DV-720

Response to Request to Renew Restraining Order

Instructions: Use this form if the protected person has asked to renew the restraining order against you and you want to respond in writing. There is no court fee to file this form.

Clerk stamps date here when form is filed.

Protected Person (see form DV-700, item (1)): Laura Owens

Fill in court name and street address:

Civic Center Courthouse 400 McAllister St. San Francisco 94102

San Francisco

Your Name: Michael Marracini

(!) Address where you can receive court papers (This address will be used by the court and by the person in (1) to send you official court dates, orders, and papers. For privacy, you may use another address like a post office box, a Safe at Home address, or another person's address, if you have their permission and can get your mail

Superior Court of California, County of

Address: City: SAN BERNARDINO State: CA Zip:

() Your contact information (optional)

regularly. If you have a lawyer, give their information.)

(The court could use this information to contact you. If you don't want the person in (1) to have this information, leave it blank or provide a safe phone number or email address. If you have a lawyer, give their information.)

Email Address Telephone:

Your lawyer's information (if you have one)

Name: Omar Raul Serrato_ State Bar No.: Firm Name: The Eagle Law Firm

Your Hearing Date (Court Date)



Your hearing date is listed on form DV-710, (Notice of Hearing to Renew Restraining Order). If you do not agree to having the restraining order renewed, attend your hearing date. If you do not attend your hearing, the judge could renew the restraining order against you for at least five years, or make it a permanent order with no expiration.

This is not a Court Order.



Case Number: FDV-18-813693
?
ld agree to: Please see attached.
t (optional) xplain why (give specific facts and
te "DV-720, Additional Reasons I Do Not
they have asked the judge to order you to d costs. The judge can order the person in 1
1

(1) The person in (1)'s request for restraining order is denied;

- (2) The judge decides that the request was frivolous or was made only to abuse, intimidate, or cause unneeded delay; and
- (3) The person in (1) can afford to pay for your lawyer's fees and costs.

☑ Check here if you want the person in 1 to pay for some or all of your lawyer's fees and costs.

This is not a Court Order.

Case Number:	5
FDV-18-813693	
N 22 F6250 F6	

(7)	Your	signatur	e
()	I Oui	Signatui	C

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: 08/22/2025

Michael Marraccini

Type or print your name

Sign your name

8 Your lawyer's signature (if you have one)
Date: 08/25/2025
Omar Raul Serrato

Lawyer's name

Omar Serrato Lawyer's signature

Your Next Steps

- Turn in (file) your completed form with the court.
- Have someone (not you) mail the person in ① a copy of this form, and complete form DV-250, Proof of Service by Mail. File form DV-250 with the court. (The person who mails this form must be at least 18 years old and cannot be you or someone protected on the restraining order.)
- Prepare for your court date by gathering evidence or witnesses, if you have any. If you need an interpreter for your court date, use <u>form INT-300</u> to request an interpreter, or ask the court clerk how you can request one. If you need a disability accommodation, use <u>form MC-410</u> to request assistance, and contact the disability/ADA coordinator at your local court for more information.
- Free legal help is available at your court's self-help center. Find your local court's self-help center at www.courts.ca.gov/selfhelp.

This is not a Court Order.

Document Title:	
DV-720	
Status:	
Closed	
Email Title:	
Response - ReSIGN	
Email Message:	
Hi Mike, the first signature didn't get picked up so if you could please resign! Thank you!	
Package ID:	
b605ad01-142b-46a1-8785-2addf8d3fd9e	

Action Recipient Time IP

Signed	Michael Marraccini (2025-08-22 17:00:47 -0700	IP: 174.50.153.185
Viewed	Michael Marraccini (2025-08-22 17:00:18 -0700	IP: 174.50.153.185

1	Omar R. Serrato,	
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5	Attorney for Respondent, MICHAEL MARRUCC	INI
6	THE SUPERIOR COURT OF	F THE STATE OF CALIFORNIA
7	COUNTY OF S	SAN FRANCISCO
8	LAURA OWENS,	
9	Petitioner) Case No: FDV-18-813693
10	retitioner) ATTORNEY BRIEF IN SUPPORT OF MICHAEL
11	vs.) MARRACCINI'S REPSONSE TO REQUEST FOR) RENEWAL OF DOMESTIC VIOLENCE
12	MICHAEL MARRACCINI,) RESTRAINING ORDER.
13	Respondent))
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PRELIMINARY STATEMENT REGARDING EXHIBITS

Several of the exhibits referenced herein are taken from a comprehensive digital forensics examination of Marraccini's laptop conducted on May 4, 2024, by Jon Berryhill of Berryhill Computer Forensics, Inc. (the "Forensics Report"). The Forensics Report, 2,489-page report and has therefore not been attached to this brief. Many of the exhibits in this filing consist of summaries, excerpts, or analyses drawn directly from the Forensics Report; accordingly, each exhibit has been assigned its own exhibit letter where applicable and cites the corresponding page numbers from the "Forensics Report." 1

I. PROCEDURAL HISTORY

Petitioner, Laura Owens ("Owens"), has a documented history of fabricating allegations of pregnancy, domestic violence, sexual assault, lying under oath, and presenting false evidence to the Court. Exhibit A². She is currently facing seven (7) felony charges related to serial pregnancy fraud and perjury in the Superior Court of Maricopa County in Arizona (CR2025-006831), including allegedly injecting herself with hCG³ so that she would test "positive" on pregnancy tests. (Exhibit B – Criminal Indictment). Her latest filing in California, seeking a permanent Domestic Violence Restraining Order against Respondent, Michael Marraccini ("Marraccini") is just the latest in a series of escalating behaviors designed to abuse court processes as a means of silencing her victims to prevent them from combatting her fictitious victim narrative.

Owens and Marraccini met in March of 2016 and engaged in an on again/off again romantic relationship that ended in August of 2017. During the relationship, Owens crafted a series of escalating narratives to emotionally manipulate Marraccini. This included fabricating pregnancies, miscarriages, abortions, and fraudulently creating documents to support an

¹ All times in the Forensics Report are in UTC (Universal Time Coordinated), which is 7 hours ahead of PST; actual events occurred 7 hours before the listed UTC time.

² Case No. FC 2023-052114 (Maricopa Cty., Ariz.): Petition found baseless and fraudulent; referred for prosecution, leading to Petitioner's indictment on seven felonies including Fraud, Perjury and Forgery.

³ **Human Chorionic Gonadotropic (hCG**), is the hormone that is produced by pregnant persons and is what causes someone to test positive on a pregnancy test.

ovarian cancer diagnosis. Owens used these traumatic fictions to coerce Marraccini into continuing to date her - using two fake letters from an OB/GYN to encourage Marraccini to "change his attitude" and be more supportive of her. Exhibit C (see Forensics Report, pgs. 682; 762, forged letter purporting to be from Doctor John Chung Kai Chan, authored by Laura Owens).

> 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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Marraccini called the police on Owens on January 7, 2018. Exhibit D. Owens had confronted Marraccini and his sister in public, yelling and screaming obscenities at him. Two days later, on January 9, 2018, Owens obtained her retaliatory domestic violence restraining order (DVRO) in the Superior Court of California, County of San Francisco (Case No. FDV-18-813693) (granted temporarily on January 10, 2018). The allegations in the DVRO were shocking with Owens claiming extreme abuse at the hands of Marraccini (including using photographs from when she fell off of a horse to allege abuse) and that it arose to such a degree she had to seek inpatient mental health treatment (an allegation she confusingly refutes in her previous filings). Exhibit E; Forensic Report, pgs. 1160; 1163; 1174-1179; 1202-1208; 1212; 1218.

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Self (m.marraccini@gmail.com) I just met my family at the hospital. iMessage 2016-12-11 06:28:16 (UTC) [2] Sender: (415) 8 Participants: (415) Self (t I love that picture of us that I put up and I will be looking at it as motivation while I'm here ok? IMessage 2016-12-11 06:28:16 (UTC) Sender: (415) Participants: (415) 8 But I'm on a hold here now that I admitted my problem Self (They said prob 24 hours and then I can do intensive outpatient if my psychiatrist approves it

On January 22, 2018, Marraccini timely filed his DV-120 Response and denied all allegations made by Owens and noted her history of manipulative conduct, including her fabricated pregnancies and conflicting medical claims. Owens and Marraccini both submitted supplemental declarations and third-party witness statements. A hearing originally scheduled for January 26, 2018, was continued for further evidence, depositions, and declarations. Ultimately, on or about July 10, 2018, exhausted by the false narratives, Marraccini entered into a stipulated agreement resulting in the issuance of a two-year CLETS-reported Restraining Order After Hearing under Family Code §§ 6200 et seq., without any admissions of wrongdoing by Marraccini. That order was set to expire on July 10, 2020. Notably, there was never any finding that Marraccini ever committed an act of Domestic Violence.

On the date the Order was set to expire, July 10, 2020, Owens filed a Request to Renew the DVRO, alleging continued fear and allegations of various violations by Marraccini (which he affirmatively denies). A hearing was held on September 11, 2020, before the Hon. Sharon Reardon. Despite Marraccini's objections and <u>without</u> a finding of new abuse, the court granted a five-year renewal under Family Code § 6345(a), extending the DVRO to July 10, 2025.

Between 2022 and 2024, Owens used this DVRO as a means of advancing a fabricated narrative that she was a domestic violence survivor. She made multiple public statements, including a January 2022 TEDxTalk (https://www.youtube.com/watch?v=UIOX-VDIfo) and a June 2023 Chicken Soup for the Soul essay⁴, all of which accused Marraccini of engaging in abuse. Exhibit F.



⁴ Chicken Soup for The Soul, after determining Owens' claims in her entry entitled "The Lifesaving Power of Kindness to Strangers" lacked credibility, removed the entry from their online publication.

Meanwhile, Owens continued to use her pattern of falsifying pregnancies with two new victims in the Superior Court of Maricopa County. In 2021 to 2022, she sued an Arizona man named Greg Gillespie in Maricopa County for "abortion coercion" after she claimed he impregnated her with twins and then later claimed to have aborted them at this direction (CV2021-052893). (Exhibit G, Civil Complaint – Owens vs. Gillespie). When he refused to continue dating her, Laura obtained a Protective Order (Arizona DVRO) against him, which she recently renewed (FN2021-004799; FN2022-052111; FN2024-052375). Exhibit H. From 2023 to 2024, Owens was the subject of a public legal controversy involving another false twin pregnancy allegation against ABC's former "The Bachelor" lead, Clayton Echard (FC2023-052114). When Mr. Echard refused to continue to date her, Owens obtained a protective order against him as well (FC2023-052771). Exhibit I.

The paternity litigation with Mr. Echard went to trial on June 10, 2024, at which time Owens' prior victims, including Mr. Marraccini, were lawfully subpoenaed to testify. Exhibit J⁵. In June of 2024, the Maricopa County Superior Court found Owens was never pregnant by Mr. Echard and granted his request for a finding of non-paternity. The Court found Owens had acted unreasonably in the litigation, initiated litigation without basis or merit, provided false testimony, and that Owen's Petition was fraudulent and made to incite communication, a relationship, or both with Mr. Echard. Moreover, the Court found that Owens had a "a pattern of similar, if not identical behavior." Owens was ordered to pay over \$149,000 to Mr. Echard and referred to the Maricopa County Attorney's Office for review. (refer to Exhibit A). On May 6, 2025, Owens was indicted by a Maricopa County Grand Jury on seven felony counts, including fraudulent schemes and artifices, perjury, forgery, and evidence tampering, related to the action with Mr. Echard. (refer to Exhibit B, Criminal Indictment). On July 10, 2025, Owens submitted a second Request to Renew her restraining order against Marraccini, indicating her intent to seek a permanent order of protection against him, largely due to his attendance at the Echard trial pursuant to a lawful subpoena. Trial is scheduled for October 21-22, 2025 in San

⁵ Lawful subpoena issued to Mike Maraccini ordering his appearance at the June 10, 2024 trial of Owens vs. Echard.

Francisco Superior Court.

Introduction

Owens has a well-documented history of making false pregnancy allegations, subsequently alleging domestic violence and otherwise abusing court processes when her victims do not wish to continue the relationship. Given this pattern of manipulating the court process to re-traumatize her victims, Marraccini urges this Court to **deny** the requested renewal. Under California Family Code § 6345, a domestic violence restraining order should be renewed only if the evidence shows the protected party harbors a genuine and reasonable fear of future abuse. Owens' own conduct, as evidenced by her current seven (7) felony charges in Arizona, demonstrates that any claimed fear on her part is neither genuine nor reasonable, but instead part of an ongoing strategy of deceit and manipulation.

II. Factual Background: Owens' Pattern of Fabrications and Inconsistencies A. False Pregnancy and Miscarriage Claims (2016)

Early on in their relationship, Owens began her pattern of faking pregnancies to manipulate Marraccini. Just three (3) months after meeting, in June of 2016, Owens informed Marraccini that she was pregnant with his child, eventually sending a photo of a positive pregnancy test to support this false narrative. Exhibit K (see Forensics Report, pg. 7096).



Within weeks, she insisted she was pregnant with his twins. Forensics Report, pgs. 470-

⁶ Text message sent from Owens to Maraccini August 19, 2016 purporting to show she was pregnant, after a string of text messages where Marraccini indicated, "No, I don't want to meet up. I'm with my family. (Exhibit A page 709).

471. No medical evidence has ever been produced to corroborate that Owens was ever pregnant, that she was pregnant with twins, or that she had to undergo the three (3) surgical and three (3) medical abortions as she would later allege.⁷

On July 14, 2016, a month after claiming she was pregnant, Owens told Marraccini she thought she was having a miscarriage, which she later retracted. Exhibit L, Forensics Report pgs. 435-441. One day later, on July 15, 2016, Owens again indicated she was miscarrying and that she was bleeding and "on her way to the hospital." Exhibit M, Forensics Report pgs. 463-470.



This claimed medical emergency is easily debunked with her social media posts that same day, where she is depicted in a white dress drinking alcohol and partying. <u>Exhibit N</u>.



⁷ Between July 23-October 14, 2016, Owens claims to have had three (3) surgical and three (3) medical abortions, all in the midst of being diagnosed with Ovarian Cancer and receiving an oophorectomy to remove her cancerous ovary.

 After "going" to the hospital, Owens informed Marraccini the pregnancy was still viable and called him to tell him they were having twins. (as referenced above - <u>Forensics Report</u>, pgs. 470-471).

On July 22, 2016, Owens started claiming that the twin pregnancy was no longer viable and that she would take abortion pills. <u>Exhibit O</u>, <u>Forensics Report pgs. 536-538</u>. Days later, she claimed that the abortion pills did not work and that she still "had to" undergo a surgical abortion. <u>Exhibit P</u>, <u>Forensics Report pgs. 565</u>; 600-606. Owens would allege a series of complications with the procedure, including that she was bleeding "a lot" and that she needed not one, but three (3) surgical abortions to terminate the alleged twin pregnancy. <u>Exhibit Q</u>, <u>Forensics Report pgs. 600-606</u>; 626; 653-660; 698-709; 996-1001.

2016-07-22 21:28:32 (01C) [4] Sender: (41S) Participants: (41S), Self (
Looks like we have to do the pills
IMessage 2016–07-28 19:18:24 (UTC) [1] Sender: (415) Participants: (415)
I"m taking it again so I don"t have to have suction done. There"s a small amount of tissue left and I can do this or suction.
IMessage 2016-08-02 15:23:44 (UTC) [1] Sender: (415) Participants: (415)
I''ll have the doctor write something after I'm done to say I'm no longer pregnant.
iMessage 2016-08-02 15:30:08 (UTC) [1] Sender: (415) Participants: (415)), Self (m.marraccini@gmail.com)
Anything else you want to say before I get there?
iMessage 2016-08-10 14-38-56 (UTC) [4] Sender: (415) Participants. (415) , Self (m.marraccini@gmail.com)
I'm feeling absolutely horrible. I'm cramping nonstop which I am not used to and it kept me up all night, have a fever, and am bleeding a lot.
Message 2016-10-11 00:53:20 (UTC)
I had a really short appointment with the doctor but glad I did it. I'm going to go ahead and just have an aspiration Wednesday. That was the doctor's recommendation and I don't want to delay it longer. She thinks there's a good chance I have Ashermans and I looked it up and it makes some sense. The ultrasound won't confirm that though. But I will get a conformation that it's done on Wednesday. Does that sound good to you? I want to have a really positive attitude since I know I haven't the whole time.

To support her escalating faux pregnancy emergencies, Owens manufactured various medical records. After the feigned multi-abortion ruse, Owens doctored letters from an OB/GYN (whom Owens claimed in her deposition for the Echard paternity case was a cancer specialist) to state she had ovarian cancer and had an oophorectomy⁸ Exhibit R⁹, Forensics Report pgs. 11-12.

15	 A. That would be an OB/GYN, but I haven't 	15	A. That would be an OB/GYN, but I haven't
16	established regular enough care with an OB/GYN. But	16	established regular enough care with an OB/GYN. But
17	I was treated for the PCOS in San Francisco by a	17	I was treated for the PCOS in San Francisco by a
18	provider.	18	provider.
19	Q. Who was the provider in San Francisco?	19	Q. Who was the provider in San Francisco?
20	A. I was treated by Dr. Chan. He is a	20	A. I was treated by Dr. Chan. He is a
21	gynecologist for it's like a specialist, one for	21	gynecologist for it's like a specialist, one for
22	-	22	-
23	Q. Fertility.	23	Q. Fertility.
24	A. No, he's not. He's for cancer.	24	A. No, he's not. He's for cancer.
25	Q. Okay.	25	Q. Okay.

These fabricated letters perpetuated the emotional manipulation of Marraccini, with the "doctors" telling Marraccini that Owens had "real' ovarian cancer" and the 'doctors' "strongly encourage[d] him to change his attribute and support [Owens]." Exhibit S (see Forensics Report, pgs. 529; 604; 653; 662; 666; 670; 671; 675; 682; 718; 726; 762; 801; 973; 1024; 1025).

⁸ An "oophorectomy" is the surgical removal of one or both ovaries. In Owens' case, she claims the procedure was performed on her right ovary.

⁹ Excerpt from a deposition where Laura Owens testified under oath in the Owens v. Echard matter.

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

Name: Laura M Owens I DOB: 5/14/1990 I 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 (cophorectomy) 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 your during recovery.

Best regards,

Rebecca Yee, MD

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Notably, even as Owens insisted she was suffering all these grave conditions, a high-risk twin pregnancy, multiple miscarriages, repeated abortions, and cancer, she continued to engage in strenuous activities. For example, during this very period she was competing in equestrian jumping events. Exhibits T-1; Exhibit T-2 (Forensics Report, pgs.380; 381; 582; 642-647; 736-737; 905; 942-947; 1026)

In December of 2016, under mounting scrutiny, Owens finally admitted to Marraccini, and her own father (Ronn Owens), that she had never been pregnant, that everything was fabricated and that she would seek psychological care. (Exhibit U – Declaration and Deposition Transcript of Colin Scanlon).

Marraccini continued to date Owens after her confession, in hopes she would seek the professional help she admitted needing and that her family would support her efforts.

Ultimately, Owens' manipulative habits only continued and escalated with Marraccini having to call the police on January 7, 2018. (see Exhibit D). Little did Marraccini know, this would initiate

Owens filing the underlying DVRO, which contained a false reality in which *Marraccini* was the abuser, despite an utter lack of verifiable evidence.

These lies were not innocent mistakes or misunderstandings; they were deliberate, sustained fabrications about the creation and loss of human life designed to manipulate Marraccini into continuing to date her. This was the pattern of Owens' relationship with Marraccini and, later, her relationships with the two victims in Arizona.

In addition to this manipulative conduct, Owens has demonstrated a consistent pattern of retaliatory legal action. When a romantic partner initiates legal proceedings against her, she responds by filing legal actions against them. This pattern is evident in three separate cases. After Marraccini contacted law enforcement regarding Owens' behavior, she filed for a temporary restraining order against him **two days later**. When Greg Gillespie (Arizona victim) filed an Order of Protection against Owens, she entirely evaded service and filed her own OOP against him **three months later**. Exhibit V¹⁰. Similarly, after Clayton Echard obtained an Injunction Against Harassment, Owens filed an Order of Protection against him **ten days later**.

When Marraccini ended their relationship, Owens continued this pattern by seeking a Domestic Violence Restraining Order based on false and completely unsupported allegations. She now seeks to make that order permanent. Meanwhile, Owens currently faces multiple felony charges in Maricopa County, including perjury, extortion, and conspiracy, stemming from precisely the type of falsehoods and deceptive behavior Marraccini experienced firsthand years ago.

B. Inconsistent Conduct Undermining Her Claims of Fear

Owens cannot satisfy her burden to demonstrate a reasonable apprehension of future abuse. Her behavior has demonstrated that her claimed fear is neither genuine nor reasonable. Owens' conduct toward Marraccini has been wholly inconsistent with that of an individual who genuinely fears for their safety. The evidence demonstrates that her pursuit of a permanent DVRO stems not from any legitimate safety concern, but from a retaliatory intent related to Marraccini's lawful compliance with a subpoena in the Arizona proceeding.

¹⁰ Orders of protection requested by Laura Owens against Greg Gillespie and Clayton Echard.

Affection and Pursuit After Alleged Abuse: Owens portrays Marraccini as violent, yet her communications reveal a consistent pattern: whenever he distanced himself or took actions she perceived as rejection, she would respond with sudden declarations of affection or fabricate a medical crisis to draw him back in. For example, Owens asserts that by early July 2016 Marraccini was already acting abusively toward her. But on July 6, 2016, she texted him, "I love and trust you." Exhibit W, Forensics Report pg. 355.

I'm really sorry for the late response, been with the horses and service is scattered here. I also really appreciate you breaking that down for me.

The moving situation makes a lot of sense. I also definitely wouldn't be opposed to moving, especially to San Diego, at some point in the future if it was the right situation.

Wanting to settle down isn't so much to do with my age as much as it is the fact that I personally have these views about wanting to just be with one person. This situation really shocked me and made me realize I need to be upfront with what I want because I haven't been in relationships in the past because I was afraid of scaring the other person off. However, this has certainly added more depth to our relationship early on and I feel like the responsible thing for both of us to do from it is to either maturely move forward or end it and it seems like we are on the same page there.

It really hurt me to read the last paragraph of your text because I feel horrible that I have made you feel that way. I really do only want to bring you up and make you feel good about yourself and I'm sorry that I have been moody and insecure. You are exactly who I want to be with and I think once we are on the same page about feelings, I will be able to take a breath and trust it. I guess I've just been questioning you and your feelings about the future because you aren't where I'm at now and I'm nervous you won't get there. Or that you won't integrate me into your life with your family and friends. Trust me, I want nothing more than to relax and enjoy our relationship.

The stress from the pregnancy is really straining it and making me have these mood swings that I hate myself for and I'm sorry for that. I also do really hate to end the pregnancy when we both see a future together and this would probably be a super kid we are missing out on, but I guess there's time for that in the future. If I think about it logically, I want to establish a solid relationship with you and make memories without kids involved because we aren't there yet. I just feel bad. But I don't want to ever make you feel bad so I won't question you. I love you and I trust you.

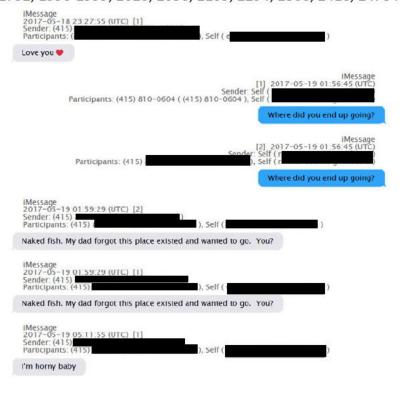
Similarly, Owens states she feels "secure and loved" by Marraccini in late 2016.

iMessage 2016-11-09 06:24:00 (UTC) [6] Sender: (415) Participants: (415) --- --- (115) --- --- (115) --- --- (115)

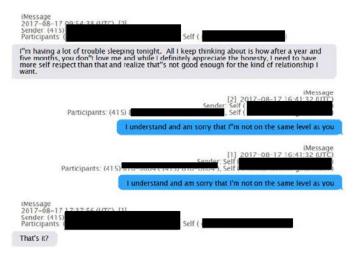
As I was driving down here and listening your playlist (which I loved and it kept me awake), I was just thinking about how tremendously lucky I am to have you as my boyfriend. You just have all these great qualities that make me smile. For me, the timing of these feelings is really strange because I feel like I am so out of control with what happens to my dad. Normally I would be really stressed out but I have changed my outlook and you have been a huge part of that...which in turn has helped me cope with what's going on with him and be a better daughter.

I feel secure and loved by you and it's one of the best feelings I've experienced in my life. You hold such a special place in my heart and I would do anything to make your life easier or make a random day better for you. Thank you so much for all you to make me a better person and for your love and support and getting me to simultaneously so enjoy living in the moment with you while also being so excited for our future. Feels great.

 After a March 2017 trip to Dubai (during which Owens now claims Marraccini was cruel, though no abuse actually occurred), she continued to initiate friendly, even flirtatious, exchanges with Marraccini, stating "I'm horny baby," "Love you" and as late as mid-November, "I wish we could get dinner." Exhibit X, Forensics Report pgs. 1667-1668; 1673; 1686-1701; 1714-1720; 1725-1732; 1996-1999; 2020; 2050; 2109; 2294; 2306; 2416; 2478.



Despite Owens' claims supporting her DVRO, her own message to Marraccini, sent a year and five months into their relationship, reveals a desire for a deeper connection. In it, she expresses appreciation for his honesty that he is not in love with her. This message undermines her portrayal of herself as a victim seeking distance or safety; instead, it shows she was pushing for clarity and perhaps greater commitment, while Marraccini was not equally invested in the relationship.



Victims of genuine domestic violence typically avoid contact with their abuser, refrain from pursuing intimacy, and do not encourage a deepened romantic relationship. Owens, however, repeatedly pressed Marraccini for commitment, urged him to become her boyfriend, and frequently professed love and trust—often immediately after the very incidents she now characterizes as abuse. Such conduct is fundamentally inconsistent with the behavior of someone living in fear or attempting to escape further harm.

Initiating Contact Despite the Order: Contrary to Owens' portrayal of Marraccini before this Court as "brutally violent," a "rapist," "pathological liar," "stalker," and the source of her "severe psychological distress," Owens herself offered to speak with Marraccini directly by phone as recently as last year. This willingness to engage in communication with an individual she has characterized in such extreme terms starkly undermines the credibility of her claims. Owens' readiness to initiate dialogue highlights the inconsistency and absurdity of her allegations throughout this case. Exhibit Y¹¹.

One last thing – after talking with Laura about this, she said she has lots of questions for Mike. I told her my preference is to have her send me any specific questions, and I'll see if Mike wants to answer them. She also said she's willing to speak directly with him, but that may not be appropriate in light of the restraining order. On the other hand, if Mike has a strong preference in favor of directly speaking with Laura, maybe we can make that happen (I'm licensed in CA and can probably do some sort of stipulation with Randy to modify the CA order to allow this, just to be safe).

¹¹ Email from **her attorney David Gingras** indicating after speaking with Laura Owens, she had lots of questions for Marraccini, and that she was willing to speak with him directly, which would have been a violation of the current restraining order.

The Court must consider the significant contradictions between her stated fears and her actual behavior. California law expressly authorizes courts to weigh not only a witness's statements, but also their demeanor, conduct, and prior inconsistent remarks in evaluating their credibility. (See Evid. Code § 780.) Here, Ms. Owens' actions **consistently** undermine her claims. Rather than showing genuine apprehension of Mr. Marraccini, her conduct has demonstrated an ongoing desire to engage and provoke conflict.

To renew a restraining order under California law, the petitioner must demonstrate that her fear of future abuse is not merely subjective but objectively reasonable. A person who continues actively to initiate contact or seeks confrontation with the purported abuser cannot credibly claim to fear them. Ms. Owens' behavior, which includes pursuing communication, harassing, and even publicly confronting Mr. Marraccini, strongly indicates she harbors no genuine fear of him. Instead, it reveals a pattern of calculated provocation and manipulation. Owens' actions disqualify her from obtaining continued judicial protection.

C. The Pattern

Abortion Coercion Suit: In August of 2021, Owens had a brief encounter with Gregory Gillespie, a man in Scottsdale, Arizona. After Mr. Gillespie refused to continue a relationship with her, she claimed she was pregnant with his twins and fabricated a sonogram to continue the ruse. When that failed, she claimed she had to take abortion pills multiple times, as the first attempt failed and the second attempt only allegedly affected one fetus. When Mr. Gillespie was not interested in seeing her again, she initiated a civil action against him, alleging he had coerced her into getting an abortion. That action was later dismissed (and forensic analysis confirmed the ultrasound was faked – identifying the original source image that Owens had manipulated), but not before Owens could obtain a protective order against Mr. Gillespie. Exhibit Z.

The Echard Paternity Scheme: In May of 2023, Owens had a one night encounter with reality TV personality Clayton Echard (former star of ABC's *The Bachelor*) in which no sexual intercourse occurred. Owens subsequently claimed she was pregnant with Echard's child-

turned-twins – an allegation that mirrors the false scenario Owens had fabricated with Gillespie

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and Marraccini. Owens even filed a paternity lawsuit in Arizona seeking custodial orders and child support from Echard, all while inundating him and the media with supposed "proof" of her pregnancy. Exhibit A-1.¹²

Clayton Echard paternity update - Hi, I am the "anonymous woman" and I just heard from the lab. Here is the relevant part of the .. Call Ravgen 10-.. inbox: Sonogram from SMIL - So much for Clayton's claim that he didn't see an ultrasound! This was the family attorney w Indian Petition 219600 - Hi, My name is Laura Owens, I had a hearing last week, but many events have happened since and I woul. V To: Clayton 2 Virtual hearing - Clayton, I am hoping the test results come back right the first time, but if they are inconclusive, I am willing to do ... Oct 5 MG_8287.jpeg 🔯 8MG_8286.jpg 🔯 8MG_8285.jpg +1 V To: Ksenia 4 Oct 5 Inbox: Clayton Echard story - Thank you so much, Ksenial I really appreciate it! If there is an inconclusive result... - Hi Brett, I am including Clayton on this email because I wanted you to clarify for him wh... Oct 5 Cease and Desist for Dave Neal - Nope. All the best, Laura Owens Nobody Told Mer' | Quartet Farms | TEDx talk Now availa Oct 4 Miles M-0751-CV-2023012527 - LAURA OWENS - Forgot to attach what I'd written... All the best, Laura Owens Nobody Told Mei'... Oct 4 Minute Order C... Seing victim shamed - from the "anonymous woman" in the Clayton Echard case - Hi, My name is Laura Owens and Lam the d

When Mr. Echard contested the validity of her claims, Owens moved to withdraw the suit, claiming she had "miscarried." The Court denied her request and Owens eventually signed a HIPAA release, allowing Echard to obtain records that showed she had never sought medical care, never received an ultrasound as she claimed, and that she had doctored medical records as part of her pregnancy fraud. The matter was eventually set for trial and both Gillespie and Marraccini, Owens' prior victims of pregnancy fraud, were lawfully subpoenaed to testify as to their personal knowledge of Owens' allegations. Owens' attorney filed *a Motion in Limine*, seeking to preclude Marraccini's testimony, which the Court denied. When Marraccini lawfully attended the hearing on June 10, 2024, Owens' attorney further sought to have Marraccini arrested at the courthouse, contacting three separate police departments, all of which denied his request, as Marraccini was lawfully present pursuant to the subpoena. (Refer to Exhibit A-2

¹² Laura Owens email demonstrating her reaching out to various media outlets to start a public scandal regarding Clayton Echard based on her lies, which mirror the allegations in this case.

Petition for Court Ordered Paternity, Case Number FC2023-052114).

Ultimately, the trial court judge found that Owens was never pregnant and referred her for investigation by the Maricopa County Attorney's Office. In May 2025, a grand jury indicted Owens on seven (7) felonies: one (1) count of fraudulent schemes and artifices, one (1) count of forgery, four (4) counts of perjury, and one (1) count of tampering with evidence. (see Exhibit C). The indictment alleges that from March 2023 - June 2024, Owens engaged in an elaborate scheme to defraud both Echard and the court -- conduct nearly identical to her conduct with Marraccini and Gillespie.

Significance of the Indictment: While the Arizona criminal case is separate from this proceeding, it is profoundly relevant to Owens' credibility and pattern of conduct, as well as her allegations against Marraccini. Owens is now facing seven (7) felony charges related to fabricating pregnancies, making "several inconsistent statements" under oath, and falsifying medical evidence. Marraccini has been identified by the Maricopa County Attorney's Office as a potential witness to Owens' fraudulent conduct, based on his direct experience with her.

Exhibit A-3¹³. The parallels between Owens' conduct with Marraccini and Mr. Echard, including Owens' habit of obtaining restraining orders against her victims, cannot be understated. In both instances, Owens falsely claimed to be pregnant with a child, turned twins and, when pressed for proof, she pretended to miscarry. In both cases, she produced doctored medical "evidence" to bolster her story and, in both, her lies eventually unraveled. Owens' modus operandi is disturbingly consistent. This Court must consider the indictment as critical to her credibility.

In short, Owens has a clear pattern: she lies about pregnancies and abuse, and when confronted with evidence of her deceit, she doubles down by dragging her accusers into court, to cast herself as the victim and to punish those who exposed her. This pattern has persisted

¹³ Marraccini was identified as a witness on the State's Notice of Disclosure, giving Owens clear knowledge that he would testify in the criminal case against her. Her filing of this renewal is retaliatory and part of the same fraudulent scheme she initiated in 2016.

for years, spanning multiple jurisdictions. Arizona courts are now grappling with the fallout, as Owens faces criminal prosecution. Should this Court, after hearing all the facts, determine that Owens has continued this pattern of falsehoods, this Court must refer her for prosecution in San Francisco County and reassess the legitimacy of all filings in this DVRO action. Owens is dangerous and is continuing to harm her victims by maintaining this fraudulent DVRO action. Owens has shown she will not stop and that she is a danger to the community.

It is virtually unheard of for someone seeking a DVRO renewal to simultaneously be under indictment for fraud and perjury on a closely related matter. The evidence of Owens' fraud and perjury is significant and it comes not just from Marraccini's assertions, but from forensic data, third-party witnesses and judicial findings. An extensive evidentiary hearing is requested by Marraccini to disprove Owens' allegations in the court of law. Owens is a charged con artist and this Court should not accept any of her claims at face value. Her allegations should be given the highest scrutiny and be fully addressed through an in person evidentiary hearing, where Owens' other victims can testify.

III. Points and Authorities

A. Legal Standard for Renewal – Credibility as a Central Factor

Under California Family Code § 6345, a domestic violence restraining order may be renewed for five years or even made permanent, "without a showing of any further abuse since the issuance of the original order." However, the law is equally clear that the burden remains on Owens to demonstrate a continuing need for protection. In practical terms, Owens must prove by a preponderance of the evidence a reasonable apprehension of future abuse if the restraining order is allowed to expire. (See Ritchie v. Konrad (2004) 115 Cal.App.4th 1275, 1283.) This standard has both subjective and objective components: Owens must actually fear future abuse, and that fear must be objectively reasonable under the circumstances. As the Court of Appeals explained in Ritchie, if the protected party's fear "is genuine and reasonable," the court should generally err on the side of renewal, given the protective purpose of the law. Conversely, if the claimed fear is not credible or not objectively reasonable, renewal is not

warranted.

In assessing whether Owens' claimed apprehension is genuine and reasonable, the Court should consider the evidence and findings underlying the initial restraining order, as well as any significant changes in circumstances since. Here, the original DVRO was issued temporarily in January 2018 after a brief hearing and was based solely on Owens' written declarations. When time came for the evidentiary hearing, Marraccini, simply wishing to move on, did not contest the order and instead, stipulated to a two-year restraining order to avoid further litigation, without conceding to any of the allegations in the underlying DVRO. Thus, the original order's "findings" were never the product of a rigorous credibility determination; they were unchallenged allegations. Now, with the benefit of hindsight and new evidence, this Court is in a very different position than it was in 2018. Owens' behaviors have culminated in fraudulent and criminal findings in Arizona. Her credibility is central to this renewal decision and must be assessed to determine whether her apprehension is both genuine and reasonable.

California law recognizes that in deciding whether to grant equitable relief like a DVRO, a court should weigh the parties' credibility. Evidence Code § 780 explicitly permits the Court to consider "any matter that has any tendency in reason to prove or disprove the truthfulness" of a witness's testimony—including prior inconsistent statements and the witness's character for honesty.

In this case, multiple factors cast doubt on Owens' credibility and the validity of her claimed fear:

Prior inconsistent statements: In July 2016, Owens assured Marraccini "it's not a
miscarriage" because she was supposedly carrying twins. Yet in her 2018 TRO filings,
unequivocally claims to have miscarried, implying that Marraccini's behavior caused the
miscarriage. Owens explicitly told Marraccini the miscarriage never happened. Likewise,

Owens' current insistence that she has lived in fear of Marraccini since 2017 is inconsistent with her own communications and actions during and after 2017. She sent Marraccini numerous affectionate, casual messages well after 2017, even initiating face-to-face encounters with him, contrary to the horrendous abuse allegations contained in the 2018 TRO filings.

- Proven lack of honesty: Owens's credibility is virtually nonexistent. This is not a mere "he-said, she-said" dispute; it is a case where the record shows deliberate fabrication. She has staged pregnancies and miscarriages that never occurred, forged medical records, and lied about having cancer. She has concocted stories of abuse and gone so far as to create false evidence, such as recycling an unrelated hospital photo to bolster her claims. Most tellingly, she now faces a felony indictment in Arizona for perjury and fraud, an official finding of probable cause that she lied under oath and falsified evidence.
- Motive to lie or exaggerate: Owens has clear incentives to misrepresent the situation. She has a pattern of using legal proceedings, like restraining orders and lawsuits, to retaliate against or control former partners. Here, her motive for seeking yet another renewal comes after she attempted (and threatened) to have Marraccini arrested for responding to a lawful subpoena in Arizona. Owens faces public disgrace and legal consequences for her actions. A DVRO is a powerful tool that Owens has used as a weapon rather than a protective measure. The Court should be mindful that extending it under these circumstances rewards her misuse of the system.

Owens has failed to meet her burden of proving a genuine, reasonable fear of future abuse. On the contrary, the evidence indicates she does not truly fear Marraccini: she fears losing control of the narrative she has constructed that is falling to pieces in light of the Echard case. Owens is a disgrace to genuine victims of domestic violence and cannot be permitted to continue abusing a process that is meant to protect victims as a tool to cause further harm. The DVPA was written to protect genuine victims, not to allow a mechanism for individuals like

Owens to craft baseless allegations, punishing men for not wanting to date her.

When a Petitioner's credibility has been eviscerated as thoroughly as Ms. Owens' has, the Court cannot find her purported fear objectively reasonable. Owens points to no new incidents or threats in the five years since the DVRO was last renewed. Marraccini has scrupulously complied with the order. Owens' case for renewal thus rests entirely on recycled allegations from the past; allegations that are demonstrably false, Marraccini's compliance with a legally issued subpoena, and a forensic investigation of his communications with Laura inspired by Owens' continued defamation of his character through her public identity as a <u>fake</u> victim. With no misconduct by Marraccini, and with Owens' credibility in ruins, there is no legitimate basis to continue the restraining order. There is, however, <u>a legitimate basis to refer Ms. Owens for</u> criminal prosecution in the state of California.

Finally, the Court should consider the broader policy implications. The Domestic Violence Prevention Act's noble purpose is to protect true victims of abuse. That purpose is undermined if the system is hijacked by false claims. Courts have warned against using restraining orders as tactical weapons rather than shields (see, e.g., *Leahy v. Peterson, 98 Cal. App. 5th 239, Ritchie v. Konrad, 115 Cal. App. 4th 1275, In re Marriage of F.M. & M.M., 65 Cal. App. 5th 106* ¹⁴).

of a civil harassment restraining order because the superior court failed to require evidence of new harassment as mandated by Cal Code Civ Proc § 527.6. The court highlighted that granting a renewal based solely on the protected party's request and subjective desire, without proper legal standards, impedes justice. The court referenced Ritchie v. Konrad, 115 Cal. App. 4th 1275 to stress that protective orders impose significant burdens and should not be extended without sufficient grounds.

In **Ritchie v. Konrad (2004)**, the court held that a trial court erred in renewing a protective order merely because the protected person requested it. The court emphasized that renewals require a finding, by a preponderance of the evidence, that the protected person has a reasonable apprehension of future abuse. The court warned against using protective orders as automatic extensions without proper evidence, as this could lead to misuse and unnecessary burdens on the restrained party Ritchie v. Konrad, 115 Cal. App. 4th 1275.

