 1: Mifepristone

Mifepristone: Swallow one 200 mg pill by mouth with a big glass of water at:
_____ (Date/Time)

**Optional: If you are already experiencing any nausea or vomiting from the pregnancy, we strongly recommend taking 1 dose of 4mg Ondansetron 30 minutes-1 hour prior to mifepristone. Write that time above the time you will take your mifepristone.*

Step 2: Misoprostol

Before using misoprostol, we recommend taking your pain medication and nausea medication (if desired). This will reduce unpleasant side effects from misoprostol. Write down the TIME you take each medication. This will help you remember the schedule of medications.

- Ibuprofen 800mg:
Swallow 1 pill 1 hr before misoprostol _____(Date/Time).
 - **Optional: Ondansetron 4mg: Swallow 1 pill with water 1hr-30 mins before misoprostol _____(Date/Time).*

- Misoprostol 800mcg: Take 4 tabs via desired route _____
(Date/Time) _____(Route: Vaginal or Buccal).

**If you are still experiencing severe nausea/vomiting, you can take Ondansetron 30 mins before taking ibuprofen instead of after.*

Reminder: Your bottle will have 8 tablets of Misoprostol inside. The remaining 4 tablets after the first dose of misoprostol is reserved for patients between 9 and 10 weeks of pregnancy or for those who require a second dose. Your Choix provider will let you know if you require a second dose (see Abortion Side Effects & Referral patient handout for when to contact your provider).

*Step 3: **ONLY** for gestational age 9-10 weeks

- Misoprostol 800mcg: Take 4 more tabs via **same** route 4 hours after 1st dose _____(Date/Time).

Additional information

- Continue to take ibuprofen every 6–8 hours on a schedule for the first 24 hours. Trust us--**this will help with the pain**, so try to stay on top of the dosing schedule. Write down the first dose, then set an alarm or reminder on your phone for each dose 6–8 hours later.
- Ondansetron does not have to be taken at any point, but you may take it as needed every 6–8 hours for 24 hours.
- If you are **breastfeeding** a child, you may continue to do so during the medication abortion process; these medications pose no risk to your baby.
- It is acceptable to take these medications any time of day however, there are some important things to keep in mind:
 - Taking them in the evening might mean you wake up throughout the course of the night to change your pad or take pain medication.
 - If you sleep through the night, it may be alarming to wake up with blood having leaked through your pad or clothing. For this reason we generally recommend taking misoprostol earlier in the day so the majority of the bleeding occurs during waking hours.

Follow-up Appointments with Choix

~72 hours after misoprostol:

A provider from Choix will reach out via text message approximately 72 hours (3 days) after misoprostol. This will be determined by the time of day you plan to take misoprostol. They will ask you a series of questions to help determine if you need to seek in-person medical care. **We expect you to respond within 1**

business day to our message. *If you selected a birth control method from us, you may start that method the day you communicate with us about the abortion process.*

-4 weeks later:

A provider from Choix will reach out via text message to remind you to take a pregnancy test. You will report the pregnancy test result in the text message. We expect you to take the pregnancy test and respond within 1 business day to our message. Please note: This is the final step to confirm your abortion is complete, and we **do not recommend taking the pregnancy test sooner than 4 weeks after your abortoin**, as it takes a few weeks for pregnancy hormones to fully leave your body. If your pregnancy test is positive, it may mean a few things; it might mean you still have a continuing pregnancy or that the abortion is incomplete, or that your body is just taking a little while to clear the hormones. We will refer you to be evaluated by a healthcare provider in person if we think it is necessary, or you may go at any point if you are concerned.

If at any time you have questions regarding your abortion process or follow-up, you can message us 858-203-0531. Please consult the information page titled **Abortion Side Effects and Referral**. If you still cannot find an answer and have a non-urgent medical question, please send us a text.

Choix Medication Abortion via Telehealth

What is a medication abortion?

Medication abortion via telehealth with Choix involves being sent two medications in the mail to end a pregnancy less than or equal to 10 weeks gestation.

- Mifepristone is the first medication. This medication stops the hormone progesterone which is needed for a pregnancy to continue. It generally does not cause any side effects.
- Misoprostol is the second medication. This medication causes cramps and bleeding, which allow you to pass the pregnancy. This medication is taken 6-48 hours after mifepristone.

