## **Court of Appeals**

## STATE OF ARIZONA DIVISION TWO

Laura Owens,

Petitioner/Appellant,

v.

Clayton Echard,

Respondent/Appellee.

Case No. 2 CA-CV-2024-0315 FC Maricopa County Superior Court Case No. FC2023-052114 Judge Julie A. Mata

## APPELLANT'S REQUEST FOR ORAL ARGUMENT

David S. Gingras, #021097 **Gingras Law Office, PLLC** 4802 E. Ray Road, #23-271 Phoenix, AZ 85044 Tel.: (480) 264-1400 <u>David@GingrasLaw.com</u> Attorney for Petitioner/Appellant Laura Owens Pursuant to Ariz. R. Civ. App. P. 18(a), Petitioner/Appellant Laura Owens respectfully requests this matter be set for oral argument.

As explained in the briefs, this appeal raises significant matters of first impression and issues of recurring statewide importance. These issues included, but are not limited to:

- Whether Rule 26 of the Rules of Family Law Procedure (the family court analogue to Civil Rule 11) permits a judge to award \$150,000 in *sua sponte* sanctions <u>after</u> a litigant seeks to invoke the safe harbor of the rule.
- 2. Whether the structural error rule, recognized in civil and criminal cases, *State v. Ring*, 204 Ariz. 534 (Ariz. 2003), applies in family court.

Because this case originated in the Maricopa County Superior Court, and since both parties, and counsel for both sides, all reside in Maricopa County and must travel, Appellant respectfully asks the Clerk to set oral argument for the Court's <u>afternoon</u> session, if possible.

DATED January 30, 2025.

GINGRAS LAW OFFICE, PLLC

David S. Gingras Attorney for Petitioner/Appellant Laura Owens

## **CERTIFICATE OF SERVICE**

On this date, the below-signing lawyer e-filed Appellant's "Request for Oral Argument" with the Clerk of the Court for Division Two, and emailed copies of it to the following:

> Gregg R. Woodnick, Esq. Markus Risinger, Esq. Deandra M. Arena, Esq. Isabel Ranney, Esq. **WOODNICK LAW, PLLC** 1747 E. Morten Avenue, Suite 205 Phoenix, Arizona 85020 Attorneys for Appellee Clayton Echard

DATED January 30, 2025.

GINGRAS LAW OFFICE, PLLC

David S. Gingras Attorney for Petitioner/Appellant Laura Owens