In Marriage of F.M. & M.M. (2021), the court underscored that domestic violence restraining orders under the Domestic Violence Prevention Act (DVPA) are meant to prevent future abuse, not to punish past conduct. The court emphasized the importance of considering evidence of post-filing abuse and ensuring that the orders are based on reasonable proof of ongoing or future threats, rather than being used as a tool for other purposes

Granting a renewal in this case, despite overwhelming evidence of Owens's dishonesty, would send a dangerous message: that the court will tolerate and even reward perjury and fabrication. It would encourage others to misuse DVROs for ulterior motives. In contrast, denying the renewal here would affirm that this Court will not be made a tool in a fraudulent narrative. Denial of Owen's renewal request would fortify the faith of California DVRO process and ensure that its protections remain reserved for those who genuinely need them.

IV. Conclusion

Owens has built her case on a foundation of falsehoods. She lied about being pregnant with Marraccini's children. She lied about suffering miscarriages and undergoing escalating emergency medical procedures that never actually occurred. She lied about having cancer and crafted fake doctors' notes telling Marraccini to be "supportive" of her. She lied about Marraccini abusing her, even misrepresenting evidence to support that lie. Owens lied in her submissions to this Court, and she lied under oath in two other pregnancy cons in Arizona. At every turn, when the truth threatened to undercut her narrative, Owens chose to double down. A person with this habit of deceit cannot be deemed credible, and her motives in seeking a renewal of the DVRO cannot be assumed to be pure.

The Court must carefully consider whether justice prevails by imposing severe restraints on Marraccini 's liberty, potentially permanently, under these circumstances. Owens has not been subjected to any abuse by Marraccini. The evidence indicates that Owens is the instigator of conflicts and that she is committed to tormenting Marraccini for the rest of his life. Her bid to renew the restraining order is not a plea for protection born of genuine fear, it appears to be a ploy for vindication and continued leverage.

For the reasons set forth above, Respondent Michael Marraccini respectfully requests that the Court deny Owens's request for renewal. Moreover, if the Court determines that the

original 2018 restraining order was procured through extrinsic fraud, it should be vacated under Code of Civil Procedure § 473(d). The seriousness of extending, or potentially making permanent, a DVRO requires strict adherence to due process and fundamental fairness, particularly where substantial evidence shows the underlying order was obtained under false pretenses. Although Marraccini stands ready to address the merits of Owens's allegations, these procedural defects alone provide an independent basis to dissolve the existing order and deny any further extension.

In sum, justice requires that this Court not countenance perjury or reward fabrication.

Owens has had her day, indeed, years, under the protection of an order that was predicated on false claims. That chapter should now close. Marraccini respectfully requests that the Court allow the restraining order to expire, restoring his freedom and good name.

Dated: August 19, 2025

Respectfully Submitted,

Omar Serrato

Omar R. Serrato
Attorney for Respondent, Michael Marraccini

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EXHIBIT A

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HONORABLE JULIE ANN MATA

CLERK OF THE COURT
L. Overton
Deputy

IN RE THE MATTER OF

LAURA OWENS DAVID S GINGRAS

AND

CLAYTON ECHARD GREGG R WOODNICK

DEANDRA ARENA JUDGE MATA MARICOPA COUNTY ATTORNEY'S OFFICE 225 W MADISON ST PHOENIX AZ 85003

UNDER ADVISEMENT RULING

An in-person Evidentiary Hearing was held on June 10, 2024, regarding the issues of sanctions, paternity, attorney's fees, and costs.

JURISDICTIONAL FINDINGS

THE COURT FINDS at the time this action was commenced at least one of the parties was domiciled in the State of Arizona and that said domicile had been maintained for at least 90 days prior to filing the Petition. There are no minor children common to the parties.

PROCEDURAL HISTORY

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• Laura Owens ("Petitioner") filed a pro per Petition to Establish Paternity, Legal Decision Making, Parenting Time and Child Support on May 20, 2023.

- Petitioner filed a pro per Motion to Communicate on August 23, 2023, a Motion to Compel on August 29, 2023, and Expedited Consideration Requested! Motion to Communicate filed September 14, 2023, and Expedited (!) Motion to Seal Court Record on September 14, 2023. All motions were denied.
- Clayton Echard ("Respondent") filed a pro per Answer on August 21, 2023. The Court granted Respondent's Motion for Leave to Amend Response filed by counsel on December 12, 2023, and Amended Response to Petition to Establish filed on January 26, 2024.
- The parties attended an Early Resolution Conference on September 28, 2023, wherein the parties entered into a Rule 69 agreement to comply with a Ravgen DNA test on October 2, 2023.
- On October 6, 2023, Petitioner filed for an ex parte Order of Protection ("OOP") in FC2023-052771. After a hearing, the OOP was affirmed. The same day the Ravgen results indicated "little to no fetal DNA."
- On October 18, 2023, Petitioner filed a Request for Pre-Decree Mediation citing Respondent's unwillingness to communicate with Petitioner and citing "he even acts as if the unborn children don't exist despite a pro ponderous of the evidence [sic]". (Dkt. No. 23, p. 2).
- On October 24, 2023, the parties appeared before Commissioner Gialketsis (retired) in CV2023-053952 in response to the Injunction Against Harassment ("IAH") filed by Respondent. On the parties' stipulation, the Court previously reviewed both days of the hearing and identified that the Petitioner, appearing virtually, frequently stood up and rubbed what appeared to be a swollen abdomen. November 2, 2023, testimony resumed, and Petitioner testified that she was "100%" and "24 weeks" pregnant with Respondent's children. She further testified that the twins were due on February 14, 2024. She further testified that due to epilepsy she was experiencing a high-risk pregnancy and was being cared for by two specialists, namely Dr. Makhoul and Dr. Higley. She testified she last saw Dr. Higley "last Friday" prior to the November 2, 2023, hearing.
- October 25, 2023, the parties appeared before Commissioner Doody to determine the validity of the contested OOP in FC2023-052771. Petitioner's abdomen again appeared swollen. During this hearing, she testified to the validity of the sonogram sent to Respondent, the media, and a Dropbox on Reddit, and further testified the parties were having a son. She later testified she believed she was having fraternal twins, one boy and one girl.

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- December 6, 2023, a second Ravgen test confirmed "little to no fetal DNA."
- A third test was done; however, the test results were lost in transit.
- December 12, 2023, Respondent filed a Notice of Filing Affidavit of Non-Paternity.
- December 28, 2023, Petitioner filed a Motion to Dismiss Petition to Establish Paternity, Legal Decision Making, Parenting Time and Child Support with Prejudice in conjunction with a Notice Requiring Strict Compliance with Arizona Rules of Evidence, thereby invoking A.R.F.L.P. Rule 2(a). Petitioner cited the basis for the dismissal that she "is not now pregnant with Respondent's children." (Dkt. No. 32 at 1). The motion was denied as the issue of attorney's fees, costs, and sanctions remained.
- January 2, 2024, Petitioner filed an Expedited Motion to Quash Deposition of Petitioner. January 3, 2024, Respondent filed a Response/Objection to Petitioner's Motion to Dismiss. The Court denied Petitioner's Motion to Quash.
- Respondent withdrew his Motion for Sanctions Pursuant to Rule 26, on January 3, 2024.
- Petitioner filed a Motion for Confidentiality and Preliminary Protective Order on January 18, 2024.
- Respondent participated in a deposition on February 2, 2024.
- At a Status Conference on February 21, 2024, Petitioner was ordered by this Court to comply with Rule 49 disclosure requirements. During the hearing, Petitioner's counsel advised that the Petitioner had miscarried sometime in September or October 2023.
- Petitioner was deposed on March 1, 2024.
- On June 3, 2024, Petitioner's prior counsel, filed Ethical Rule 3.3 Notice of Candor, wherein counsel advises the Court that statements made by counsel at the February 21, 2024, Status Conference were factually incorrect. Specifically, counsel stated "Ms. Owens has not lied in this case. She has not intentionally lied to the Court." (Dkt. No. 108 at 1). While counsel believed the statements to be accurate at the time, counsel later determined those statements were not true based on the Petitioner's deposition taken March 1, 2024. (*Id.* at 2-4).
- Voluminous additional pre-trial pleadings were filed by both parties. Those
 motions were ruled on separately, by minute entry, and the rulings are not
 relevant for purposes of this hearing.

FINDINGS OF FACT

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Petitioner, Laura Owens

- Petitioner contacted Respondent through Linkedin.
- Petitioner and Respondent met on May 17, 2023, to locate potential investment properties in Scottsdale.
- Petitioner has a podcast, a real estate investing company, and buys and sells horses. (Ex. B. 49, p. 13, line 24-25).
- Between May 18-20, the parties viewed some properties in Scottsdale.
- On the evening of May 20, 2023, Respondent invited Petitioner over to his home, which she accepted.
- After Petitioner arrived, Respondent told her he was "high" on cannabis "gummies" and he offered one to her, which she accepted.
- During the late evening of May 20, 2023, and early morning of May 21, both parties agree that Petitioner performed oral sex on Respondent "to completion" twice.
- Petitioner testified she did not want to have sexual intercourse, but that Respondent "stuck it in" briefly.
- Petitioner's implication that Respondent initiated sexual intercourse without consent was not alleged initially in the court filings. It was not alleged until 2024. (Ex. B. 49, p. 67).
- At trial, Petitioner testified that the parties had sexual intercourse, and that it was rape.
- Petitioner testified Respondent was too high to remember sexual intercourse, due to his voluntary intoxication.
- Petitioner believes she became pregnant on May 20, 2023. She testified that after May 20, 2023, her menstrual period stopped and did not resume until November 2023.
- Petitioner has had PCOS since the age of seventeen and does not have regular periods. (Ex. A. 11).
- Petitioner has a history of epilepsy. (*Id.*).
- Petitioner testified she has been pregnant four times. Each time, the alleged father believed she fabricated the pregnancy, and doctored medical records.
- On May 24, 2023, Petitioner asked Respondent to prepare written purchase offers for two properties Petitioner wanted to purchase in Scottsdale – one was located at 19777 North 67th Street in Scottsdale (offer amount was \$425,000) and the other was located at 7609 N. Lynn Oaks Drive in Scottsdale (offer amount was \$699,000).

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• Petitioner asked Respondent, as her realtor, to prepare these purchase offers and to submit them to the seller or the seller's agent.

- Respondent prepared the purchase offers, which Petitioner signed on or around May 24, 2023, but Respondent never submitted them to the seller or the seller's agent.
- Petitioner later asked Respondent if he had heard anything from the seller in response to Laura's offers.
- Respondent advised he had not heard back from the seller.
- Petitioner testified that she advised the Real Estate Board and action was taken.
- On May 31, 2023, Petitioner took a home pregnancy test which showed a faint positive result.
- Petitioner testified that after multiple positive pregnancy tests, she told the Respondent she was pregnant.
- Petitioner denies using hormones, someone else's urine, or altering the test at all.
- Petitioner found Respondent's reaction to be hostile and dismissive.
- On June 1, 2023, Petitioner went to Banner Urgent Care at Greenway and 64th Street, she informed the nurse that she believed she may be pregnant, and she asked for a test to determine whether she was, in fact, pregnant. (Ex. A. 2).
- The test result from Banner Urgent Care was positive for pregnancy. (*Id.*).
- Petitioner testified that for more than six months prior to May 2023, she was not sexually active with any other men. Based on this, Petitioner testified that she believed she was pregnant, and Respondent was the only potential father.
- June 19, 2023, Petitioner went to Respondent's home at his request.
- Respondent provided a pregnancy test for Petitioner to take. Conflicting testimony makes it difficult to ascertain whether the test was taken in front of the Respondent or with the bathroom door closed due to a shy bladder. Both parties agree the test was positive.
- In the "Something to Consider" email the Court finds the language to imply Respondent was attempting to buy into the idea that rubbing or grinding their genitals together might have led to a pregnancy. (Ex. A. 2). The Court, however, does not find the email conclusive that Respondent believed her to be pregnant with his children, but rather an attempt to consider her ascertains.
- In the "Something to Consider" email Respondent maintains that the lack of sexual intercourse would preclude him from being the father of the fetuses. The email does not deny the pregnancy test was positive. (Ex. A. 2).
- In the email, Respondent suggested that the positive test was the result of Petitioner's epilepsy medication.

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• Petitioner emailed Dr. Glynnis Zieman, MD from Barrow Concussion & Brain Injury Center on June 28, 2023. (Ex. A. 3). The subject of the email is "Pregnancy and Seizure Med?" (*Id.*).

- Petitioner denies sending Respondent an ultrasound video, citing instead that Greg Gillespie hacked into her email and sent the video to Respondent. (Ex. A. 5) (Ex. B. 49, p. 64).
- Petitioner testified that July 2, 2023, she anonymously sought care at a Planned Parenthood in Los Angeles. While she failed to provide records of any Planned Parenthood appointment, anonymous or under an alias, Respondent presumably sought records from all Mission Viejo Planned Parenthoods as that is where, up until today, Petitioner disclosed she sought care. (Ex. B. 49, p. 81, line 4). Petitioner testified that she had the sonogram at a Planned Parenthood in California either anonymously or under a pseudonym and changed the location to prevent Respondent from tracking down the records. The Court was not provided with those records at trial.
- Petitioner testified that on July 23, 2023, she experienced bleeding and passed two small fleshy objects smaller in size than her hand. She took pictures of the tissue and sought telehealth assistance.
- Petitioner testified that she texted a miscarriage hotline and sought telehealth assistance.
- The telehealth provider told Petitioner it was hard to tell if she miscarried and she should monitor the situation and seek further care as needed. Petitioner chose not to seek in person care that would have confirmed if she had been, still was, or had miscarried. The Court finds the "hard to tell" component of the telehealth visit was due to the nature of telehealth and the inability to provide care in the form of an exam, hCG test, blood test, ultrasound, or sonogram.
- Instead of seeking in-person care, Petitioner chose to take another hCG home pregnancy test on July 25, 2023, which was positive.
- Petitioner again took an at home test instead of seeking care on August 1, 2023.
- Petitioner testified that she made multiple appointments to see Dr. Makhoul. Three of the four appointments were rescheduled and then cancelled when the Petitioner tested positive for COVID. Dr. Makhoul's records indicate forty-four pages of records confirming making and cancelling appointments.
- The Court was not provided with evidence of the positive COVID test but maintains that the nature of her high-risk pregnancy would warrant a visit to the emergency room who would be equipped to care for a high-risk pregnancy wherein the Mother was COVID positive.

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- In August 2023, the parties agreed to a DNA test through Ravgen.
- Petitioner paid \$725 to Ravgen for the test, but Respondent failed to provide a sample and Petitioner canceled the test on August 18, 2023. (Ex. A. 5).
- The Court does not find the sexual contact between Petitioner and Respondent resulted in a pregnancy.
- The Court finds that if the Petitioner was pregnant, it is profoundly unlikely that conception occurred because of rubbing, grinding, or oral sex.
- During this litigation, if Petitioner had maintained consistently an allegation of sexual assault, coupled with a police report, or physical exam, the Court may find differently. Evidence and testimony, however, do not support this inconsistent contention.
- Petitioner admitted to changing an hCG test result to reflect 31,000. (Ex. B. 17). She further testified she altered the document using Adobe, but not Adobe Acrobat.
- In late September or early October, both parties submitted samples to Ravgen for DNA testing.
- October 16, 2023, the Petitioner's blood was drawn, and the results were hCG levels of 102. (Ex. A. 9). Petitioner changed the results to reflect 102,000.
- Petitioner testified that on October 18, 2023, she was aware the alleged pregnancies were not viable and filed the Request for Pre-Decree Mediation in the hopes that at mediation she could tell the Respondent that the pregnancy was no longer viable.
- Upon denial of her Request, however, she did not file a Motion to Dismiss or make other arrangements to advise Respondent of the development.
- The Court finds this testimony uncredible and a misuse of judicial resources.
- Petitioner was not treated by Dr. Makhoul, or Dr. Higley as testified to in her November 2, 2023, hearing on the IAH.
- Petitioner's alleged pregnancy was not treated by Dr. Makhoul, Dr. Higley, or any other in-person obstetrician or gynecologist.
- The Court finds failure to seek in person care for a high-risk pregnancy to be both unreasonable and uncreditable.
- The Court further finds that going to Banner for a pregnancy test, but not the passage of fetal tissue to be unreasonable and uncredible. A reasonable person, if seeking emergency room care to confirm a pregnancy, would not rely on telehealth to confirm the non-viability of the pregnancies.
- Petitioner testified that on November 14, 2023, she sought OB/GYN services from a facility, MomDoc, to determine whether she was allegedly still pregnant.

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- (Ex. A. 11). At that appointment, Petitioner took two pregnancy tests that were both negative.
- Petitioner testified that she currently weighs 91 pounds but weighed 133 in November 2023, during her MomDoc appointment. She experienced significant swelling in her abdomen and felt pregnant.
- The Court was presented with videos dated September 19, 2023, and October 9, 2023, Petitioner sent Respondent of her abdomen as evidence of pregnancy. (Ex. A. 6, 7). Dr. Medchill testified that while she appeared pregnant, that alone was not conclusive of pregnancy.
- Petitioner denies tampering with hCG tests but does admit to altering and fabricating ultrasounds and sonograms. She further testified that she changed the hCG numbers on two of the results. The Court finds little, if any difference, in altering the test itself for which she denies, and altering the results which she did tamper with by her own admission.
- During Petitioner's cross-examination, it became profoundly obvious that counsel for the Petitioner was attempting to coach her answers.
- Respondent's counsel, identifying the issue, moved between counsel and the Petitioner.
- From that point forward, the Petitioner began to exhibit extreme anxiety and unwillingness to answer questions.
- The Court had to remind the Petitioner twice that counsel would ask a question and she needed to answer it.
- At this time, Petitioner pushed back her chair and advised the Court she did not believe she was being treated fairly. The Court attempted to redirect Petitioner to no avail.
- At this time, Petitioner became emotional and asked for a brief recess, which the Court granted.
- The Court finds this interaction between counsel and Petitioner, diminishes the creditability and veracity of the Petitioner's responses during cross-examination.
- The Court finds it is impossible to determine the date of any alleged miscarriage, not because it is impossible, but rather because she failed to seek even a minimal level of care for her high-risk condition. Failure to demonstrate confirmation of ongoing pregnancy is a purposeful way to ensure Respondent would not be able to determine if she was pregnant and if so, for how long the pregnancy lasted.

Michael T. Medchill, MD

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• Dr. Michael T. Medchill, MD, a retired OB/GYN and prior Chair at St. Joseph's Hospital, testified that pregnancy is possible without sexual intercourse. Dr. Medchill testified that he delivered 30,000 babies during his practice and saw many patients for miscarriages.

- Dr. Medchill testified that he reviewed approximately 200 pages of Petitioner's medical records from Barrow Neurological Institute in Phoenix that included summaries of Petitioner's medications. He did not, however, review primary care or historical OB/GYN records.
- Dr. Medchill testified that none of the medication records he reviewed would cause a false positive home pregnancy test.
- Dr. Medchill testified that a false positive hCG test could be the result of epilepsy medication, anxiety medication, Clozapine, horse urine, or IVF prescribed injections ("trigger shots").
- When asked by the Court, Dr. Medchill testified he did not review any Planned Parenthood records from Mission Veijo or Los Angeles facilities.
- Dr. Medchill testified that a home pregnancy can detect pregnancy eleven days after conception.
- Dr. Medchill testified that he is 99.9% sure that the Petitioner was pregnant based on the hCG tests. He did not change his perspective after Petitioner's admissions on the stand that she altered more than one test to reflect higher, viable hCG numbers.
- The Court finds Dr. Medchill's testimony that .1% chance that Petitioner received a false positive due to several medications she is in fact taking, possible trigger shot for hCG, and a prior history of ovarian cancer to dimmish his creditability. Especially given that records that the Petitioner testified existed were not presented to her own expert for review and consideration.
- Dr. Medchill testified that a blood hCG level of 102 is proof of a non-viable pregnancy. While Dr. Medchill testified that a non-viable pregnancy is still a pregnancy, the Court finds that altering the number to reflect 102,000 which would be a viable pregnancy to indicate that she intended for the Respondent to believe that she was still pregnant with viable fetuses.
- Dr. Medchill concluded that the Petitioner became pregnant on May 20, 2023, and ended with a "spontaneous abortion" late October, early November, or possibly sooner in 2023. Given the alterations of the only records to indicate pregnancy the Court does not accept this conclusion.
- Dr. Medchill testified that woman may expel tissue during a spontaneous abortion, or the pregnancy might remain in her body, ultimately being reabsorbed.

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Given that the Petitioner testified under oath at a prior hearing that she was absolutely twenty-four weeks pregnant and had seen her doctor (presumably inperson) the Court does not accept that twenty-four-week-old twin fetuses would be reabsorbed into a mother's body. The Court further finds a miscarriage at that stage of pregnancy would result in emergency medical care and corresponding death certificates of the twins. If what Dr. Medchill testified to is true, and she miscarried much sooner, negating the need for the death certificates, then Petitioner perjured herself at a prior hearing.

Samantha Deans, MD, MPH

- Dr. Samantha Deans, MD, MPH, reviewed Petitioner's records and provided her analysis of the hCG results. (Ex. B. 39, 41). Additionally, she was the prior Associate Medical Director of Planned Parenthood in Florida, and Pennsylvania.
- She testified that Planned Parenthood does not accept anonymous patients. They do not accept patients using an alias. Patients are required to provide a government issued form of identification. She further testified that Planned Parenthood is not open on Sundays, when Petitioner testified, she sought care July 2, 2023.
- Dr. Deans testified that hCG does not confirm pregnancy. There must be serial hCG or an ultrasound and examination, which were never done, or never disclosed to the Court, the Respondent, Dr. Medchill or Dr. Deans.
- Dr. Deans reviewed the July 23, 2023, telehealth instructions that Petitioner "proceed to an emergency room for additional evaluation and care." (Ex. B. 41, p. CE0527). The instructions were not followed but Petitioner called the Abortion and Miscarriage Hotline which also recommended and encouraged the Petitioner to seek in-person medical care. (*Id.*).
- Dr. Deans testified that there is no data to indicate a conception date.
- After reviewing the records, Dr. Deans determined that the hCG tests were never dispositive of pregnancy and that the related miscarriage timeline, which included detailed analysis of the likely origin of hCG in Petitioner's blood and urine was not indicative of human gestational norms.
- Dr. Deans testified that heterophilic autoimmune responses due to exposure to animals could produce a positive hCG test, but the confirmation blood test would be negative.
- A prior history of cancer could also produce a positive hCG result. Petitioner has a prior history of ovarian cancer that prompted the surgical removal of her right ovary.

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• Familial hCG Syndrome can also produce a false positive hCG test. Dr. Deans testified that syndrome is very rare with only ten known cases in the world.

• Horse tranquilizers can create a positive hCG result.

Respondent, Clayton Echard

- Respondent denies all allegations of sexual intercourse.
- Respondent confirms both parties were under the influence of marijuana but denies being "high" and further denies memory loss because of the marijuana ingestion.
- Respondent testified that around May 22, 2023, he realized his behavior with Petitioner was unprofessional and he intended to discontinue a sexual relationship with the Petitioner. He testified that upon hearing this, the Petitioner became very emotional.
- Respondent testified that he told Petitioner he had submitted the offers to the seller. Respondent testified he did not believe the Petitioner was really interested in the properties.
- When asked if he had received any response, Respondent told Petitioner that he had not, but he never told Petitioner the reason why no response had been received i.e., because the offers had never been submitted.
- Respondent made knowingly false statements to Laura about the real estate purchase offers.
- Respondent testified that Petitioner sent him approximately 500 texts message using thirteen different phone numbers threatening to leak information to the media. (Ex. B. 3).
- Respondent testified that Petitioner reached out to "The Sun," called his family, co-workers, and prior girlfriends accusing him of being a deadbeat for not supporting her and the twins.
- Respondent testified that he received the video from Petitioner and continued to correspond with her over that email string which would reasonably prompt Petitioner to advise she did not send the video, but she did not advise of that at the time. (Ex. B. 11).
- Petitioner emailed Respondent "[y]ou can't say you haven't been given a voice when I have told you that I will have an abortion if we try things out for a few weeks and have a good reason for aborting the child...[t]hese words feel menacing because you know I like you and want to try things out with you." (Ex. B. 7). The email continues "[y]ou would be 'obliging' to make the decision to date exclusively before deciding whether or not we have an abortion." (Id.).

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• Petitioner encouraged Respondent to have sexual intercourse with her, citing she was "tight" and already pregnant.

- Petitioner further emailed Respondent that he had control of the outcome of the pregnancy "if we date exclusively and care for each other." (Ex. B. 6). On June 28, 2023, she said "[i]f you think about it, having sex with me is the safest thing you can do at this point. I'm already pregnant and if we choose to go this route (and trust each other enough to have sex), then we are at the point where I would be taking abortion pills...so there's no risk." (Id.).
- Petitioner told Respondent the twins were a boy and a girl.
- Petitioner provided Respondent with a sonogram that was posted on YouTube seven years ago. Petitioner admitted to this during her deposition (Ex. A. 28).
- Petitioner sent a threatening letter to Respondent indicating her intention to sue him for 1.4 million dollars in collateral allegations unless he agreed to dismiss this action that she initiated. (Ex. B. 55).
- Petitioner signed a release of records for Dr. Jeffrey Blake Higley, MD at Women's Care. In a letter dated March 18, 2024, the provider advised "[w]e have no record of treatment for the date(s) of service you request." (Ex. B. 59, p. OWENS 2).

VALIDITY OF PETITIONER'S ORDER OF PROTECTION

In this case, the gravamen of Respondent's position is that Petitioner has fabricated her pregnancy, a condition which cannot have resulted from the parties' interactions, because according to Respondent they never had sexual intercourse. But he does admit that the pair engaged in oral sex. Respondent seeks to have the protective order invalidated based on the alleged fabrication, while Petitioner essentially argues that even if she was never pregnant, the sexual activity between the two, and Respondent's subsequent harassing online conduct, are sufficient to sustain the order regardless.

There is a predicate issue that should be addressed which goes to the Court's authority to reconsider the protective order at all. Put simply, extant appellate authority, namely *Vera v. Rogers*, 246 Ariz. 30 (Ct. App. 2018) and like cases, precludes reconsideration here.

In *Vera*, Mother applied for a protective order in Phoenix Municipal Court, but it was eventually transferred to the superior court after Father petitioned to establish legal decision-making authority, parenting time, and child support here. After a contested hearing, the commissioner handling the order of protection affirmed it in its entirety. Father then filed a

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special action, asking the court of appeals to order the family court to amend the order of protection to align it with the temporary parenting-time orders it had made in the separate case. The court of appeals accepted the special action, finding it raised a "purely legal issue of first impression that is of statewide importance," to wit, "the interplay between the procedural rules and statutes governing protective orders and family law proceedings." (*Id.* at 33).

The court of appeals first recognized that the superior court, pursuant to ARFLP 5(A), has the authority to hold a joint hearing to concurrently consider both actions so that it may harmonize the orders. But having said that, the court noted that the superior court's "authority to modify an order of protection only exists pursuant to the statutes and rules controlling protective orders." (Id. at 34). And those statutes and rules prevented the relief Father sought in Vera, because another superior court officer had already affirmed the contested order of protection. Indeed, the court stated that "[o]nce [a contested] hearing has been held, an affirmed order of protection may be amended or dismissed only in two ways: (1) by a request of the party protected by the order, Ariz. R. Protect. Ord. P. 40(a), 641(a); or (2) by appeal, Ariz. R. Protect. Ord. P. 42(a)(2), (b)." (Id. at 35). Because Mother had not requested amendment, and Father did not appeal from what amounted to a final judgment, he could not obtain relief, and the family court had no power to amend the protective order. Put another way, "a superior court judicial officer is not to engage in horizontal appellate review of another judicial officer's decision to affirm an order of protection." (Id. at 36; see also Davis v. Davis, 195 Ariz. 158, 161, ¶ 11) (App. 1999) (holding that "a superior court judge has no jurisdiction to review or change the judgment of another superior court judge when the judgment has become final").

Just like in *Vera*, absent a move by Petitioner to modify or dismiss the protective order, Respondent's "sole remedy was to appeal" the final ruling affirming it after the contested hearing. (*Id.* at 36). Although *Vera* did not involve fraud, this Court was unable to identify any cases collaterally challenging a final protective order judgment on Rule 85 grounds in a separate family court proceeding, nor any authority suggesting that *Vera*'s exclusive roadmap (which is rooted in ARPOP 40 & 41) for amending or dismissing a final order of protection judgment is subject to an exception based on Rule 85 review. This Court's power to invalidate the order is foreclosed by *Vera*.

Even if *Vera* did not foreclose this Court's review, Respondent cannot prevail here (despite what appears to be a case of serial fabrications here and elsewhere by Petitioner). Under A.R.S. § 13-3601(A)(6), the parties admittedly had a relationship that was "previously . . . romantic or sexual," however fleeting it might have been. Petitioner thus had a statutory avenue to seek a protective order, regardless of whether she fabricated her pregnancy. Moreover, Commissioner Doody did not issue the order based solely, or even primarily, on the "fact" of

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Petitioner's pregnancy. Indeed, his initial order required that Respondent not contact Petitioner or "communicate or post untrue or harassing comments regarding Plaintiff online, including but not limited to social media, and shall not cause others to" do the same. (Dkt. No. 3, Case No. 2023-052771 filed October 6, 2023). Moreover, Petitioner's initial Petition referenced a myriad of communications Respondent made to her that could be deemed threatening per the statutory guidelines and appears to have prompted Commissioner Doody to confirm the order after the hearing. Thus, even if Petitioner's broader pregnancy allegations are proven untrue, one aspect of the court's order indicated that it found Respondent had engaged in harassing conduct, so even on the merits there is no cause to invalidate the final judgment.

Vera v. Rogers forecloses not only reviewing the orders in principle but also prevents tinkering at the margins as well. If the superior court cannot "engage in horizontal appellate review of another judicial officer's decision to affirm an order of protection," 246 Ariz. at 36, there is no way that the Court can otherwise review portions of those decisions piecemeal either. The parties' remedies as to both decisions were to appeal and have the appellate court review the entirety of those decisions. Both had hearings as to their respective orders, and under ARPOP 42(a)(2), "[a]n Order of Protection, an Injunction Against Harassment, or an Injunction Against Workplace Harassment that is entered, affirmed, modified, or quashed after a hearing at which both parties had an opportunity to appear" is appealable.

SANCTIONS

ARFLP 26(b) provides that "by signing a pleading, motion or other document, the attorney or party certifies to the best of the person's knowledge, information, and belief formed after reasonable inquiry: (1) it is not being presented for any improper purposes, such as to harass . . . (2) the claims, defenses, and other legal contentions are warranted by existing law . . . (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery . . . "Meanwhile, Rule 26(c) provides that "if a pleading, motion, or other document is signed in violation of this rule, the court—on motion *or on its own*—may impose on the person who signed it, a represented party, or both, an appropriate sanction, which may include an order to pay to the other party or parties the amount of the reasonable expenses incurred because of the filing of the document, including a reasonable attorney fee." (emphasis added).

In this case, Respondent filed a Motion for Sanctions Pursuant to Rule 26 on January 3, 2024, arguing that "Petitioner filed the underlying action for an improper purpose without medical evidence to support her claim that she was pregnant and/or that she was pregnant by Respondent." (Dkt. No. 40 at 1). However, after significant motion practice between the parties'

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attorneys, Respondent filed a Motion to Withdraw Motions for Sanctions Pursuant to Rule 26 on April 3, 2024, while retaining his other claims under A.R.S. §§ 25-324, 25-415, 25-809. (Dkt. No. 76). The question thus becomes, can the court still award Rule 26 sanctions, considering Respondent's withdrawal of his motion.

As already noted above, ARFLP 26(c) expressly provides that the court can sanction a party for a violation "on its own." The Court was unable to locate any decisions pertaining to whether the withdrawal of a party's Rule 26 sanctions motion precludes a sua sponte court award. But, as a matter of plain meaning and strict interpretation, it would seem not to matter whether a party ever files a motion or even whether that party does file a motion and then withdraws it—a court may still award the sanctions it deems appropriate, based on the conduct it deems to violate the rule. Indeed, if per Rule 26(c) the court can at any time award sanctions of its own accord and on its own findings, absent invitation, the withdrawal of a party's motion to do so would not seem to vitiate or in any way affect that power, as a matter of plain logic. So, for instance, if the Court were to here find that Petitioner fabricated her pregnancy to provide leverage against Respondent in order to secure a long-term relationship with him and all its attendant benefits, Rule 26(c) would appear without doubt to provide it the authority to "order [her] to pay [Respondent his] reasonable expenses . . . including a reasonable attorney fee," regardless of any prior filings by the parties. That is because that fabrication, if adjudicated as such, would have been the predicate for her initial petition and many, indeed all, of the motions that came after it.

Although there is a dearth of case law on this issue, other rules confirm that the family court has the authority to award sanctions on its own. Rule ARFLP 76.2(a)(1), for instance, provides that "[i]n a pre-judgment or post-judgment proceeding, the court upon motion *or its own initiative* may impose sanctions if a party or attorney: (1) fails to obey a scheduling or pretrial order; (2) fails to appear at a Resolution Management Conference, a scheduling conference, an evidentiary hearing, a trial, or other scheduled hearing; (3) is substantially unprepared to participate in a conference, hearing or trial; (4) fails to participate in good faith in a conference, hearing, or trial, or in preparing a resolution statement, scheduling statement, or pretrial statement." (emphasis added). And the remedies available include, in addition to substantive sanctions, ordering the party at fault "to pay reasonable expenses--including attorney fees, an assessment to the clerk, or both--caused by any noncompliance with a court order." ARFLP 76.2(c); *see also Hamby v. Hamby*, No. 1 CA-CV 19-0498 FC, 2020 WL 4717115, at *2 (Ariz. Ct. App. Aug. 13, 2020) (confirming power of court to award sanctions on its own initiative under ARFLP 76). Rule 71 provides for a similar power in the settlement and ADR context.

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Additionally, as is evident from their near textual identicality, and per the *Arizona Family Law Rules Handbook*, "ARFLP 26 is based on [Arizona Rule of Civil Procedure] 11." 3

Comparison with Civil Rules, 13 Ariz. Prac., *Family Law Rules Handbook* Rule 26. And Rule 11 also expressly provides that in the event of a violation "the court—on motion or on its own—may impose on the person who signed it, a represented party, or both, an appropriate sanction." And in the Rule 11 context, the Court of Appeals has concluded that a trial court may impose sanctions even after a complaint has been dismissed for lack of prosecution. *See Britt v. Steffen*, 220 Ariz. 265 (App. Div.1 2008). This lends credence to the idea that the family court's inherent authority to award sanctions under ARFLP 26 should not be read to be limited by the course of the case or by the litigation strategy pursued by the parties. The power is there by rule and can be used by the court when necessary and appropriate.

NON-PATERNITY

A.R.S. § 25-814(A)(2) provides a man is presumed to be the father of a child if "[g]enetic testing affirms at least a ninety-five percent probability of paternity." A.R.S. § 25-814 (C) provides a man is presumed to be the father based on DNA testing, that may only be rebutted by clear and convincing evidence. Based on a lack of confirmed pregnancy and repetitive Ravgen results of "little to no fetal DNA" the Court cannot establish that Petitioner was pregnant. The Court cannot establish paternity of a nonconfirmed pregnancy lacking DNA evidence despite testing twice. Here, two test results of "little to no fetal DNA" fall woefully short of the 95% required to meet the burden of clear and convincing evidence that Respondent was the father of Petitioner's alleged pregnancy.

ATTORNEY FEES AND COSTS

Clayton Echard has requested an award of attorney fees and costs. An award of attorney fees and costs is governed by A.R.S. § 25-324. A.R.S. § 25-324 provides as follows:

A. The court from time to time, after considering the financial resources of both parties and the reasonableness of the positions each party has taken throughout the proceedings, may order a party to pay a reasonable amount to the other party for the costs and expenses of maintaining or defending any proceedings under this chapter or chapter 4, article 1 of this title. On request of a party or another court of competent jurisdiction, the court shall make specific findings concerning the portions of any award of fees and expenses that are based on consideration of financial resources and that are based on consideration of reasonableness of positions. The court may make these findings before, during

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or after the issuance of a fee award.

- B. If the court determines that a party filed a petition under one of the following circumstances, the court shall award reasonable costs and attorney fees to the other party:
 - 1. The petition was not filed in good faith.
 - 2. The petition was not grounded in fact or based on law.
 - 3. The petition was filed for an improper purpose, such as to harass the other party, to cause an unnecessary delay or to increase the cost of litigation to the other party.
- C. For the purpose of this section, costs and expenses may include attorney fees, deposition costs and other reasonableness expenses as the court finds necessary to the full and proper presentation of the action, including any appeal.
- D. The court may order all amounts paid directly to the attorney, who may enforce the order in the attorney's name with the same force and effect, and in the same manner, as if the order had been made on behalf of any party to the action.

THE COURT FINDS there is no substantial disparity of financial resources between the parties. Petitioner did not provide an AFI but testified she and her mother collectively earn \$200,000 a year. Respondent filed an AFI on May 15, 2024, citing monthly income of \$12,000, and annual income of \$144,000.

THE COURT FURTHER FINDS that Petitioner acted unreasonably in the litigation. Specifically, Petitioner acted unreasonably when she initiated litigation without basis or merit. Without an authentic ultrasound, sonogram, physical examination, and in conjunction with a belief she passed tissue in July 2023, the Court finds the underlying Petition premature at best. At worst, however, fraudulent and made to incite communication, a relationship, or both, with the Respondent. The Court further finds that filing a motion seeking mediation for the purpose of telling the Respondent that the pregnancies were not viable disingenuous at best but certainly misleading to the Court. If the purpose of the motion was in fact to attend mediation, then the Petitioner perjured herself today when she said the purpose of the mediation was to tell the Respondent about the miscarriage. Either way, Respondent likely incurred costs associated with this litigation prior to retaining counsel and he is entitled to reimbursement for those costs.

THE COURT FURTHER FINDS that Petitioner repetitively failed to comply with Rule 49, even on Order of this Court. Further compounded by the fact that on the day of trial, she testified that she anonymously sought care at a Planned Parenthood in Los Angeles. While she failed to provide records of any Planned Parenthood appointment, anonymous or under an alias, Respondent presumably sought records from all Mission Viejo Planned Parenthoods as that

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is where, up until today, Petitioner disclosed she sought care. This undoubtably, caused Respondent to incur substantial legal fees attempting to locate records that may, or may not exist in Los Angeles but now appear to have never existed in Mission Viejo. Additionally, Petitioner acknowledged she altered hCG test results, an ultrasound and sonogram.

THE COURT FURTHER FINDS that the provisions of A.R.S. § 25-324(B) do apply because the petition was not filed in good faith, the petition was not grounded in fact or based on law, the petition was filed for an improper purpose, such as to harass the other party, to cause an unnecessary delay or to increase the cost of litigation to the other party. Here, the Court finds Petitioner provided false testimony as to the viability of the pregnancy in all three cases addressed in the procedural history. Additionally, prior to her deposition, Petitioner sent a threatening letter to Respondent indicating her intention to sue him for 1.4 million dollars in collateral allegations unless he agreed to dismiss this action that she initiated.

THE COURT FURTHER FINDS that Laura Owens knowingly presented a false claim, knowingly violated a court order compelling disclosure or discovery such that an award of attorney fees and costs is appropriate under A.R.S. § 25-415.

IT IS THEREFORE ORDERED granting Clayton Echard's request for attorney fees and costs associated with FC2023-052114.

IT IS FURTHER ORDERED denying Clayton Echard's request for attorney fees and costs associated with the OOP and IAH hearings referencing the analysis above.

IT IS FURTHER ORDERED that Laura Owens shall pay Clayton Echard's reasonable attorney fees and costs. Not later than July 8, 2024, Respondent and counsel for Clayton Echard shall submit all necessary and appropriate documentation to support an application for an award of attorney fees and costs, including a *China Doll* Affidavit and a form of proposed order. By no later than July 29, 2024, Laura Owens shall file any written objection and a form of proposed order. If Clayton Echard's counsel fails to submit the documentation by July 8, 2024, no fees or costs will be awarded. The Court shall determine the award and enter judgment upon review of the Affidavit as well as any objections.

ADDITIONAL ORDERS

IT IS FURTHER ORDERED granting the Respondent's Petition for Non-Paternity.

IT IS FURTHER ORDERED, the Court having determined that Laura Owens has a pattern of similar, if not identical behavior, and court involvement, referring this matter to the Maricopa County Attorney's Office for review of Laura Owen's actions pursuant to A.R.S § 13-

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2702 and A.R.S § 13-2809. Accordingly, the Maricopa County Attorney's Office will be endorsed on this Order.

The Court must decide the amount of attorney's fees and costs to be awarded but finds there is no just reason to delay making a final order.

IT IS THEREFORE ORDERED pursuant to Rule 78(b), Arizona Rules of Family Law Procedure, that this is a final judgment, and it shall be entered by the Clerk. The time for appeal begins upon entry of this judgment by the Clerk. For more information on appeals, see Rule 8 and other Arizona Rules of Civil Appellate Procedure.