Other medications will be prescribed to help manage side effects that may result from the above medications. We will provide you with recommendations for when and how to take these medicines. All of these medicines will be sent to your house from our partner pharmacy. You will set a timeline for when to take each medication and notify your healthcare provider.

What are the risks of a telehealth medication abortion?

A medication abortion is very safe, even safer than continuing a pregnancy to delivery. Like with any medical procedure, there are some associated risks, which are very rare. These risks may include:

- The pills don't work at all, or they only partially work.
- Excessive bleeding (bleeding too much or too long)
- Infection
- Allergic reaction
- Death (this is very, very rare!)

If the pills don't work, you may need to have a surgical abortion procedure. Misoprostol can cause serious birth defects to a developing pregnancy, but the choice to continue a pregnancy after an abortion is yours.

In the case of a telemedicine abortion, if/when we do not use an ultrasound to evaluate the location and gestational age (age of the pregnancy), we instead use evidence-based methods to evaluate the gestational age. There is always a risk we are wrong, and that the pregnancy might be:

- Further along than the information we had to assess gestational age
- The pregnancy might be ectopic (outside the uterus; this is very rare)

The information we gather from you helps us rule out this possibility with a high degree of certainty, however Choix cannot make an absolute guarantee that errors in the diagnosis of the gestational age/location will not happen.

What are the benefits and effectiveness of a medication abortion?

Medication abortion is a safe and effective way to end a pregnancy less than or equal to 10 weeks. A medication abortion via telehealth can be done privately in the comfort of your own home, and doesn't require clinic visits or a visit to a pharmacy.

- This means you can stay at home with whomever you choose, or do it alone (we always recommend telling someone you trust what you're doing, but this is not required). You also don't have to worry about transportation, weather, childcare, or someone seeing you visiting a clinic.
- During the COVID-19 pandemic, this reduces your interaction with other people at a clinic or pharmacy, and reduces your likelihood of contracting the virus (when combined with physical distancing and mask wearing).

Overall effectiveness of medication abortion with the prescribed regimens we use is around 95%. Less than 1% of people have serious complications requiring hospital or surgical intervention.

What can I expect from a medication abortion?

The main side effects from a medication abortion occur after taking misoprostol. You should expect:

- **Cramping** - moderate-to-heavy cramps, that may feel like period cramps or a little bit stronger
- **Bleeding** - menstrual-like (possibly lighter/heavier) bleeding with or without some blood clots.
- **Other symptoms** - Low grade fever, chills, nausea/vomiting, diarrhea, dizziness, headache, back pain, can all occur after taking misoprostol

The symptoms people experience range from mild to severe, but for most women, the experience might feel like a heavy/painful period with flu-like symptoms. For this reason, we recommend staying at home or somewhere calm and relaxing for 24 hours after misoprostol.

You will receive thorough information about all of these normal side effects, when to expect them and what to do if you experience any unusual side effects. A medication abortion can be uncomfortable, but Choix will provide you with all the information and medication you need to feel supported throughout the process. If you feel like you are experiencing potentially life threatening side effects, you should go to your nearest hospital or call 911.

Your options and your future

People have a few choices when it comes to pregnancy, including parenthood, adoption, or abortion. There are multiple types of abortion, including medication in-person, medication via telehealth, and surgical (in an outpatient clinic or a hospital). All options have been presented through the Choix platform, and a medication abortion via telehealth is the selected option. If after reviewing this information you do not feel that this is the best option for you, please let your healthcare provider know.

Abortion is a safe, normal, and legal part of a person's reproductive healthcare. Having a medication abortion has no impact on your future fertility. Many people have a wide variety of feelings before, during, and after an abortion. All of them are valid and normal, and we will provide you with resources for managing any complicated feelings.

This option is a personal decision made by free will, and is not being forced by any outside person or party.

I have read and understand all of the information presented to me here. If it deemed medically safe, I consent to receive a medication abortion via telehealth from Choix. I understand it is my responsibility to obtain any necessary follow-up care outside of what can be provided to me at Choix, and I am financially responsible for any of that care.

