

1 David S. Gingras, #021097  
2 **Gingras Law Office, PLLC**  
3 4802 E Ray Road, #23-271  
4 Phoenix, AZ, 85044

5 Attorney for Petitioner  
6 Laura Owens

7 **MARICOPA COUNTY SUPERIOR COURT**  
8 **STATE OF ARIZONA**

9 **In Re Matter of:**

Case No: FC2023-052114

10 **LAURA OWENS,**

**AFFIDAVIT OF LAURA OWENS IN  
SUPPORT OF HER  
REPLY IN SUPPORT OF  
EMERGENCY MOTION TO STRIKE  
AND  
REQUEST FOR IMMEDIATE  
TELEPHONIC SCHEDULING  
CONFERENCE**

11 **Petitioner,**

12 **And**

13 **CLAYTON ECHARD,**

14 **Respondent.**

(Assigned to Hon. Julie Mata)

15  
16  
17 1. My name is Laura Owens. If called to testify in court, I could and would  
18 testify to the following under penalty of perjury based on my own personal knowledge.

19 2. I am the Petitioner in this matter.

20 3. I am aware that on April 30, 2024, counsel for Respondent Clayton Echard  
21 served a document entitled Respondent's 7<sup>th</sup> Supplemental Disclosure Statement.

22 4. Among other things, attached to Mr. Echard's Supplemental Disclosure  
23 Statement were certain documents which purport to be my medical records. For purposes  
24 of clarity, copies of these records are attached hereto as Exhibit A.

25 5. Under penalty of perjury, I swear each of the following things are true:

- 26
- 27 • The records attached hereto as Exhibit A are fake; these are not my medical records.
  - 28 • I have never had, nor have I ever claimed to have, ovarian cancer.
-

- 1 • I have never had, nor have I ever claimed to have, an ovary removed.
- 2 • Many years ago, I was diagnosed with polycystic ovary syndrome (PCOS).
- 3 • I have received treatment for my PCOS symptoms, including a pelvic CT scan
- 4 performed at Scottsdale Medical Imaging on June 7, 2022.
- 5 • Among other things, when I retained Dr. Michael Medchill as an expert in
- 6 this matter, I provided him with true and correct copies of certain medical
- 7 records which are identified in, and attached to, his expert report in this matter.
- 8 • Among those records was a report from Scottsdale Medical Imaging, shown
- 9 below, which confirmed the presence of “bilateral ovarian cysts” during my scan
- 10 on June 7, 2022, which confirms I still have both my ovaries.



GINGRAS LAW OFFICE, PLLC  
4802 E RAY ROAD, #23-271  
PHOENIX, ARIZONA 85044

## ← CT PELVIS WITHOUT CONTRAST

### Report

Patient **LAURA OWENS**    Acc# [REDACTED]    Exam done on **June 7, 2022**    Referred by [REDACTED]

#### CT PELVIS WITHOUT CONTRAST

HISTORY: Abdominal distention and concern for inguinal hernia

COMPARISON: Ultrasound dated 05/09/2022

TECHNIQUE: No contrast. Coronal and sagittal reformations.

#### FINDINGS:

No body wall hernias are identified. No inguinal lymphadenopathy is seen.

Moderate to large amounts of stool are seen throughout visualized colon. The rectum is mostly decompressed. No free fluid is identified.

Uterus is present. Bilateral ovarian cysts and follicles are seen with some complex heterogeneous components in the left ovary measuring up to 5.1 cm.

No acute osseous findings.

#### IMPRESSION:

No inguinal abnormalities or hernia is identified.

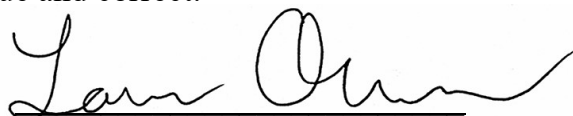
Increased colonic stool burden of the pelvis.

Bilateral ovarian follicles with some complexity within the left ovary, likely partially hemorrhagic. No routine follow-up is recommended.

1           6.     I have no idea who created the fake records attached hereto as Exhibit A.  
2 All I can say is that I did not create them, I have no idea who did, and I never sent them  
3 to anyone else, because I had never seen these documents prior to them being disclosed  
4 by Mr. Echard on April 30, 2024.

5  
6 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the  
7 United State of America that the foregoing is true and correct.

8  
9 Executed on May 3, 2024

  
\_\_\_\_\_  
Laura Owens

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# Exhibit A



Attn: My Health Online  
P.O. Box 255386  
Sacramento, California 95865-5386

Name: Laura M Owens | DOB: [REDACTED] | PCP: John Chung Kai Chan, MD

## 8/30 (Owens)

To: Laura M Owens  
From: Rebecca Yee, MD  
Sent: 8/31/2016 4:46 PM PDT

---

Hi Ms. Owens,

Yesterday (8/30/16), you received ovary removal surgery (oophorectomy) of your right ovary as well as a surgical abortion. Due to your recent medical history, I will wait to confirm pregnancy termination until blood work and a follow-up ultrasound are completed, although there were no complications during the procedure. As you explained to me, you have already experienced emotional side effects such as extreme fatigue, depression, and mood swings. These are common and I would ask your boyfriend to support you during recovery.

Best regards,

Rebecca Yee, MD

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CE0572

To: [Redacted]

Details



Sorry you had to go back!

Here

9/1/16, 6:54 AM

8/31/2016

My Health Online - (attn: - 8/31/2016)



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Sacramento, California 95865-5386

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Best regards,

Rebecca Yee, MD

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CE0585





Attn: My Health Online  
P.O. Box 255386  
Sacramento, California 95865-5386

Name: Laura M Owens | DOB: [REDACTED] | PCP: John Chung Kai Chan, MD

## Re: Ovarian cancer (Owens)

To: Laura M Owens  
From: John Chung Kai Chan, MD  
Sent: 8/13/2016 6:37 AM PDT

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Dear Laura,

Thank you for your e-mail. I am sorry you are going through such a rough time right now and will do my best to help you through it.

I read the messages you sent me from your boyfriend and answer his questions. Stage IA is without a doubt considered to be true cancer and something that we take very seriously. You are correct, Laura, that this cancer is found only in one ovary. He is incorrect in his saying that this means you just 'might' have malignant cancer cells. Please tell him that yes, I have diagnosed you with 'real' ovarian cancer, not something that just 'may' be there. I am not sure what is meant by the message you forwarded that says I would only be diagnosing it if it were something other than stage IA. That is a very real stage and simply means it has not spread beyond your right ovary. I recommend looking at the American Cancer Society's website page for more information.

In addition, you can let him know that your diagnosis and treatment has been complicated by your pregnancy, which on its own has been extremely difficult and unusual. I would strongly encourage him to change his attitude and support you at this time. I sincerely hope things get better.

All the best,  
John Chung Kai Chan, MD

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