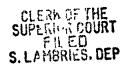
IT IS FURTHER ORDERED denying any affirmative relief sought before the date of this Order that is not expressly granted above.

Done in open Court on: 06/17/2024

HONORABLE Julie Mata

All parties representing themselves must keep the Court updated with address changes. A form may be downloaded at: https://superiorcourt.maricopa.gov/llrc/fc_gn9/

EXHIBIT B



25 MAY - 1 PM 3: 23

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

THE STATE OF ARIZONA,

Plaintiff,

VS

LAURA MICHELLE OWENS,

Defendants.

CR 2025 0 0 6 8 3 1 * 0 0 1

INDICTMENT 896 GJ 480

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY (Laura Michelle Owens)

COUNT 2: FORGERY, A CLASS 4 FELONY

(Laura Michelle Owens)

COUNT 3: PERJURY, A CLASS 4 FELONY

(Laura Michelle Owens)

COUNT 4: PERJURY, A CLASS 4 FELONY

(Laura Michelle Owens)

COUNT 5: PERJURY, A CLASS 4 FELONY

(Laura Michelle Owens)

COUNT 6: PERJURY, A CLASS 4 FELONY

(Laura Michelle Owens)

COUNT 7: TAMPERING WITH PHYSICAL EVIDENCE, A CLASS 6 FELONY (Laura Michelle Owens)

The Grand Jurors of Maricopa County, Arizona, accuse LAURA MICHELLE OWENS, on May 1, 2025, charging that in Maricopa County, Arizona.

COUNT 1

LAURA MICHELLE OWENS, on or between May 17, 2023 and June 10, 2024, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit from Clayton Ray Echard, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A R S §§ 13-2310, 13-701, 13-702, and 13-801

COUNT 2:

LAURA MICHELLE OWENS, on or between June 27, 2023 and July 11, 2023, with intent to defraud, did falsely make, complete, or alter a written instrument, to-wit: Sonogram, in violation of A.R.S. §§ 13-2002, 13-2001, 13-701, 13-702, and 13-801.

COUNT 3

LAURA MICHELLE OWENS, on or about October 25, 2023, in regard to a material issue and believing it to be false, did make a false sworn statement, to-wit. Testifying in Front of Judge John Doody that she had not been intimate with anyone else since March 2022, in violation of A R S §§ 13-2701, 13-2702, 13-2706, 13-701, 13-702, and 13-801

COUNT 4.

LAURA MICHELLE OWENS, on or about March 1, 2024, in regard to a material issue and believing it to be false, did make a false sworn statement, to-wit: Claiming that Sonogram image was hers during sworn deposition, in violation of A R S §§ 13-2701, 13-2702, 13-2706, 13-701, 13-702, and 13-801

COUNT 5:

LAURA MICHELLE OWENS, on or about March 1, 2024, in regard to a material issue and believing it to be false, did make a false sworn statement, to-wit. video clip of father touching pregnant belly, in violation of A R.S §§ 13-2701, 13-2702, 13-2706, 13-701, 13-702, and 13-801

COUNT 6:

LAURA MICHELLE OWENS, on or about June 10, 2024, in regard to a material issue and believing it to be false, did make a false sworn statement, to-wit: Claiming, "That's me showing my pregnant stomach", in violation of A.R S §§ 13-2701, 13-2702, 13-2706, 13-701, 13-702, and 13-801

COUNT 7

LAURA MICHELLE OWENS, on or about June 10, 2024, with intent that it be used, introduced, rejected or made unavailable in an official proceeding which was then pending or which LAURA MICHELLE OWENS knew was about to be instituted, did destroy, mutilate, alter, conceal or remove physical evidence, to-wit Exhibits A-6 and A-

7 used during June 10, 2024 hearing, with the intent to impair its verity or availability, in violation of A R.S §§ 13-2809, 13-2801, 13-701, 13-702, and 13-801.

("A[\]True Bill")

RACHEL H. MITCHELL

MARICOPA COUNTY ATTORNEY

Edward Leiter

Deputy County Attorney

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11/1/ xm//...h/

FOREPERSON OF THE GRAND JURY

EXHIBIT C



Attn: My Health Online P.O. Box 255386

Sacramento, California 95865-5386

Name: Laura M Owens I DOB: 5/14/1990 I 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

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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Attn: My Health Online P.O. Box 255386

Sacramento, California 95865-5386

Name: Laura M Owens I DOB: 5/14/1990 I 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 your during recovery.

Best regards,

Rebecca Yee, MD

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EXHIBIT D

San Francisco Police Department REPORTEE FOLLOW-UP

Case Number: 180018711

on facts obtained during the initial investigation.

Company A	(Central)	315-2400
Company B	(Southern)	575-6000
☐ Company C	(Bayvlew)	671-2300
☐ Company D	(Mission)	558-5400
☐ Company E	(Northern)	614-3400
☐ Company F	(Park)	242-3000
Company G	(Richmond)	666-8000
☐ Company H	(Ingleside)	404-4000
☐ Company I	(Taraval)	759-3100
☐ Company J	(Tenderloin)	345-7300

Please contact the investigation unit checked above to provide additional information not available during initial police report.

Information such as:

- Serial numbers of lost or stolen items
- Video evidence of the incident
- Name(s) of possible witness(es) or suspect(s)

BOWAN 2059
Officer's Name and Star No. SFPD105 (rev.03/15)



EXHIBIT E



I've answered all your questions today and have asked you to get help. I told you to prove it with actions. I'm not going to keep taking more questions until I see you do something for me.

iMessage [3] 2<u>016-12-11 05:30:40 (UTC)</u> Participants: (415) I'm tired of doing your merry go round and want you to get help iMessage 2016-12-11 05:32:48 (UTC) [3] Sender: (415) Participants: (415) Self (□I just said that iMessage 2016-12-11 05:32:48 (UTC) [3] Sender: (415) Self (Participants: (415) I'm going to check myself in now I'm on my way iMessage 2016-Ĭ2-11 05:32:48 (UTC) [2][4] Sender: (415) Participants: (415)), Self (□I just said that iMessage 2016-12-11 05:32:48 (UTC) [2][5][6] Sender: (415) Participants: (415)), Self (IMG_0024.PNG iMessage 2016-12-11 05:32:48 (UTC) [2] Sender: (415) Participants: (415)), Self (I'm going to check myself in now I'm on my way iMessage [2] 2016-12-11 05:34:56 (UTC) Sender: Self (Participants: (415)), Self (Yes trying to be really nice iMessage 2016-12-11 15:38:40 (UTC) [2] Sender: (415)), Self Participants: (415) I thought that would mean something to you iMessage 2016-12-11 15:38:40 (UTC) [1] Sender: (415) Participants: (415)), Self (I don't have my first appointment until 8 so I get to check my phone. I am really upset. I was trying to be really nice iMessage 2016-12-11 15:38:40 (UTC) [1] Sender: (415) Participants: (415)), Self (I thought that would mean something to you iMessage 2016-Ĭ2-11 <u>15:45:04 (UTC) [1]</u> Sender: (415)), Self Participants: (415) I mean to be this fantastic partner for you and I don't know why that seems to annoy you. It's not that I don't want to live in the present. I was trying to thank you and let you know you deserve the best and that's what I want to be for you iMessage 2016-Ĭ2-11 15:45:04 (UTC) [2] Sender: (415)), Self (Participants: (415) I mean to be this fantastic partner for you and I don"t know why that seems to annoy you. It"s not that I don"t want to live in the present. I was trying to thank you and let you know you deserve the best and that"s what I want to be for you iMessage 2016-12-11 <u>15:49:20 (UTC) [2]</u> Sender: (415)), Self Participants: (415) Please get back to me before I lose my phone iMessage 2016-Ĭ2-11 <u>15:49:20 (UTC</u>) [1] Sender: (415) Participants: (415)), Self Please get back to me before I lose my phone iMessage 2016-12-11 15:55:44 (UTC) [1] Sender: (415)), Self (Participants: (415) I'm really worried you're upset with me

I don"t have my first appointment until 8 so I get to check my phone. I am really upset. I was

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iMessage
2016-12-11 15:55:44 (UTC) [2]
Sender: (415)
                                                ), Self (
Participants: (415)
I'm really worried you"re upset with me
iMessage
2016-12-11 16:02:08 (UTC) [2]
Sender: (415)
Participants: (415)
                                                ), Self
Please say something :( :(
iMessage
2016-12-11 16:02:08 (UTC) [1]
Sender: (415)
                                                ), Self (
Participants: (415)
Please say something:(:(
iMessage
2016-12-11 17:04:00 (UTC) [1]
Sender: (415)
Participants: (415)
                                                ), Self (
I begged for my phone back after the first session. Please get back to me. I can't focus
iMessage
2016-12-11 17:04:00 (UTC) [2]
Sender: (415)
Participants: (415)
                                                ), Self (
I begged for my phone back after the first session. Please get back to me. I can''t focus
iMessage
2016-12-11 17:29:36 (UTC) [2]
Sender: (415)
Participants: (415)
                                                ), Self (
Please. My next session is at 10 and now I'm really worried you"re not getting back. I won"t
get to check my phone again
iMessage
2016-12-11 17:29:36 (UTC) [1]
Sender: (415)
Participants: (415)
                                                ), Self (
Please. My next session is at 10 and now I'm really worried you're not getting back. I won't get
to check my phone again
iMessage
2016-Ĭ2-11 17:48:48 (UTC) [1]
Sender: (415)
                                                ), Self
Participants: (415)
iMessage
2016-12-11 17:48:48 (UTC) [2]
Sender: (415)
Participants: (415)
                                                  Self (
```

```
iMessage
2016-12-11 17:53:04 (UTC) [2]
Sender: (415)
Participants: (415) ), Self ( )
```

Please, I don't feel like I can do this right now because I have clearly pissed you off

Notes	
[1] Source Device	BCF1237.E01/Macintosh HD
[1] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2016-12-13/+1 (415) 810-0604 on 2016-12-10 at 16.21.20.ichat
[2] Source Device	BCF1237.E01/Macintosh HD
[2] Source File	/Users/michaelmarraccini/Library/Messages/chat.db

Tag: Laura text messages (9001-9100 of 19636)

Communications Message	
iMessage 2016-12-11 17:53:04 (UTC) [1] Sender: (415)) Participants: (415)), Self ()	
Please, I don't feel like I can do this right now because I have clearly pissed you off	
iMessage 2016–12–11 17:57:20 (UTC) [1] Sender: (415) Participants: (415)), Self ()	
I just want to check myself out now. I've fucked everything up.	
iMessage 2016–12–11 17:57:20 (UTC) [2] Sender: (415) Participants: (415)), Self ()	
I just want to check myself out now. I"ve fucked everything up.	
iMessage 2016–12–11 18:37:52 (UTC) [2] Sender: (415) Participants: (415)), Self ()	
Please say something. I cannot focus at all and I don't understand why what I said didn't mean anything to you. I want to be this great partner and all that seems to do is frustrate you and I don't get why	
iMessage 2016–12–11 18:37:52 (UTC) [1] Sender: (415) Participants: (415)), Self ()	
Please say something. I cannot focus at all and I don't understand why what I said didn't mean anything to you. I want to be this great partner and all that seems to do is frustrate you and I don't get why	
iMessage 2016-12-11 18:52:48 (UTC) [1] Sender: (415) Participants: (415)), Self ()	

```
iMessage
2016-Ĭ2-11 <u>18:52:48 (UTC)</u> [2]
Sender: (415)
                                                 ), Self (
Participants: (415)
                              ((415)
iMessage
2016-12-11 19:24:48 (UTC) [2]
Sender: (415)
                                                 ), Self (
Participants: (415)
I need to just check myself out. I can't do this
iMessage
2016-Ĭ2-11 <u>19:24:48 (</u>UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                              (415)
                                                 ), Self (
I need to just check myself out. I can't do this
iMessage
2016-12-11 19:35:28 (UTC) [1]
Sender: (415)
                              5)
                                                ), Self (
                              (415)
Participants: (415)
Please I want to stay and get better but I just feel like I have screwed everything up
iMessage
2016-12-11 19:35:28 (UTC) [2]
Sender: (415)
                         ((415)
Participants: (415)
                                                ), Self (
Please I want to stay and get better but I just feel like I have screwed everything up
iMessage
2016-12-11 20:33:04 (UTC) [2]
Sender: (415)
                         (415)
Participants: (415)
                              ((415)
                                                 ), Self (
Please
iMessage
2016-12-11 20:33:04 (UTC) [1]
Sender: (415)
                         (415)
Participants: (415)
                                                 ), Self (
Please
iMessage
2016–12–11 20:48:00 (UTC) [1]
Sender: (415) (415)
Participants: (415)
                                                 ), Self (
Are you ok?????
iMessage
2016-12-11 20:48:00 (UTC) [2]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
```

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Are you ok????
iMessage
2016-Ĭ2-11 21:13:36 (UTC) [2]
                            ((415)
Sender: (415)
                                                      ), Self (
Participants: (415)
                                 (415)
Should I text Stephanie
iMessage
2016-12-11 21:13:36 (UTC) [1]
Sender: (415)
                                                      ), Self (
Participants: (415)
Should I text Stephanie
iMessage
2016-12-11 21:47:44 (UTC) [1]
                            ( (4<u>1</u> 5)
Sender: (415)
Participants: (415)
                                  (415)
                                                      ), Self (
Mike????
iMessage
2016-12-11 21:47:44 (UTC) [2]
Sender: (415)
Participants: (415)
                            ((4)5)
                                                      ), Self (
                                  (415)
Mike????
iMessage
2016-12-11 21:49:52 (UTC) [2]
Sender: (415)
                           (<u>(4</u>15)
Participants: (415)
                                                      ), Self (
I"m not even supposed to have a phone at all. I just can"t focus on getting better or therapy or anything because I don"t know what is going on with you and if I have screwed up
everything, which I think I have, and I hate myself for it so much
iMessage
2016-12-11 21:49:52 (UTC) [1]
Sender: (415)
                            (41
                                                      ), Self (
Participants: (415)
                                  (415)
I'm not even supposed to have a phone at all. I just can't focus on getting better or therapy or
anything because I don't know what is going on with you and if I have screwed up everything, which I think I have, and I hate myself for it so much
iMessage
2016-Ĭ2-11 22:34:40 (UTC) [1]
Sender: (415)
                            (415)
Participants: (415)
                                 ((415)
                                                      ), Self (
Hello????
iMessage
2016-12-11 22:34:40 (UTC) [2]
Sender: (415)
                            <u>( (4</u>15)
                                                      ), Self (
Participants: (415)
Hello????
```

```
iMessage
2016-12-12 03:39:44 (UTC) [2]
Sender: (415)
Participants: (415)
                                                     ), Self (
I have my phone for a bit. I just finished for the day and am feeling better but am extremely
worried about you
iMessage
2016-12-12 03:39:44 (UTC) [1]
Sender: (415)
                                                     ), Self (
Participants: (415)
I have my phone for a bit. I just finished for the day and am feeling better but am extremely
worried about you
iMessage
2016-12-12 06:17:36 (UTC) [1]
Sender: (415)
                                                     ), Self (
Participants: (415)
I got to check my phone one more time. I am praying nothing happened to you and that your
stepdad is getting better. I'm so sorry for what I put you through and care about you more
than you know. This place is absolute hell and I will never come back. Please text me back as
soon as you get this and know how important you and your happiness is to me. I am learning the tools to make myself happy and in turn make you happy. I am here at least through
tomorrow afternoon as I don't think I am ready to go home (even though the 24 hour hold is
lifted) and then I am going to continue really thorough outpatient treatment in the mornings
for a while.
iMessage
2016-12-12 06:17:36 (UTC) [2]
Sender: (415)
                           ((415)
Participants: (415)
                                                     ), Self (
I got to check my phone one more time. I am praying nothing happened to you and that your stepdad is getting better. I'm so sorry for what I put you through and care about you more
than you know. This place is absolute hell and I will never come back. Please text me back as
soon as you get this and know how important you and your happiness is to me. I am learning
the tools to make myself happy and in turn make you happy. I am here at least through
tomorrow afternoon as I don't think I am ready to go home (even though the 24 hour hold is
lifted) and then I am going to continue really thorough outpatient treatment in the mornings
for a while.
iMessage
2016-12-12 15:42:56 (UTC) [2]
 Sender: (415)
                                                     ), Self (
Participants: (415)
Will you please keep up your end of the "boyfriend" bargain if I stay here longer
iMessage
2016-12-12 15:42:56 (UTC) [1]
Sender: (415)
                           (415)
                                                    ), Self (
Participants: (415)
                                 ((415))
Will you please keep up your end of the "boyfriend" bargain if I stay here longer
                                                                                                iMessage
                                                                      [1] 2016-12-12 15:45:04 (UTC)
                                                              Sender: Self (
                Participants: (415) (415)
                                                                    ), Self (
                                                                                                  In time
```

```
iMessage
2016-12-12 20:18:08 (UTC) [2]
Sender: (415)
Participants: (415)
I will really try. Just please try not to resent me forever for the weekend. I will work to build
your trust up
iMessage
2016-12-12 20:18:08 (UTC) [1]
Sender: (415)
Participants: (415)
I will really try. Just please try not to resent me forever for the weekend. I will work to build
your trust up
iMessage
2016-12-12 20:22:24 (UTC) [1]
Sender: (415)
Participants: (415)
                                                  ), Self (
I care about you more than I can say
iMessage
2016-12-12 20:22:24 (UTC) [2]
Sender: (415)
                          (415)
                                                  ), Self (
Participants: (415)
I care about you more than I can say
iMessage
2016-12-12 <u>20:26:40 (</u>UTC) [2]
Sender: (415)
Participants: (415)
                          ((4)5)
                                (415)
And I want to get better so I can better myself and be good to myself and everyone around me
and then we can go step by step the right way. Can we just be partners in that? I'm sorry we
have been at each other's throats and I want to show you I mean it
iMessage
2016-Ĭ2-12 20:26:40 (UTC) [1]
Sender: (415)
Participants: (415)
                               (415)
                                                  ), Self (
And I want to get better so I can better myself and be good to myself and everyone around me
and then we can go step by step the right way. Can we just be partners in that? I'm sorry we have been at each other"s throats and I want to show you I mean it
iMessage
2016-12-12 20:30:56 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
(I will lose my phone soon so if you could respond it would mean a lot)
iMessage
2016-12-12 20:30:56 (UTC) [1]
Sender: (415)
                          (415)
Participants: (415)
                                                  ), Self (
                               (415)
And I also have one more thing
```

```
iMessage
2016-12-12 20:30:56 (UTC) [2]
Sender: (415)
Participants: (415)
And I also have one more thing
iMessage
2016-12-12 20:30:56 (UTC) [2]
Sender: (415)
                           ((4\dot{1}5)
                                 (415)
Participants: (415)
                                                     ). Self (
(I will lose my phone soon so if you could respond it would mean a lot)
iMessage
2016-12-12 20:35:12 (UTC) [2]
Sender: (415)
                           l ( (415)
                                                     ), Self (
Participants: (415)
I'll call you when I get my phone back
iMessage
2016-12-12 20:35:12 (UTC) [1]
Sender: (415)
                           (415)
Participants: (415)
                                                     ), Self (
                                 (415)
I'll call you when I get my phone back
iMessage
2016-12-13 05:26:24 (UTC) [1]
Sender: (415)
                                                     ), Self (
Participants: (415)
                                 ((415))
I really wanted to share something with you from today.
iMessage
2016-12-13 05:26:24 (UTC) [3]
 Sender: (415)
                           ((415)
Participants: (415)
I really wanted to share something with you from today.
iMessage
2016-12-13 05:30:40 (UTC) [3]
Sender: (415)
                                 5)
                                                    ), Self (
Participants: (415)
                                 (415)
I forgot to tell you that my therapist is wanting me to set aside time at the end of each day to
focus on what I am grateful for. I am so, so incredibly thankful for you and your care towards me. It's interesting because one of the things we talked about was "love" and how
much anxiety I have had about that in our relationship. It really hit me over the head today
that just over this past weekend, you SHOWED me the love more than I have ever felt from any guy. It really got me emotional. I feel your feelings for me and I didn't want you to think they
went unnoticed. You are so wonderful and appreciated by me and I promise to show how
lucky and proud I feel to be with you each day. My goal is to each moment with you and
appreciate every baby step that eventually leads to big ones. You deserve the world and I am
not just going to try, I AM going to give it to you as the great partner you deserve. Xoxo.
iMessage
2016-12-13 05:30:40 (UTC) [1]
Sender: (415)
                           (415)
                                                     ), Self (
Participants: (415)
                                 (415)
```

I forgot to tell you that my therapist is wanting me to set aside time at the end of each day to focus on what I am grateful for. I am so, so incredibly thankful for you and your care towards me. It's interesting because one of the things we talked about was "love" and how much anxiety I have had about that in our relationship. It really hit me over the head today that just over this past weekend, you SHOWED me the love more than I have ever felt from any guy. It really got me emotional. I feel your feelings for me and I didn"t want you to think they went unnoticed. You are so wonderful and appreciated by me and I promise to show how lucky and proud I feel to be with you each day. My goal is to each moment with you and appreciate every baby step that eventually leads to big ones. You deserve the world and I am not just going to try, I AM going to give it to you as the great partner you deserve. Xoxo.

iMessage 2016-12-13 06:20:29 (UTC) [1] Sender: (415) (415)), Self ()	
I really hope that went through, I'm gonna lose my phone soon and it means a lot that you read it cause it might put a smile on your for before bed	
iMessage 2016–12–13 06:20:29 (UTC) [3] Sender: (415) (415)), Self ()	
I really hope that went through, I'm gonna lose my phone soon and it means a lot that you read it cause it might put a smile on your for before bed	
iMessage 2016–12–13 06:25:21 (UTC) [3] Sender: (415) (415)), Self ()	
Also one more good thing too but not sure you're getting the	
iMessage 2016–12–13 06:25:21 (UTC) [1] Sender: (415) (415)), Self ()	
Also one more good thing too but not sure you"re getting the	
iMessage 2016-12-13 15:45:04 (UTC) [1] Sender: (415) (415)), Self ()	
Lmk if you can respond while I still have my phone	
iMessage 2016-12-13 15:45:04 (UTC) [2] Sender: (415) (415)), Self ()	
Lmk if you can respond while I still have my phone	
iMessage 2016-12-13 15:49:20 (UTC) [2] Sender: (415) (415)), Self ()	
And I have something to tell you too that you'll be excited about	

```
iMessage
 2016–12–13 15:49:20 (UTC) [1]
Sender: (415) (415)
Participants: (415) (4
And I have something to tell you too that you"ll be excited about
 iMessage
2016–12–13 16:40:32 (UTC) [1][5][6][7]
Sender: (415) (415)
Participants: (415) (415)
                                                                                                                                                          ), Self (
I also had wanted to let you know we were invited to these (and that my boss is very
 understanding and said we can just start again next week) but my text to you is more
important. I'm gonna talk about what I said and what you said in my morning individual session. I know you will be great in your review and I'll be thinking about you
 iMessage
  2016-12-13 16:40:32 (UTC) [1][8][9][10][11]
                                                                                  ((415)
  Sender: (415)
  Participants: (415)
                                                                                                                                                                 ), Self (
                                                                                      ((415)
  Charles A. V
     The description TPC many risks
flowing lists show by all risks places
when shows are set
   SHOWING THE PARTY OF THE PARTY.
  + + T + K
 IMG_0032.PNG
 IMG_0033.PNG
 IMG_0034.PNG
 iMessage
 2016–12–13 16:40:32 (UTC) [1][12][13][14][15]
Sender: (415) (415)
                                                                                                                                                                ), Self (
  Participants: (415)
  Chou Moth . . . .
            "PASSENGERS"
                  Colombia Pleasers
    Corne Militardo, December of the
         Ohn Sharina have a shall Plangthy than
SEPSE has a modely, modely and
police/code.
             many our manners
     ter of manifest subsection
  For developable EFS, subscale positive film eller, is not, one j, phrase in the film of th
 IMG_0032.PNG
 IMG_0033.PNG
 IMG_0034.PNG
 iMessage
 2016–12–13 16:40:32 (UTC) [1][16][17][18][19]
Sender: (415) (415)
                                                                                                                                                  ), Self (
                                                                                  ((415)
  Participants: (415)
```

FENCES
IMC 0022 PMC
IMG_0032.PNG IMG_0033.PNG
IMG_0034.PNG
iMessage 2016-12-13 16:40:32 (UTC) [2] Sender: (415) (415)), Self ()
I also had wanted to let you know we were invited to these (and that my boss is very understanding and said we can just start again next week) but my text to you is more important. I'm gonna talk about what I said and what you said in my morning individual session. I know you will be great in your review and I'll be thinking about you \upsilon \upsilon \upsilon
iMessage 2016-12-13 19:54:40 (UTC) [2] Sender: (415) (415)), Self ()
Did you get a chance to read it? I'm at a quick break before my next session
iMessage 2016-12-13 19:54:40 (UTC) [1] Sender: (415)
Did you get a chance to read it? I"m at a quick break before my next session
iMessage [1] 2016-12-13 20:20:16 (UTC) Sender: Self (Participants: (415) ((415)), Self ()
I"m so happy to hear that. You should be grateful for so much and I"m glad you see that. I"m also excited to hear you"re looking forward to the baby steps. :) keep trekking ahead!
iMessage
[1] 2016-12-13 20:20:16 (UTC) Sender: Self (Participants: (415) ((415)), Self ()
And I"ve never heard of any of those movies, but I"ll check out the trailers
iMessage [2] 2016-12-13 20:20:16 (UTC)
Participants: (415) ((415)), Self ()
And I've never heard of any of those movies, but I'll check out the trailers

```
[2] 2016-12-13 20:20:16 (UTC)
Sender: Self (
              Participants: (415)
                                           ((415)
                                                             ), Self (
  I'm so happy to hear that. You should be grateful for so much and I'm glad you see that. I'm
  also excited to hear you're looking forward to the baby steps. :) keep trekking ahead!
                                                                                      iMessage
                                                               [2] 2016-12-13 23:36:32 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                          (415)
                                                             ), Self (
                                                       Did you buy followers for relevant radio?
                                                                                      iMessage
                                                       [2] 2016–12–13 23:36:32 (UTC)
Sender: Self (
                                                             ), Self (
              Participants: (415)
                                            (415)
                                                                                             Lol
                                                                                      iMessage
                                                               [2] 2016-12-13 23:36
                                                                                      32 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                         ((415)
                                                             ), Self (
                                                                                       Ummmm
                                                                                      iMessage
                                                               [1] 2016-12-13 23:36:32 (UTC)
                                                        Sender: Self (
                                           (415)
                                                             ), Self (
              Participants: (415)
                                                                                       Ummmm
                                                                                      iMessage
                                                               [1] 2016-12-13 23:36:32 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                        ((415)
                                                             ), Self (
                                                       Did you buy followers for relevant radio?
                                                                                      iMessage
                                                               [1] 2016-12-13 23:36:32 (UTC)
                                                        Sender: Self (
                                           (415)
              Participants: (415)
                                                                                             Lol
iMessage
2016-12-14 01:18:56 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                              ), Self (
                             (415)
lol I might have to give us a boost...they were supposed to be American!! I'm gonna be out
tomorrow so see you tomorrow night, right?:)
iMessage
2016-12-14 01:18:56 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
```

iMessage

lol I might have to give us a boost...they were supposed to be American!! I'm gonna be out tomorrow so see you tomorrow night, right? :)

iMessage 2016–12–14 05:00:48 (UTC) [2] Sender: (415) (415)), Self (415)), Self (415) (415)

I am so looking forward to seeing you I can't even stand it. I just can't wait to start our "new" journey together and be the person I've always intended to be but haven't. I learned today that I have let so many insecurities and my desire to be perfect interfere with our relationship and realized you have never asked me to be perfect, but rather just to be myself. What I am grateful for with us from my counseling session on relationships today: you accepting me flaws and all, the way I feel your unconditional love, your kind and selfless heart, how I am always learning something from you, your patience with me, and your belief in me to be a better and stronger person even when I gave up on myself. I am seeing myself as a worthy person and partner now and realize I have a lot to give to you that you haven't seen yet. I want to do all the therapy sessions tomorrow so I will leave at 4 and be back by 5 or 5:30, really just can't wait to hold you and see your smile/make you smile. Xoxoxo

iMessage 2016–12–14 05:00:48 (UTC) [1] Sender: (415) (415)), Self (415) (415) (415) (415)

I am so looking forward to seeing you I can"t even stand it. I just can"t wait to start our "new" journey together and be the person I"ve always intended to be but haven"t. I learned today that I have let so many insecurities and my desire to be perfect interfere with our relationship and realized you have never asked me to be perfect, but rather just to be myself. What I am grateful for with us from my counseling session on relationships today: you accepting me flaws and all, the way I feel your unconditional love, your kind and selfless heart, how I am always learning something from you, your patience with me, and your belief in me to be a better and stronger person even when I gave up on myself. I am seeing myself as a worthy person and partner now and realize I have a lot to give to you that you haven"t seen yet. I want to do all the therapy sessions tomorrow so I will leave at 4 and be back by 5 or 5:30, really just can"t wait to hold you and see your smile/make you smile. Xoxoxo

```
iMessage
2016-12-14 06:11:12 (UTC) [1]
Sender: (415)
                        ((4)
Participants: (415)
All ok? I hope I didn"t say something wrong there
iMessage
2016-12-14 06:11:12 (UTC) [2]
Sender: (415)
                                                ), Self (
Participants: (415)
All ok? I hope I didn't say something wrong there
iMessage
2016-12-14 07:04:32 (UTC) [2]
Sender: (415)
                        ((41
                                               ), Self (
Participants: (415)
                              ((415)
Did you read what I wrote?
```

iMessage [2] 2016-12-14 07:04:32 (UTC) Sender: Self () Participants: (415) ((415)), Self ()

You didn't say anything wrong. I've been busy and am just getting in bed.



IMG_0039.PNG IMG_0042.PNG IMG_0041.PNG

iMessage 2016–12–14 18:10:08 (UTC) [4] Sender: (415) (415)), Self (

I am so sorry it didn't go well. Still so proud of you. And hopefully we can work hard on the radio stuff next week and make big \$! Also wanted to send these to you \Box

```
iMessage
2016–12–14 18:16:32 (UTC) [4]
Sender: (415) (415) ), Self (415) ), Self (415)
```

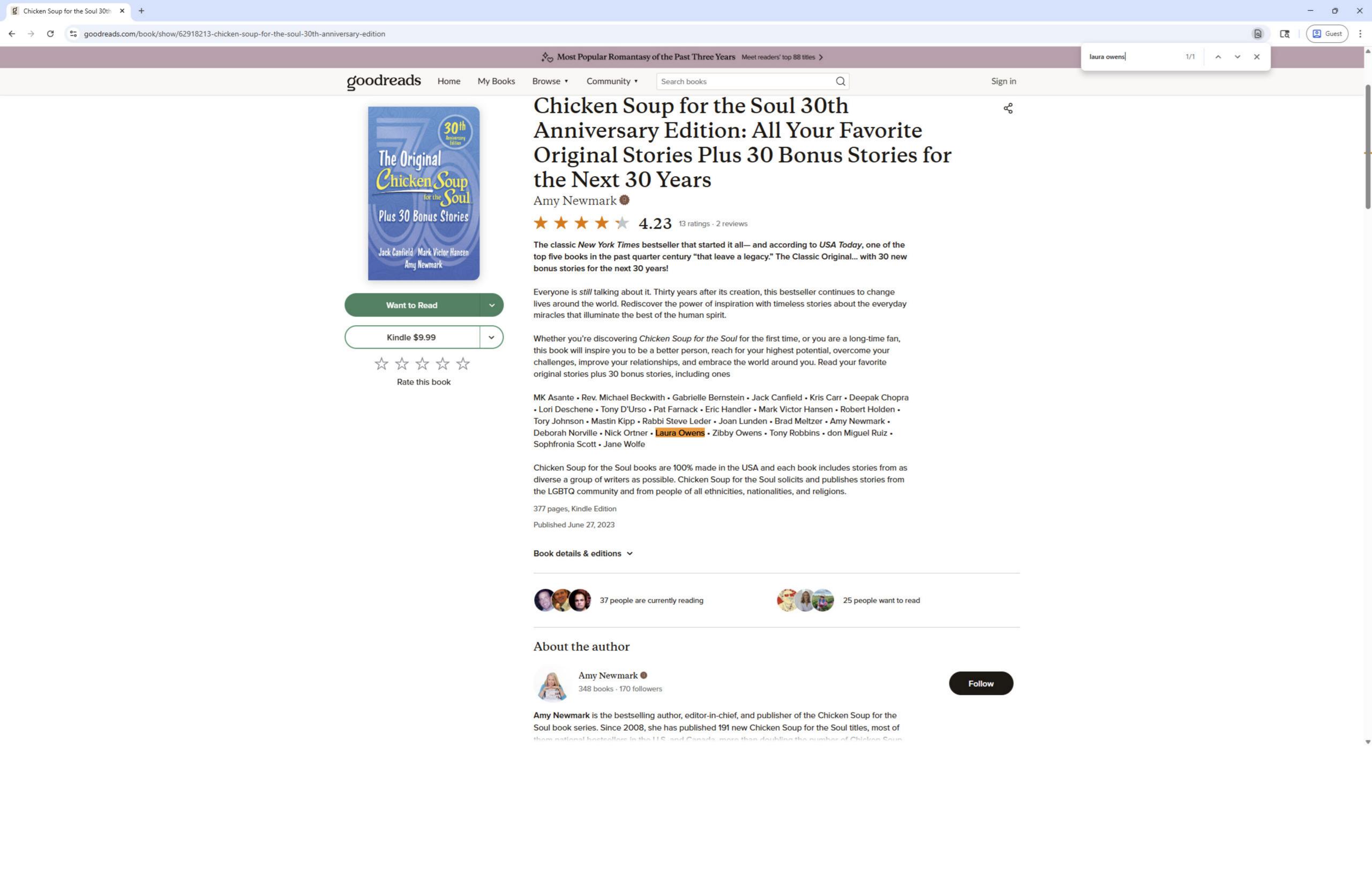
I'm just eating breakfast but I had a session this morning and it got me thinking. What are things I can do/work on that would make you proud to be with me? I'm gonna talk about answers to that in my individual session next

```
iMessage
2016–12–14 18:16:32 (UTC) [1]
Sender: (415) (415) (415) ), Self (415) (415) (415) (415) (415)
```

I'm just eating breakfast but I had a session this morning and it got me thinking. What are things I can do/work on that would make you proud to be with me? I'm gonna talk about answers to that in my individual session next

```
iMessage
2016–12–14 22:43:12 (UTC) [1]
Sender: (415) ((415)
Participants: (415)
I'll see you later and we can cuddle right?
iMessage
2016-12-14 22:43:12 (UTC) [2]
Sender: (415)
                         ((4\dot{1}5)
                              (415)
Participants: (415)
                                                 ), Self (
I"ll see you later and we can cuddle right?
iMessage
2016-12-14 22:53:52 (UTC) [2]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
                              (415)
I"m so sad
iMessage
2016-12-14 22:53:52 (UTC) [1]
Sender: (415)
                         (415)
                                                 ), Self (
Participants: (415)
                              (415)
I'm so sad
iMessage
2016-12-14 23:36:32 (UTC) [1]
Sender: (415)
Participants: (415)
                                                 ), Self (
                              ((415))
I know I can get through it. Cuddling later though? I'm gonna have a surprise
iMessage
2016-12-14 23:36:32 (UTC) [2]
Sender: (415)
                         (415)
                                                ), Self (
Participants: (415)
I know I can get through it. Cuddling later though? I'm gonna have a surprise
iMessage
2016-12-15 <u>00:00:00 (</u>UTC) [2]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
                              (415)
I"m leaving
iMessage
2016-12-15 00:00:00 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                 ), Self (
I'm leaving
iMessage
2016-12-15 00:08:32 (UTC) [1]
Sender: (415)
                         (415)
                              (´(<del>4</del>15)
                                                ), Self (
Participants: (415)
So I will see you when you are home, is that going to be for dinner? I can pick up take out for
us later.
```

EXHIBIT F





The Lifesaving Power of Kindness to Strangers

One day you will tell your story of how you overcame what you went through and it will be someone else's survival guide.

-Brené Brown

ecember 30, 2016. Scat 22H. Non-stop, San Francisco to Reykjavík.

Despite a delay of more than a dozen hours, the excitement was contagious as the passengers boarded the plane. The flight attendants greeted everyone with a smile and didn't look like they were being paid to give it. I overheard the phrases "Blue Lagoon," "northern lights," and "dog sledding" repeatedly as they exchanged pleasantries with the travelers.

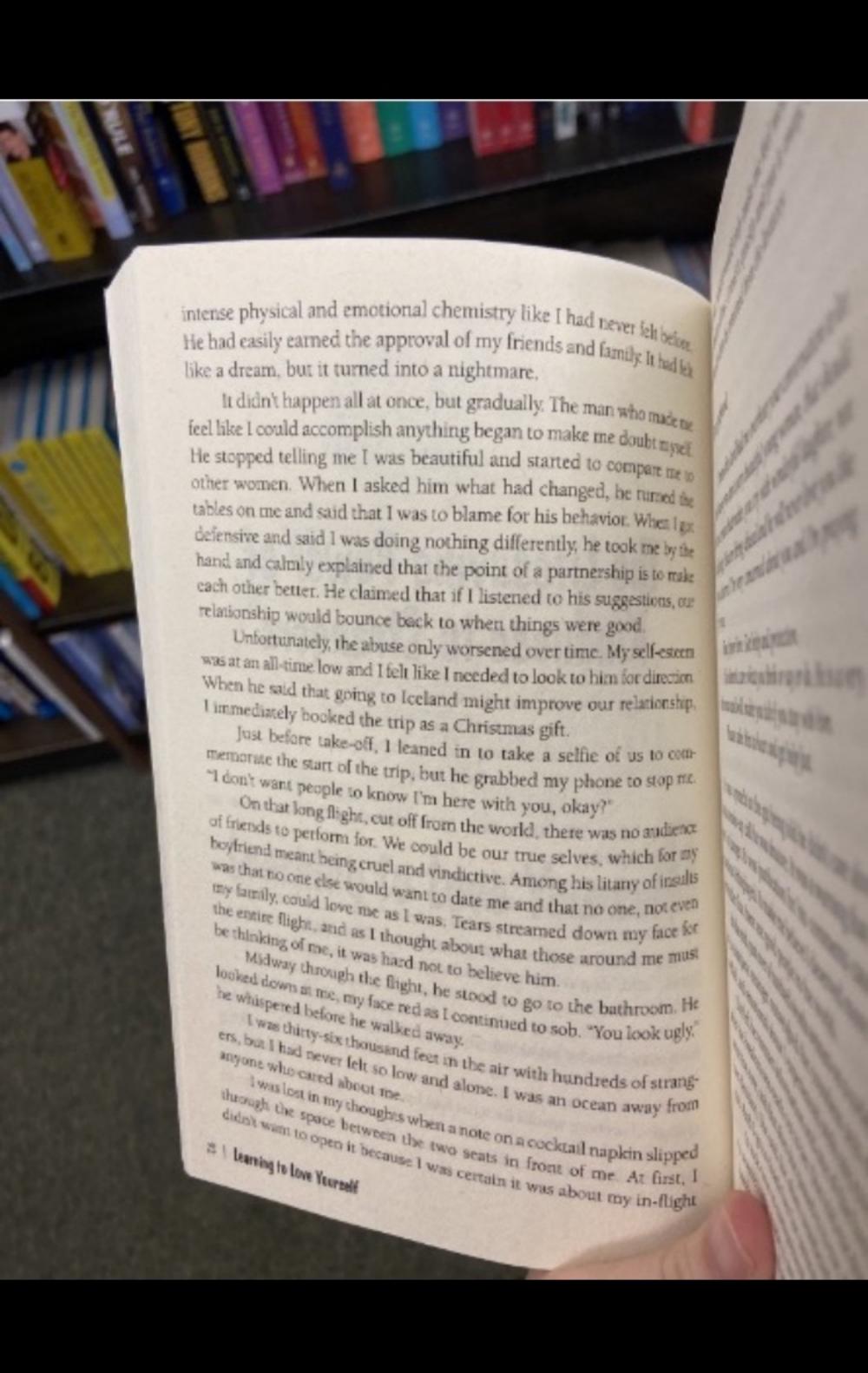
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ong a lot of p

We were all going to the same destination, but I felt worlds away hom everyone else on board. My wishes for this trip were much different than my fellow passengers, who were looking forward to making memories on a once-in-a-lifetime vacation. In my case, I hoped that a change of scenery would fix what had become not just toxic, but scary.

I turned to look at the tall, extremely good-looking man next to and admonished myself for even thinking of those words about lashed back to our first several months together, marked by



breakdown, which would only make me feel worse, but curiosity breakdown better of me. I read it quickly and put it away, terrified he would see it when he returned from the lavatory.