Patient Name Laura Owens

Patient Signature



Date Wednesday, July 21, 2021

Provider Signature



Provider Name Lauren Dubey

Date Wednesday, July 21, 2021

SMS with +1 [REDACTED]
7/23/21, 11:22 AM

Hi Laura, this is Maria with Choix. I am following up to confirm you received your medications. Please read through ALL patient education materials in your Choix Patient Portal. After reading, please go to the following link and log in to your patient portal to document your medication information: <https://portal.mychoix.co/login?serviceid=MCI>. Please complete this link within 24 hours of receiving it. If you have not yet received your medication or read through your instructions, please complete this link when you have. Message us here with any questions or concerns!

7/29/21, 5:10 PM

Hello Laura, This is Lauren, Nurse Practitioner with Choix. I just want to let you know this is our final text regarding your medication. As you know, we would like you to fill out the following link to let us know the time/date of when you plan to take your medications so that we can continue with your required follow ups and care: <https://portal.mychoix.co/login?serviceid=MCI>. Please know that can no longer be held responsible for your care if you are not checking in for required follow ups. If have you decided to continue the pregnancy, we recommend good prenatal care and prenatal vitamins if you have not already done so. We also recommend disposing of the medications at a local pharmacy (you can put them in an unmarked container if desired) to ensure they are not ingested incorrectly or on accident. Take care and please let us know if you have any additional questions.

I'm having a hard time logging in, but took the first one yesterday

Thank you for contacting Choix Inc. Our office is currently closed. We are open M-F from 9 am to 5 pm PST. If this is an emergency, please dial [911](https://www.911.gov). If you are a current patient messaging us regarding side effects, please consult the patient handout materials/links given to you. Otherwise, we will text you back when we return to the office. Thank you!

1000007

Can you tell me what issues you are having Laura, so we can assist you in fixing them? It is important you are able to access that information and also document your information through links we send you.

Can't remember my login

7/30/21, 7:10 AM

Hey, figured out my login late last night, then was reading through the portal. I didn't realize that I wasn't supposed to swallow the four Misoprostol pills, so I did. Will that abort the fetus or do I need to do more? I still have four pills left.

Thank you for contacting Choix Inc. Our office is currently closed. We are open M-F from 9 am to 5 pm PST. If this is an emergency, please dial [911](#). If you are a current patient messaging us regarding side effects, please consult the patient handout materials/links given to you. Otherwise, we will text you back when we return to the office. Thank you!

7/30/21, 11:07 AM

Hi Laura, this is Lauren the NP. Have you started bleeding at all?

Not yet

What time did you take mifepristone and what time did you take the misoprostol?

10pm each day

But I did swallow those pills

So you took mifepristone 7/28 and then misprostol on 7/29, both at 0pm.

Yep

L0000016

Then yes I would take the additional 4 misoprostol via one of the advised routes and let me know which. You do need to start before 10pm this evening.

What time?

Any time before 10pm, based on your schedule, and let me know when that is so I can update your chart accordingly.

7/30/21, 3:30 PM

9?

Since I haven't bled, does that mean it didn't work yet?

It isn't absorbed through the stomach like other medications are for this purpose of an abortion. It is best absorbed through mucosa like the cheeks or vagina.

Ok, I feel like such an idiot for not seeing that! Glad you guys included extras.

Glad you got your portal figured out--it's there for a reason! :-)

I saw that I was supposed to have some bleeding after the initial medicine and didn't even have spotting. So does that mean that the pregnancy is still active?

No, bleeding is NOT expected after that first medication but if it happens, it's okay.

Will you be doing your misoprostol in the cheeks or vagina at 9pm?

Which is better?

Both are equally effective, it is just up to comfort level/preference, as

FO000017

well as nausea you may be experiencing. The buccal (cheek) route can cause more nausea, and thus you will want to use the ondansetron we gave you in your medication pack.

7/30/21, 9:06 PM

Thank you! Does it matter if I wait until tomorrow? I wanted to do it with my boyfriend and he is sick

8/2/21, 9:00 AM

Hi Laura, Lauren the NP here. I hope you did take the medication and/or had bleeding when you took the medication; please let us know. As stated in all your instructions, you needed to do the second medication 48 hours after the first.

Hi! I did not have bleeding. I took it Saturday.

Did you have bleeding after your medication on Saturday?

No

I am also on Lamotrogine for seizures, would that interact?