Dear girlfriend,

I know the Lord had me overhear your conversation to let you know you are a very beautiful young woman, that should have a man that makes you cry with wonderful laughter, not bullying. You are being abused and he will never love you like you deserve. I'm very concerned about you and I'm praying for you.

Run from him. Get help and protection.

He doesn't care what you think or say or do. He is a very sick man and will make you sick if you stay with him.

Please take this to heart and get help fast.

It was a punch in the gut being told he didn't care about me. hwis a wake-up call he was abusive. It was a warning that my life was in danger. It was justification for his comments causing the emotions I displayed. It made me believe I deserved more. It was a minder that there are good people in the world.

In the end, just over a hundred words written on a cocktail napkin by a complete stranger outweighed the countless acts of physical, rethal, and emotional abuse I experienced with my ex-boyfriend.

She left her contact information and one of the first things I did ater the breakup was reach out to her. She told me she almost didn't the note, and that after she passed it to me, she second-guessed her decision. She said she often wondered what had happened to And I got to thank her for saving my life.

hand time to comprehend what had happened, and keeping la secret only made it weigh more heavily on me. Long after the heading, as I edited an old photo of myself in a bikini poolside for Thomback Thursday, I realized that I couldn't remember what year taken or where. It felt disingenuous to be presenting overly

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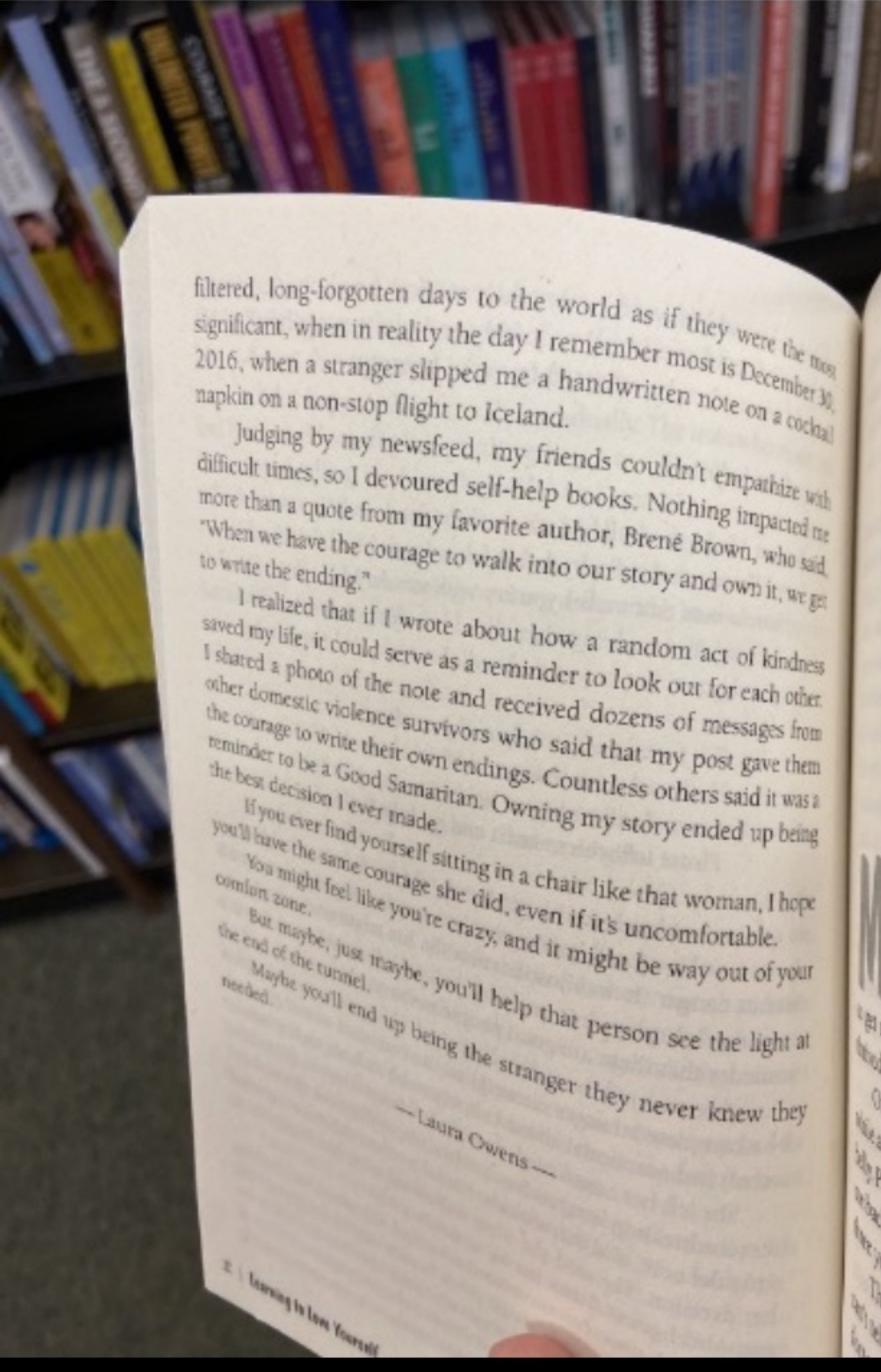
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hroom, He look ugly."

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wake-up (Valentine's Da my power ba acress and p

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The Lifesaving Power of Kindness to Strangers

One day you will tell your story of how you overcame what you went through and it will be someone else's survival guide.

~Brené Brown

December 30, 2016. Seat 22H. Non-stop, San Francisco to Reykjavik.

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We were all going to the same destination, but I felt worlds away from everyone else on board. My wishes for this trip were much different than my fellow passengers, who were looking forward to making memories on a once-in-a-lifetime vacation. In my case, I hoped that a change

of scenery would fix what had become not just toxic, but scary.

I turned to look at the tall, extremely goodlooking man next to me and admonished myself for even thinking of those words about him. I flashed back to our first several months together, marked by intense physical and emotional chemistry like I had never felt before. He had easily earned the approval of my friends and family. It had felt like a dream, but it turned into a nightmare.

It didn't happen all at once, but gradually. The man who made me feel like I could accomplish anything began to make me doubt myself. He stopped telling me I was beautiful and started to compare me to other women. When I asked him what had changed, he turned the tables on me and said that I was to blame for his behavior. When I got defensive and said I was doing nothing differently, he took me by the hand and calmly explained that the point of a partnership is to make each other better. He claimed that if I listened to his suggestions, our relationship would bounce back to when things were good.

Unfortunately, the abuse only worsened over time. My self-esteem was at an all-time low and I felt like I needed to look to him for direction. When he said that going to Iceland might improve our relationship, I immediately booked the trip as a Christmas gift.

Just before take-off, I leaned in to take a selfie of us to commemorate the start of the trip, but he grabbed my phone to stop me. "I don't want people to know I'm here with you, okay?"

On that long flight, cut off from the world, there was no audience of friends to perform for. We could be our true selves, which for my boyfriend meant being cruel and vindictive. Among his litany of insults was that no one else would want to date me and that no one, not

even my family, could love me as I was. Tears streamed down my face for the entire flight, and as I thought about what those around me must be thinking of me, it was hard not to believe him.

Midway through the flight, he stood to go to the bathroom. He looked down at me, my face red as I continued to sob. "You look ugly," he whispered before he walked away.

I was thirty-six thousand feet in the air with hundreds of strangers, but I had never felt so low and alone. I was an ocean away from anyone who cared about me.

I was lost in my thoughts when a note on a cocktail napkin slipped through the space between the two seats in front of me. At first, I didn't want to open it because I was certain it was about my in-flight breakdown, which would only make me feel worse, but curiosity got the better of me. I read it quickly and put it away, terrified he would see it when he returned from the lavatory.

Dear girlfriend,

I know the Lord had me overhear your conversation to let you know you are a very beautiful young woman, that should have a man that makes you cry with wonderful laughter, not bullying. You are being abused and he will never love you like you deserve. I'm very concerned about you and I'm praying for you.

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It was justification for his comments causing the emotions I displayed. It made me believe I deserved more. It was a reminder that there are good people in the world.

In the end, just over a hundred words written on a cocktail napkin by a complete stranger outweighed the countless acts of physical, verbal, and emotional abuse I experienced with my exboyfriend.

She left her contact information and one of the first things I did after the breakup was reach out to her. She told me she almost didn't write the note, and that after she passed it to me, she second-guessed her decision. She said she often wondered what had happened to me. And I got to thank her for saving my life.

It took time to comprehend what had happened, and keeping it a secret only made it weigh more heavily on me. Long after the breakup, as I edited an old photo of myself in a bikini poolside for Throwback Thursday, I realized that I couldn't remember what year it was taken or where. It felt disingenuous to be presenting overly filtered, long-forgotten days to the world as if they were the most significant, when in reality the day I remember most is December 30, 2016, when a stranger slipped me a handwritten note on a cocktail napkin on a non-stop flight to Iceland.

Judging by my newsfeed, my friends couldn't empathize with difficult times, so I devoured self-help books. Nothing impacted me more than a quote from my favorite author, Brené Brown, who said, "When we have the courage to walk into our story and own it, we get to write the ending."

I realized that if I wrote about how a random act of kindness saved my life, it could serve as a reminder to look out for each other. I shared a photo of the note and received dozens of mes-

EXHIBIT G

Clerk of the Superior Court
*** Electronically Filed ***
A. Sutton, Deputy
8/11/2021 11:39:30 AM
Filing ID 13236528

PLAI	NTIFF	(S) ATTORNEY INFORMATION:	
<u>Laura</u>	Owen	S	
Scotts	dale, A	AZ	
	/ 4 1 1	/D1	
Name	/Addre	ess/Phone	
		Superior Court of Arizona in Maricopa Court Phoenix, AZ 85003 (Court Name, Address and Phone N	•
	Laura	Owens	
			Case Numbe £ V2021-052893
	Scotts	dale, AZ	
			COMPLAINT
Plaint	iff(s) N	Name/Address/Phone V.	CIVIL
		v .	
	Grego	ory Gillespie	
	Scotts	<u>dale, AZ</u>	
Defen	dant(s) Name/Address/Phone	
Plain	tiff(s) a	alleges:	
1.	This c	elaim arises from: [X] Tort [] Contract []	Debt
2.	Venue in this precinct is proper because:		
	[X]	The defendant(s) reside(s) or does business in	n this precinct.
	[]	The debt or obligation that resulted in this class at the following location:	

Arizona Supreme Court Page 1 of 4 LJCV00002F-040814

		<u>.</u>
[]	Other:	(pursuant to A.R.S. §
	12-401).	

- 3. The defendant(s) owes the sum of \$\(\) 45,000. The defendant(s) owe the plaintiff(s) this amount because: (State the facts in support of your claim. You may attach an additional page to your complaint, if necessary.)
 - The Plaintiff became pregnant with the Defendant's child on either June 4) Plaintiff became pregnant on her second date with Defendant on or around June 30 2021 after only 2 dates.
 - 5) 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.
 - 6) Once Defendant finally learned the pregnancy was real, Defendant employed false promises, and verbal and emotional abuse to coerce Plaintiff into getting an abortion.
 - 7) Upon Plaintiff's first attempt to terminate the pregnancy, Defendant blocked Plaintiff from all communication.
 - 8) When Plaintiff informed Defendant of her failed attempt at termination, Defendant again employed false promises, and verbal and emotional abuse to coerce Plaintiff again.
 - 9) During this entire time, Plaintiff clearly expressed her desire to not terminate the pregnancy. (See attachment for more)

Case Number:	
--------------	--

1) - ARS 13-3601

- 3. The victim or the defendant is pregnant by the other party.
- 6. The relationship between the victim and the defendant is currently or was previously a romantic or sexual relationship.
- L. If a person is convicted of an offense involving domestic violence and the victim was pregnant at the time of the commission of the offense, at the time of sentencing the court shall take into consideration the fact that the victim was pregnant and may increase the sentence.

- ARS 36-2153:

- G. A person shall not intimidate or coerce in any way any person to obtain an abortion.
- Intentional tort: Intentional Infliction of Emotional Distress
 - The person's conduct or actions were extreme or outrageous;
 - The person intended to inflict distress, or the person recklessly disregarded that their conduct would result in the victim's emotional distress; and,
 - The person's conduct resulted in the victim's severe emotional distress

- 4. Plaintiff(s) is also claiming:
 - [X] Attorney's fees
 - [] Prejudgment interest

[]	Postjudgment interest
[X]	Court costs
[]	Other (specify):
5. I state ur	nder penalty of perjury that the foregoing is true and correct.
Date: <u>8/10/2</u>	21 <u>Laura Owens</u> Plaintiff

Case Number:

PLAINTIFF(S) ATTORNEY INFORMATION: Laura Owens Scottsdale, AZ Plaintiff(s) Name/Address/Phone Name/Address/Phone Superior Court of Arizona in Maricopa County, 201 W Jefferson St., Phoenix, AZ 85003 (Court Name, Address and Phone Number) Case Number: Laura Owens Scottsdale, AZ Plaintiff(s) Name/Address/Phone V. Gregory Gillespie Scottsdale, AZ Defendant(s) Name/Address/Phone

The following pages are copies of relevant notes and text messages from July and August of 2021 between the Plaintiff and the Defendent.







otes and records from Ms. a ra Owens visits to One Medical on 1





week. We need to get our lives back and healthy. And then we can get to know our true selves. This is damaging both of us severally with every hour that continues to pass. I know that I liked you very much when this wasn't on our minds and over our heads. I know that it is damaging each of us. I want this to be over with. Do you? Can we take care of it this week and try for this weekend. The timing is perfect. I don't want to go into the week next week with this on our minds any longer. I should be almost healthy, this will be beyond us. Hopefully have a nice weekend going into the week and we can get back to being ourselves.

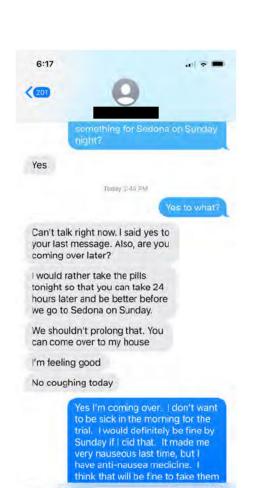
I promise this to you. I will support you after this, I will grow with you get to know our real selfs and we can begin our relationship in the tight foot.

I need the same from you. To see that you support what I'm trying to do here also. Get back to healthy.

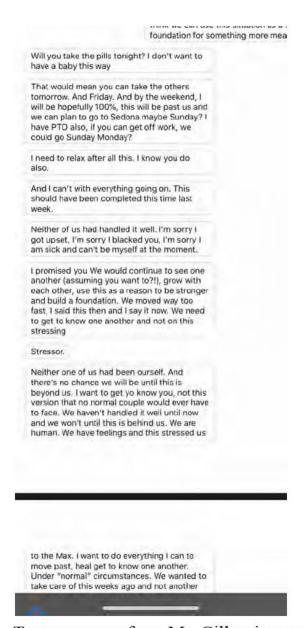




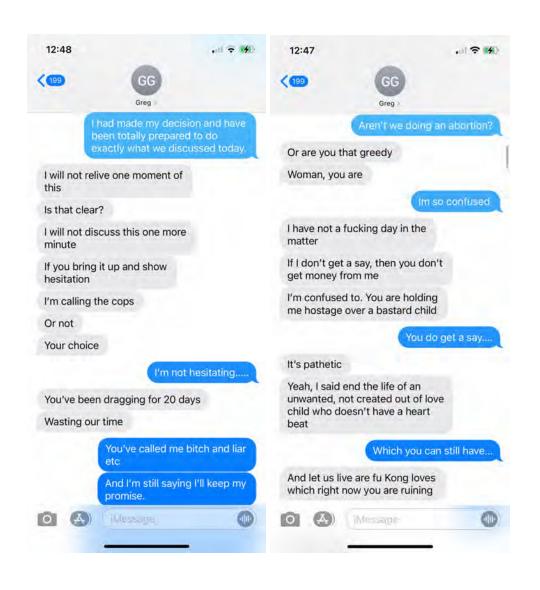


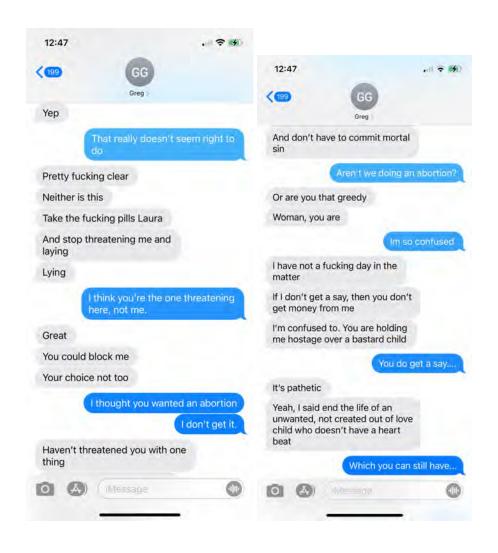


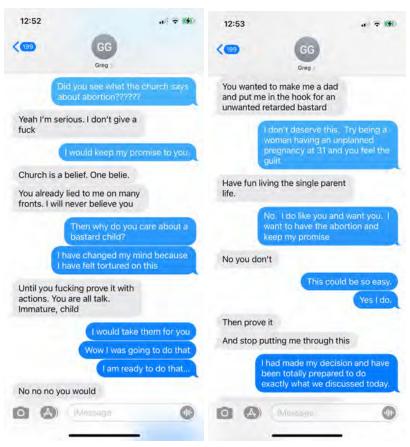
O (A) Message

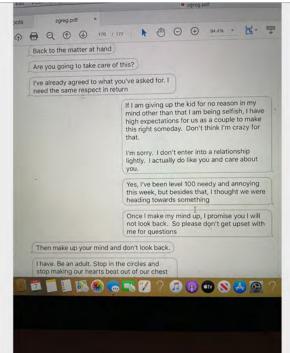


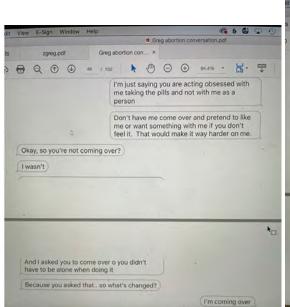
Text messages from Mr. Gillespie expressing his desire to have a relationship after Ms. Owens would have an abortion from the week of August 4, 2021

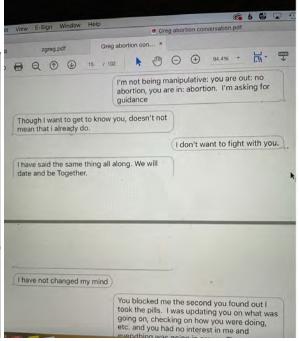


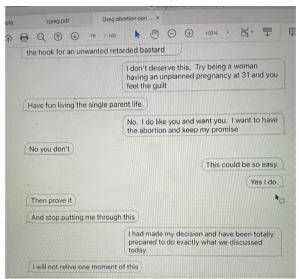


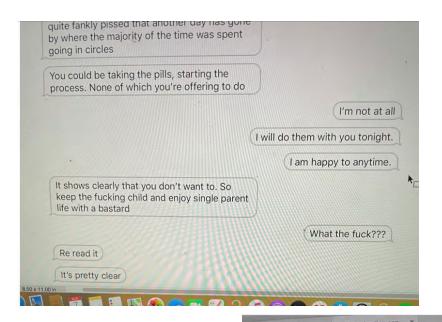


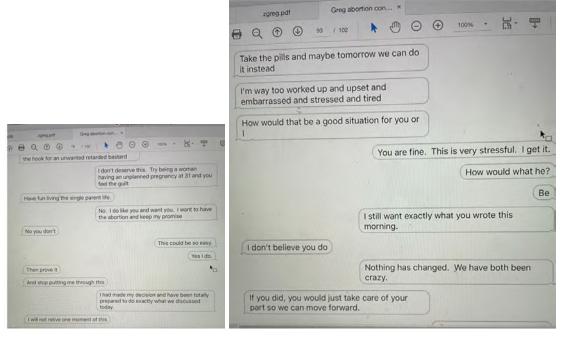


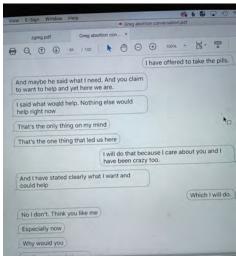


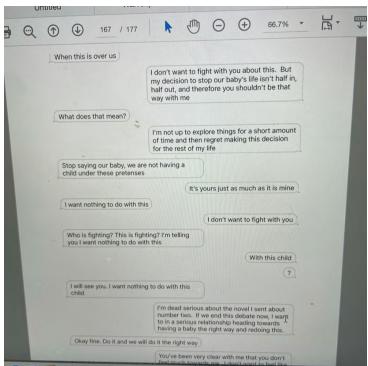


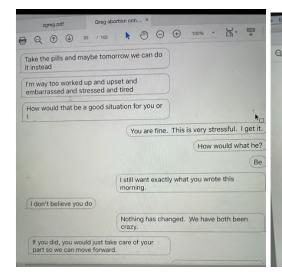


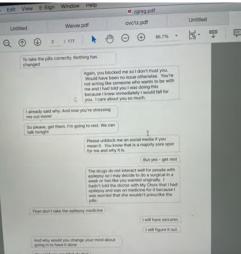


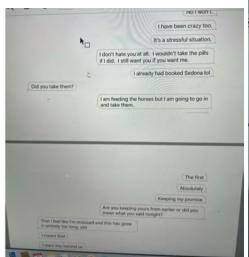


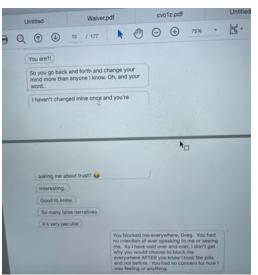


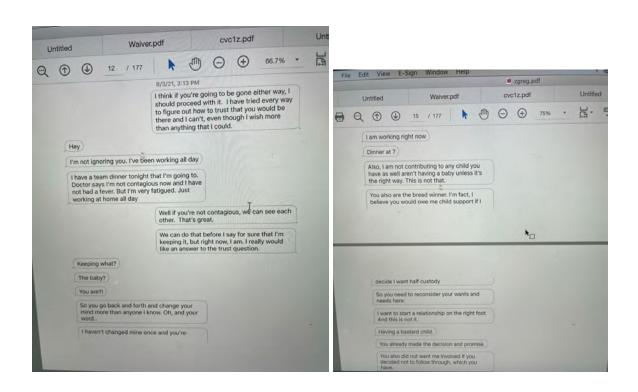


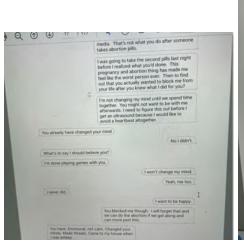


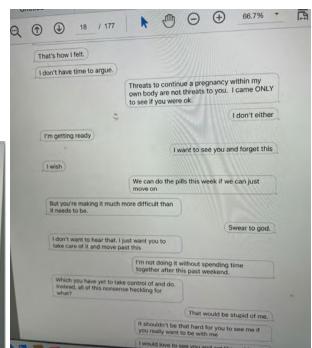


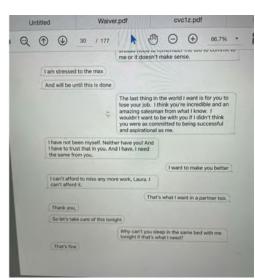


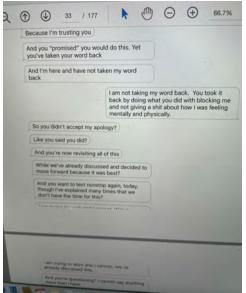


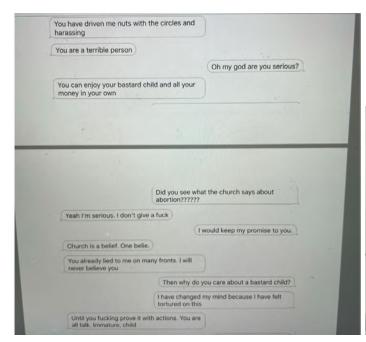


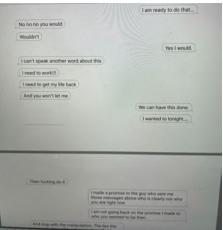


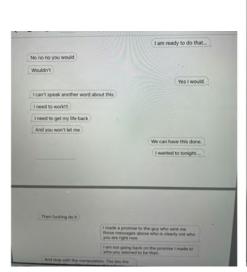


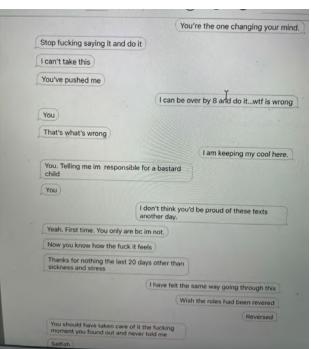


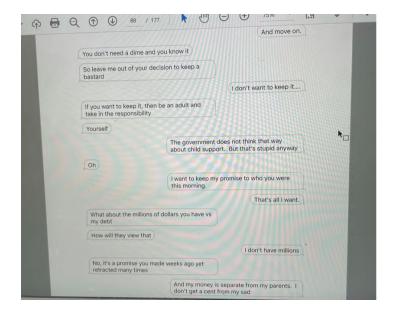




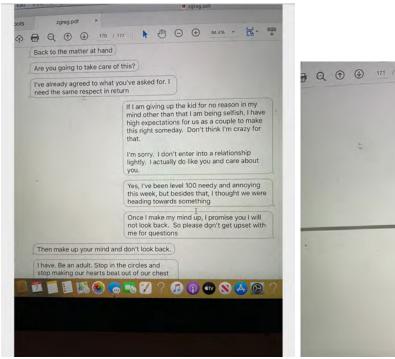


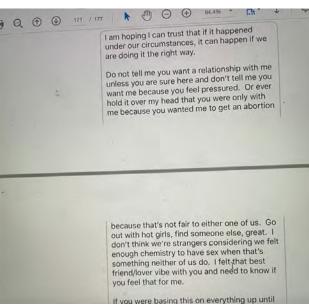


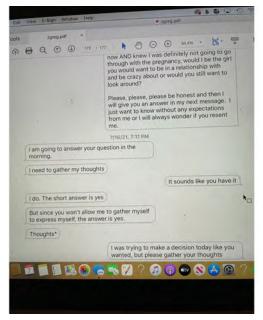


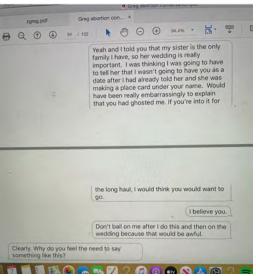


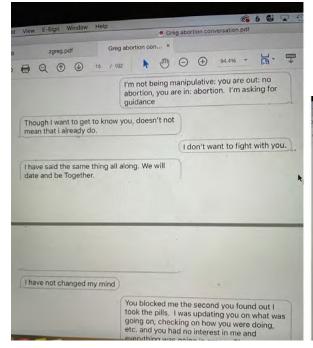
Text messages from Mr. Gallespie coercing Ms. Owens into an abortion

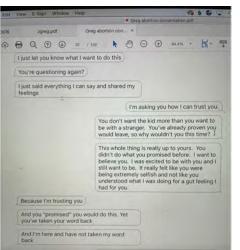


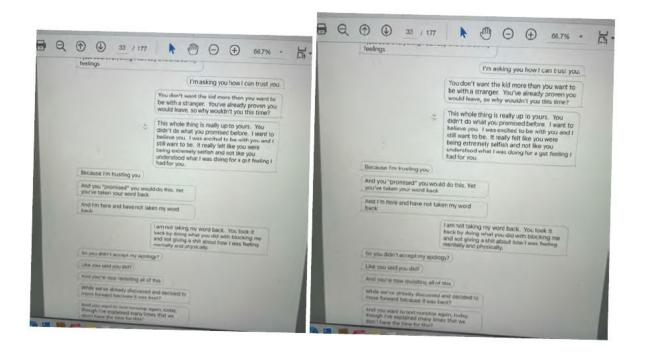


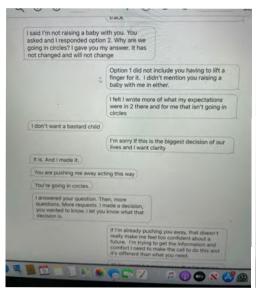


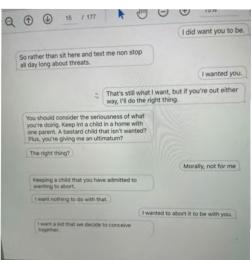


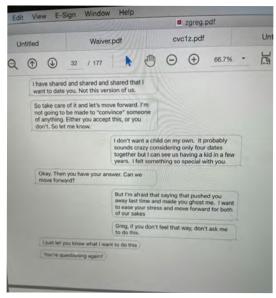


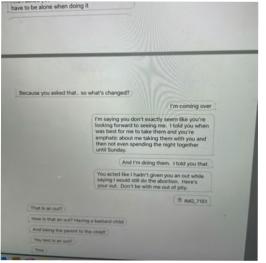


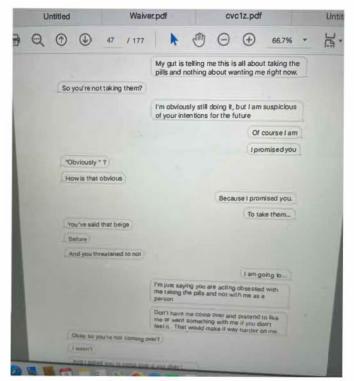


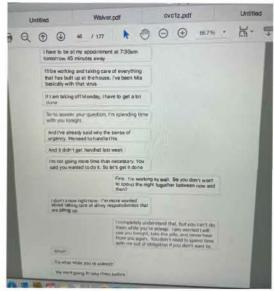


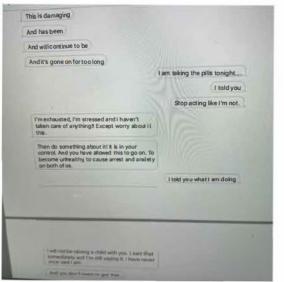












And only ask me to do this if you want me, not just an abortion. I was mad yesterday and impulsive. I wouldn't ask you for child support. So just make sure that I am what you want and you're not just pitying me

And I will do it

I have

And I vocalize this to you

Text messages from Ms. Owens expressing her expectations for the relationship if she were to have an abortion and his responses

PLAINTIFF(S) ATTORNEY INFORMATION: Laura Owens Scottsdale, AZ Name/Address/Phone Superior Court of Arizona in Maricopa County, 201 W Jefferson St., Phoenix, AZ 85003 (Court Name, Address and Phone Number) Laura Owens Case Number: Scottsdale, AZ Plaintiff(s) Name/Address/Phone V. Gregory Gillespie Scottsdale, AZ

Defendant(s) Name/Address/Phone

STATEMENT OF FACTS AND BREACH (CONT)

- 11. Defendant was steadfast in his viewpoint that the pregnancy be terminated immediately because he did not want a "bastard child" and said he would have no involvement in its life, nor pay child support.
- 12. Plaintiff did not wish to give up the pregnancy from a spiritual or moral standpoint and planned to proceed with it, even if she was doing it alone.
- 13. Defendant's false promises included comments regarding a great opportunity for them to work towards eventual marriage and to have a child 'the right way' in the future
- 14. Plaintiff indicated to Defendant that she did not expect him to be involved in the rearing and support of this child and did not need to speak with her again if that is what he desired.
- 15. Defendant refused and instead indicated that he wanted a relationship but he refused to see her or contribute to the relationship until Plaintiff had terminated the pregnancy.
- 16.Despite Arizona's five-week pregnancy limit in order to terminate a pregnancy, Defendant found this unacceptable and coerced Plaintiff into obtaining abortion pills using an unorthodox method.
- 17. Although Plaintiff was reluctant to administer the pills because she felt that she was financially, emotionally, and physically able to create an environment where their child would thrive, Defendant was insistent that she proceed immediately so that they could move on with their future.
- 18.On July 28, 2021, at around 10pm Plaintiff administered the first pill while over the phone with Defendant.
- 19. During that conversation Plaintiff reiterated that she did not expect him to participate in the child rearing and support if she were to make the decision to continue her pregnancy.
- 20. Defendant pleaded with her and said she needed to believe him.
- 21. On July 29, 2021, Plaintiff administered the second pill incorrectly.
- 22. After receiving instructions on how to properly administer the second pill, Plaintiff attempted to contact Defendant to administer the second pill over the phone with him, but he was unreachable.
- 23.Once Plaintiff finally reached Defendant on July 31, 2021, Defendant scolded her for waiting to administer the second pill.

- 24.On July 31, 2021, Plaintiff correctly administered the second pill after Defendant's persistent insistence that it must be done; however, the termination did not pass as it should.
- 25.On August 1, 2021, Plaintiff discovered from her doctor that it was a "failed abortion" and that the development of the fetus may not have stopped, but it was uncertain.
- 26. After attempting to contact Defendant during this time, Plaintiff discovered that Defendant had blocked her from all forms of traditional communication.
- 27. Upon discovery of the "failed abortion", Defendant panicked and attempted to persuade Plaintiff not only that he had not blocked her from communication, but also that he wanted to stay with her if she followed through with the termination.
- 28. At that point, Plaintiff indicated that she would let God decide what happened to the fetus at that point regardless of whether she ended up passing it or not.
- 29. Defendant indicated that he "did not want a retarded bastard child" while also promising that he would attend a wedding with Plaintiff, wanted to start a family with her, and wanted to be introduced to Plaintiffs father (who is suffering from many medical issues) once the pregnancy was terminated.
- 30.Defendant also indicated that Plaintiff needed to stop playing games with him and that if she wanted a relationship with him, she needed to follow through with the termination.
- 31.Plaintiff explained that the decision to end a human life was much more serious than any decision she had made before and that she would have to live with the consequences of this for the rest of her life.
- 32.On August 4, 2021 in text messages sent between Plaintiff and Defendant, Defendant indicated that he wanted to continue the relationship if "we take care of it this week and try for this weekend", and that he promises to "support [her] after this" and they can "begin their relationship" in exchange for terminating the pregnancy. See exhibit [number here].
- 33. Relying on these representations, Plaintiff was convinced that Defendant's intentions were pure.
- 34. When the time came for Plaintiff to administer her termination pills, she hesitated and contacted Defendant.
- 35.Defendant used verbally and emotionally abusive manipulations, even threatening to call the police if she hesitated in terminating the pregnancy. See exhibit [number here].

- 36.On August 5, 2021, Plaintiff went to Defendant's house where she anticipated he would be there to support her in her emotionally distraught condition due to taking the termination pill on the previous day.
- 37.Instead, Defendant's behavior was extreme cold and bizarre, as he was telling Plaintiff that she was toying with him and that he could not relax in their relationship until the abortion was done.
- 38.He further questioned and criticized every action Plaintiff made that night, including making Plaintiff show Defendant that she was properly administering the second pill by showing the inside of her cheek to Defendant because he did not believe that she was taking the pill; Defendant's actions were clear that he cared more about making sure the abortion was done than he did about wanting a future with Plaintiff.
- 39.Defendant acted disgusted and disrespectful and refused to provide any verbal, emotional, or physical comfort to Plaintiff during this traumatic process until he was convinced that the pregnancy was terminated, causing Plaintiff to leave his house at 1:00AM.
- 40.By that point Plaintiff had already administered the second pill in Defendant's presence.
- 41.On August 6, 2021 Plaintiff again discovered that Defendant and blocked her from all forms of traditional communication and social media.
- 42. Plaintiff is physically, emotionally and psychologically distraught to have go thought the tedious and traumatic process of terminating a pregnancy for the sake of a relationship with Defendant, whom had no intention of having one but used the false promises and abuse to manipulate Plaintiff into believing he did.
- 43. Defendant continued to call Plaintiff names, including "psychopath", and criticized her participation in Apple Podcast's "Nobody Told Me!" as a "joke".
- 44. Defendant also threatened to go public with Plaintiff's abortion knowing that Plaintiff would lose respect as an advocate for domestic violation and victim's rights and insisted on recording their phone conversations so that he could repeatedly say that Plaintiff "murdered [his] child".
- 45. Simply put, Defendant did not want a child to be burn under any circumstances and was willing to say or do whatever it took to get Plaintiff to terminate the pregnancy without consideration for the fetus or Plaintiff.
- 46. Plaintiff is suffering from a complete state of shock, depression, and guilt over a needless decision that she made for the sake of Defendant's empty promises.

EXHIBIT H

CLERK OF THE SUPERIOR COURT

FILED

11/12/2021 (2) 8:354m

L. Deputy

Superior Court of Arizona/AZ007035J/0700 201 W. Jefferson Phoenix, AZ 85003 Case No. Defendant **Plaintiff** □ Employer-Plaintiff if Workplace Injunction FN2021-004799 Gregory Gillespie Laura Owens Defendant's address □ On behalf of minor/person in need of protection named: □ Order of Protection ☐ Injunction Against Harassment □ Workplace Injunction Defendant's phone Agent's name (if Workplace Injunction) 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) ☐ Related as parent, grandparent, child, grandchild, ☐ Married (past or present) brother, sister (or in-law/step) ☐ Live/lived together as intimate partners ☐ Live/lived together but not as intimate partners ⋈ Romantic or sexual relationship (past or present) ☐ Dating (but not romantic or sexual) ☐ Parent of a child in common □Other: ☐ 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 to do offend him?".
10/29/2021	On October 29, I was unable to login to my computer. After a three-hour support call and an inperson 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 exgirlfriend, 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 harrassment 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 choser 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.
The following persons should also be on this order. They should be protected because Defendant is a danger to them:
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
 □ 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.
□ 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.
Other requests:
r penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge, and I request an r / Injunction granting relief as allowed by law. Laura Owens Attest: Judicial Officer/Cierk/Notary Date

SUPERIOR COURT

Laura Owens			
Plaintiff v. Gregory Gillesple Defendant	Case No.	052375 2	JAN -8 AM 9 DECLARATION OF SERVICE OPIIAH/IAWH Issue Dete 12/06/2024
USE THIS FORM ONLY IF YOU ARE AUTH UNDER ARCP 4 OR A The undersigned, being first duly qualified by law, swears of served on Defendant on 1/7/2025 10:50 4201 North Marshall Way	ARS § 13-3602(K). or certifies that a copy 0:00 AM at the following	of the following location:	
(address where Defend	Commence of the second		
Petition and Order of Protection (OP) Petition and Injunction Against Harassment (IAH) Petition and Injunction Against Workplace Harassment (Notice of Hearing Plaintiff has been advised of service Yes Poeclarant is a registered process server peace/correct		(IAH) (IAWH)	ed by the court
David Sheets Maricopa County	Sheriff's Office		S0827
		Iden	
rint: Name Agency		100-11	ification No.
Charges*: 0 Mileage 0 Fee Services S 0 Paid *No charges/fees for any OP or for any IAH that aris. I declare under penalty of perjury that the foregoin	s s es from a dating relation	0 nship or sexu	al violence.
Charges*: 0 Mileage 0 Fee Services S S Paid *No charges/fees for any OP or for any IAH that arise	s s es from a dating relation	0 nship or sexu ursuant to A	al violence.

226

GRN

BRO

804

12/30/1985

CLERK OF THE SUPERIOR COURT

FILED 12-6-2024 3:06 PM

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032

N. MATUZAK

Monday-Friday 8:00-5:00

ELECTRONICALLY RECORDED DEPUTY CLERK

		Protection ended Order		Case No. FN Court ORI No. County Maric	AZ00703	35J	State AZ
PLAINTIFF			3040	10.75° (10.3004)			
Laura		Owens					
-irot	Middle	Last					
		ily member or other Prote	cted Person	listed below:	3		
rirst nd on beha	If of any minor fam	ily member or other Prote			The state of the s		Name of the same o
nd on beha	If of any minor fam	ily member or other Prote		NDANT IDENT	The state of the s	Інт	WT
nd on beha DEFENDAN Gregory	If of any minor fam	ily member or other Prote	DEFEN	NDANT IDENT	TIFIERS	HT 6'4"	<u>wr</u>
DEFENDAN Bregory irst	If of any minor fam V. ∛T Middle	Gillespie Last	DEFEN SEX	NDANT IDENT	TIFIERS DOB	6'4"	WT s Release of
DEFENDAN Gregory irst	If of any minor fam V. ₹T Middle	Gillespie Last D: We have or had a	DEFEN SEX Male	NDANT IDENT RACE White	DOB Arizona	6'4" Prohibits	
DEFENDAN Gregory First	If of any minor fam V. ∛T Middle	Gillespie Last D: We have or had a	DEFEN SEX Male EYES Green	NDANT IDENT RACE White HAIR	DOB Arizona	6'4" Prohibits	s Release of Numbers

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.

[] Estimated Date of Birth

Any order served on or after 9/24/2022 is in effect for two years from date of service. Any order served before 9/24/2022 is in effect for one year from date of service.

THE COURT HEREBY FINDS THAT:

CAUTION: [] Weapon Alleged in Petition

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 [] Electronic (email, text, etc.) [] 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:		
[x] Other:		
Address Protecte		
the physical safety of firearms and shall su enforcement agency.	Plaintiff or Protected Persons. Therefore render same within 24 hours of service	the court finds that Defendant poses a credible threat to re, Defendant shall not possess, receive, or purchase to the Maricopa County Sheriff's Office or other local law
kept, or held by the p defendant. Defendant	laintiff, the defendant, or a minor child re	control of any animal that is owned, possessed, leased, esiding in the residence or household of the plaintiff or the al and shall not take, transfer, encumber, conceal, commit otherwise dispose of the animal.
No contact included no c	ontact from third parties or via social me	edia.
	frig	
12/6/2024		Joanna Reihing
Date	Judicial Officer	Printed Name
WA PAULO, This face		
		order, you may be arrested and prosecuted for the 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 decisionmaking) 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.

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
FRED
12106 12024 1:20 PM

- Cuponor Co	Jan of Falkona Flagor Co.	00000 10000 N. 40th St	Pricerita, A2, 05052
Plaintiff	☐ Employer-Plaintiff if Workplace Injunction		Case No.
Laura Owens	Trompiado injunction	Gregory Gillespie	FN2024-052375
On behalf of min need of protection		Defendant's address	PETITION for: ☑ Order of Protection ☐ Injunction Against Harassment ☐ Workplace Injunction
Agent's name (if W	Vorkplace Injunction)	Defendant's birth date	
		Defendant's phone	
		Très le NOT a dour écrés.	
Tale periles cons	one Pisinili'is ellegeben	s and requests. To seek mo	Attendant has ordered, see "Order Joyn .
DI	RECTIONS: Please read	the Plaintiff's Guide Sheet I	before filling out this form.
			cribe your relationship to the defendant. *If between the other person and the defendant
☐ Live/lived to ☐ Parent of a ☐ One party i ☒ Romantic c 2. ☐ If checked,		rs brother, sis ☐ Live/lived ☐ Other (det t or present) ending action involving mater	nity, paternity, annulment, legal separation,
3. Name of cour	t, if any, in which any other	support inCounty Superior r protective order related to the	¥
Court name_	1,	Case #	
	there is a contested hearin	g, a judge can consider only v	oth the dates and a brief description of what what you write here. on when the order is served.
Approx. Date		in the margin. Attach addition	
9/27/2023	protection against me, or lawsuit against him for at legally in effect. Accordin would have had access to obtained it directly. Mann not only picked up a pape him. This timeline is signicollected the document for admission to the police thappearing shortly thereaf leak. This action—retriev	cortion coercion. This order way to Manny Vargas, the clerk to this unserved document—nay confirmed, in a recorded pher copy of this order in person ificant because the post apperom the court, demonstrating that he collected the document fiter, indicating he was either dring the document, then either	die posted an order of d in August 2021, Just a day after I filed a civil as never served, meaning it was never at Dreamy Draw Justice Court, only Greg to teven I, as the named party, could have none call on October 3, 2023, that Greg had a but had also requested that it be emailed to ared on Reddit the same day that Greg a clear chain of events. Greg's own that aligns directly with the Reddit post directly involved in or indirectly facilitated its posting it himself or allowing it to be posted the pattern of harassment, where Greg

continually seeks ways to harm my reputation and cause me distress. By ensuring that the document was posted online, he engaged in conduct that is unquestionably intended to intimidate, embarrass, and harm my standing. This act runs counter to the "No Crimes" and "No Contact" clauses of our order, as it is a clear attempt to circumvent direct communication while still causing reputational harm. Furthermore, the nature of this act—distributing a document he knew was unserved and therefore invalid-suggests an intention to mislead and malign, aligning with a pattern of indirect harassment meant to disrupt my life. 11/5/2024 On October 6, 2023, I obtained an order of protection against Clayton Echard (case number FC2023-052114). Just weeks later, on November 2, 2023, Mr. Echard obtained an Injunction Against Harassment against me (case number CV2023-053952), During the pre-issuance continuance hearing for this injunction, Mr. Gillespie attended the court session, ostensibly to "support Clayton"—a man he had no prior relationship with until I filed a paternity case against Mr. Echard. Gillespie's presence was undeniably strategic; he appeared there with no legitimate reason, clearly expecting I would be present, hoping his appearance would shock and unsettle me. He had absolutely no connection to the case and was not a witness or involved party, which makes his attendance, purely and simply, an attempt to intimidate me. This behavior is a clear violation of the order of protection I hold against him, as it constitutes an intentional act to confront or intimidate me. His actions reflect a blatant disregard for the terms of the order, as he appeared at a place he anticipated I would be, solely to cause distress. Although I was able to attend virtually due to a lastminute decision by the judge on the morning of the hearing, it is evident that Gillespie presumed he would encounter me there. 7/25/2024 As part of his ongoing harassment, Greg Gillespie has publicly leaked private emails, text messages, and allegedly recorded phone calls. These private communications have been featured in YouTube videos by content creators such as Dave Neal and Dr. Heinz, where they are used to scrutinize and disparage me, Gillespie's decision to release personal conversations publicly is a clear violation of the protective order. The order explicitly prohibits direct or indirect contact and any behavior that could reasonably cause harassment or distress. By ensuring that my private interactions are broadcasted to a wide audience, Gillespie is clearly using these leaks as a means to intimidate, embarrass, and provoke emotional harm. This is indirect harassment designed to discredit me and cause ongoing distress, and it clearly disregards the protective order's terms, which were put in place to prevent precisely this kind of intimidation. Gillespie's repeated and public exposure of my private communications reveals a clear intent to harm and manipulate my reputation, turning what should be protected, private exchanges into tools for harassment. His actions demonstrate a blatant disregard for the order's purpose of safeguarding my privacy and well-being. 1/10/2024 Gillespie has made public statements on his Instagram account under the username ' In one particularly alarming post, he wrote, "Stop this woman! No one should cave to her harassment, she is DANGEROUS." This statement, publicly labeling me as "dangerous" and accusing me of harassment, serves no purpose other than to harm my reputation and incite fear and distrust among those who see it. By publicly characterizing me in this way, Gillespie is actively attempting to influence others' perceptions and create a hostile environment for me. Such language—calling me "dangerous" and accusing me of "harassment"—is intended to provoke others to act against me, effectively encouraging third parties to "stop" me. This kind of inflammatory statement goes beyond personal opinion or commentary; it is a calculated effort to portray me as a threat, encouraging others to engage in or support his campaign of harassment. This behavior directly violates the terms of the protective order, which prohibits indirect contact and any actions that would reasonably cause me distress, harm, or harassment. By spreading false and harmful narratives about me on a public platform, Gillespie is engaging in a form of indirect harassment, using his social media presence to harm my reputation and provoke fear. This post illustrates a continued pattern of intimidation, as Gillespie is not merely airing grievances but actively attempting to harm my standing in the community and incite further hostility. His actions represent a blatant disregard for the protective order, which is meant to prevent precisely these types of aggressive, public displays intended to intimidate and cause emotional harm. 8/4/2024 On August 4, 2024, I received an email from informing me that a woman , an associate of content creator Dave Neal, had obtained of "intel" about me directly from Greg Gillespie. According to the email, this information was shared with the assistance of a woman named of and was specifically intended to harm my reputation through wider dissemination. This demonstrates that Gillespie has actively collaborated with others to share private or harmful information about me, with the apparent goal of exacerbating the distress and damage caused by his actions. Gillespie's actions are not protected speech under the First Amendment, as they serve no legitimate public interest and are expressly Intended to cause harm, contrary to the restrictions of the protective order. The order prohibits not

	only direct contact but also indirect actions reasonably expected to cause distress, harassment, or harm. By enlisting third parties to disseminate private information with the intent to discredit and intimidate me, Gillespie is actively circumventing the court's restrictions. This calculated effort reflects a clear and ongoing disregard for the boundaries set by the court. The involvement of third parties in these actions exacerbates the harm and creates a wider circle of hostility. This is not lawful expression but targeted harassment intended to intimidate and cause reputational damage, violating the protective order. Gillespie's behavior is a direct attempt to use others to achieve what he is forbidden to do himself, further demonstrating his intent to undermine the legal protections afforded to me.
2/22/2024	On February 22, 2024, Greg Gillespie attended a court hearing related to my paternity case with Clayton Echard. Gillespie had no legitimate involvement in the case or reason to be present in the courtroom. According to an article published by The Arizona Republic on the same date, Gillespie attended the hearing as an observer and declined an interview afterward. His presence at this sensitive proceeding was clearly intended to intimidate and distress me, knowing that his attendance would cause discomfort and emotional harm. At the time of this hearing, Gillespie was not listed as a witness in any capacity; this designation only occurred later, on March 29, 2024. His attendance on February 22 had no connection to any legitimate legal obligation and was solely an act of harassment. This behavior directly violates the protective order, which prohibits indirect harassment and any actions reasonably expected to cause me distress.
12/8/2023	I have had two orders of protection against Gillespie, one served on November 15, 2021, that was in effect for one year (FN2021-004799), and one that was served on December 8, 2022, that was in effect for two years (FN2022-05211).

- 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.

☐Work/Business

⊠ School/other

- 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: 1. No indirect contact through third parties or online forums. 2. Prohibit him from sharing police reports or court filings related to me. 3. Ban on sharing my personal information. 4. No interaction with my online profiles. 5. No surveillance or tracking. 6. No mentions of me in harassment forums.;

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:

Judicial Officer/Clerk/Notary

Data

CLERK OF THE SUPERIOR COURT FILED 11/15/2022@10:55am

Superior Court of Arizona/AZ007035J/0700 201 W. Jefferson Phoenix, AZ 85003 602-506-7353 Monday - Friday 8am - 5pm

Plaintiff Laura Owens	☐ Employer-Plaintiff if Workplace Injunction	Defendant Gregory Gillespie	Case No. FN2022-052111
☐ On behalf of minor/ need of protection na		Defendant's address	PETITION for: ☑ Order of Protection □ Injunction Against Harassment □ Workplace Injunction
Agent's name (if Work	place Injunction)	Defendant's birth date Defendant's phone	

This is NOT a court order.

This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

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

1.	Defendant/Plaintiff Relationship (Choose the options that best describe your relationship to the defendant. *If you are applying on behalf of another person, choose the relationship between the other person and the defendant)			
	 ☐ Married (past or present) ☐ Live/lived together as intimate partners ☐ Parent of a child in common ☐ One party is pregnant by the other ☒ Romantic or sexual relationship (past or present) 	 □ Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step) □ Live/lived together but not as intimate partners □ Other (describe): 		
2.	☐ If checked, Defendant and I have a pending action invidissolution, custody, parenting time, or support in Cour			
3.	Name of court, if any, in which any other protective orde	r related to this conduct has been filed.		

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.)
2/8/2022	On February 8, 2022, I received messages from an unknown number. The sender identified himself as 'Danny Hutzler', and while I didn't recognize the name immediately, an Instagram search showed me that it was a former baseball player for the Chicago Cubs who I had contacted once in June 2021 after seeing him on a dating app, which was right before I met Mr. Gillespie. It soon became clear that I was not communicating with Mr. Hutzler, as the sender repeatedly referred to coming to Scottsdale to pitch for the Chicago Cubs during spring training. The real Mr. Hutzler retired from playing in 2021. I strongly suspected that this was Mr. Gillespie, as he had made attempts to contact me before under fake identities, and no one else would have reason to commit identity theft in order to obtain information about me. 'Mr. Hutzler' immediately and relentlessly tried to get me to meet up with him. He referenced us spending time together before, when in reality, I never met the real Mr. Hutzler. The only conclusion I can make as to why Mr. Gillespie chose Mr. Hutzler to defraud over any other man in my social network is that he saw that Mr. Hutzler was the

only man I had communicated with during the same time period as Mr. Gillespie - meaning that in Mr. Gillespie's mind, it could have been Mr. Hutzler who impregnated me and not him. This was most definitely not the case, as I had no sexual interaction with anyone other than Mr. Gilespie from early 2020 to present day. I had not seen Mr. Gillespie since early August 2021 and he did not know whether or not I had terminated the pregnancy. I presume that his repeated requests to see my body under the identity of Mr. Hutzler was to see if I had or had not. On August 11, 2021, I filed a lawsuit against Mr. Gillespie for abortion coercion and intentional infliction of emotional distress, and litigation is ongoing. Thus, the pregnancy and its status was of the utmost importance to him. I continued the conversation with the fake Mr. Hutzler because I wanted to be able to have firm proof that it was Mr. Gillespie before I reported a violation of the protective order. I was able to get 'Mr. Hutler' to admit that he knew about my pregnancy. Outside of my parents and sister, ONLY Mr. Gillespie, his legal counsel, and my legal counsel know about it. I moved from San Francisco to Scottsdale in early 2021 and have not developed friendships as I have been extremely nervous about leaving my home and encountering Mr. Gillespie given his prior threats and behavior towards me. In addition, 'Mr. Hutzler' referenced my restraining order against Mr. Gillespie, which again, I have not told anyone about. Among the texts sent from the fake Mr. Hutzler: "he didn't want to kill you, he wanted to kill the baby. Not sure I made that clear." He was asking for photos of my body, brought up my order against Greg, said he was going to "make me see stars" and that I "deserved a spanking for being rude" and that he was into violence when he was turned on. He repeatedly begged me to meet up with him. Again, this was confirmed not to be Danny, and no one else would know anything about my past with Greg, let alone be wanting to discuss it for three days. I noticed that my public Instagram story for my personal account was getting watched a lot by 2/22/2022 accounts with no photos or followers. I came to suspect that this was the defendant. I created stories using pins of quotes from Pinterest that were ONLY viewable to accounts I suspected were ', and ' ". On February 22, 2022 (the date used for 'date of the incident'), I was sent the Initial Disclosures for the civil case we are involved in (CV2021-052893). He included ten pages of screenshots of the Instagram stories that were only viewable to him, proving that he was in fact using the pseudonyms listed above to view my account, these despite the order of protection granted on November 11, 2021 (FN2021-004799), which states, in part (with capitalization added here for emphasis on relevant statements), "DO NOT ACCESS any part of the plaintiff's computer, phone, or similar device, or ANY ACCOUNT." In addition, it specifically orders the defendant to, "not make any attempts to track the plaintiff's whereabouts," and he knew that there was a significant chance that I would have geotagged my location on these stories. The defendant blatantly viewed my Instagram story under his own username name, 7/3/2022 ", despite the court's orders in FN2021-004799, stated in detail above. Making my Instagram private would be detrimental to my businesses, which combined have nearly 35,000 followers. The defendant simply needs to stop cyberstalking.

- 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
 Work → Business
 Work → Business
 - □ School/other
- ☐ 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: I request that the defendant not be permitted to contact me via text message under pseudonyms. I also request that the defendant not be able to watch my videos on social media under his name or a pseudonym to attempt to determine my whereabouts.;

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	Attest:	MM	11/15/2022
Plaintiff		Judicial Officer/Clerk/Notary	Date

EXHIBIT I

-10-

CLERK OF THE SUPERIOR COURT FILED

10/6/2023 @ 10:43AM

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032 602-506-7353 Monday - Friday 8am - 5pm

Plaintiff	☐ Employer-Plaintiff if Workplace Injunction	Defendant	Case No. FC2023 - 052771	
Laura Owens	:	Clayton Ray Echard	1 C2023 032 7 11	
☐ On behalf of minor/person in need of protection named:		Defendant's address	PETITION for:	
			☑ Order of Protection	
			☐ Injunction Against Harassment☐ Workplace Injunction	
Agent's name (if Workplace Injunction)		Defendant's birth date		
		Defendant's phone		

This is NOT a court order.

This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

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

1.	Defendant/Plaintiff Relationship (Choose the options that best describe your relationship to the defendant. *If
	you are applying on behalf of another person, choose the relationship between the other person and the defendant)

☐ Married (past or present)	☐ Related as parent, grandparent, child, grandchild,
☐ Live/lived together as intimate partners	brother, sister (or in-law/step)
☐ Parent of a child in common	☐ Live/lived together but not as intimate partners
☑ One party is pregnant by the other	☐ Other (describe):
☑ Romantic or sexual relationship (past or present)	, ,

- 2. ☑ If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in Maricopa County Superior Court, Case # FC2023-052114.
- Name of court, if any, in which any other protective order related to this conduct has been filed. Court name_Case #_
- 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.)
6/1/2023	Clayton has sent threatening messages since discovering I was pregnant, such as: I legitimately hate you right now. my hatred will only grow if you decide to put me through all of this. My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever My hate is toward you and you only. If you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.
9/21/2023	Clayton Echard was The Bachelor and has many diehard loyal fans. He and I are involved in a very public paternity case that is being covered by every major media outlet. Clayton posted to a story to his 270k followers to look me up, which they have, and I have been sent threatening and harassing messages by his followers. I explained this to him and asked him to take down the post, which he did not. By posting personal and sensitive information about me publicly (and without my consent), he has made me feel humiliated and embarrassed.

9/21	ŀ	narassment in and of itself, coupled with the fact that he was inciting his followers to harass me as well. Despite this call, Clayton still did not take down the post.
10/5		Between 9/22 and 10/5. Clavton has posed as several users on Reddit, including and others. He has posted private and confidential information, including facts about my medical history, that is known only to him because of our paternity case. This is why it is 100% traceable back to him. He has also been writing defamatory and very hurtful things about me, including comments about how I have gained weight (I am pregnant), how I am not attractive, how my photos are so poorly edited that it is laughable, how I am bad at my job (a self-help podcaster), and how my prior abusive relationship, which inspired a red talk, never happened, despite mountains of evidence. He is doing everything in his power to uin and hurt my reputation. As a result of what he has posted, I have gotten harassing messages that have told me to harm myself as a result of becoming pregnant with his twins. I am getting other hieratening messages as well, and all of this attention from the general public that he has incited is hereatening messages as well, and all of this attention from the general public that he has incited is hereatening messages as well of this public shaming, he has caused me extreme psychological harm and disrupted my peace. I have asked Clayton to stop the harassment on Reddit and social media so many times, but he won't. I have reported his accounts and posts to Reddit, but he continues to write unacceptable, cruel things about me. He has multiple accounts now and so even from is blocked, he can create another one. As a result of him spreading false and damaging information under pseudonyms, I feel demeaned, humiliated, and like my deepest sense of privacy has been invaded. In addition, he has been in communication with my ex, who I have an order of protection against, and who he knows is dangerous. I have asked him to stop talking to him because it will put me in danger, but he continues to communicate with him.
10/6		When combined, all of this has led me to feel extreme anxiety and fear for my safety. I have not left ny house since September 28th because of this.
them 6. Defe	: ndant shou	ersons should also be on this order. They should be protected because Defendant is a danger to all did be ordered to stay away from these locations at all times, even when I am not present.
⊠ R ⊠ W		confidential) ess
□ De	efendant sh	vns or carries a firearm or other weapons. lould be ordered NOT to possess firearms while this order is in effect because of the risk of harm to lected persons.
		ould be ordered to stay away from any animal that is owned, possessed, leased, kept or held by or a minor child living in either my household or Defendant's household.
9. Other	r requests:	No cyberharassment or cyberbullying under real name or pseudonyms.;
		ry, I swear or affirm the above statements are true to the best of my knowledge, and I request an ting relief as allowed by law.
/s/ Laura	Owens	Attest: \(\frac{1}{2} \) \(\frac{10\lambda \lambda \lambda \text{2}}{2} \)

Plaintiff

Judicial Officer/Clerk/Notary

Date

CLERK OF THE SUPERIOR COURT

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY

Superior Court of Arizona/AZ007035J/0700 602-506-7353 Monday - Friday 8am - 5pm

18380 N. 40th St Phoenix, AZ 85032

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		L.	Brown, D	eputy			

			Electronically recorded		
Order of Protection [] Amended Order			Case No. FC2023-052771 Court ORI No. AZ007035J County Maricopa State AZ		
PLAINTIFF Laura		Owens	PLAINTIFF IDENTIFIERS		
First	Middle	Last	Plaintiff's Date of Birth		

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

DEFENDAN	Τ	
Clayton	Ray	Echard
First	Middle	Last

Defendant/Plaintiff Relationship: One of us is pregnant by the other, We have or had a romantic or sexual relationship.

Defendant's Address:

DEFENDANTIDENTIFIERS					
SEX	RACE	D	ОВ	НТ	WT
Male					
EYES	HAIR		-		ts Release of
			Social Security Numbers		
DDIVED'S LICENSE #			TATE	EVDD	ATE

12:00:00 AM

ΑZ

[] Estimated Date of Birth

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.

Any order served on or after 9/24/2022 is in effect for two years from date of service. Any order served before 9/24/2022 is in effect 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 [] Electronic (email, text, etc.) [] Mail [x] Other: through legal counsel and court proceeding, and through electronic mail only regarding matters pertaining only to the paternity matter.

THE COURT FURTHER ORDERS:

[X] RESIDENCE. Plaintiff is granted exclusive use and possession of the residence currently shared with Defendant. [X] 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 Plaintiffs or other Protected Person's:

the physical safety of Plaintif	. Under A.R.S. § 13-3602(G)(4), the court finds the for Protected Persons. Therefore, Defendant sha same within 24 hours of service to:	
[] ANIMALS. Plaintiff is grante kept, or held by the plaintiff, defendant. Defendant is orde an act of cruelty or neglect in	d the exclusive care, custody, or control of any are the defendant, or a minor child residing in the rese ered to stay away from the animal and shall not tan a violation of section 13-2910, or otherwise dispos	idence or household of the plaintiff or the ake, transfer, encumber, conceal, commit
committed an act of domestic vi shall have no contact with Plains as outlined herein. Defendant sl	se to believe that the Defendant may commit an a colence within the past year (or good cause exists tiff other than as outlined herein and shall not cause all not communicate or post untrue or harassing ocial media, and shall not cause others to commuline or otherwise.	to consider a longer period). Defendant use others to contact Plaintiff other than comments regarding Plaintiff online,
10/6/2023	1306 C	Gary Popham
Date	Judicial Officer	Printed Name

WARNING: This is an official court order. If you disobey this order, you may be arrested and prosecuted 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 decistion-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.

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.

EXHIBIT J

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

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

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

Page: 5 of 8

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

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	-	

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

EXHIBIT K

-12-

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iMessage
2016-07-17 05:56:16 (UTC) [1]
Sender: (415)
Participants: (415)
I'm getting nervous cause I can't tell what this bleeding means
                                                                                       iMessage
                                                                [1] 2<u>016-07-17 05:56:16 (UTC)</u>
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
                                         ((415)
     I"m sorry you were bedridden all day. And yes, our relationship will be good. Believe darlig!
iMessage
2016-07-17 06:00:32 (UTC) [1]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                              (415)
I''ll stop doing research cause we just won''t know for sure for a few days til we make a
decision on twins.
iMessage
2016-07-17 06:00:32 (UTC) [2]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                              ((415))
I'll stop doing research cause we just won't know for sure for a few days til we make a decision
on twins.
iMessage
2016-07-17 06:02:40 (UTC) [2]
Sender: (415)
                        ((41
Participants: (415)
                              (415)
                                               ), Self (
I hope today has been as healing as it could be. Sure love you baby. Wish I could take all your
pain and hurt away!
iMessage
2016-07-17 06:02:40 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                               ), Self (
                              (415)
I hope today has been as healing as it could be. Sure love you baby. Wish I could take all your
pain and hurt away!
iMessage
2016-07-17 06:19:44 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
Twins would be such a cool experience to have together. so many things I want to do with you
in and that just sounds fun. Wish this wasn"t an added stress factor for us cause twins def
change the picture
iMessage
2016-07-17 06:19:44 (UTC) [2]
                        ((4)5)
Sender: (415)
                                               ), Self (
Participants: (415)
                             (415)
Twins would be such a cool experience to have together. so many things I want to do with you
in and that just sounds fun. Wish this wasn't an added stress factor for us cause twins def
change the picture
```

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iMessage
2016-07-17 15:08:48 (UTC) [3]
Sender: (415)
Participants: (415)
Ok...what time should I be ready today? Know you said you were planning something so I can
be ready any time.
iMessage
2016-07-17 15:08:48 (UTC) [1]
Sender: (415)
                                                  ), Self (
Participants: (415)
Ok...what time should I be ready today? Know you said you were planning something so I can
be ready any time.
iMessage
2016-07-17 16:40:32 (UTC) [1]
Sender: (415)
Participants: (415)
                                                  ). Self (
I"ve been sick the last hour and it"s upsetting me that I haven"t heard from you since we"re a
team in this. If we are completely sure we aren"t going to go through with it even if it"s twins
it"s important for me to lie down all day.
iMessage
2016-07-17 16:40:32 (UTC) [3]
Sender: (415)
                         ((415)
Participants: (415)
                                                  ), Self (
I've been sick the last hour and it's upsetting me that I haven't heard from you since we're a
team in this. If we are completely sure we aren't going to go through with it even if it's twins
it's important for me to lie down all day.
                                                                                            iMessage
                                                                   [3] 2016-07-17 16:51
                                                           Sender: Self (
               Participants: (415)
                                                                 ), Self (
  Laura, we are about to drive back from Stinson. Since you are bedridden and have been the
  last day, I scrapped the hiking plans. I'm thinking we just hang out and relax:)
                                                                                            iMessage
                                                                   [1] 2016-07-17 16:51:12 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                              (415)
  Laura, we are about to drive back from Stinson. Since you are bedridden and have been the last day, I scrapped the hiking plans. I'm thinking we just hang out and relax :)
iMessage
2016-07-17 16:57:36 (UTC) [1]
Sender: (415)
Participants: (415)
Hiking could be fun tho!! We could try lands end and stay close to the city?
iMessage
2016-07-17 16:57:36 (UTC) [3]
Sender: (415)
                                                  ), Self (
Participants: (415)
Hiking could be fun tho!! We could try lands end and stay close to the city?
```

EXHIBIT L

```
iMessage
2016-07-15 00:10:00 (UTC) [3]
Sender: (415)
                        ((4)5)
Participants: (4T5)
                                                ), Self (
                             ((415))
Does that mean anything to you?? Seriously after all this. Jeez. Kind of taking a big step in
forgiveness here.
iMessage
2016-07-15 00:10:00 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
                             (415)
Does that mean anything to you?? Seriously after all this. Jeez. Kind of taking a big step in
forgiveness here.
iMessage
2016-07-15 00:49:04 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                             (415)
                                                ), Self (
I don't actually feel like you give a shit either way. It's extremely hard for me to come to
terms with. My love and my desire to make you feel special doesn"t mean anything to you and
I don"t get it.
iMessage
2016-07-15 00:49:04 (UTC) [3]
Sender: (415)
                         (415)
                                                ), Self (
Participants: (415)
I don't actually feel like you give a shit either way. It's extremely hard for me to come to terms
with. My love and my desire to make you feel special doesn't mean anything to you and I don't
get it.
iMessage
2016-07-15 <u>01:08:16 (</u>UTC) [3]
Sender: (415)
                        (415)
Participants: (415)
                                                ), Self (
After 8:15 ok?
iMessage
2016-07-15 01:08:16 (UTC) [1]
Sender: (415)
Participants: (415)
After 8:15 ok?
iMessage
2016-07-15 01:21:04 (UTC) [1]
Sender: (415)
                         (415)
Participants: (415)
                                                ), Self (
I"m sporting
iMessage
2016-07-15 01:21:04 (UTC) [3]
Sender: (415)
                        (415)
                                                ), Self (
Participants: (415)
```

I do really love you.

I'm sporting

```
iMessage

2016-07-15 01:23:12 (UTC) [3]

Sender: (415) (415) ), Self (415) (415) (415) ), Self (415) (415) (415)
```

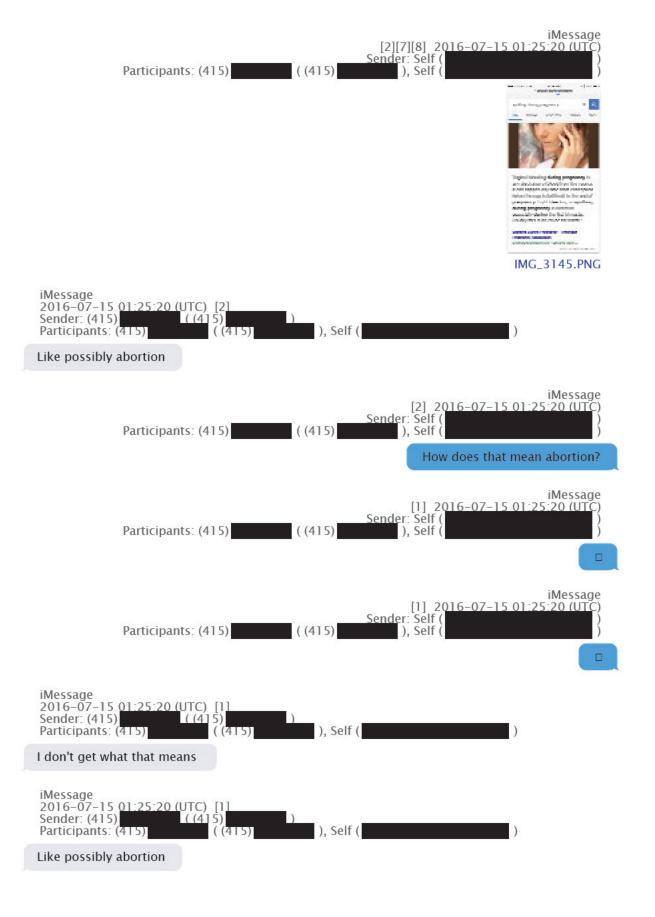
Notes	
[1] Source Device	BCF1237.E01/Macintosh HD
[1] Source File	/Users/michaelmarraccini/Library/Messages/chat.db
[2] Source Device	BCF1237.E01/Macintosh HD
[2] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2016-07-12/+1 (415) on 2016-07-11 at 15.58.08.ichat
[3] Source Device	BCF1237.E01/Macintosh HD
[3] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2016-07-14/+1 (415) on 2016-07-13 at 13.35.12.ichat
[4] External Item	IMG_7345.PNG
[5] Associated File	/Users/michaelmarraccini/Library/Messages/Attachments/db/11/6FC205C D-3EFD-4137-8F60-92F53BC3D92A/IMG_7345.PNG
[6] External Item	IMG_7345.PNG

Tag: Laura text messages (3301-3400 of 19636)

Communications Message

```
iMessage
[1] 2<u>016-07-15 01:23:12 (UTC</u>)
                                                            Sender: Self (
), Self (
               Participants: (415)
                                               (415)
                                                                             And yea, 830-45 works
iMessage
2016-07-15 <u>01:23:12 (</u>UTC) [1]
Sender: (415)
Participants: (415)
                          ((415)
                                                   ), Self (
                                (415)
Spotting*
                                                                                             iMessage
                                                                    [1] 2016-07-15 01:23:12 (UTC)
                                                            Sender: Self (
), Self (
               Participants: (415)
                                               (415)
                                                                               What does that mean?
iMessage
2016-07-15 01:23:12 (UTC) [2]
Sender: (415)
                          ((415)
                                                   ), Self (
Participants: (415)
                               (415)
Like spots of blood
                                                                                             iMessage
                                                           [2] 2016-07-15 01
Sender: Self (
                                                                                          23:12 (UTC)
               Participants: (415)
                                            ((415)
                                                                  ), Self (
                                                                             And yea, 830-45 works
```

```
IMessage
[2] 2016-07-15 01:23:12 (UTC)
Sender: Self (
                                                                                                                                                                                                                                                                                                        iMessage
                                                 Participants: (415) ((415)
                                                                                                                                                                                                                  ), Self (
                                                                                                                                                                                                                                                            What does that mean?
 iMessage
2016-07-15 01:23:12 (UTC) [2]
Sender: (415) (415)
Participants: (415) (445)
                                                                                   ( (415)
( (415)
                                                                                                                                                                  ), Self (
Spotting*
 iMessage
 2016-07-15 01:25:20 (UTC) [2]
Sender: (415) (415)
 Participants: (415)
                                                                                                                                                                   ), Self (
                                                                                                     (415)
I don"t know. There"s not a lot. There was a big clot.
 iMessage
 2016-07-15 01:25:20 (UTC) [2]
 Sender: (415)
                                                                                  ((4)5)
                                                                                                                                                                  ), Self (
 Participants: (415)
                                                                                                   (415)
I mean miscarriage Mike.
                                                                                                                                                                                                                                                                                                        iMessage
                                                                                                                                                                                                       [2][4][5] 2016-07-15 01:25:20 (UTC)
                                                                                                                                                                                               Sender: Self (
                                                 Participants: (415)
                                                                                                                                            ((415)
                                                                                                                                                                                                                 ), Self (
                                                                                                                                                                                                                                                                                  * Anardrens in Street name and V
                                                                                                                                                                                                                                                                                                   Google
                                                                                                                                                                                                                                                                                    dend no later amount v
                                                                                                                                                                                                                                                                                   attention, an experience construction of the control of the contro
                                                                                                                                                                                                                                                                                    Manting Period Language Nagar a Malaite
Malaite Andre against Manting about
                                                                                                                                                                                                                                                                                    Blacks Date Forman Rha's Hond.
                                                                                                                                                                                                                                                                                   0 0 0
                                                                                                                                                                                                                                                                                     IMG_3144.PNG
 iMessage
 2016-07-15 01:25:20 (UTC) [2]
 Sender: (415)
                                                                                   ((415)
                                                                                                   (415)
 Participants: (415)
                                                                                                                                                                 ), Self (
I don"t get what that means
                                                                                                                                                                                                                                                                                                        iMessage
                                                                                                                                                                                                                [2][6] 2016-07-15 01:25:20 (UTC)
                                                                                                                                                                                               Sender: Self (
                                                 Participants: (415) (415)
                                                                                                                                                                                                                 ), Self (
```



```
iMessage
                                                               [1] 2016-07-15 01:25:20 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                                               Self (
                                                                How does that mean abortion?
iMessage
2016-07-15 01:25:20 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
I don't know. There's not a lot. There was a big clot.
iMessage
2016-07-15 01:25:20 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             (415)
I mean miscarriage Mike.
iMessage
2016-07-15 01:27:28 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
Nothing we can do about it regardless
iMessage
2016-07-15 01:27:28 (UTC) [1]
Sender: (415)
                                               ), Self (
Participants: (415)
                             ((415))
http://www.parents.com/pregnancy/complications/miscarriage/understanding-miscarriage/
iMessage
2016-07-15 01:27:28 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                                              ), Self (
http://www.parents.com/pregnancy/complications/miscarriage/understanding-miscarriage/
iMessage
2016-07-15 01:27:28 (UTC) [2]
Sender: (415)
                        ((41
                             5)
Participants: (415)
                             (415)
                                               ), Self (
Nothing we can do about it regardless
                                                                                     iMessage
                                                              [2] 2016-07-15 01:31:44 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                                               Self (
                                                                 Laura, you"re not having one.
iMessage
2016-07-15 01:31:44 (UTC) [2]
Sender: (415)
                        ((4)5)
                                              ), Self (
Participants: (415)
                             ((415))
Why do you say that?
```

```
iMessage
                                                           inessage
[2] 2016-07-15 01:31:44 (UTC)
Sender: Self (________)
               Participants: (415)
                                                                 ), Self (
                                       It says you would have loss of other symptoms like nausea
iMessage
2016-07-15 <u>01:31:44 (</u>UTC) [2]
Sender: (415)
                         ((4)5)
Participants: (415)
                               (415)
                                                  ), Self (
They told me at planned parenthood to watch for spotting and bleeding
iMessage
2016-07-15 01:31:44 (UTC) [2]
Sender: (415) (415)
Participants: (415)
                                                  ), Self (
                               (415)
Didn"t throw up today
iMessage
2016-07-15 01:31:44 (UTC) [2]
Sender: (415)
                         ((4)5)
                                                  ), Self (
Participants: (415)
                               (415)
I have no idea
                                                                                           iMessage
                                                                   [2] 2016-07-15 01:31:44 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                            ((415)
                                                                 ), Self (
iMessage
2016-07-15 01:31:44 (UTC) [2]
                         ((415)
Sender: (415)
                                                  ), Self (
Participants: (415)
I'm just throwing it out there
iMessage
2016-07-15 <u>01:31:44 (</u>UTC) [1]
Sender: (415)
Participants: (415)
                         ((4)5)
                                                  ), Self (
                               (415)
I have no idea
iMessage
2016-07-15 01:31:44 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                               ((415))
                                                  ), Self (
I'm just throwing it out there
                                                                                           iMessage
                                                                   [1] 2016-07-15 01:31:44 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                              (415)
                                                                ), Self (
                                                                      Laura, you're not having one.
```

```
iMessage
2016-07-15 01:31:44 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
Why do you say that?
                                                                                     iMessage
                                                              [1] 2016-07-15 01:31:44 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                                               Self (
                                           (415)
                                    It says you would have loss of other symptoms like nausea
iMessage
2016-07-15 01:31:44 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
They told me at planned parenthood to watch for spotting and bleeding
iMessage
2016-07-15 01:31:44 (UTC) [1]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                             (415)
Didn't throw up today
                                                                                     iMessage
                                                              [1] 2016-07-15 01:31:44 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                         ((415)
                                                            ), Self (
iMessage
2016-07-15 01:33:52 (UTC) [1]
                        ((4)5)
Sender: (415)
                                              ), Self (
Participants: (415)
You're right, probably not. Don't know why I seem to have hit a nerve there with you.
iMessage
2016-07-15 01:33:52 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             (415)
Why?
iMessage
2016-07-15 01:33:52 (UTC) [2]
Sender: (415)
                        (415)
                                               ), Self (
Participants: (415)
You"re right, probably not. Don"t know why I seem to have hit a nerve there with you.
iMessage
2016-07-15 01:33:52 (UTC) [2]
Sender: (415)
                        ((4)5)
                            ((415)
                                              ), Self (
Participants: (415)
Why?
```

EXHIBIT M

```
iMessage
2016-07-16 03:05:36 (UTC) [2]
Sender: (415)
                          ((415)
Participants: (415)
I'm sorry I was upset about you not coming and I'm sorry I didn't get that you don't want
support about your dad. But not responding to me when we are in the midst of this is not ok.
iMessage
2016-07-16 03:05:36 (UTC) [1]
Sender: (415)
                          ((415)
Participants: (415)
                                                    ), Self (
I"m sorry I was upset about you not coming and I"m sorry I didn"t get that you don"t want
support about your dad. But not responding to me when we are in the midst of this is not ok.
iMessage
2016-07-16 03:09:52 (UTC) [1]
Sender: (415)
Participants: (415)
                                                    ), Self (
I don"t want to actually cancel my appointment. I"m really having a rough night. I am
bleeding and feeling horrible. I"m deciding if I need to go to the hospital and I need to speak
with you. I'm extremely upset. I know you are too and I apologize for my part.
iMessage
2016-07-16 03:09:52 (UTC) [2]
Sender: (415)
                          ((415)
Participants: (415)
                                                    ), Self (
I don't want to actually cancel my appointment. I'm really having a rough night. I am bleeding and feeling horrible. I'm deciding if I need to go to the hospital and I need to speak with you. I'm extremely upset. I know you are too and I apologize for my part.
iMessage
2016-07-16 03:37:36 (UTC) [2]
Sender: (415)
                          ((4)5)
Participants: (415)
                                                    ), Self (
                                (415)
I'm sorry Mike.
                                                                                               iMessage
                                                                     [2] 2016-07-16 03:37:36 (UTC)
                                                             Sender: Self (
                Participants: (415)
                                               (415)
                                                                   ), Self (
  Good night Laura. I'm going to because I fee sick and will talk to you tomorrow at some point.
  Please don't call me again for the rest of the night
                                                                                               iMessage
                                                                     [2] 2016-07-16 03:37:36 (UTC)
                                                             Sender: Self (
                Participants: (415)
                                               (415)
                                                                   ), Self (
                                                                       Unless it's a medical emergency
iMessage
2016-07-16 03:37:36 (UTC) [2]
Sender: (415)
                          ((41
                                                    ), Self (
Participants: (415)
I don't want to interrupt your mourning.
```

```
iMessage
                                                         [2] 2016-07-16 03:37:36 (UTC)
Sender: Self (
               Participants: (415)
                                                                ), Self (
                                                                Then please stop. I'm going to bed
iMessage
2016-07-16 <u>03:37:36 (</u>UTC) [2]
Sender: (415)
                         ((4)5)
                              (415)
Participants: (415)
                                                 ), Self (
Are you still my partner? Do you still want to be with me? All I want to know. I will respect
that.
                                                         IMessage
[2] 2016-07-16 03:37:36 (UTC)
Sender: Self (
                                                                                         iMessage
               Participants: (415)
                                             (415)
                                                                ), Self (
                                                                          Yes and yes. Good night
iMessage
2016-07-16 <u>03:37:36 (</u>UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
                              (415)
I"m sorry Mike.
                                                                                         iMessage
                                                                 [1] 2016-07-16 03:37:36 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                               ), Self (
  Good night Laura. I'm going to because I fee sick and will talk to you tomorrow at some point.
  Please don"t call me again for the rest of the night
                                                                                         iMessage
                                                                 [1] 2016-07-16 03:37:36 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                                ), Self (
                                                                  Unless it"s a medical emergency
iMessage
2016-07-16 03:37:36 (UTC) [1]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
                              (415)
I don"t want to interrupt your mourning.
                                                                                         iMessage
                                                                 [1] 2016-07-16 03:37:36 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                                ), Self (
                                                                Then please stop. I"m going to bed
iMessage
2016-07-16 03:37:36 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                 ), Self (
```