No, it does not. However since you have not had any bleeding, I do recommend you follow up with an in person abortion provider. Since your medications were taken very far apart, this may contribute to the failed or incomplete abortion. If you need resources for in person care, you can find a clinic here: <https://www.mychoix.co/resources>

If it is a failed or incomplete abortion, is the fetus still viable?

I have had serious second thoughts.

hat will only be determined on an ultrasound; please note that misoprostol can be teratogenic (toxic) to a developing fetus, so if you have an ongoing pregnancy, you will want to discuss this with your prenatal provider

LO000018

Hi Laura, Lauren the NP here. I hope you did take the medication and/or had bleeding when you took the medication; please let us know. As stated in all your instructions, you needed to do the second medication 48 hours after the first.

Hi! I did not have bleeding. I took it Saturday.

Did you have bleeding after your medication on Saturday?

No

I am also on Lamotrogine for seizures, would that interact?

No, it does not. However since you have not had any bleeding, I do recommend you follow up with an in person abortion provider. Since your medications were taken very far apart, this may contribute to the failed or incomplete abortion. If you need resources for in person care, you can find a clinic here: <https://www.mychoix.co/resources>

If it is a failed or incomplete abortion, is the fetus still viable?

I have had serious second thoughts.

That will only be determined on an ultrasound; please note that misoprostol can be teratogenic (toxic) to a developing fetus, so if you have an ongoing pregnancy, you will want to discuss this with your prenatal provider.

Okay, will do. Is there an option to redo the meds on the correct schedule?

At this point, not with Choix. It would have to be managed with an in-person provider.

Okay

L0000019

Procedure Performed at One Medical

Date: Jul 16, 2021

Patient

Legal Name: Laura Owens

Goes By: Laura

Birth Date: [REDACTED]

Phone: [REDACTED]

Is patient pregnant:

See attached for complete demographic and insurance information.

Procedure

Urine pregnancy test, 81025

Indication

Amenorrhea (ICD-10CM: N91.2)

Procedure Summary

Result: 2 lines - positive

Thank you,



John Jones

[REDACTED]



15210 N Scottsdale Road - Suite 275 - Scottsdale, AZ 85254
[REDACTED]

July 16, 2021

Laura Owens, DOB: [REDACTED]

To Whom It May Concern:

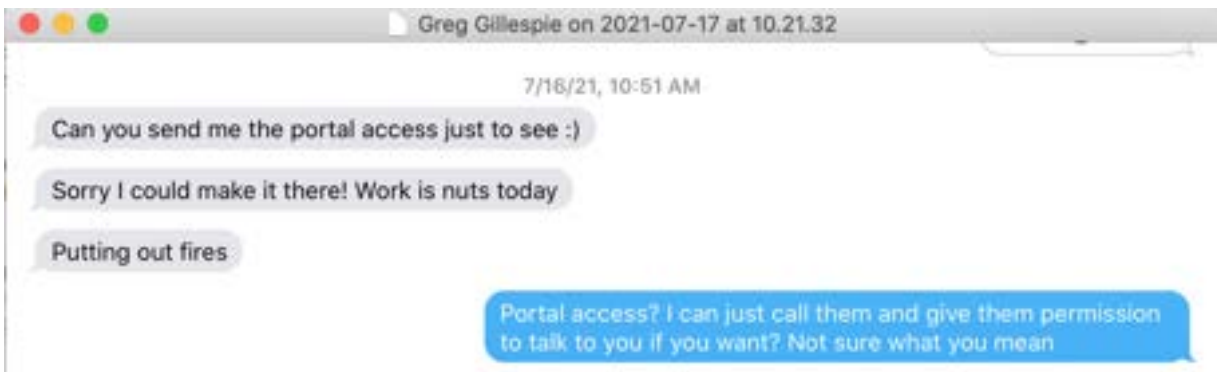
Patient was evaluated in the office today and was determined to be in early stages of pregnancy. Patient was on seizure medication that decreased the effectiveness of her oral contraceptives. Please contact our office for any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Jones', is written over a light gray rectangular background.