Are you still my partner? Do you still want to be with me? All I want to know. I will respect that.

iMessage

```
[1] 2016-07-16 03:37:36 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                             ((415)
                                                                 ), Self (
                                                                             Yes and yes. Good night
iMessage
2016-07-16 03:39:44 (UTC) [1]
Sender: (415)
                         ((415)
                                                  ), Self (
Participants: (415)
                               ((415))
I don"t know how to deal with what you are going through and I just want to help and all I
know how to do is be proactive. I know you don"t want that. I jus don"t know how to do the
other way.
iMessage
2016-07-16 03:39:44 (UTC) [2]
Sender: (415)
                          ((4)5)
                                                  ), Self (
Participants: (415)
                               ((415))
I don't know how to deal with what you are going through and I just want to help and all I know how to do is be proactive. I know you don't want that. I just don't know how to do the
other way.
iMessage
2016-07-16 03:41:52 (UTC) [2]
Sender: (415)
                               (415)
                                                  ), Self (
Participants: (415)
I will try though. I'm sorry. I genuinely love you. I hope you feel better. You know I would do
anything to help you.
iMessage
2016-07-16 03:41:52 (UTC) [1]
Sender: (415)
                          ((4)5)
Participants: (415)
                              (415)
                                                  ), Self (
I will try though. I"m sorry. I genuinely love you. I hope you feel better. You know I would do
anything to help you.
iMessage
2016-07-16 04:22:24 (UTC) [1]
Sender: (415)
                          ((415)
                                                  ), Self (
Participants: (415)
                               (415)
My mom is here trying to determine if it"s an emergency or if we should wait and see
iMessage
2016-07-16 04:22:24 (UTC) [2]
Sender: (415)
                                                  ), Self (
Participants: (415)
My mom is here trying to determine if it's an emergency or if we should wait and see
iMessage
2016-07-16 04:26:40 (UTC) [2]
Sender: (415)
                          ((4)5)
Participants: (415)
```

We called the hospital and bed rest is the best way to get an optimum result not damage the fetus so we are doing that. I know what signs to look for if it looks like its getting wore but hopefully no miscarriage

```
iMessage
2016-07-16 04:26:40 (UTC) [1]
Sender: (415)
                          ((4)5)
                                                   ), Self (
Participants: (415)
                                (415)
We called the hospital and bed rest is the best way to get an optimum result not damage the fetus so we are doing that. I know what signs to look for if it looks like its getting wore but
hopefully no miscarriage
iMessage
2016-07-16 12:09:36 (UTC) [1]
Sender: (415)
                          ((4)5)
Participants: (415)
We are on the way to the hospital. Not doing well.
iMessage
2016-07-16 12:09:36 (UTC) [2]
Sender: (415)
                                                     Self (
Participants: (415)
We are on the way to the hospital. Not doing well.
iMessage
2016-07-16 16:00:00 (UTC) [2]
Sender: (415)
Participants: (415)
Can you give me a quick call so I can update you?
iMessage
2016-07-16 16:00:00 (UTC) [1]
Sender: (415)
                          ((415)
Participants: (415)
                                                   ), Self (
                                ((415)
Can you give me a quick call so I can update you?
iMessage
2016-07-16 16:02:08 (UTC) [1]
Sender: (415)
                          ((415)
Participants: (415)
                                                   ), Self (
Actually it's super important.
iMessage
2016-07-16 16:02:08 (UTC) [2]
Sender: (415)
                          ((4)5)
                                (415)
                                                   ), Self (
Participants: (415)
Actually it's super important.
                                                                                             iMessage
                                                                     [2] 2016-07-16 19:37:36 (UTC)
                                                            Sender: Self (
               Participants: (415)
                                     ((415)
                                                                  ), Self (
                                                     After thinking about it, my answer is the same.
```

```
[2] 2016-07-16 19:37:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                                Self (
                                           I'm sorry, but I still feel like we should go on Tuesday
                                                                                       iMessage
                                                                [1] 2016-07-16 19:37:36 (UTC)
                                                        Sender: Self (
                                            (415)
              Participants: (415)
                                                              ), Self (
                                          I'm sorry, but I still feel like we should go on Tuesday
                                                                                       iMessage
                                                                [1] 2016-07-16 19:37:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                            (415)
                                                              ), Self (
                                                 After thinking about it, my answer is the same.
iMessage
2016-07-16 19:46:08 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                                ). Self (
Do you think maybe we should think a little more?
iMessage
2016-07-16 19:46:08 (UTC) [2]
Sender: (415)
                                                ), Self (
Participants: (415)
                              (415)
Do you think maybe we should think a little more?
iMessage
2016-07-16 19:48:16 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
I just feel like this changes it up a bit and we need to give it a good amount of thought.
iMessage
2016-07-16 19:48:16 (UTC) [1]
Sender: (415)
                        ((41
Participants: (415)
                                               ), Self (
                              (415)
I just feel like this changes it up a bit and we need to give it a good amount of thought.
iMessage
2016-07-16 21:28:32 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
Do you want to think about it some more?
iMessage
2016-07-16 21:28:32 (UTC) [2]
Sender: (415)
                        ((41
                                                ), Self (
Participants: (415)
                             (415)
Do you want to think about it some more?
```

iMessage

iMessage [2] 2016-07-16 22:34:40 (UTC) Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

I thought about it. We will chat about it tomorrow

iMessage

[1] 2016-07-16 22:34:40 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

I thought about it. We will chat about it tomorrow

iMessage

2016-07-16 23:25:52 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Are you mad at me?

iMessage

2016-07-16 23:25:52 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Are you mad at me?

iMessage

[2] 2016-07-16 23:34:24 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

No, not at all

iMessage

[1] 2016-07-16 23:34:24 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

No, not at all

iMessage

2016-07-16 23:38:40 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

You doing ok today? Thinking about you

iMessage

2016-07-16 23:38:40 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

You doing ok today? Thinking about you

iMessage

2016-07-17 05:05:04 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

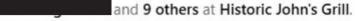
Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

You doing ok?

```
iMessage
2016-07-17 05:05:04 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
You doing ok?
                                                                                       iMessage
                                                                [1] 2<u>016-07-17 05:28:32 (UTC)</u>
                                                        Sender:
                                                                Self (
              Participants: (415)
                                            (415)
                                                                Self (
                                                 I'm doing really good. How was your Saturday?
                                                                                       iMessage
                                                                [2] 2016-07-17 05:28:32 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                 I'm doing really good. How was your Saturday?
iMessage
2016-07-17 05:30:40 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                              ((415))
                                                ), Self (
I had to stay in bed for all of it but my parents came over. Bleeding started up again about an
hour ago. What are you doing?
iMessage
2016-07-17 05:30:40 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             ((415)
I had to stay in bed for all of it but my parents came over. Bleeding started up again about an
hour ago. What are you doing?
iMessage
2016-07-17 05:43:28 (UTC) [1]
                        ((415)
Sender: (415)
Participants: (415)
                             ((415)
                                                ), Self (
Baby our relationship is going to be ok together regardless of if we miscarry or abort right?
iMessage
2016-07-17 05:43:28 (UTC) [2]
Sender: (415)
                        ((415)
Participants: (415)
                                               ), Self (
                              (415)
Baby our relationship is going to be ok together regardless of if we miscarry or abort right?
                                                                                       iMessage
                                                                [2] 2016-07-17 05:56:16 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                            (415)
                                                              ), Self (
      I'm sorry you were bedridden all day. And yes, our relationship will be good. Believe darlig!
iMessage
2016-07-17 05:56:16 (UTC) [2]
Sender: (415)
Participants: (415)
                                               ), Self (
                              (415)
I'm getting nervous cause I can't tell what this bleeding means
```

```
iMessage
2016-07-17 05:56:16 (UTC) [1]
Sender: (415)
Participants: (415)
I'm getting nervous cause I can't tell what this bleeding means
                                                                                       iMessage
                                                                [1] 2<u>016-07-17 05:56:16 (UTC)</u>
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
                                         ((415)
     I"m sorry you were bedridden all day. And yes, our relationship will be good. Believe darlig!
iMessage
2016-07-17 06:00:32 (UTC) [1]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                              (415)
I''ll stop doing research cause we just won''t know for sure for a few days til we make a
decision on twins.
iMessage
2016-07-17 06:00:32 (UTC) [2]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                              ((415))
I'll stop doing research cause we just won't know for sure for a few days til we make a decision
on twins.
iMessage
2016-07-17 06:02:40 (UTC) [2]
Sender: (415)
                        ((41
Participants: (415)
                              (415)
                                               ), Self (
I hope today has been as healing as it could be. Sure love you baby. Wish I could take all your
pain and hurt away!
iMessage
2016-07-17 06:02:40 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                               ), Self (
                              (415)
I hope today has been as healing as it could be. Sure love you baby. Wish I could take all your
pain and hurt away!
iMessage
2016-07-17 06:19:44 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
Twins would be such a cool experience to have together. so many things I want to do with you
in and that just sounds fun. Wish this wasn"t an added stress factor for us cause twins def
change the picture
iMessage
2016-07-17 06:19:44 (UTC) [2]
                        ((4)5)
Sender: (415)
                                               ), Self (
Participants: (415)
                             (415)
Twins would be such a cool experience to have together. so many things I want to do with you
in and that just sounds fun. Wish this wasn't an added stress factor for us cause twins def
change the picture
```

EXHIBIT N



Celebrating the great Ronn Owens tonight at John's Grill...40 years asking San Francisco politicians the tough questions over the 50,000 watt clear channel KGO Radio...



145

12 comments 1 share

Share









EXHIBIT O

```
iMessage
2016-07-22 17:57:20 (UTC) [3]
Sender: (510) 703-6631 ( (510) 703-6631 )
Participants: (415) 810-0056 ((415) 810-0056), (510) 703-6631 ((510) 703-6631), (415)
                        ), Self (
     (415)
Mike. If it's your first Uforia class use the promo code " JOY& SWEAT"
iMessage
2016-07-22 17:59:28 (UTC) [3]
Sender: (415) 810-0056 ( (415) 810-0056 )
Participants: (415) 810-0056 ( (415) 810-0056 ). (510) 703-6631 ( (510) 703-6631 ), (415)
     (415)
                        ), Self (
Can we do the early class?
iMessage
2016-07-22 17:59:28 (UTC) [2]
Sender: (415) 810-0056 ( (415) 810-0056 )
<u>Participants: (510) 703</u>-6631 ((5<u>10) 703-6631 ), (415) 81</u>0-0056 ((415) 810-0056 ), (415)
                        ), Self ( e
     (415)
Can we do the early class?
iMessage
2016-07-22 17:59:28 (UTC) [1]
Sender: (415) 810-0056 ( (415) 810-0056 )
Participants: (510) 703-6631 ( (510) 703-6631 ). (415)
                                                                      ((415)
                                                                                      ), (415) 810-
0056 ((415) 810-0056), Self (
Can we do the early class?
iMessage
2016-07-22 21:28:14 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                              ((415)
                                                  ), Self (
In the office still
iMessage
2016–07–22 21:28:14 (UTC) [4]
Sender: (415) ((4<u>1</u>5)
                         ( (415)
( (415)
Participants: (415)
                                                  ), Self (
In the office still
iMessage
2016–07–22 21:28:32 (UTC) [4]
Sender: (415) ((4]5)
                         ((415)
                                                  ), Self (
Participants: (415)
Looks like we have to do the pills
iMessage
2016-07-22 21:28:32 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                               (415)
                                                 ), Self (
Looks like we have to do the pills
                                                                                           iMessage
                                                                   [1] 2016-07-22 21:36:53 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                             (415)
                                                                ), Self (
```

```
iMessage
                                                                    [4] 2016-07-22 21:36:53 (UTC)
                                                            Sender: Self (
                                              (415)
               Participants: (415)
                                                                  ), Self (
                                                             Did they tell you that? How do you feel?
iMessage
2016-07-22 21:43:28 (UTC) [4]
Sender: (415)
                                                   ), Self (
Participants: (415)
Yes
iMessage
Message
2016-07-22 21:43:28 (UTC) [1]
Sender: (415) (415)
Participants: (415) (415)
                                                   ), Self (
Yes
                                                            iMessage
[1] 2016-07-22 21:46:40 (UTC)
Sender: Self (
               Participants: (415)
                                               (415)
                                                                  ), Self (
                                                                                 Is everything alright?
                                                                                             iMessage
                                                                    [4] 2016-07-22 21:46:40 (UTC)
                                                            Sender: Self (
               Participants: (415)
                                               (415)
                                                                  ), Self (
                                                                                 Is everything alright?
iMessage
2016-07-22 22:02:40 (UTC) [4]
Sender: (415)
                          ((4)5)
                                                   ), Self (
Participants: (415)
                               (415)
Yes it's just a massive bummer.
iMessage
2016–07–22 22:02:40 (UTC) [1]
Sender: (415) (415)
                                                   ), Self (
Participants: (415)
Yes it"s just a massive bummer.
                                                                                             iMessage
                                                                    [1] 2016-07-22 22:26:08 (UTC)
                                                            Sender: Self (
               Participants: (415)
                                               (415)
                                                                  ), Self (
                           I had a feeling that was going to be the case. What are you doing now?
                                                                                             iMessage
                                                                    [4] 2016-07-22 22:26:08 (UTC)
                                                            Sender: Self (
               Participants: (415) (415)
                                                                  ), Self (
```

Did they tell you that? How do you feel?

```
I had a feeling that was going to be the case. What are you doing now?
```

```
iMessage
                                                                [2] 2016-07-22
                                                                                    38:56 (UTC)
                                                       Sender: Self ( e:
Participants: (510) 703-6631 ( (510) 703-6631 ), (415) 810-0056 ( (415) 810-0056 ). (415)
                                                             ), Self (e
                                           (415)
                             Whatever time works for me and I'll sign up now and enter the code
                                                                                       iMessage
                                                                [3] 2016-07-22 22:38:56 (UTC
                                                        Sender: Self (
Participants: (415) 810-0056 ( (415) 810-0056 ), (510) 703-6631 ( (5
                                                               ), Self
                                             (415)
                             Whatever time works for me and I'll sign up now and enter the code
                                                                                       iMessage
                                                                [1] 2016-07-22 22:38:56 (UTC)
                                                                Self (
                                                         Sender:
Participants: (510) 703-6631 ( (510) 703-6631 ), (415)
                                                                 ((4)
                                                                                   ). (415) 810
                                       0056 ((415) 810-0056),
                             Whatever time works for me and I'll sign up now and enter the code
 iMessage
 2016-07-22 23:13:04 (UTC) [1]
 Sender: (415)
                         ((415)
 Participants: (415)
                              (415)
                                                ), Self (
 Sorry, my mom picked me up from the doctor and I was with her and filled her in. I took the
 Mifepristone.
 iMessage
 2016-07-22 23:13:04 (UTC) [4]
 Sender: (415)
                         ((4)5)
 Participants: (415)
                              ((415))
                                                ), Self (
 Sorry, my mom picked me up from the doctor and I was with her and filled her in. I took the
 Mifepristone.
 iMessage
 2016-07-22 23:15:12 (UTC) [4]
 Sender: (415)
                         ((4)
 Participants: (415)
                              (415)
                                                ), Self (
 She's running to Walgreens for me and I'm at my parents house for a bit. I can text though.
 iMessage
 2016-07-22 23:15:12 (UTC) [1]
 Sender: (415)
                         ((41
                                                ), Self (
 Participants: (415)
 She"s running to Walgreens for me and I"m at my parents house for a bit. I can text though.
 iMessage
 2016-07-23 00:29:52 (UTC) [1]
 Sender: (415)
                         ((4)5)
                                                ), Self (
 Participants: (415)
                              (415)
 Is your meeting done?
```

EXHIBIT P

```
iMessage
2016-07-28 <u>18:18:40 (</u>UTC) [1]
Sender: (415)
Participants: (415)
I'm ok, just at the doctor's office and then going into the station. How was last night?
                                                                                       iMessage
                                                                [1] 2016-07-28 18:18:40 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                            (415)
  So amazing. I got trashed with my family and my phone died, so it was kind of nice to not take
  any phone calls or work emails and just focus on me madre
iMessage
2016-07-28 18:37:52 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                              (415)
                                                ), Self (
I bet she loved that :)
iMessage
2016-07-28 18:44:16 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                                                ), Self (
When do you want me to take misoprostol again?
iMessage
2016-07-28 18:44:16 (UTC) [1]
                        ((415)
Sender: (415)
                                                ), Self (
Participants: (415)
                             (415)
I"m picking it up after work
                                                                                       iMessage
                                                                [1] 2016-07-28 19:09:52 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           ((415)
                                                             ), Self (
                                                                       You have to take it again?
iMessage
2016-07-28 19:18:24 (UTC) [1]
Sender: (415)
                        (415)
                                               ), Self (
Participants: (415)
I"m taking it again so I don"t have to have suction done. There"s a small amount of tissue left
and I can do this or suction.
iMessage
2016-07-28 19:22:40 (UTC) [1]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
So when?
iMessage
2016-07-28 19:50:24 (UTC) [1]
Sender: (415)
                                               ), Self (
Participants: (415)
                              (415)
We can just do it at night after work?
```

```
iMessage
                                                           [2] 2016-08-02 04:01:04 (UTC)
Sender: Self (
               Participants: (415)
                                                                 ), Self (
                                                                                                 Here
iMessage
2016-08-02 <u>04:03:12 (</u>UTC) [2]
                         ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                  ), Self (
Tossing keys
iMessage
2016-08-02 04:03:12 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                  ), Self (
                               ((415)
Tossing keys
iMessage
2016-08-02 14:53:52 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                               (415)
                                                  ), Self (
You"re staying with me the rest of the week until SD, right?
iMessage
2016-08-02 14:53:52 (UTC) [2]
Sender: (415)
Participants: (415)
                                                  ), Self (
                               (415)
You're staying with me the rest of the week until SD, right?
iMessage
2016-08-02 15:17:20 (UTC) [2]
Sender: (415) (415)
                                                  ), Self (
Participants: (415)
On the way
iMessage
2016-08-02 15:17:20 (UTC) [1]
Sender: (415)
Participants: (415)
                          ((4)5)
                                                  ), Self (
                               (415)
On the way
                                                                                            iMessage
                                                                   [1] 2016-08-02 15:19:28 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                              (415)
                                                                 ), Self (
                                                                                                  Yes
                                                                                            iMessage
                                                                   [1] 2<u>016-08-02 15:19:28 (UTC)</u>
                                                           Sender: Self (
), Self (
               Participants: (415)
                                              ((415)
                                                                             Who is going with you?
```

```
iMessage
2016-08-02 15:19:28 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
Sarah and my mom
                                                                                       iMessage
                                                               [2] 2016-08-02 15:19:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                                                            Yes
                                                                                       iMessage
                                                               [2] 2016-08-02 15:19:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                          ((415)
                                                             ), Self (
                                                                         Who is going with you?
iMessage
2016-08-02 15:19:28 (UTC) [2]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             (415)
Sarah and my mom
iMessage
2016-08-02 15:23:44 (UTC) [2]
Sender: (415)
Participants: (415)
                                               ), Self (
                              ((415))
I'll have the doctor write something after I'm done to say I'm no longer pregnant.
                                                                                       iMessage
                                                        [2] 2016–08–02 15
Sender: Self (
                                                                                     3:44 (UTC)
              Participants: (415)
                                                              ), Self (
                                                  K, I'll come right after my mandatory meeting
                                                                                       iMessage
                                                               [1] 2016-08-02 15
                                                                                    23:44 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                         ((415)
                                                  K, I'll come right after my mandatory meeting
iMessage
2016-08-02 15:23:44 (UTC) [1]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
I'll have the doctor write something after I'm done to say I'm no longer pregnant.
iMessage
2016-08-02 15:30:08 (UTC) [1]
Sender: (415)
                        ((4)5)
                             (415)
                                               ), Self (
Participants: (415)
Anything else you want to say before I get there?
```

```
iMessage
                                                                [1] 2016-08-02 15:30:08 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                                           No, that"s perfect! Thank you for that
                                                                                       iMessage
                                                                [2] 2016-08-02 15:30:08 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                            (415)
                                                           No, that's perfect! Thank you for that
iMessage
2016-08-02 15:30:08 (UTC) [2]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
Anything else you want to say before I get there?
iMessage
2016-08-02 15:36:32 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
                             (415)
Ok. So still committed to us and our future after this is over? I understand it will take time and
work
iMessage
2016-08-02 15:36:32 (UTC) [1]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
                             (415)
Ok. So still committed to us and our future after this is over? I understand it will take time and
work
                                                                                       iMessage
                                                                [1] 2016-08-02 15:40:48 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                            (415)
                                                              ), Self (
                                                                                            Yes:)
                                                                                       iMessage
                                                                [2] 2016-08-02 15:40:48 (UTC)
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
                                          ((415)
                                                                                            Yes:)
iMessage
2016-08-02 15:49:20 (UTC) [2]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
□Sausage fest
iMessage
2016-08-02 15:49:20 (UTC) [1][3]
Sender: (415)
Participants: (415)
                                                ), Self (
□Sausage fest
```

```
iMessage
2016–08–02 15:49:20 (UTC) [1][4][5]
Sender: (415) (415)
Participants: (415) (415)
                                                       ), Self (
IMG_7551.JPG
                                                                                                      iMessage
                                                                           [1] 2016-08-02 17:55:12 (UTC)
                                                                  Sender: Self (
                 Participants: (415)
                                                 ((415)
                                                                        ), Self (
                                                                                          How are you doing?
                                                                                                      iMessage
                                                                  [2] 2016-08-02 17:55:12 (UTC)
Sender: Self (
                 Participants: (415)
                                                   (415)
                                                                         ), Self (
                                                                                          How are you doing?
iMessage
Message
2016–08–02 18:46:24 (UTC) [2]
Sender: (415) (415)
Participants: (415) (415)
                                                        ), Self (
It's done
iMessage
2016-08-02 18:46:24 (UTC) [1]
Sender: (415)
                            ((415)
                                  (415)
                                                        ), Self (
Participants: (415)
It"s done
iMessage
2016-08-02 18:48:32 (UTC) [1]
                            ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                        ), Self (
I"m tiredddddd
iMessage
2016–08–02 18:48:32 (UTC) [2]
Sender: (415) (415)
Participants: (415) (44
```

I'm tiredddddd

```
iMessage
2016–08–02 18:50:40 (UTC) [2]
Sender: (415) ((415)
Sender: (415)
Participants: (415)
I don't regret it
iMessage
2016-08-02 <u>18:50:40 (</u>UTC) [2]
Sender: (415)
Participants: (415)
                            ((415)
                                  (415)
                                                      ), Self (
What time will I see you at? Like 3?
iMessage
2016–08–02 18:50:40 (UTC) [1]
Sender: (415) (415)
Sender: (415)
Participants: (415)
                                                      ), Self (
                                 (415)
I don"t regret it
iMessage
2016-08-02 18:50:40 (UTC) [1]
Sender: (415)
                           ((4)5)
                                                      ), Self (
Participants: (415)
                                 (415)
What time will I see you at? Like 3?
iMessage
2016-08-02 18:54:56 (UTC) [1][6]
Sender: (415)
                                                      ), Self (
Participants: (415)
                                  (415)
□I hope that that is a good step towards trusting me. I had them draft it on their letterhead as
well and not just paper.
iMessage
2016-08-02 18:54:56 (UTC) [1][7][8]
Sender: (415)
Participants: (415)
                           ( (415)
( (415)
                                                      ), Self (
IMG_7560.JPG
```

iMessage [1] 2016-08-02 18:54:56 (UTC) Sender: Self () Participants: (415) ((415)), Self ()

Whenever this meeting is over. Just walking in now. How do you feel?

```
iMessage
2016-08-02 <u>18:54:56 (</u>UTC) [2]
Sender: (415)
Participants: (415)
□ I hope that that is a good step towards trusting me. I had them draft it on their letterhead as
well and not just paper.
                                                                                        iMessage
                                                                [2] 2016-08-02 18:54:56 (UTC)
                                                         Sender: Self (
                                            (415)
              Participants: (415)
                                                               ), Self (
                           Whenever this meeting is over. Just walking in now. How do you feel?
iMessage
2016-08-02 18:57:04 (UTC) [2]
Sender: (415)
                         ((4)5)
                                                ), Self (
Participants: (415)
                              (415)
I'm tired and have cramps but feel relieved
iMessage
2016-08-02 18:57:04 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                              ((415))
                                                ), Self (
Did you get the attachment?
iMessage
2016-08-02 18:57:04 (UTC) [1]
                        ((415)
Sender: (415)
Participants: (415)
                                                ), Self (
                              ((415)
I"m tired and have cramps but feel relieved
iMessage
2016-08-02 18:57:04 (UTC) [1]
Sender: (415)
                         ((4)5)
                                                ), Self (
Participants: (415)
                              (415)
Did you get the attachment?
                                                                                        iMessage
                                                                [1] 2016-08-02 19:26:56 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                            (415)
                                                               ), Self (
                                                              I did, thank you very much for that
                                                                                        iMessage
                                                         [2] 2016-08-02 19:26:56 (UTC)
Sender: Self (
              Participants: (415)
                                                              ), Self (
                                            (415)
                                                              I did, thank you very much for that
iMessage
2016-08-02 20:50:08 (UTC) [2]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
I'm not feeling so great
```

```
iMessage
                                                               [2] 2016-08-02 20:50:08 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                                             ), Self (
                                                      I'm still in the meeting. What's going on?
iMessage
2016-08-02 20:50:08 (UTC) [1]
Sender: (415)
                        (415)
                             (415)
Participants: (415)
                                               ), Self (
I'm not feeling so great
                                                                                      iMessage
                                                               [1] 2016-08-02 20:50:08 (UTC)
                                                       Sender: Self (
                                         ((415)
              Participants: (415)
                                                             ), Self (
                                                     I"m still in the meeting. What"s going on?
iMessage
2016-08-02 21:07:12 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
Sorry lying down. Just feel uncomfortable and out of it
iMessage
2016-08-02 21:07:12 (UTC) [2]
Sender: (415)
                                               ), Self (
Participants: (415)
                             ((415)
Sorry lying down. Just feel uncomfortable and out of it
iMessage
2016-08-02 21:09:20 (UTC) [2]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
Sarah went back to work and my mom is about to leave my place because my dad has an
oncology appointment and I told her you would be here pretty soon
iMessage
2016-08-02 21:09:20 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                               ), Self (
Sarah went back to work and my mom is about to leave my place because my dad has an
oncology appointment and I told her you would be here pretty soon
iMessage
2016-08-02 21:41:20 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
Leaving soon?
                                                                                      iMessage
                                                               [1] 2016-08-02 21
                                                                                      20 (UTC)
                                                       Sender: Self (
              Participants: (415) (415)
                                                             ), Self (
                                                                                   Still in here
```

EXHIBIT Q

```
iMessage
                                                           [2] 2016-08-02 04:01:04 (UTC)
Sender: Self (
               Participants: (415)
                                                                 ), Self (
                                                                                                 Here
iMessage
2016-08-02 <u>04:03:12 (</u>UTC) [2]
                         ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                  ), Self (
Tossing keys
iMessage
2016-08-02 04:03:12 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                  ), Self (
                               ((415)
Tossing keys
iMessage
2016-08-02 14:53:52 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                               (415)
                                                  ), Self (
You"re staying with me the rest of the week until SD, right?
iMessage
2016-08-02 14:53:52 (UTC) [2]
Sender: (415)
Participants: (415)
                                                  ), Self (
                               (415)
You're staying with me the rest of the week until SD, right?
iMessage
2016-08-02 15:17:20 (UTC) [2]
Sender: (415) (415)
                                                  ), Self (
Participants: (415)
On the way
iMessage
2016-08-02 15:17:20 (UTC) [1]
Sender: (415)
Participants: (415)
                          ((4)5)
                                                  ), Self (
                               (415)
On the way
                                                                                            iMessage
                                                                   [1] 2016-08-02 15:19:28 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                              (415)
                                                                 ), Self (
                                                                                                  Yes
                                                                                            iMessage
                                                                   [1] 2<u>016-08-02 15:19:28 (UTC)</u>
                                                           Sender: Self (
), Self (
               Participants: (415)
                                              ((415)
                                                                             Who is going with you?
```

```
iMessage
2016-08-02 15:19:28 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
Sarah and my mom
                                                                                       iMessage
                                                               [2] 2016-08-02 15:19:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                                                            Yes
                                                                                       iMessage
                                                               [2] 2016-08-02 15:19:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                          ((415)
                                                             ), Self (
                                                                         Who is going with you?
iMessage
2016-08-02 15:19:28 (UTC) [2]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             (415)
Sarah and my mom
iMessage
2016-08-02 15:23:44 (UTC) [2]
Sender: (415)
Participants: (415)
                                               ), Self (
                              ((415))
I'll have the doctor write something after I'm done to say I'm no longer pregnant.
                                                                                       iMessage
                                                        [2] 2016–08–02 15
Sender: Self (
                                                                                     3:44 (UTC)
              Participants: (415)
                                                              ), Self (
                                                  K, I'll come right after my mandatory meeting
                                                                                       iMessage
                                                               [1] 2016-08-02 15
                                                                                    23:44 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                         ((415)
                                                  K, I'll come right after my mandatory meeting
iMessage
2016-08-02 15:23:44 (UTC) [1]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
I'll have the doctor write something after I'm done to say I'm no longer pregnant.
iMessage
2016-08-02 15:30:08 (UTC) [1]
Sender: (415)
                        ((4)5)
                             (415)
                                               ), Self (
Participants: (415)
Anything else you want to say before I get there?
```

```
iMessage
                                                                [1] 2016-08-02 15:30:08 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                                           No, that"s perfect! Thank you for that
                                                                                       iMessage
                                                                [2] 2016-08-02 15:30:08 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                            (415)
                                                           No, that's perfect! Thank you for that
iMessage
2016-08-02 15:30:08 (UTC) [2]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
Anything else you want to say before I get there?
iMessage
2016-08-02 15:36:32 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
                             (415)
Ok. So still committed to us and our future after this is over? I understand it will take time and
work
iMessage
2016-08-02 15:36:32 (UTC) [1]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
                             (415)
Ok. So still committed to us and our future after this is over? I understand it will take time and
work
                                                                                       iMessage
                                                                [1] 2016-08-02 15:40:48 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                            (415)
                                                              ), Self (
                                                                                            Yes:)
                                                                                       iMessage
                                                                [2] 2016-08-02 15:40:48 (UTC)
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
                                          ((415)
                                                                                            Yes:)
iMessage
2016-08-02 15:49:20 (UTC) [2]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
□Sausage fest
iMessage
2016-08-02 15:49:20 (UTC) [1][3]
Sender: (415)
Participants: (415)
                                                ), Self (
□Sausage fest
```

```
iMessage
2016–08–02 15:49:20 (UTC) [1][4][5]
Sender: (415) (415)
Participants: (415) (415)
                                                       ), Self (
IMG_7551.JPG
                                                                                                      iMessage
                                                                           [1] 2016-08-02 17:55:12 (UTC)
                                                                  Sender: Self (
                 Participants: (415)
                                                 ((415)
                                                                        ), Self (
                                                                                          How are you doing?
                                                                                                      iMessage
                                                                  [2] 2016-08-02 17:55:12 (UTC)
Sender: Self (
                 Participants: (415)
                                                   (415)
                                                                         ), Self (
                                                                                          How are you doing?
iMessage
Message
2016–08–02 18:46:24 (UTC) [2]
Sender: (415) (415)
Participants: (415) (415)
                                                        ), Self (
It's done
iMessage
2016-08-02 18:46:24 (UTC) [1]
Sender: (415)
                            ((415)
                                  (415)
                                                        ), Self (
Participants: (415)
It"s done
iMessage
2016-08-02 18:48:32 (UTC) [1]
                            ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                        ), Self (
I"m tiredddddd
iMessage
2016–08–02 18:48:32 (UTC) [2]
Sender: (415) (415)
Participants: (415) (44
```

I'm tiredddddd

```
iMessage
2016–08–02 18:50:40 (UTC) [2]
Sender: (415) ((415)
Sender: (415)
Participants: (415)
I don't regret it
iMessage
2016-08-02 <u>18:50:40 (</u>UTC) [2]
Sender: (415)
Participants: (415)
                            ((415)
                                  (415)
                                                      ), Self (
What time will I see you at? Like 3?
iMessage
2016–08–02 18:50:40 (UTC) [1]
Sender: (415) (415)
Sender: (415)
Participants: (415)
                                                      ), Self (
                                 (415)
I don"t regret it
iMessage
2016-08-02 18:50:40 (UTC) [1]
Sender: (415)
                           ((4)5)
                                                      ), Self (
Participants: (415)
                                 (415)
What time will I see you at? Like 3?
iMessage
2016-08-02 18:54:56 (UTC) [1][6]
Sender: (415)
                                                      ), Self (
Participants: (415)
                                  (415)
□I hope that that is a good step towards trusting me. I had them draft it on their letterhead as
well and not just paper.
iMessage
2016-08-02 18:54:56 (UTC) [1][7][8]
Sender: (415)
Participants: (415)
                           ( (415)
( (415)
                                                      ), Self (
IMG_7560.JPG
```

iMessage [1] 2016-08-02 18:54:56 (UTC) Sender: Self () Participants: (415) ((415)), Self ()

Whenever this meeting is over. Just walking in now. How do you feel?

```
iMessage
2016-08-02 <u>18:54:56 (</u>UTC) [2]
Sender: (415)
Participants: (415)
□ I hope that that is a good step towards trusting me. I had them draft it on their letterhead as
well and not just paper.
                                                                                        iMessage
                                                                [2] 2016-08-02 18:54:56 (UTC)
                                                         Sender: Self (
                                            (415)
              Participants: (415)
                                                               ), Self (
                           Whenever this meeting is over. Just walking in now. How do you feel?
iMessage
2016-08-02 18:57:04 (UTC) [2]
Sender: (415)
                         ((4)5)
                                                ), Self (
Participants: (415)
                              (415)
I'm tired and have cramps but feel relieved
iMessage
2016-08-02 18:57:04 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                              ((415))
                                                ), Self (
Did you get the attachment?
iMessage
2016-08-02 18:57:04 (UTC) [1]
                        ((415)
Sender: (415)
Participants: (415)
                                                ), Self (
                              ((415)
I"m tired and have cramps but feel relieved
iMessage
2016-08-02 18:57:04 (UTC) [1]
Sender: (415)
                         ((4)5)
                                                ), Self (
Participants: (415)
                              (415)
Did you get the attachment?
                                                                                        iMessage
                                                                [1] 2016-08-02 19:26:56 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                            (415)
                                                               ), Self (
                                                              I did, thank you very much for that
                                                                                        iMessage
                                                         [2] 2016-08-02 19:26:56 (UTC)
Sender: Self (
              Participants: (415)
                                                              ), Self (
                                            (415)
                                                              I did, thank you very much for that
iMessage
2016-08-02 20:50:08 (UTC) [2]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
I'm not feeling so great
```

```
iMessage
                                                               [2] 2016-08-02 20:50:08 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                                             ), Self (
                                                      I'm still in the meeting. What's going on?
iMessage
2016-08-02 20:50:08 (UTC) [1]
Sender: (415)
                        (415)
                             (415)
Participants: (415)
                                               ), Self (
I'm not feeling so great
                                                                                      iMessage
                                                               [1] 2016-08-02 20:50:08 (UTC)
                                                       Sender: Self (
                                         ((415)
              Participants: (415)
                                                             ), Self (
                                                     I"m still in the meeting. What"s going on?
iMessage
2016-08-02 21:07:12 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
Sorry lying down. Just feel uncomfortable and out of it
iMessage
2016-08-02 21:07:12 (UTC) [2]
Sender: (415)
                                               ), Self (
Participants: (415)
                             ((415)
Sorry lying down. Just feel uncomfortable and out of it
iMessage
2016-08-02 21:09:20 (UTC) [2]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
Sarah went back to work and my mom is about to leave my place because my dad has an
oncology appointment and I told her you would be here pretty soon
iMessage
2016-08-02 21:09:20 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                               ), Self (
Sarah went back to work and my mom is about to leave my place because my dad has an
oncology appointment and I told her you would be here pretty soon
iMessage
2016-08-02 21:41:20 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
Leaving soon?
                                                                                      iMessage
                                                               [1] 2016-08-02 21
                                                                                      20 (UTC)
                                                       Sender: Self (
              Participants: (415) (415)
                                                             ), Self (
                                                                                   Still in here
```

```
iMessage
2016-08-10 07:10:56 (UTC) [3]
Sender: (415)
Participants: (415)
Peace out?
iMessage
2016-08-10 <u>07:10:56 (</u>UTC) [2]
Sender: (415)
                           ((415)
                                                    ). Self (
Participants: (415)
Peace out?
iMessage
2016-08-10 07:15:12 (UTC) [2]
Sender: (415)
                           (415)
                                                     ), Self (
Participants: (415)
You don"t do that to someone who aborted your kids a week ago. You made promises to me
and I made them to you. My dad guaranteed me you were going to stay when I was having
doubts last week before this. Said no stand up guy would ever leave a girl after an abortion. He would be absolutely livid. We did this together. Don't put all the guilt of it on me.
iMessage
2016-08-10 07:15:12 (UTC) [3]
Sender: (415)
                           ((4)5)
                                                    ), Self (
Participants: (415)
You don't do that to someone who aborted your kids a week ago. You made promises to me
and I made them to you. My dad guaranteed me you were going to stay when I was having
doubts last week before this. Said no stand up guy would ever leave a girl after an abortion. He would be absolutely livid. We did this together. Don't put all the guilt of it on me.
iMessage
2016-08-10 14:38:56 (UTC) [4]
                           ((415)
Sender: (415)
Participants: (415)
                                                    ), Self (
I'm feeling absolutely horrible. I'm cramping nonstop which I am not used to and it kept me
up all night, have a fever, and am bleeding a lot.
iMessage
2016-08-10 14:38:56 (UTC) [2]
                           (415)
Sender: (415)
                                                    ). Self (
Participants: (415)
I"m feeling absolutely horrible. I"m cramping nonstop which I am not used to and it kept me
up all night, have a fever, and am bleeding a lot.
iMessage
2016-08-10 <u>14:41:04 (UTC)</u> [2]
Sender: (415)
                                                    ). Self (
Participants: (415)
I don"t know if I should try to go back to planned parenthood this AM. What do you think?
iMessage
2016-08-10 <u>14:41:04 (</u>UTC) [4]
Sender: (415)
                           ((41
                                                    ), Self (
Participants: (415)
                                 (415)
I don't know if I should try to go back to planned parenthood this AM. What do you think?
```

```
iMessage
2016-08-12 20:03:12 (UTC) [1]
                         ((4)5)
Sender: (415)
Participants: (415)
Can you answer my questions thoughV
iMessage
2016-08-12 20:03:12 (UTC) [1]
Sender: (415)
                         (415)
Participants: (415)
                                                 ), Self (
                               ((415)
Hopefully I bleed tonight though
iMessage
2016-08-12 20:07:28 (UTC) [1]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
                               (415)
□It's exactly what the plan was earlier in the week. They added the second pills for me to take
today. That's the only change.
iMessage
2016-08-12 20:07:28 (UTC) [2][3]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
                               (415)
\Boxlt"s exactly what the plan was earlier in the week. They added the second pills for me to take today. That"s the only change.
iMessage
2016-08-12 20:07:28 (UTC) [2][4][5]
Sender: (415)
Participants: (415)
                         ((415)
                               (415)
                                                 ), Self (
IMG_7657.JPG
iMessage
2016-08-12 20:11:44 (UTC) [2]
Sender: (415)
                         ((41
Participants: (415)
                               (415)
                                                 ), Self (
so can you just respond to what I said here? I have to take the pills by 2
Babe you aren"t going to bail after this right? Do you want to stay committed to us and not
just making it work but being happy? I'm taking pills but they scheduled the surgery and I'm
super upset
iMessage
2016-08-12 20:11:44 (UTC) [1]
Sender: (415)
Participants: (415)
                         ((4)5)
                                                 ), Self (
                               (415)
```