John Jones, DO
[REDACTED]

LO000021



1/13/22, 2:02 PM

HLA | Laura Owens

Patient: Laura Owens

DOB: [REDACTED]

Sex: Female

PCP: John Jones, DO

Patient ID: [REDACTED]

Address: [REDACTED]

Chief Complaint: VV: UPT results request

Note Type: Video Encounter

Date of Service: 12:09 PM 07/16/2021

Date Signed: 12:26 PM 07/16/2021

Created By: Julie Ahlrich, NP

Signed By: Julie Ahlrich, NP

Subjective

DATE 7/16/21, TIME 12:10 PM PST. Patient verifies name and DOB. Consent obtained for evaluation via video based platform today. Julie Ahlrich FNP-BC

31 y/o female seen earlier today for early pregnancy calls requesting results of her urine pregnancy test. The father would like to see it. Of note, Greg (the father) was on another video chat with pt and could hear most of our conversation. IOV note not yet available nor is the in office UPT. Letter written by PCP messaged to pt as PDF per her request. Other message initiated by pt assigned to PCP with this request for the UPT results.

Writer asked pt for private conversation, call with Greg ended. Pt confirms that she is physically and emotionally safe. Feels safe in home.

Exam

General: NAD, A&O

HEENT: EOML, normal conjunctiva & lids, hearing grossly normal

Pulm: No appreciable SOB, stridor or cough. Pt speaking in full sentences without difficulty.

Psych: normal judgment, insight, mood and affect

After Visit Guidance To Patient

LO00023

Bright HealthCare
 777 NW BLUE PLOWY STE 3350
 LEES SUMMIT MO 64086-5709



Forwarding Service Requested

 *****ALL FOR BASIC 852 5%
 P9-257-20-ENV 21308
 LAURA OWENS
 SCOTTSDALE AZ

Questions? We are here to help!

If you have questions about this document or questions about your benefits: visit our web site brighthealthcare.com and review your certificate of coverage.
 Call us at 1-800-822-7188
 Email us at customerservice@brighthealthcare.com

Date: 7/27/2021
 Member ID: [REDACTED]
 Subscriber: LAURA OWENS

Explanation of Benefits

RETAIN FOR TAX PURPOSES
 THIS IS NOT A BILL

Claims processed for the period: 07/16/2021 thru 07/16/2021

Dear LAURA OWENS,

The information below is a summary of the claims processed from 07/16/2021 to 07/16/2021. You can use it to make sure you're being charged the correct amount by each of the providers listed.

Total Amount Billed by Provider(s)

\$155.00

Total Amount Paid By Bright

\$0.00

Total Amount You Owe

\$0.04

Claim Number: [REDACTED]
 Patient: LAURA OWENS
 Relationship: Subscriber
 Network: BRIGHT HEALTH NETWORK

Line No.	Provider	Date(s) of Service	Benefit Description	Proc Code	Amount Billed	Excluded Amount	Bright Discount	Co-Pay Amount	Deductible Amount	Amount Paid At	What we will pay	
01	OMG ARIZONA LLC	07/16-07/16/21	OFFICE VISIT	89213	140.00	140.00	0.00	0.00	0.00	0.00	0%	0.00
02	OMG ARIZONA LLC	07/16-07/16/21	LABORATORY	81025	15.00	0.00	5.96	9.04	0.00	0.00	0%	0.00
Column Totals					155.00	140.00	5.96	9.04	0.00	0.00		0.00
What you owe:			9.04		What we will pay							0.00

Claim Information

1 (Line 1-\$140.00) PLEASE SUBMIT PRENATAL CARE W/DELIVERY FEE AT THE TIME OF DELIVERY
 2 ANY CHARGES THAT MAY BE LISTED IN THE "DISCOUNT" COLUMN REPRESENT AMOUNTS OVER THE EPO'S CONTRACTED FEE ALLOWANCE FOR THESE SERVICES. THE PROVIDER IS A EPO PARTICIPANT AND THE CLAIMANT SHOULD NOT BE BILLED FOR THIS AMOUNT.

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY

Superior Court of Arizona/AZ007035J/0700 201 W. Jefferson Phoenix, AZ 85003

ELECTRONICALLY RECORDED

Order of Protection

[] Amended Order

Case No. FN2021-004799

Court ORI No. AZ007035J

County Maricopa State AZ

PLAINTIFF

Laura Owens

First Middle Last

PLAINTIFF IDENTIFIERS

[Redacted]

Plaintiff's Date of Birth

And on behalf of any minor family member or other Protected Person listed below:

V.