so can you just respond to what I said here? I have to take the pills by 2

Babe you aren't going to bail after this right? Do you want to stay committed to us and not just making it work but being happy? I'm taking pills but they scheduled the surgery and I'm super upset

```
iMessage
                                                                  [1] 2016-08-12 20:18:08 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                                ), Self (
  Laura, you've asked me this guestion over 30 times in the last month and you've already asked
  twice today. The more you ask the more frustrated I get with you.
iMessage
2016-08-12 20:18:08 (UTC) [1]
Sender: (415)
                         ((415)
                                                 ), Self (
Participants: (415)
                               (415)
You didn't answer today and you're not the one who probably has to have surgery for this. It's
a big deal. It's hard when you're distant.
                                                                                          iMessage
                                                                  [2] 2016-08-12 20:18:08 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                                ), Self (
  Laura, you"ve asked me this question over 30 times in the last month and you"ve already
  asked twice today. The more you ask the more frustrated I get with you.
iMessage
2016-08-12 20:18:08 (UTC) [2]
Sender: (415)
                         ((4)
Participants: (415)
                                                ), Self (
                               (415)
You didn"t answer today and you"re not the one who probably has to have surgery for this. It"s a big deal. It"s hard when you"re distant.
iMessage
2016-08-12 20:26:40 (UTC) [2]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
So what"s the answer?
iMessage
2016-08-12 20:26:40 (UTC) [1]
Sender: (415)
                         ((4)
                               5)
Participants: (415)
                               (415)
                                                 ), Self (
So what's the answer?
iMessage
2016-08-12 20:28:48 (UTC) [1]
                         ((415)
Sender: (415)
Participants: (415)
                                                 ), Self (
You aren't going to bail
You are committed to our relationship
Yes!
```

```
iMessage
                                                              [1] 2016-08-12 20:28:48 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                                             ), Self (
                                                    Same answer that I've given the entire time
iMessage
2016-08-12 20:28:48 (UTC) [1]
                        ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                                                     iMessage
                                                              [2] 2016-08-12 20:28:48 (UTC)
                                                       Sender: Self (
              Participants: (415) (415)
                                                            ), Self (
                                                    Same answer that I"ve given the entire time
iMessage
2016-08-12 20:28:48 (UTC) [2]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             (415)
You aren"t going to bail
You are committed to our relationship
Yes!
iMessage
2016-08-12 20:28:48 (UTC) [2]
Sender: (415)
                        ((4)5)
                             ((415))
                                              ), Self (
Participants: (415)
                                                                                     iMessage
                                                              [2] 2016-08-12 20:30:56 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                          (415)
                                                             ), Self (
  I"m not bailing unless you act the way you were during pregnancy. Also it"s going to take me
  time to trust you again
                                                                                     iMessage
                                                              [1] 2016-08-12 20:30:56 (UTC)
                                                       Sender: Self (
              Participants: (415) (415)
                                                            ), Self (
  I'm not bailing unless you act the way you were during pregnancy. Also it's going to take me
  time to trust you again
iMessage
2016-08-12 20:33:04 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                            (415)
                                              ), Self (
But you are committed to our relationship?
```

```
iMessage
2016-08-12 20:33:04 (UTC) [2]
Sender: (415)
Participants: (415)
But you are committed to our relationship?
iMessage
2016-08-12 20:35:12 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
If I can just get over this, you think we will make it the distance?
                                                                                       iMessage
                                                               [2] 2016-08-12 20:35:12 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                          ((415)
                                                             ), Self (
                                                       Laura, you seriously need to stop asking.
iMessage
2016-08-12 20:35:12 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                               ), Self (
                             (415)
If I can just get over this, you think we will make it the distance?
                                                                                      iMessage
                                                               [1] 2016-08-12 20:35:12 (UTC)
                                                        Sender: Self (
                                         ((415)
                                                             ), Self (
              Participants: (415)
                                                       Laura, you seriously need to stop asking.
                                                                                       iMessage
                                                               [1] 2016-08-12 20:39:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                                             I've already answered the question.
iMessage
2016-08-12 20:39:28 (UTC) [1]
Sender: (415)
                        ((41
                                               ), Self (
Participants: (415)
                             (415)
Can you just answer that please? No more after
iMessage
2016-08-12 20:39:28 (UTC) [1]
Sender: (415)
                        (415)
Participants: (415)
                                               ), Self (
So that's two yes's?
iMessage
2016-08-12 20:39:28 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                                               ), Self (
                             (415)
Can you just answer that please? No more after
```

```
iMessage
                                                                         [2] 2016-08-12 20:39:28 (UTC)
                                                                Sender: Self (
                Participants: (415)
                                                                       ), Self (
                                                                     I"ve already answered the question.
iMessage
2016-08-12 20:39:28 (UTC) [2]
Sender: (415)
                            (415)
                                  ((415)
Participants: (415)
                                                       ), Self (
So that"s two yes"s?
                                                                                                   iMessage
                                                                         [2] 2016-08-12 20:41:36 (UTC)
                                                                Sender: Self (
                Participants: (415)
                                                 ((415)
                                                                      ), Self (
                                                                            How are you not getting this?
                                                                                                   iMessage
                                                                         [1] 2016-08-12 20:41
                                                                                                   :36 (UTC)
                                                                Sender: Self (
                Participants: (415)
                                                  (415)
                                                                      ), Self (
                                                                            How are you not getting this?
iMessage
2016-08-12 20:50:08 (UTC) [1]
Sender: (415)
                                                       ), Self (
Participants: (415)
                                  ((415))
What? I just asked for reassurance in a really tough time
iMessage
2016-08-12 20:50:08 (UTC) [2]
Sender: (415)
                            ((4)5)
Participants: (415)
What? I just asked for reassurance in a really tough time
iMessage
2016-08-12 21:00:48 (UTC) [2]
Sender: (415)
                            ((41
                                  5)
                                                      ), Self (
Participants: (415)
                                  (415)
I mean I just want to feel like you want to be with me and right now you are so distant that it"s hurting me immensely. I don"t want you to be with me if you don"t want to. I"m only asking because you don"t seem to be into it and I want to be my best but I am terrified about this and
what it"s doing to my body.
iMessage
2016-08-12 21:00:48 (UTC) [1]
Sender: (415)
                            ((4]5)
                                                      ), Self (
Participants: (415)
                                  (415)
I mean I just want to feel like you want to be with me and right now you are so distant that it's
hurting me immensely. I don't want you to be with me if you don't want to. I'm only asking
because you don't seem to be into it and I want to be my best but I am terrified about this and
what it's doing to my body.
```

```
iMessage
2016-08-12 21:30:40 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
Did you get that?
iMessage
2016-08-12 <u>21:30:40 (</u>UTC) [2]
Sender: (415)
                        (415)
Participants: (415)
                                               ), Self (
                             (415)
Did you get that?
                                                                                      iMessage
                                                               [2] 2016-08-12 21:41:20 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                          ((415)
                                                             ), Self (
  I got it. Laura, as of right now I"m wanting that. I won"t comment over the distance because
  that will take actions rather than words of promises.
                                                                                      iMessage
                                                               [1] 2016-08-12 21 41
                                                                                      20 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                          (415)
                                                             ), Self (
  I got it. Laura, as of right now I'm wanting that. I won't comment over the distance because
  that will take actions rather than words of promises.
iMessage
2016-08-12 22:28:16 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                               ), Self (
                             (415)
Right but are you gonna switch your mind right after the surgery. That's what I'm worried
about. You only said as of right now.
iMessage
2016-08-12 22:28:16 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
Right but are you gonna switch your mind right after the surgery. That's what I'm worried
about. You only said as of right now.
                                                                                      iMessage
                                                               [2] 2016-08-12 22:32:32 (UTC)
                                                        Sender: Self (
              Participants: (415) (415)
                                                               Self (
  I"m so fucking confused. So you"re saying your last abortion didn"t work and your still
  pregnant? I"m beyond confused
                                                                                      iMessage
                                                               [1] 2016-08-12 22:32:32 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                     ((415)
                                                             ). Self (
  I'm so fucking confused. So you're saying your last abortion didn't work and your still
  pregnant? I'm beyond confused
```

```
iMessage
   2016-08-12 22:34:40 (UTC) [1]
   Sender: (415)
   Participants: (415)
  I have the d and e next week. I sent you the notes.
   iMessage
   2016-08-12 22:34:40 (UTC) [1]
   Sender: (415)
                          ((4)5)
                                (415)
   Participants: (415)
                                                  ), Self (
  Hopefully the pills work tonight but if not its scheduled for next week
                                                                                        iMessage
                                                                 [1] 2016-08-12 22:34:40 (UTC)
                                                          Sender: Self (
                 Participants: (415)
                                             (415)
                                                                ), Self (
          I've read the notes. It says you still have elevated levels, but it doesn't say your pregnant
                                                                                        iMessage
                                                                 [1] 2016-08-12
                                                                                     :34:40 (UTC)
                                                          Sender: Self (
                 Participants: (415)
                                              ((415))
                                                                ), Self (
                                                                 It says you have remaining tissue
                                                                                        iMessage
                                                                 [2] 2016-08-12 22:34:40 (UTC)
                                                          Sender: Self (
                                            ((415)
                 Participants: (415)
                                                                ), Self (
                                                                 It says you have remaining tissue
   iMessage
   2016-08-12 22:34:40 (UTC) [2]
   Sender: (415)
                          ((4)5)
   Participants: (415)
  I have the d and e next week. I sent you the notes.
   iMessage
   2016-08-12 22:34:40 (UTC) [2]
   Sender: (415)
                           ((41
                                5)
                                                 ), Self (
   Participants: (415)
                                (415)
  Hopefully the pills work tonight but if not its scheduled for next week
Notes
[1] Source Device
                         BCF1237.E01/Macintosh HD
[1] Source File
                          /Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library
                          /Messages/Archive/2016-08-12/14158100604 on 2016-08-10 at
                         07.38.56.ichat
                         BCF1237.E01/Macintosh HD
[2] Source Device
[2] Source File
                         /Users/michaelmarraccini/Library/Messages/chat.db
[3] External Item
                         IMG_7657.IPG
[4] Associated File
                          /Users/michaelmarraccini/Library/Messages/Attachments/bb/11/739533C
                         E-A1A4-47AE-8302-174FFBE478A5/IMG_7657.JPG
```

IMG_7657.JPG

[5] External Item

Communications Message

```
iMessage
                                                                [1] 2016-08-12 22:34:40 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
       I"ve read the notes. It says you still have elevated levels, but it doesn"t say your pregnant
iMessage
2016-08-12 22:36:48 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                             (415)
                                                ), Self (
What are you not getting?
iMessage
2016-08-12 22:36:48 (UTC) [2]
Sender: (415)
                                                ), Self (
Participants: (415)
                              (415)
What are you not getting?
                                                                                        iMessage
                                                         [2] 2016-08-12 22:38:56 (UTC)
Sender: Self (
              Participants: (415)
                                            (415)
                                                                 Self (
                                                                I'm still here after one procedure
                                                                                        iMessage
                                                        [2] 2016-08-12 22:38:56 (UTC)
Sender: Self (
                                         ((415)
              Participants: (415)
                                                              ), Self (
  I'm confused if you think you're pregnant because the details say you're not, but you have
  remaining tissue
iMessage
2016-08-12 22:38:56 (UTC) [2]
Sender: (415)
                                                ), Self (
Participants: (415)
                              ((415))
This is all I said:
Right but are you gonna switch your mind right after the surgery. That's what I'm worried
about. You only said as of right now.
iMessage
2016-08-12 22:38:56 (UTC) [1]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
                              (415)
This is all I said:
Right but are you gonna switch your mind right after the surgery. That's what I'm worried
about. You only said as of right now.
                                                                                        iMessage
                                                                [1] 2<u>016-08-12 22:38:56 (UTC)</u>
                                                         Sender: Self (
              Participants: (415)
                                  ((415)
                                                              ), Self (
```

The way we have been going

iMessage

2016-08-16 22:38:56 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

You mean it"s good for you right now? :)

iMessage

2016-08-17 00:02:08 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Btw could you pretty please put this on your calendar 1,48 it supposed to be amazing

https://www.sfsymphony.org/Buy-Tickets/Elevated-Events/Opening-Night-Gala

iMessage

2016-08-17 00:55:28 (UTC) [1] Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

It would really help me if you wouldn"t be distant like this

iMessage

[1] 2016-08-17 01:01:52 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

I"m not being distant. I"m busy with work. I"ve been on the go nonstop all day

iMessage

2016-08-17 01:31:44 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Ok I get it. Will you look at the symphony thing when you get a chance? Sept 7. We can use Sarah"s tickets since she can"t make it back

iMessage

2016-08-17 02:50:40 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

I"m just feeling alone today and nervous about tomorrow and wanting to feel close to you

iMessage

2016-08-17 05:26:24 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

:)

iMessage

2016-08-17 06:00:32 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

```
iMessage
2016-08-17 06:04:48 (UTC) [1]
                        ((415)
Sender: (415)
                                                ), Self (
                              (415)
Participants: (415)
My feelings are really hurt.
                                                                                       iMessage
                                                                [1] 2016-08-17 06:26:08 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                 I haven"t finished and I ran into my sisters bf, so we have been chatting. :/ sorry
iMessage
2016-08-17 <u>06:45:20 (</u>UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
You haven"t answered anything. I have a massive day tomorrow and reassurance on your own
would be really nicer
                                                                                       iMessage
                                                                [1] 2016-08-17 06:51:44 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                               ), Self (
                                                                What do you want me to answer?
                                                                                        iMessage
                                                        [1] 2016-08-17 06:51:44 (UTC)
Sender: Self (
                                                              ), Self (
              Participants: (415)
                                                                     I"m down for the symphony
iMessage
2016-08-17 <u>13:17:52 (</u>UTC) [1]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
Just whatever you want to say to me that"s from your heart. Something sweet like I try to say
to you.
iMessage
2016-08-17 13:24:16 (UTC) [1]
Sender: (415)
                        ((4)
                                                ), Self (
Participants: (415)
Something that would make me feel good going into today, that would make me feel loved
and excited for our future
```

Notes	
[1] Source Device	BCF1237.E01/Macintosh HD
[1] Source File	/Users/michaelmarraccini/Library/Messages/chat.db
[2] Source Device	BCF1237.E01/Macintosh HD
[2] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2016-08-14/14158100604 on 2016-08-13 at 12.37.36.ichat
[3] Source Device	BCF1237.E01/Macintosh HD

[3] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2016-08-15/+1 (415) on 2016-08-15 at 13.54.24.ichat
[4] External Item	IMG_7331.jpeg
[5] Associated File	/Users/michaelmarraccini/Library/Messages/Attachments/ec/12/9A7C3E75 -3692-47F3-B47F-ABD736B5FA84/IMG_7331.jpeg
[6] External Item	IMG_7331.jpeg

Tag: Laura text messages (5401–5500 of 19636)

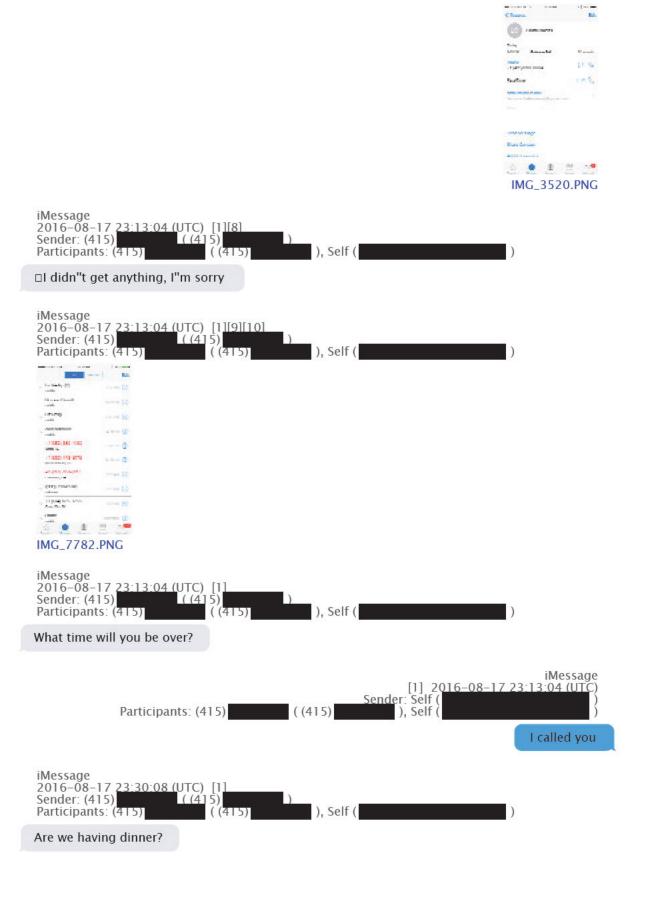
```
Communications Message
                                                                                        iMessage
                                                                [1] 2016-08-17 14:41:04 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                            (415)
                                                              ), Self (
  Well, first I want to say I'm sorry For not coming over. Though I slept amazing in my own bed,
  I know it meant w lot to you that I cane over. I hope you have a good morning :)
                                                                                        iMessage
                                                                [2] 2016-08-17 14:41:04 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                            (415)
                                                              ), Self (
  Well, first I want to say I'm sorry For not coming over. Though I slept amazing in my own bed, I
  know it meant w lot to you that I cane over. I hope you have a good morning:)
iMessage
2016-08-17 14:47:28 (UTC) [2]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                ), Self (
Do you have faith in us making it the distance together at this point?
iMessage
2016-08-17 14:47:28 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                              (415)
                                                ), Self (
I appreciate that. Thank you
iMessage
2016-08-17 14:47:28 (UTC) [1]
Sender: (415)
Participants: (415)
                              (415)
                                                ), Self (
I appreciate that. Thank you
iMessage
2016-08-17 14:47:28 (UTC) [1]
Sender: (415)
Participants: (415)
Do you have faith in us making it the distance together at this point?
iMessage
2016-08-17 <u>15:13:04 (</u>UTC) [1]
Sender: (415)
Participants: (415)
                         ((4)5)
                              (415)
                                                ), Self (
```

Be honest

```
iMessage
2016-08-17 <u>15:13:04 (</u>UTC) [2]
Sender: (415)
                         ((415)
Participants: (415)
Be honest
iMessage
2016-08-17 <u>16:19:12 (</u>UTC) [2]
                         ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                  ), Self (
iMessage
2016-08-17 <u>16:19:12 (</u>UTC) [1]
Sender: (415)
                         ((415)
                                                  ), Self (
Participants: (415)
                              ((415)
??
iMessage
2016-08-17 16:23:28 (UTC) [1]
Sender: (415)
                         (415)
Participants: (415)
                               (415)
                                                  ), Self (
Your answer would really mean a lot to me
iMessage
2016-08-17 16:23:28 (UTC) [2]
Sender: (415)
                                                  ), Self (
Participants: (415)
                               (415)
Your answer would really mean a lot to me
iMessage
2016-08-17 <u>16:46:56 (</u>UTC) [2]
Sender: (415)
                         ( (4<u>1</u>15)
                                                  ), Self (
Participants: (415)
Mike???
iMessage
2016-08-17 16:46:56 (UTC) [1]
Sender: (415)
Participants: (415)
                         ((4\dot{1}5)
                               (415)
                                                  ), Self (
Mike???
iMessage
2016-08-17 16:49:04 (UTC) [1]
Sender: (415)
                         ((415)
                                                  ), Self (
Participants: (415)
I"m about to do this and you not responding to this is super upsetting
iMessage
2016-08-17 16:49:04 (UTC) [2]
Sender: (415)
                         (415)
                              (´(<del>4</del>15)
                                                 ), Self (
Participants: (415)
I'm about to do this and you not responding to this is super upsetting
```

```
iMessage
                                                                [2] 2016-08-17 16:57:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                                               Yes, I feel very strongly about us.
                                                                                       iMessage
                                                                [2] 2016-08-17 16:57:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                            ((415))
                                                              ). Self (
  Laura, I've been in a meeting since 745 and haven't had a phone. I'm sorry that I wasn't there
  to respond.
                                                                                       iMessage
                                                        [1] 2016-08-17 16:57:36 (UTC)
Sender: Self (
                                                              ), Self (
              Participants: (415)
                                            ((415))
                                                               Yes, I feel very strongly about us.
                                                                                       iMessage
                                                                [1] 2016-08-17 16:57:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                      ((415)
                                                              ), Self (
  Laura, I"ve been in a meeting since 745 and haven"t had a phone. I"m sorry that I wasn"t there
  to respond.
iMessage
2016-08-17 16:59:44 (UTC) [1]
Sender: (415)
                        ((41
Participants: (415)
                                                ), Self (
                              (415)
Ok I"m here. I"ll see you tonight. Looking forward to Carmel this weekend and San Diego
next and everything we have to look forward to. Btw I have to drive up to Sac tomorrow
provided there are no complications here (they said I would more than likely be fine) and stay
overnight so I can drive you up tomorrow
iMessage
2016-08-17 16:59:44 (UTC) [2]
                        ((415)
Sender: (415)
Participants: (415)
                                                ), Self (
Ok I'm here. I'll see you tonight. Looking forward to Carmel this weekend and San Diego next
and everything we have to look forward to. Btw I have to drive up to Sac tomorrow provided
there are no complications here (they said I would more than likely be fine) and stay overnight
so I can drive you up tomorrow
iMessage
2016-08-17 21:26:24 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
Hello!?
iMessage
2016-08-17 21:26:24 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                              ((415))
Hello!?
```

```
iMessage
2016-08-17 23:10:56 (UTC) [1]
Sender: (415) (415)
Participants: (415) (415)
iMessage
2016-08-17 23:10:56 (UTC) [2]
Sender: (415) (415)
Participants: (415) (415)
                                                           ), Self (
iMessage
1Message
2016–08–17 23:13:04 (UTC) [2]
Sender: (415) ((415)
                                                           ), Self (
Participants: (415)
                                     (415)
What time will you be over?
                                                                                                            iMessage
                                                                               [2] 2016-08-17 23:13:04 (UTC)
                                                                      Sender: Self (
                                                                            ), Self (
                  Participants: (415)
                                                      (415)
                                                                                                         I called you
                                                                                                            iMessage
                                                                               [2] 2016-08-17 23:13:04 (UTC)
                                                                     Sender: Self (
                  Participants: (415) ( (415)
                                                                            ), Self (
iMessage
2016–08–17 23:13:04 (UTC) [2]
Sender: (415) (415)
Participants: (415) ((415)
                                                           ), Self (
□I didn't get anything, I'm sorry
                                                                                                            iMessage
                                                                     IMessage
[1][5] 2016-08-17 23:13:04 (UTC)
Sender: Self ( )
), Self ( )
                  Participants: (415)
                                                      (415)
                                                                                                            iMessage
                                                                        [1][6][7] 2016-08-17 23:13:04 (UTC)
                                                                      Sender: Self (
), Self (
                  Participants: (415)
                                                     (415)
```



```
iMessage
2016-0
Sender
Participants: (4
Are we having dinner?
iMessage
2016-08-18 0<u>0:27:44 (UTC) [2]</u>
Sender: (415)
Participants: (415)
                                                4), Self (
I am totally relieved this part is over and totally looking forward to being happy with you :)
iMessage
2016-08-18 00:27:44 (UTC) [1]
Sender: (415) 810-0004 (415) 810-0004 )
                                                  ), Self (
Participants: (415)
I am totally relieved this part is over and totally looking forward to being happy with you :)
iMessage
2016-08-18 03:09:52 (UTC) [1]
Sender: (415)
Participants: (415)
                                                  ), Self (
Want me to drive us to sac Manana since I have to go too?
iMessage
2016-08-18 03:09:52 (UTC) [2]
Sender: (415)
                                                   ), Self (
Participants: (415)
Want me to drive us to sac Manana since I have to go too?
iMessage
2016-08-18
Sender: (415)
Participants: (415)
                                                  ), Self (
Btw what time? I'm back
iMessage
2016-08-18 03:29:04 (UTC) [1]
Sender: (415)
Participants: (415)
                                                   ), Self (
Btw what time? I"m back
iMessage
2016-08-18 03:39:44 (UTC) [1]
Sender: (415)
Participants: (415)
And cramping 9
iMessage
2016-08-18 <u>03:39:44 (UTC) [2]</u>
Sender: (415)
                                                 ), Self (
Participants: (415)
And cramping !
```

```
iMessage
2016-08-18 03:52:32 (UTC) [2]
Sender: (415)
                         ((4)5)
Participants: (415)
iMessage
2016-08-18 <u>03:52:32 (</u>UTC) [1]
Sender: (415)
Participants: (415)
                        ( (415)
( (415)
                                                ), Self (
                                                                                        iMessage
                                                                [1] 2016-08-18 04:01:04 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                            (415)
                                                              ), Self (
                                                                                             Here
                                                                                        iMessage
                                                                [2] 2016-08-18 04:01:04 (UTC)
                                                         Sender: Self (
                                                              ), Self (
               Participants: (415)
                                            (415)
                                                                                             Here
iMessage
2016-08-18 04:03:12 (UTC) [2]
Sender: (415)
                              ((415)
                                                ), Self (
Participants: (415)
Throwing down keys
iMessage
2016-08-18 04:03:12 (UTC) [1]
                        (<u>(4</u>15)
Sender: (415)
Participants: (415)
                                                ), Self (
Throwing down keys
iMessage
2016-08-18 19:09:52 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                              (415)
                                                ), Self (
How is your day going?
iMessage
2016-08-18 19:09:52 (UTC) [3]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
How is your day going?
iMessage
2016-08-18 19:14:08 (UTC) [3]
Sender: (415)
                         ((4)5)
                             (415)
                                               ), Self (
Participants: (415)
I'm really not feeling well from yesterday at all. I just wanted you to know how grateful I am
for you and how I'm thinking of how excited I am for everything ahead. Thinking of all the
ways I can make you happy )
```

```
iMessage
2016-08-18 19:14:08 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
I"m really not feeling well from yesterday at all. I just wanted you to know how grateful I am
for you and how I'm thinking of how excited I am for everything ahead. Thinking of all the
ways I can make you happy :)
iMessage
2016-08-18 20:54:24 (UTC) [1]
Sender: (415)
                        (415)
Participants: (415)
                              (415)
                                                ), Self (
Just wondering why aren"t you responding to my texts?
iMessage
2016-08-18 20:54:24 (UTC) [3]
Sender: (415)
                                                ). Self (
Participants: (415)
Just wondering why aren't you responding to my texts?
iMessage
2016-08-18 22:11:12 (UTC) [3]
Sender: (415)
                         ((4]5)
Participants: (415)
                                                ), Self (
                              (415)
I am just having a really rough time after the procedure yesterday and need you to be there for
me. Really trying to be positive. You being sweet really helps me
iMessage
2016–08–18 22:11:12 (UTC) [1]
Sender: (415) ((4<u>1</u>5)
Participants: (415)
                                                ), Self (
I am just having a really rough time after the procedure yesterday and need you to be there for
me. Really trying to be positive. You being sweet really helps me
iMessage
2016-08-19 00:21:20 (UTC) [1]
Sender: (415)
                         ((4\dot{1}5)
Participants: (415)
                                                ), Self (
You ok?
iMessage
2016-08-19 16:46:56 (UTC) [1]
Sender: (415)
                         (415)
Participants: (415)
                                                ), Self (
iMessage
2016-08-19 17:53:04 (UTC) [1]
Sender: (415)
                         ((4\dot{1}5)
Participants: (415)
                              (415)
                                                ), Self (
Mike, are you ok? I'm very worried about you. I don't know what to do.
iMessage
2016-08-19 18:01:36 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                             ((415)
                                                ), Self (
```

I mean you said you weren"t going to bail and be a better teammate. I had my D and C on Wednesday, have surgery to remove my ovary on the 31st, and you haven"t said a word so I"m concerned about your well being and whether or not you even made it to Sacramento.

```
iMessage
2016–08–19 18:40:00 (UTC) [1][11][12]
Sender: (415) ((4]5)
                         ( (415)
( (415)
                                                  ), Self (
Participants: (415)
iMessage
2016-08-19 18:40:00 (UTC) [1][13][14][15]
Sender: (415)
Participants: (415)
                         ( (415)
( (415)
                                                  ), Self (
IMG_7820.PNG
IMG_7819.PNG
iMessage
2016-08-19 <u>18:40:00 (UTC)</u> [1][16][17][18]
Sender: (415)
                         ((4)15)
                               ((415))
                                                  ), Self (
Participants: (415)
61 (F) (F) (B) (B)
IMG_7820.PNG
IMG_7819.PNG
iMessage
2016–08–19 19:31:12 (UTC) [1]
Sender: (415) ((415)
                                                 ), Self (
Participants: (415)
I"m thinking maybe I will stay in sac. Would you want to meet up at some point tonight?
                                                                                            iMessage
                                                                   [1] 2016-08-19 19:54:40 (UTC)
                                                           Sender: Self (
               Participants: (415) (415)
                                                                 ), Self (
```

```
iMessage
2016-08-19 20:11:44 (UTC) [1]
Sender: (415)
                        (415)
Participants: (415)
                                                ), Self (
                             (415)
Are you free for a chat?
iMessage
2016-08-19 <u>20:11:44 (</u>UTC) [1]
Sender: (415)
                                                ), Self (
Participants: (415)
                             (415)
On the phone
iMessage
2016-08-19 20:28:48 (UTC) [1][19]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
```

□This was this morning before I left. I"m supposed to take photos to email my doctor today and Monday to make sure my hormone levels are going down post procedure (which is shown by the like and how dark it is). All I"m saying is that I"m finishing the process of going through with this. I don"t have the ability to just shut off and decide to be happy, live this weekend not thinking about it, and remove myself from it. I have to be responsible and follow through with the doctor and what I"ve been instructed to do. I"m trying to be happy given the circumstances. So with that being said, can you please try to not be rude and be there for me while I"m dealing with this? It doesn"t help anyone to be cold. This isn"t easy on anyone. I don"t disagree that these past few months have been horribly stressful. I know I have put too much pressure on this. At the end of the day, your uncle is right about life being too short not to be happy. But it"s pretty damn hard in life to find someone who genuinely cares about making your day better and your life better and I do feel that way about you. Yesterday I got you a GoPro book and a journal I was filling in about why you are important to me. I don"t understand what I have done between Wednesday and today that you are now acting like you hate me, but I understand you are going through an extremely stressful weekend. Given the photo I sent, the meaning behind it, and what I said, I would ask you to acknowledge my feelings and the situation and really try your best instead of going into this with a defeated mentality. Is that ok?



I'm having a challenging time with things. I'm hopeful that we can get on the same page and get to the bottom of our issues to try to do it the right way. I am saying a prayer for that.

I'm just gonna lose my phone soon. I just want us to do our best after this. I will wake up and be a different persons, not needy, and I know we can do this if we try. I think we can use Tony Robbins seminar as a way to bring us closer and use that as a goal. I think that's a perfect bf/gf thing to do. And I think it will get us back on track. Do you think that sounds right? Also I want you to know before this that I love you. iMessage 2016-10-13 18:42:08 (UTC) [2] ((415)Sender: (415)), Self (Participants: (415) (415)I"m just gonna lose my phone soon. I just want us to do our best after this. I will wake up and be a different persons, not needy, and I know we can do this if we try. I think we can use Tony Robbins seminar as a way to bring us closer and use that as a goal. I think that"s a perfect bf/gf thing to do. And I think it will get us back on track. Do you think that sounds right? Also I want you to know before this that I love you. iMessage 2016-Ĭ0-13 <u>18:46:24 (</u>UTC) [2] Sender: (415) (415) Participants: (415)), Self ((415)Just want to hear from you before. It starts at noon. I'm dilated enough. iMessage 2016-10-13 <u>18:46:24 (</u>UTC) [1] Sender: (415) ((415)Participants: (415) Just want to hear from you before. It starts at noon. I'm dilated enough. iMessage 2016-10-13 18:54:56 (UTC) [1 Sender: (415) ((41 Participants: (415) (415)), Self (Sorry it's just that I'm gonna lose my phone soon and I want to hear back from you iMessage 2016-10-13 <u>18:54:56 (UTC)</u> [2] Sender: (415) ((4) Participants: (415)), Self (Sorry it"s just that I"m gonna lose my phone soon and I want to hear back from you iMessage 2016-10-13 18:59:12 (UTC) [2] Sender: (415) (41), Self (Participants: (415) (415)And I promise I will get an ultrasound report after iMessage 2016-10-13 18:59:12 (UTC) [1]

), Self (

And I promise I will get an ultrasound report after

Sender: (415)

Participants: (415)

```
iMessage
                                                                 [1] 2016-10-13 19:01:20 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                                               ), Self (
                                                           Yea, that all sounds great. Just relax :)
                                                                                        iMessage
                                                                 [2] 2016-10-13 19:01:20 (UTC)
                                                         Sender: Self (
                                             (415)
                                                               ), Self (
               Participants: (415)
                                                           Yea, that all sounds great. Just relax :)
iMessage
2016-10-13 19:05:36 (UTC) [2]
Sender: (415)
                         ((415)
                                                 ), Self (
Participants: (415)
Let"s just work on us as best as we can until the seminar and be our best and a team without a
break up threat.
If some reason we are not getting along after that then we can figure it out but I just don"t
want to have the threat of it ending tomorrow or in a week or whatever. Let"s just give it our
best. Please.
iMessage
2016-10-13 19:05:36 (UTC) [2]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
I'm so nervous right now:(
iMessage
2016-10-13 19:05:36 (UTC) [1]
Sender: (415)
                         ((41
                              5)
                                                 ), Self (
Participants: (415)
                              ((415)
Let's just work on us as best as we can until the seminar and be our best and a team without a
break up threat.
If some reason we are not getting along after that then we can figure it out but I just don't
want to have the threat of it ending tomorrow or in a week or whatever. Let's just give it our
best. Please.
iMessage
2016-10-13 19:05:36 (UTC) [1
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
                              ((415)
I'm so nervous right now :(
iMessage
2016-10-13 19:14:08 (UTC) [1]
Sender: (415)
                         ((415)
                                                 ), Self (
Participants: (415)
                              ((415)
Is that ok?
iMessage
2016-10-13 19:14:08 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                 ), Self (
I promise I will make sure you have the report and this will be done.
```

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iMessage
2016-10-13 19:14:08 (UTC) [2]
Sender: (415)
                        ((415)
Participants: (415)
Is that ok?
iMessage
2016-10-13 <u>19:14:08 (</u>UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
I promise I will make sure you have the report and this will be done.
iMessage
2016–10–13 19:26:56 (UTC) [2]
Sender: (415) (415)
                                               ), Self (
Participants: (415)
                             (415)
iMessage
2016-10-13 19:26:56 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
iMessage
2016-10-13 19:37:36 (UTC) [1]
Sender: (415)
                                               ), Self (
Participants: (415)
                             ((415))
I still haven't gone in. Now it's 1:15. Can you answer?
                                                                                       iMessage
                                                               [1] 2016-10-13 19:37:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                             ), Self (
             What do you need me to answer? Are you asking me about my commitment again?
                                                                                      iMessage
                                                               [2] 2016-10-13 19:37:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                             ), Self (
             What do you need me to answer? Are you asking me about my commitment again?
iMessage
2016-10-13 19:37:36 (UTC) [2]
Sender: (415)
                        ((415)
Participants: (415)
                                               ), Self (
I still haven"t gone in. Now it"s 1:15. Can you answer?
iMessage
2016-10-13 19:41:52 (UTC) [2]
Sender: (415)
                        ((4)5)
                             (415)
                                               ), Self (
Participants: (415)
```

No I was just asking about what I said here

Let"s just work on us as best as we can until the seminar and be our best and a team without a break up threat.

If some reason we are not getting along after that then we can figure it out but I just don"t want to have the threat of it ending tomorrow or in a week or whatever. Let"s just give it our best. Please.

```
iMessage
2016–10–13 19:41:52 (UTC) [1]
Sender: (415) (415) )
Participants: (415) (415) ), Self (
```

No I was just asking about what I said here

Let's just work on us as best as we can until the seminar and be our best and a team without a break up threat.

If some reason we are not getting along after that then we can figure it out but I just don't want to have the threat of it ending tomorrow or in a week or whatever. Let's just give it our best. Please.