DEFENDANT

Gregory Gillespie

First Middle Last

DEFENDANT IDENTIFIERS

Table with columns: SEX, RACE, DOB, HT, WT, EYES, HAIR, DRIVER'S LICENSE #, STATE, EXP DATE. Includes text: Arizona Prohibits Release of Social Security Numbers

[] Estimated Date of Birth

Defendant/Plaintiff Relationship: We have or had a romantic or sexual relationship.

Defendant's Address: [Redacted]

CAUTION: [] Weapon Alleged in Petition

WARNINGS TO DEFENDANT: This order shall be enforced, even without registration, by the courts of any state, the District of Columbia, any U.S. Territory, and may be enforced by Tribal Lands (18 U.S.C. § 2265). Crossing state, territorial or tribal boundaries to violate this order may result in federal imprisonment (18 U.S.C. § 2262). Because of this order, it may be unlawful for you to possess or purchase a firearm or ammunition pursuant to federal law under 18 U.S.C. § 922(g)(8) or state, tribal, territorial, or local law. If you have any questions whether these laws make it illegal for you to possess or purchase a firearm, you should consult an attorney. Only the Court, in writing, can change this order. This order is effective for one year from date of service.

THE COURT HEREBY FINDS THAT:

It has jurisdiction over the parties and subject matter.

[] Defendant received actual notice of this Hearing and had an opportunity to participate.

THE COURT, finding reasonable cause to believe that Defendant may commit an act of domestic violence or has committed an act of domestic violence within the past year (or good cause exists to consider a longer period), HEREBY ORDERS:

NO CRIMES. Defendant shall not commit any crimes, including but not limited to harassment, stalking, or conduct involving the use, attempted use, or threatened use of physical force that would reasonably be expected to cause bodily injury, against Plaintiff or Protected Persons.

[x] NO CONTACT. Defendant shall have no contact with Plaintiff except through attorneys, legal process, court hearings, and as checked: [] Phone [] Email/Fax [] Mail [] Other:

THE COURT FURTHER ORDERS:

[] RESIDENCE. Plaintiff is granted exclusive use and possession of the residence currently shared with Defendant.

[] LAW ENFORCEMENT STANDBY. Defendant may return once with a law enforcement officer to obtain necessary personal belongings. Neither law enforcement nor this protective order can resolve conflicts over property, title, furniture, finances, real estate, or other ownership issues.

PROTECTED LOCATIONS. Defendant shall not go to or near Plaintiff's or other Protected Person's:

[x] Residence (confidential)

[] Workplace:

[] School:

[] Other:

[] **ARIZONA FIREARMS LAW.** Under A.R.S. § 13-3602(G)(4), the court finds that Defendant poses a credible threat to the physical safety of Plaintiff or Protected Persons. Therefore, Defendant shall not possess, receive, or purchase firearms and shall surrender same within 24 hours of service to:

[] **ANIMALS.** Plaintiff is granted the exclusive care, custody, or control of any animal that is owned, possessed, leased, kept, or held by the plaintiff, the defendant, or a minor child residing in the residence or household of the plaintiff or the defendant. Defendant is ordered to stay away from the animal and shall not take, transfer, encumber, conceal, commit an act of cruelty or neglect in violation of section 13-2910, or otherwise dispose of the animal.

OTHER ORDERS:

Do not approach the plaintiff's vehicle or other personal property. Do not access any part of the plaintiff's computer, phone, or similar device, or any account. Do not access any of the plaintiff's private information anywhere. Do not impersonate the defendant in any way. Do not make any attempt to track the plaintiff's whereabouts.



11/12/2021

Date

Judicial Officer

John Doody

Printed Name

WARNING: This is an official court order. If you disobey this order, you will be subject to arrest and prosecution for the crime of interfering with judicial proceedings and any other crime you may have committed in disobeying this order.

NOTICE: If you disagree with this order, you have the right to request a hearing, which will be held within 5 to 10 business days after your written request has been filed in the court that issued this order. Violations of this order should be reported to a law enforcement agency, not the court. Each party must notify this court if an action for dissolution (divorce), separation, annulment or paternity/maternity is filed. This is NOT a parenting time (visitation) or custody (legal decision-making) order. You must file those requests separately in Superior Court.

ADDITIONAL WARNINGS TO DEFENDANT: Nothing the plaintiff does can stop, change, or undo this order without the court's written approval. You must appear in court to ask a judge to change (modify) or dismiss (quash) this order. **Even if the plaintiff initiates contact, you could be arrested and prosecuted for violating this order. If you do not want the plaintiff to contact you, you have the right to request a protective order against the plaintiff. But orders are not automatically granted upon request. Legal requirements must be met.**

NOTICE TO PLAINTIFF: If this order gives you exclusive use and possession of the residence and you move out while this order is in effect, you must notify the court within five days of moving out of the residence.

CLERK OF THE SUPERIOR COURT

FILED

11/12/2021 @ 8:35am

[Signature] Deputy

Superior Court of Arizona/AZ007035J/0700 201 W. Jefferson Phoenix, AZ 85003

Plaintiff Laura Owens	<input type="checkbox"/> Employer-Plaintiff if Workplace Injunction	Defendant Gregory Gillespie	Case No. FN2021-004799
<input type="checkbox"/> On behalf of minor/person in need of protection named:		Defendant's address [REDACTED]	PETITION for: <input checked="" type="checkbox"/> Order of Protection <input type="checkbox"/> Injunction Against Harassment <input type="checkbox"/> Workplace Injunction
Agent's name (if Workplace Injunction)		Defendant's phone -	



DIRECTIONS: Please read the Plaintiff's Guide Sheet before filling out this form.

1. **Defendant/Plaintiff Relationship** (or relationship between Defendant and minor/person in need of protection)

- | | |
|---|--|
| <input type="checkbox"/> Married (past or present) | <input type="checkbox"/> Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step) |
| <input type="checkbox"/> Live/lived together as intimate partners | <input type="checkbox"/> Live/lived together but not as intimate partners |
| <input checked="" type="checkbox"/> Romantic or sexual relationship (past or present) | <input type="checkbox"/> Dating (but not romantic or sexual) |
| <input type="checkbox"/> Parent of a child in common | <input type="checkbox"/> Other: |
| <input type="checkbox"/> One party is pregnant by the other | |

2. If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in _____ County Superior Court, Case # _____.

3. Name of court, if any, in which any other protective order related to this conduct has been filed.
Court name _____ Case # _____

(Continue to next page)

4. Tell the judge what happened and why you need this order. PRINT both the dates and a brief description of what happened. If there is a contested hearing, a judge can consider only what you write here.

NOTE: Defendant will receive a copy of this petition when the order is served.

Approx. Date	(Do not write on back or in the margin. Attach additional paper if necessary.)
6/30/2021	Gregory Gillespie and I were involved in a brief romantic relationship that lasted about 5 dates. From that relationship, I became pregnant. Mr. Gillespie the login information for my computer, email, and everything else I have passwords to online, when he demanded my login information to my One Medical Patient Portal to confirm my pregnancy. He has used that information to stalk and harass me.
8/11/2021	On 8/11/21, I filed a lawsuit against Mr. Gillespie in which I (pro se) sued him for DV, intentional infliction of emotional distress, and abortion coercion. This request for a PO has nothing to do with the current litigation whatsoever and is a last resort since he will not listen to law enforcement's calls to ask him to stop contacting me despite me making three police reports against him. In text messages between the two of us, Mr. Gillespie told me that he would "make [my] fucking life a living hell" if I did not take abortion pills, "take the fucking pills, Laura", and that he would call the police, "if I showed a moment's hesitation" in taking them to force me to do it.
10/26/2021	On October 26, I received an anonymous message from someone saying they were hired to hack my podcast's website and my personal number, asking me "what did you do to him?" and "what did you do to offend him?".
10/29/2021	On October 29, I was unable to login to my computer. After a three-hour support call and an in-person visit on that day, Apple determined that the computer was going to need to be cleared. The computer stored extremely important information for the civil case that I am involved in against Mr. Gillespie that has not been presented at a trial, which he, of course, knew. While Apple was unable to fix my issue, I hired a data recovery specialist to save the information that Mr. Gillespie tried to corrupt and was successful in my efforts. It was also determined that my iPhone had an app called 'Team Viewer' installed, a remote access and remote control software that allows a remote user to control iPhones and computers. Given that I am self-employed, I have never needed a software like this. I called the police to inform them of this incident on 11/1/21.
10/29/2021	Between 10/29 and 11/8, there were several instances of bizarre text messages on my devices designed to engage me, which I chose not to do. I was also logged out of my Facebook, Instagram, and Twitter accounts due to suspicious activity.
11/6/2021	On 11/6/2021 at 3:37pm, I received a text from a number I did not recognize with a photo of a man who looked to be in his twenties alongside his mother who was holding a 'Happy Mother's Day' sign. I asked who it was, and was told, "Must be a wrong number! Sorry dude!". After research online, I confirmed that the man in the photo is a Mr. Gillespie's family friend (through his cousin). This incident can be traced back to Mr. Gillespie, and combined with all of the other acts of stalking and harassment, has frightened me to no end.
11/7/2021	I spoke with the Scottsdale police department on 11/7/21 and was told that another woman has an active order against Mr. Gillespie that she filed for in September. I know this woman to be his ex-girlfriend, who he told me he had tracked on her Apple Watch in December 2020 in order to prove that she was cheating on him. When he discovered that she was, he admitted to grabbing her arm and snatching the watch off. I do not know what has happened between them since then, but there has clearly been an additional issue. Mr. Gillespie also told me about how he had been accused of harassment by a co-worker, who I met while we were out to dinner.
6/30/2021	Despite knowing that I am a DV survivor and a public speaker on the topic, Mr. Gillespie previously put his hands on my throat, and this would have undoubtedly led to something more had I not stopped him. He is 6'4", while I am 5'5", and weighs more than double what I do. I do not stand a chance against him.
11/12/2021	I am asking the Court for this injunction because I fear for my life. Mr. Gillespie is a manipulative and dangerous person and has been incessantly harassing me. I believe that he is retaliating against me for my pregnancy with his child and will not stop until he has ruined my life, my podcast, and causes serious mental and/or physical harm to me. He has shown me that he is an aggressive person, in my brief history with him, and I am fearful to be outside of my home alone. I pray that this will make him understand the consequences of him tracking me, via cyberstalking or otherwise. Knowing how much I did not want to have an abortion, he forced me to take abortion pills so that his own child would not be born, and in doing that, has shown a complete lack of care for human life or empathy for me. I am unsure if even a protective order will stop him given that he has chosen to ignore law enforcement's warnings to stop cyberstalking and harassing me. However, I am

desperate to get him to stop and understand the consequences his actions will have if he continues. Your Honor, Mr. Gillespie is an extremely dangerous man and I have no other remedy than to ask this Court to enter an Order of Protection and other relief as it deems necessary to ensure my safety.

5. The following persons should also be on this order. They should be protected because Defendant is a danger to them:
6. Defendant should be ordered to stay away from these locations at all times, even when I am not present.
NOTE: Do not list confidential addresses here.
 - Residence (confidential)
 - Work/Business
 - School/other
7. Defendant owns or carries a firearm or other weapons.
 Defendant should be ordered NOT to possess firearms while this order is in effect because of the risk of harm to me or other protected persons.
8. Defendant should be ordered to stay away from any animal that is owned, possessed, leased, kept or held by me, Defendant, or a minor child living in either my household or Defendant's household.
9. Other requests:

Under penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge, and I request an Order / Injunction granting relief as allowed by law.

/s/ Laura Owens
Plaintiff

Attest:

[Signature] 11/12/2021
Judicial Officer/Clerk/Notary Date

**Chat started on 03 Mar 2022,
07:39 PM (GMT+0)**

(07:39:11) **** Visitor [46115545](#) joined the chat ****

(07:39:11) **Visitor [46115545](#)**: Hello?

(07:39:17) **** J [REDACTED] P [REDACTED] joined the chat ****

(07:39:29) **J [REDACTED] P [REDACTED]**: Good afternoon, how can I help you today?

(07:40:29) **Visitor [46115545](#)**: Hi, I'm in Scottsdale. I see that Greg Gillespie is listed as working in the Scottsdale store, but he is not listed as someone who the public can make an appointment with. Does he still work there?

(07:42:03) **J [REDACTED] P [REDACTED]**: Hi, he still works for Circa, but does not work directly in the showroom.

(07:42:31) **Visitor [46115545](#)**: Ok, that makes sense then. Thank you!

(07:42:55) **J [REDACTED] P [REDACTED]**: My pleasure, please reach back out if we can answer any other questions.

(07:44:15) **** Visitor [46115545](#) left the chat ****