```
iMessage
2016–10–13 19:50:24 (UTC) [1]
Sender: (415) (415) ), Self (415) ), Self (415) (415) (415)
```

I'm already on drugs so give a break please

```
iMessage
[1] 2016–10–13 19:50:24 (UTC)
Sender: Self (
), Self (
)
Laura, it all sounds good
```

```
iMessage
2016-10-13 19:50:24 (UTC) [2]
Sender: (415) (415) ), Self ( ), Self ( )
```

I'm already on drugs so give a break please

```
iMessage
[2] 2016-10-13 19:50:24 (UTC)
Sender: Self (
), Self (

Laura, it all sounds good
```

```
iMessage

2016–10–13 20:16:00 (UTC) [2]

Sender: (415) (415) )

Participants: (415) (415) ), Self ( )
```

I"ll see you tonight

```
iMessage
2016–10–13 20:16:00 (UTC) [1]
Sender: (415) (415) ), Self (
```

I'll see you tonight

iMessage

2016–10–14 00:55:28 (UTC) [1] Sender: (415) 810–0604 ((415) 810–0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Hi babe, I just talked to your sister. You poor thing. I'm so sorry you are in so much pain and would do anything to make you feel better! I'm here for you 100%. Everything went well with me today so you don't have to worry about that, just worry about getting better. Praying for you to be out of pain. Just know that I love you and am here for you for whatever you need!

iMessage

2016-10-14 00:55:28 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Hi babe, I just talked to your sister. You poor thing. I'm so sorry you are in so much pain and would do anything to make you feel better! I'm here for you 100%. Everything went well with me today so you don"t have to worry about that, just worry about getting better. Praying for you to be out of pain. Just know that I love you and am here for you for whatever you need!

iMessage

2016-10-14 03:29:04 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

How are you doing?

iMessage

2016-10-14 03:29:04 (UTC) [1]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

How are you doing?

iMessage

[3] 2016-10-14 14:36:48 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

I'll call you in a bit

iMessage

[2] 2016-10-14 14:36:48 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

I"ll call you in a bit

iMessage

2016-10-14 14:38:56 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Ok, praying you are doing okay 💗

iMessage

2016-10-14 14:38:56 (UTC) [3]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Ok, praying you are doing okay 💗

iMessage

2016–10–14 14:51:44 (UTC) [3] Sender: (415) 810–0604 ((415) 810–0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Ps I'm in bed the rest of the day to recover (don't leave til tomorrow morning) so anytime you want a talking buddy, I'm yo girl :)

iMessage

2016–Ĭ0–14 14:51:44 (UTC) [2] Sender: (415) 810–0604 ((415) 810–0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Ps I'm in bed the rest of the day to recover (don't leave til tomorrow morning) so anytime you want a talking buddy, I'm yo girl :)

iMessage

2016-10-14 15:49:20 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Hey babe can I have the sac address you will be at ASAP? bigst on the phone to send something and so far all I have is el dorado hills

iMessage

2016-10-14 15:49:20 (UTC) [3]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Hey babe can I have the sac address you will be at ASAP? bjust on the phone to send something and so far all I have is el dorado hills

iMessage

2016-10-14 21:15:44 (UTC) [3]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

How do you feel?

iMessage

2016-10-14 21:15:44 (UTC) [2]

Sender: (415) 810-0604 ((415) 810-0604)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

How do you feel?

[2] 2016-10-14 23:42:56 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

Hey

iMessage

[2] 2016-10-14 23:42:56 (UTC)

Sender: Self (m.marraccini@gmail.com)
Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

I still feel pretty shitty, but I'm doing a lot better than yesterday

iMessage

[3] 2016-10-14 23:42:56 (UTC)

Sender: Self (m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

EXHIBIT R

Clerk of the Superior Court ** Electronically Filed * C. Brown, Deputy 5/2/2024 4:23:58 PM Filing ID 17758124

WOODNICK LAW, PLLC 1 2

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Gregg R. Woodnick, #020736 Isabel Ranney, #038564

Attorney for Respondent/Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No.: FC2023-052114

RESPONSE/OBJECTION TO PETITIONER'S EMERGENCY MOTION TO STRIKE AND REQUEST FOR IMMEDIATE SCHEDULING CONFERENCE

(Assigned to the Honorable Julie Mata)

Defendant/Respondent, CLAYTON ECHARD, by and through counsel undersigned, hereby files his Response and Objects to Plaintiff/Petitioner, LAURA OWENS, Emergency Motion to Strike and Request for Immediate Scheduling Conference.

There is neither an emergency nor cause to strike any part of the Reply to Petitioner's Response filed on April 30, 2024. Not only does Laura's Motion fail to conform to procedural Rules (neither Rule 29(e) nor Rule 35(a)(3)), but it also fails to acknowledge that when Laura filed a Response that (contrary to explicit court orders) appended her medical records and proclaimed "there is objective medical proof Ms. Owens was, in fact pregnant" and "Ms.

28

 Owens Was Pregnant," (emphasis in original), she opened the door for Respondent to reply to the same. Put simply, Laura's own medical records are *not* new evidence to Laura and only continue to demonstrate that this process has been predicated on *duplicity*.

As and for his Response/Objection, Clayton states as follows:

1. Laura's Motion to Strike does not comply with Rule 29(e) nor requests the relief afforded by Rule 35(a)(3), Arizona Rules of Family Law Procedure. A Motion to Strike is governed by Rule 29(e), which permits a party to move to strike from a motion "an insufficient claim or defense or any redundant, immaterial, impertinent, or scandalous matter." Laura's Motion does not reference this Rule, nor does it allege any facts that would justify a "strike" consistent with this Court's authority. Laura's Motion also does not comply with the Rule it does cite. Rule 35(a)(3) provides that, if a party believes they need to respond to matters raised in a Reply, it "may not respond to a reply unless authorized by the court." If Laura is asking this Court to allow her to respond to the Reply to Petitioner's Response to Respondent's Amended Motion for Relief Based on Fraud, she needs to request this relief and Clayton will respond (and object) as his verified Reply was appropriate and there is no cause for a sur-reply.

The disclosed material was neither "untimely" nor "new." The "untimely" material— Laura's own medical records—were properly disclosed to her¹ consistent with this Court's disclosure deadline² (which Laura is aware of per her counsel's personal Tweets, blog posts

¹ Specifically, in Respondent's 7th Supplemental Disclosure Statement.

² See Minute Entry dated 2/21/24 ("IT IS FURTHER ORDERED setting a discovery & disclosure deadline (30) days prior to trial") (emphasis in original).

and emails regarding the same) and within 24 to 48 hours of receiving the disclosure. The "new" material—Laura's medical records from 2016, her emails and texts regarding the same, yet another sonogram she shared with the media (well after the date she now seems to claim to have miscarried), a letter from an actual person whose ultrasound she allegedly pirated, and her own communications with her prior victims and the media—is not new to Laura.

The information Laura claims is "new" are <u>her</u> medical records and a third sonogram <u>she</u> dispatched via email to the media. [Parenthetically, the first two (2) sonograms were already addressed in court proceedings as well as in the underlying *Motion for Relief* and are therefore not "new" to anyone, nor is the general topic of improperly tampered sonograms].

Moreover, Laura testified about being treated by Dr. Chan and that he was "a specialist, one for [...] cancer, because they thought I might have precancerous for ovarian--." Trans. at 56-57 (Exhibit 1). That Laura, upon information and belief, failed to disclose her relevant medical history to her expert is not Clayton's doing. It would be paradoxical if Laura being provided with her own medical records (which she now seems to deny, as is consistent with her believed modus operandi of denying any conflicting data) constituted "new" information.

2. Clayton's Reply appropriately responded to the allegations in Laura's Response. To the extent that this Court believes that the Motion to Strike (despite being procedurally improper) warrants further attention, Clayton's Reply complied with the requirement that a "reply may address only those matter raised in the response." Rule 35(a)(3).

In Laura's Response, she stated, "there is objective medical proof Ms. Owens was, in fact pregnant," "Ms. Owens Was Pregnant," attached both expert reports and an affidavit by

Laura,³ and acknowledged that Clayton's *Motion* alleges Clayton believes Laura was "never pregnant," and that he asserts she "lied about things such as the authenticity of a sonogram image and other aspects of her pregnancy." Clayton's Reply concerns the same scope as Laura's Response, namely Laura's repeated assertions that she was pregnant. It is not "sandbagging" to provide the Court information directly responsive to, and conflicting with, the crux of Laura's Response. Rule 35(a)(3) is intended to prevent requesting a different form of relief or raising a claim that would deny the other party an opportunity to respond, not to prevent a party from elaborating on and replying to allegations in the response.

Of course, it is understandable <u>if</u> Laura does not want conflicting information surfacing in litigation that, at its core, is about allegations that she fabricated medical records and faked claims that she was pregnant by Clayton. Laura attached her own medical records, expert reports, and made statements regarding the "truthfulness" of her alleged pregnancy in her Response. Clayton responded in kind and with properly disclosed (and redacted) data, as he was permitted to do under the Rules.⁴

3. It appears that Ms. Owens is unable to keep track of her story as the fiction compounds. This is the carnage of what, upon information and belief, is serial pregnancy fraud in efforts to compel relationships. Notably, as more controverting data comes out, it is anticipated, based on Laura's counsels' emails and blogs, that Laura will claim that voice

³ Which included the sonogram that has been confirmed not to have originated in SMIL or Planned Parenthood.

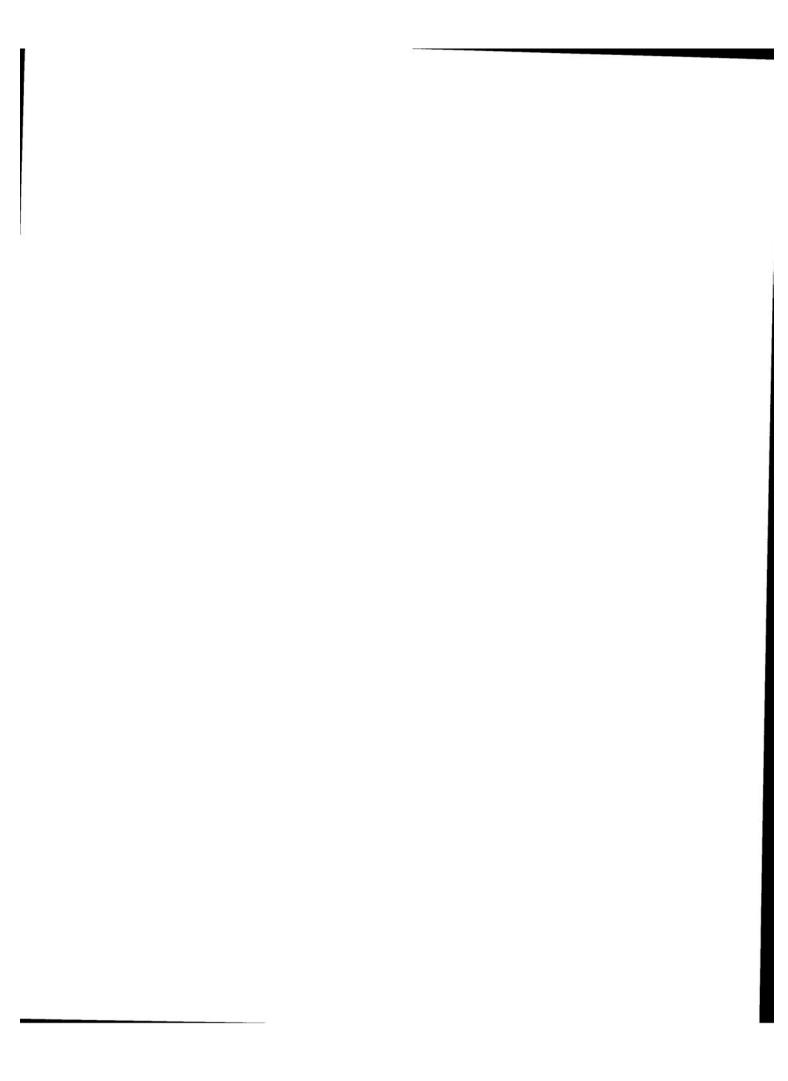
⁴ Note, Clayton redacted medical records consistent with this court's orders, notwithstanding the fact that Laura continues to unilaterally publish filings and musings regarding the case and court via Twitter, including "affidavits" that have not been admitted to this Court. At trial, the Court will be provided with the unredacted ultrasounds, in addition to the one already confirmed to be tampered with. The ultrasound video was already admitted as an exhibit during Laura's deposition and the alleged "new" sonogram that shows Laura' being twenty-one (21) weeks along was sent to the media. The medical records from Drs. Chan and Yee are on letterhead and contemporaneous with communication from Laura in 2016.

recordings are the product of Artificial Intelligence (AI) and her emails and texts were hacked. She can address these alleged (and highly disputed) concerns at trial. Despite what she may claim to explain away these "new" records, they came *from Laura* – her email, her texts, her claimed medical records. Whether she *now* claims they are real or not does not change the fact that she sent them. It does beg the question of the extent of fraud consistent with someone who already admitted to tampering with medical records. See A.R.S. § 13-2809.

based on a fraudulent sonogram. Once again, in Laura's *Motion to Strike*, she fails to acknowledge that the very sonogram that was the basis for Judge Doody granting the Order of Protection has been proven <u>not</u> to have originated from Planned Parenthood <u>or SMIL</u>. Laura has since admitted she tampered with it. That there may be *more* records that are believed to be fraudulently created by Laura is problematic for her, but she published these "records" and sent them to members of the media. Those actions have consequences.

The fraud in the procurement of the Order of Protection matters requires it to be dismissed on the pleadings. The remaining issues in the establishment matter will be adjudicated on June 10th, notwithstanding her anticipated efforts to continue that hearing.

5. There is no need for any scheduling conference. Trial is set in more than a month – June 10, 2024. The deadline for discovery and disclosure is May 10, 2024. If Laura has what, upon information and belief, will be a new excuse for why her medical records from 2016 and the sonogram she sent to the media in 2023 are somehow "fake" or the product of an AI/technology, she is welcome to allege that at trial. This case is not complicated as the



Court articulated at the status conference in February, and both parties have had more than enough time to prepare to present their cases in June.

this entire action. This improperly pleaded *Motion to Strike* is entirely. If Laura's counsel's Twitter is to be believed, more unpleasant filings are forthcoming. Trial is scheduled for June 10th and disclosure is still timely. Clayton is entitled to his reasonable attorney's fees and costs expended defending himself against Laura pursuant to statutes. Note: The court already tolled fees on the Motion to Compel pending trial. Perhaps, granting leave to file a China Doll Affidavit for fees incurred to date would serve to deter more toxic tactics geared only toward expanding the litigation and forestalling the resolution of this case.

WHEREFORE, Clayton respectfully requests the Court:

- A. Deny Laura's Motion to Strike;
- B. Grant leave to Clayton to submit a Child Doll Affidavit;
- C. Order such further relief as the Court deems just, including sanctions available to this Court under Rule 26, *Arizona Rules of Family Law Procedure*.

RESPECTFULLY SUBMITTED this 2nd day of May, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick

Isabel Ranney

Attorneys for Respondent/Defendant

ORIGINAL of the foregoing e-filed this 2nd day of May, 2024 with:

Clerk of the Court

Maricopa County Superior Court

COPY of the foregoing document delivered this same day to: The Honorable Julie Mata Maricopa County Superior Court COPY of the foregoing document emailed this same day to: **David Gringas** Gringas Law Office, PLLC 4802 E. Ray Road, #23-271 Phoenix, AZ 85004 David@GringasLaw.com Attorney for Petitioner/Plaintiff By: /s/ MB_____

VERIFICATION

I, CLAYTON ECHARD, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing Response/Objection to Petitioner's Emergency Motion to Strike and Request for Immediate Scheduling Conference and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

Clayton Echard	May 2, 2024	
CLAYTON ECHARD	Date	

Email: claytonechard@gmail.com

Verification - Response to Mx to Strike

Final Audit Report

2024-05-02

Created:

2024-05-02

Ву:

Isabel Ranney (Isabel@woodnicklaw.com)

Status:

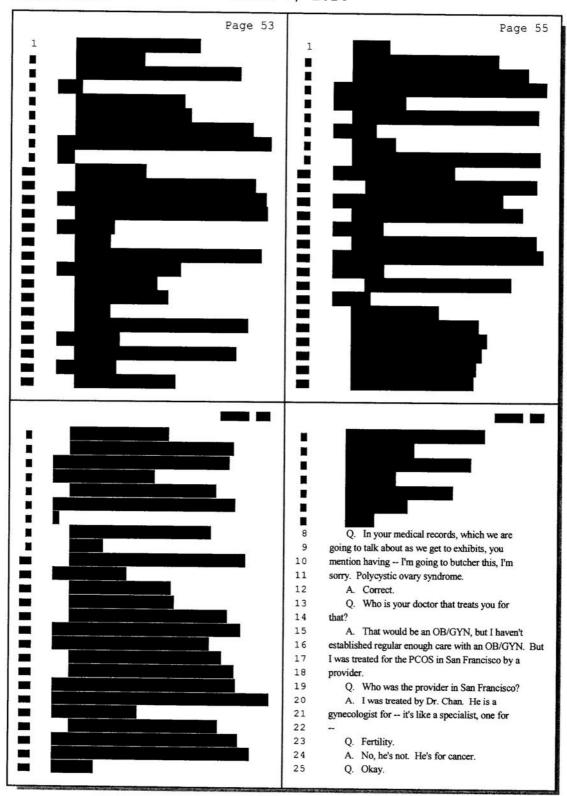
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Transaction ID:

CBJCHBCAABAAUcNSOH6XOInO_X1PmzaQv-y1lyCccdxz

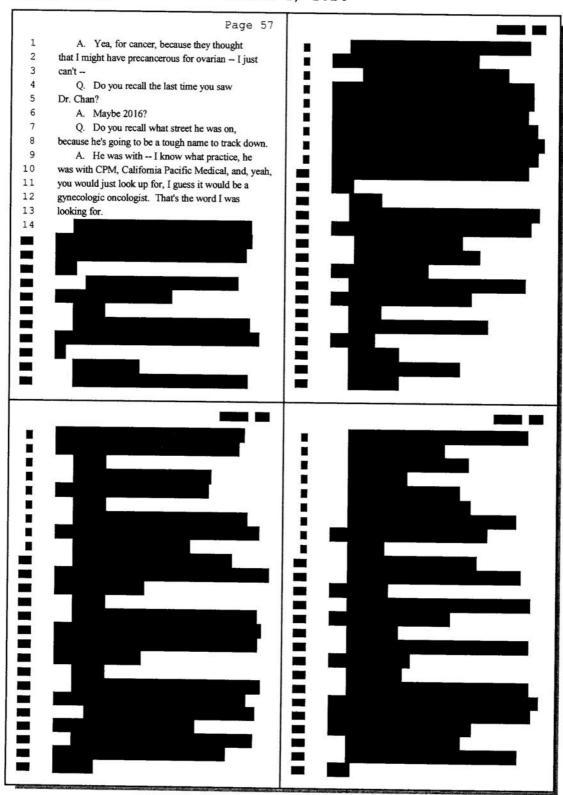
"Verification - Response to Mx to Strike" History

- Document created by Isabel Ranney (isabel@woodnicklaw.com) 2024-05-02 9:31:47 PM GMT
- Document emailed to Clayton Echard (claytonechard@gmail.com) for signature 2024-05-02 9:32:21 PM GMT
- Email viewed by Clayton Echard (claytonechard@gmail.com) 2024-05-02 11:07:35 PM GMT
- Document e-signed by Clayton Echard (claytonechard@gmail.com)
 Signature Date: 2024-05-02 11:07:52 PM GMT Time Source: server
- Agreement completed. 2024-05-02 - 11:07:52 PM GMT



14 (Pages 53 to 56)

Maricopa Reporting - (480)-597-4744



15 (Pages 57 to 60)

EXHIBIT S



Attn: My Health Online P.O. Box 255386

Sacramento, California 95865-5386

Name: Laura M Owens I DOB: 5/14/1990 I 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

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



Attn: My Health Online

P.O. Box 255386 Sacramento, California 95865-5386

n Chung Kai Chan MD

Name: Laura M Owens I DOB: 5/14/1990 I PCP: John Chung Kai Chan, MD

Owens pregnancy

To: Laura M Owens From: Rebecca Yee, MD

Sent: 8/25/2016 1:46 PM PDT

Hi Ms. Owens.

As you requested, here is a summary of what we discussed so you can share it with your boyfriend. I have also spoken to Dr. Chan to confirm that we are on the same page.

You came into the office on 8/25/16 with symptoms of nausea and pelvic pain. Considering your procedure last week, we thought these could be symptoms of a complication. Blood tests ordered confirmed elevated levels of hCG (4,130 mlU/ml). Given that result, I ordered both a transvaginal and pelvic ultrasound. Ultrasound results confirmed a gestational sac that was not present on last week's scan, so it is estimated that you about 5 weeks pregnant with a new pregnancy as that is the earliest it would show up. As you have been told, you have a severely "tipped" or retroverted uterus, which makes the aspiration and D & E procedures more difficult and less likely to be successful. Last week, it would have been impossible to remove this pregnancy as it had not attached. In addition, we have tried to treat you as conservatively as possible given your recent diagnosis of stage IA ovarian cancer. I cannot speak for Dr. Chan, but I'm sure he would agree that your case is amongst the more difficult I have treated.

At this point, Dr. Chan and I are both of the opinion that you need to give serious thought to what you are going to do with the new pregnancy. You have taken medication abortion pills recently that could potentially be harmful to the fetus. However, as you likely know, the nature of your condition makes it so that pregnancies in the future will be more difficult. There is an elevated risk that once one ovary is removed, he would need to remove the other (and perhaps complete a full hysterectomy) before you would necessarily be ready to have children. At that point, having children on your own would, obviously, be impossible, so I think you must take time to determine what you think is best. Should you continue your current pregnancy, it would be imperative that you are monitored extremely closely.

Best regards,

Dr. Yee



Attn: My Health Online P.O. Box 255386

Sacramento, California 95865-5386

Name: Laura M Owens I DOB: 5/14/1990 I 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 your during recovery.

Best regards,

Rebecca Yee, MD

Name: Laura M Owens | DOB: 5/14/1990 | PCP: John Chung Kai Chan, MD

PREGNANCY TEST (HCG) QUANTITATIVE - Details



If you have questions or concerns regarding your test results, contact the clinician who ordered the test.

Common Test Results Flags: A=Abnormal, L=Low, H=High, more flags

Next

Component Results

Component	Your Value	Standard Range	Flag
Beta hCG, Quantitative	6,220 mIU/mL	0 - 6 mIU/mL	
Expected Values During Pregnancy			
Gestational Age			
3-4 weeks 9-130 mIU/mL			

3-4 weeks 9-130 mIU/mL 4-5 weeks 75-2,600 mIU/mL 5-6 weeks 850-20,800 mIU/mL 6-7 weeks 4,000-100,200 mIU/mL 7-12 weeks 11,500-289,000 mIU/mL 12-16 weeks 18,300-137,000 mIU/mL 16-29 weeks 1,400-53,000 mIU/mL 29-41 weeks 940-60,000 mIU/mL

Normal Males and Non-Pregnant Females: <5 mIU/mL

This assay measures intact HCG and free beta-HCG

General Information

Collected: 09/06/2016 8:24 AM

Resulted: 09/06/2016 10:01 AM

Ordered By: Rebecca Yee, MD

Result Status: Final result

This test result has been released by an automatic process.

Next

Print This Page | Close This Window

US PREGNANCY < 14 WEEKS OB WITH ENDOVAGINAL IMAGING (RAD PERF) - Details

About This Test

Study Result

US PREGNANCY < 14 WEEKS OB WITH ENDOVAGINAL IMAGING (RAD PERF): 10/10/2016 3:51 PM CLINICAL HISTORY: Multiple attempted medical and surgical abortions since June (no pregnancies previously), now presents with possible continuing pregnancy or retained products of conception based on last US completed last week. Last aspiration completed 9/21. Unsure about LMP (prior to pregnancy, patients explains she was on a low-dose birth control pill and did not get a period). COMPARISON EXAMS AND/OR REPORTS: MedStar Georgetown TECHNIQUE: Transabdominal and transvaginal images of the pelvis were obtained. FINDINGS: Uterus: The uterus measures 7.2 x 3.6 x 3.9 cm and is retrovered. Intrauterine adhesions are present. Single gestational sac is identified. CRL measures 3.1 cm. Embryonic heart rate is 62 BPM. Endometrium: 8 mm bilayer thickness. No focal endometrial lesion or fluid. Right ovary: Not present (patient recently underwent oopherectomy surgery) Left ovary: Measures 4.1 x 4.7 x 2.8 cm. Possible suspicious left adnexal mass. Cul-desac fluid: None IMPRESSION: Possible twin pregnancy with intrauterine death of one fetus. Second embryo not removed during abortion 9/21. Questionable viability of remaining fetus. While spontaneous abortion is a possibility, recommend correlation with serial beta hCG levels and repeated surgical abortion as patient has been clear she does not want to continue pregnancy. Unlikely to be retainined products of conception. Hysteroscopy recommended for possible diagnosis of Asherman syndrome. Results discussed with Elena Gates, MD, at UCSF via telephone on 10/11/2016. END OF IMPRESSION.



Messages (74) Laura

Details

July 21, 2016 at 6:08 PM All Mail

Hello Laura M Owens,

You have a new and/or updated test result to review.

Please use your secure Online ID and password to log into My Health Online.

https://myhealthonline.sutterhealth.org

If you have forgotten your online ID or password, use the "Forgot your Online ID?" or "Forgot your Password?" links on the My

Learn More

Frequently Asked Questions



1-866- Your account is disabled. Please call 978-8837 if more info is needed.

Log In To Your Account



My Health Online

Convenience at your fingertips

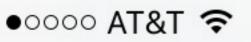
Sutter's My Health Online connects 1 million patients like you to their doctors and health records - anytime, anywhere.

Schedule appointments online



iMessage





9:28 PM ocrf.org



In Stage I ovarian cancer, cancer cells are found in one or both ovaries. Cancer cells may be found on the surface of the ovaries or in fluid collected from the abdomen (ascites).

- IA Limited to one ovary and the outer ovarian capsule is not ruptured. There is no tumor on the external surface of the ovary and there is no ascites and/or the washings are negative.
- IB Cancer is present in both ovaries, but the outer capsule is intact and there is no tumor on external surface. There is no ascites and the washings are negative.
- IC The cancer is either Stage IA or IB level but the capsule is ruptured or there is tumor on the ovarian surface or malignant cells are present in ascites or washings.

Prognosis & Survival Rates

For all types of ovarian cancer taken together, about 3 in 4 women with ovarian cancer live for at least 1 year after diagnosis. Almost half (46%) of women with ovarian cancer are still alive at least 5 years after diagnosis. Women diagnosed when they are younger than 65 do better than older women.

Most women with Stage I ovarian cancer have an excellent prognosis. Stage I patients with grade I tumors have a 5-year survival of over 90%, as do patients in stages IA and IB. Survival rates are often based on studies of large numbers of people, but they can't predict what will happen in any particular person's case. Other factors impact a woman's prognosis, including he general health, the grade of the cancer, and how well the cancer responds to treatment.

Stage	Relative 5-Year Survival Rate
	89%



Done TestOrder Jul 21, 2016 03:37 PM PD...



Meghan Sullivan, NP 3490 California Street Suite 203 San Francisco, CA 94118 p: 415-593-1134 f: 415-291-0489

Request for Diagnostic Testing

From: Meghan Sullivan

To: UCSF Outpatient Imaging at Mission Bay

Date: Jul 21, 2016

Urgency: URGENT

Patient

Name: Laura Owens
Birth Date: 05/14/1990
Phone: 415-810-0604

Is patient pregnant:

See attached for complete demographic and insurance information.

Test

Pelvis ultrasound with transvaginal view, 76856,76830

Indication

Vaginal bleeding in pregnancy (ICD-9CM: 641.90, ICD-10CM: O46.90)

Reason for Test / Clinical Question

26yo with suspected SAB. Bleeding and clotting last week, none x 4 days. Requesting urgent to check for completeness. LMP unsure. Requesting sensitivity - pt does not want to see images. Thank you.

Send Report To

415-291-0489

Thank you,

Meghan Sullivan (NPI: 1831160340)

msullivan@onemedical.com



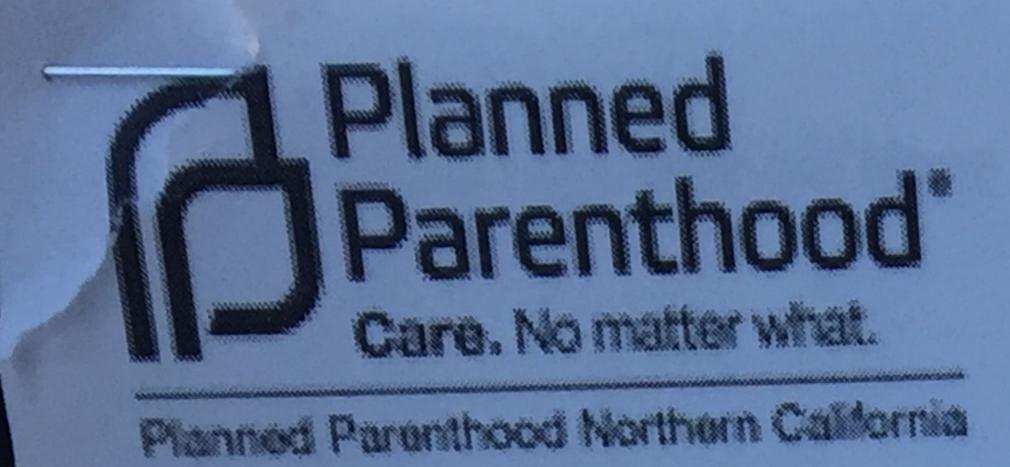
Meghan Sullivan, NP 3490 California Street Suite 203 San Francisco, CA 94118 p: 415-593-1134 f: 415-291-0489

Patient:

Name: Laura Owens







PATIENT:

GENDER:

DATE OF BIRTH / AGE: MEDICAL RECORD:

DATE:

VISIT TYPE:

PATIENT STATUS:

Laura Owens

Female

05/14/1990 / 26 Years

504517

08/02/2016 8:40 AM

Office Visit

Established patient

Reason(s) for Visit

1. Counseling/Education (F)

Comments: As of end of visit on 08/02/2016 client Laura is not pregnant, verified by clinician Anna Webster. jchavez rhs

Subjective History

26 year old

LMP:

Patient reported LMP date as unknown

Pertinent Patient Information Updated o Manually Updated by Source Estimated Data Date Derived from 08/02/2016 Last Tobacco Screen

EHR

Pregnancy Symptoms

Spotting or bleeding since her last LMP that began on 07/26/2016, frequency is intermittent, lasting 7 days and she describes the quality as spotting

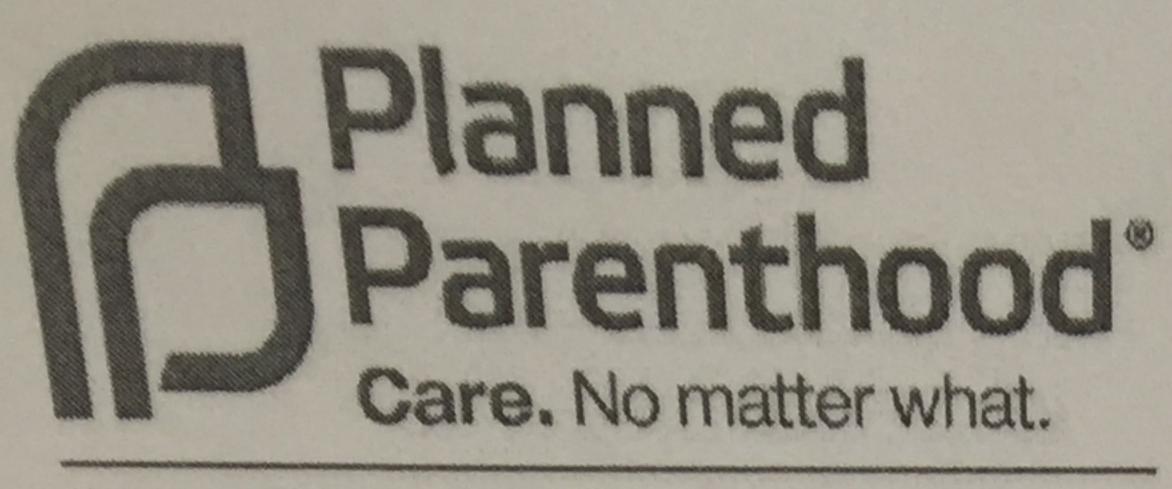
Lower abdominal or pelvic pain since her last LMP that began on 06/03/2016, located in midline, lasting > 14 days, and she describes the quality as Dull, Crampy and severity as moderate

Counseling

Patient does not desire pregnancy.

Pertinent History

No hx of ectopic/tubal pregnancy



Planned Parenthood Northern California

PATIENT:

GENDER:

DATE OF BIRTH / AGE:

MEDICAL RECORD:

DATE:

VISIT TYPE:

PATIENT STATUS:

Laura Owens

Female

05/14/1990 / 26 Years

504517

08/10/2016 12:00 PM

Office Visit

Established patient

Reason(s) for Visit

1. Counseling/Education (F)

Comments: Ultrasound shows retroverted uterus, tissue remains. Blood test shows elevated HCG levels from last visit. Patient took Mifepristone (600mg) in the office, instructed to take 800mcg Misoprostol in 24 hours to evacuate remains. If unsuccessful, D&E to take place at follow up. Patient instructed to make appointment for follow up in one week. jchavez rhs

Subjective History

26 year old

LMP:

Patient reported LMP date as unknown

Pertinent Patient Information

Data	Date	Estimated	Source	Manually Updated by Updated On
Last Tobacco Screen	08/10/2016		Derived from	
	00, 10, 1		EHR	

Patient had aspiration abortion 08/02/2016. Also attempted medical abortion twice and says the results were more like spotting than consistent bleeding (failed abortion).

Counseling

Patient maintains that she does not desire pregnancy.

Pertinent History

No hx of ectopic/tubal pregnancy - recheck if symptoms worsen.

myhealthonline.sutterhealth.org

Enrollment Information

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- Email your doctor's office
- View lab and most test results
- Access records via secure mobile apps

Sign Up Today





To: lauramichelleowens@gmail.com >

My Health Online - New Information Available

July 21, 2016 at 6:08 PM All Mail

Hello Laura M Owens,

You have a new and/or updated test result to review.

Please use your secure Online ID and password to log into My Health Online.

https://myhealthonline.sutterhealth.org

If you have forgotten your online ID or password, use the "Forgot your Online ID?" or "Forgot your Password?" links on the My Health Online Log-in page.













Attn: My Health Online P.O. Box 255386

Sacramento, California 95865-5386

Name: Laura M Owens I DOB: 5/14/1990 I PCP: John Chung-Kai Chan, MD

CA-125 - Details



If you have questions or concerns regarding your test results, contact the clinician who ordered the test.

Common Test Results Flags: A=Abnormal, L=Low, H=High, more flags

Component Results

Component	Your Value	Standard Range	Flag
CA-125	432 u/mL	0 - 35 u/mL	н

General Information

Collected: 07/18/2016 1:10 PM
Resulted: 07/20/2016 1:35 PM
Ordered By: John Chung-Kai Chan, MD

Result Status: Final result



Attn: My Health Online P.O. Box 255386

Sacramento, California 95865-5386

Name: Laura M Owens I DOB: 5/14/1990 I PCP: John Chung-Kai Chan, MD

Medical History

This is an overview of your medical history on file with the clinic.

Diagnosis	When
Ovarian Cancer (IA)	
Polycystic Disease, Ovaries	
H Pylori Ulcer	
Pericarditis	
Hernia, Umbilical	
Unspecified Asthma(493.90)	
Pleuritis	

[Click to add or edit notes]

Surgical History

Procedure	When
Hx Foot Surgery Nos* (no Bill)	
Hx Dental Surgery Nos	
Hx Repair Umbilical Hern,5+y/o,reduc	

Personal notes about my surgical history

Not viewable by your clinician

[Click to add or edit notes]

Family Medical History

Relationship	Health Issue	Comment
Father	Parkinson's Disease	
Father	Cancer	
Maternal Grandmother	Diabetes	

Patient Demographics

SAN FRANCISCO, CA 94121

Patient Address Communication Language Race / Ethnicity

145 25TH AVE 4158100604 (Mobile) English (Preferred) White/Caucasian / Non Hispanic

4158761600 (Home) 810-0604

lauramichelleowens@gmail.com

Note from Sutter Health Affiliates and Community Connect Practices

This document contains information that was shared with Laura M Owens. It may not contain the entire record from Sutter Health Affiliates and Community Connect Practices.

Reason for Visit

Reason

Ovarian Cancer (IA)

Encounter Details

Date	Type	Department	Care Team
08/08/16	Office Visit	Gyn Oncology 3838 SF	Chan, John Chung Kai, MD
		3838 California Street	3838 CALIFORNIA ST
		ste 410	STE 10
		SAN FRANCISCO, CA 94118	SAN FRANCISCO, CA 94118
		415-751-1847	14157511847

Active Allergies and Adverse Reactions - as of 08/12/2016

Allergen	Noted Date	Severity	Reactions	Comments
Morphine Base	02/02/2015		Other	Itching, tolerates Dilaudid. Has tolerated morphine in the past occasionally with itching

15153872613 (Fax)

Current Medications - as of 08/12/2016

Prescription	Sig.	Disp.	Start Date End Date	Status
Norethin Ace-Eth Estrad-FE (MINASTRIN 24 FE PO)	Take by mouth.			Active
polyethylene glycol (GLYCOLAX, MIRALAX) Packet	Take 1 Packet by mouth daily.		12/16/2015	Active
ondansetron (ZOFRAN) 4mg Orally Disintegrating Tablet	Place 1 Tab on tongue and let dissolve every 4 hours as needed for Nausea.	20 Tab	04/07/2016	Active
dicyclomine (BENTYL) 10mg Cap	Take 1 Cap by mouth four times daily as needed.	20 Cap	04/07/2016	Active
zolpidem CR (AMBIEN CR) 6.25mg Tab	Take 6.25 mg by mouth at bedtime as needed.			Active
metoclopramide (REGLAN) 10mg Tab	Take 1 Tab by mouth four times daily.	30 Tab	06/05/2016	Active
pantoprazole (PROTONIX) 40mg EC Tab	Take 1 Tab by mouth daily.	20 Tab	06/05/2016	Active

Active Problems - as of 08/12/2016

Problem	Noted Date
Pelvic pain	07/16/2016
Pregnancy	07/16/2016
Nausea & vomiting	02/02/2015
Acute abdominal pain in right lower quadrant	12/16/2014
Female genital symptoms	01/23/2012
Functional dyspepsia	
Constipation	

nestived Froblems - as of 00/12/2010		
Problem	Noted Date	Resolved Date
Bloating symptom	04/07/2015	12/15/2015
Abdominal pain	12/20/2014	12/15/2015
Abdominal pain		12/16/2015

Packs/Day

Drinks/Week

Years Used

Date

Home: +14158761600 SAN FRANCISCO, CA 94121

oz/Week

Immunizations - as of 08/12/2016

Name	Dates Previously Given	Next Due
Influenza Vac 2+ Vre Quadr Proc Eron	12/16/2015	

Influenza Vac 3+ Yrs Quadr Pres Free 12/16/2015

Social History Tobacco Use

Never Smoker		

Yes

Plan of Care Patient to undergo D & E procedure with alternative provider 08/18/16

Alcohol Use

Make appointment for surgery one week after tissue evacuation with Dr. Chan

Types

Visit Diagnoses

Malignant neoplasm of right ovary Pregnancy test positive

COMMERCIAL OTHER

Insurance					
Payer	Benefit Plan / Group	Subscriber ID	Type	Phone	Address
CIGNA	CIGNA OPEN ACCESS PLUS	00105516404	PRIVATE FFS HMO/POS		PO BOX 182223 CHATTANOOGA, TN 37422
CIGNA LEASED NETWORK	CIGNA LEASED NETWORK	001055164	PRIVATE FFS PPO/EPO		PO BOX 182223 CHATTANOOGA, TN 37422

Guarantor Name Account Type Relation to Patient Date of Birth Phone Billing Address OWENS, LAURA M Personal/Family Self 05/14/1990 145 25TH AVE Work: +19999999999

Document Information

COMMERCIAL U31837712

OTHER

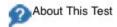
PRIVATE

TRADITIONAL

Problem Noted Date Resolved Date Bloating symptom 04/07/2015 12/15/2015 Abdominal pain 12/20/2014 12/15/2015 Abdominal pain 12/16/2015 Immunizations - as of 08/12/2016 Name Dates Previously Given **Next Due** Influenza Vac 3+ Yrs Quadr Pres Free 12/16/2015 Social History Tobacco Use Types Packs/Day Years Used Date Never Smoker Alcohol Use Drinks/Week oz/Week Yes Plan of Care Patient to undergo D & E procedure with alternative provider 08/18/16 Make appointment for surgery one week after tissue evacuation with Dr. Chan Visit Diagnoses Malignant neoplasm of right ovary Pregnancy test positive Insurance Benefit Plan / Payer Phone Address Type **CIGNA** PRIVATE FFS PO BOX 182223 HMO/POS CHATTANOOGA, TN 37422 PO BOX 182223 CIGNA LEASED NETWORK PRIVATE FFS PPO/EPO CHATTANOOGA, TN 37422 COMMERCIAL OTHER PRIVATE TRADITIONAL **Guarantor Name** Account Type Relation to Patient Date of Birth Phone Billing Address OWENS, LAURA M Work: +19999999999 Personal/Family Self 05/14/1990 Home: +1415 **Document Information Document Coverage Dates** Primary Care Provider Rebecca Yee (Jan. 11, 2014 - Present) Aug. 8, 2016 - Aug. 8, 2016 4159233123 (Work) 4159233132 (Fax) 2100 WEBSTER ST STE 319 SAN FRANCISCO, CA 94115 **Custodian Organization** Sutter Health Affiliates and Community Connect Practices 8888886044 (Work) 10481 Armstrong Avenue Mather, CA 95655 Encounter Providers **Encounter Date** John Chung Kai Chan (Attending) Aug. 8, 2016 - Aug. 8, 2016 4157511847 (Work) 5153872613 (Fax) 3838 CALIFORNIA ST SAN FRANCISCO, CA 94118

Name: Laura M Owens I DOB: 5/14/1990 I PCP: John Chung Kai Chan, MD

PREGNANCY TEST (HCG) QUANTITATIVE - Details



If you have questions or concerns regarding your test results, contact the clinician who ordered the test.

Common Test Results Flags: A=Abnormal, L=Low, H=High, more flags

Next

Component Results

Component	Your Value	Standard Range	Flag
Beta hCG, Quantitative	4,130 mIU/mL	0 - 6 mIU/mL	

Expected Values During Pregnancy

Gestational Age

3-4 weeks 9-130 mIU/mL

4-5 weeks 75-2,600 mIU/mL

5-6 weeks 850-20,800 mIU/mL 6-7 weeks 4,000-100,200 mIU/mL

7-12 weeks 11,500-289,000 mIU/mL

12-16 weeks 18.300-137.000 mIU/mL

16-29 weeks 1.400-53.000 mIU/mL

29-41 weeks 940-60,000 mIU/mL

Normal Males and Non-Pregnant Females: <5 mIU/mL

This assay measures intact HCG and free beta-HCG

General Information

Collected: 08/25/2016 9:35 AM
Resulted: 08/25/2016 11:21 AM
Ordered By: Rebecca Yee, MD Final

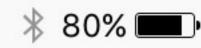
Result Status: result

This test result has been released by an automatic process.

Next







Done My Health Online - Test Details.pdf



Name: Laura M Owens | DOB: 5/14/1990 | PCP: Elena Gates, MD

US PREGNANCY < 14 WEEKS OB WITH ENDOVAGINAL IMAGING (RAD PERF) - Details

About This Test

Study Result

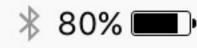
US PREGNANCY < 14 WEEKS OB WITH ENDOVAGINAL IMAGING (RAD PERF): 10/20/2016 12:32 PM CLINICAL HISTORY: Multiple attempted medical and surgical abortions since June (no pregnancies previously). Last procedure completed 10/12 and thought to be successful, however patient admitted to CPMC yesterday with complaints of vomiting and pain. Unsure about LMP (prior to pregnancy, patients explains she was on a low-dose birth control pill and did not get a period). COMPARISON EXAMS AND/OR REPORTS: US pregnancy 10/10/16 TECHNIQUE: Transabdominal and transvaginal images of the pelvis were obtained on 10/19 and 10/20 respectively. FINDINGS: Uterus: The uterus measures 6.1 x 3.1 x 3.4 cm and is retrovered. Intrauterine adhesions are present. No gestational sac is identified. Endometrium: 6 mm bilayer thickness. No focal endometrial lesion or fluid. Right ovary: Not present (oopherectomy surgery) Left ovary: Measures 4.1 x 4.7 x 2.8 cm. Possible suspicious left adnexal mass. Cul-de-sac fluid: None IMPRESSION: No pregnancy identified. Results discussed with Elena Gates, MD, at UCSF via telephone on 10/20/2016. END OF IMPRESSION:







6:40 PM



Done My Health Online - Test Details - PRE...



Name: Laura M Owens | DOB: 5/14/1990 | PCP: Elena Gates, MD

PREGNANCY TEST (HCG) QUANTITATIVE - Details



If you have questions or concerns regarding your test results, contact the clinician who ordered the test.

Common Test Results Flags: A=Abnormal, L=Low, H=High, more flags

Previous Next Result

Component Results

Component	Your Value	Standard Range	Flag
Quantitive Beta hCG	5 mIU/mL	0 - 6 mIU/mL	

Expected Values During Pregnancy

Gestational Age

3-4 weeks 9-130 mIU/mL

4-5 weeks 75-2,600 mIU/mL

5-6 weeks 850-20,800 mIU/mL

6-7 weeks 4,000-100,200 mIU/mL

7-12 weeks 11,500-289,000 mIU/mL

12-16 weeks 18,300-137,000 mIU/mL

16-29 weeks 1,400-53,000 mIU/mL

29-41 weeks 940-60,000 mIU/mL

Normal Males and Non-Pregnant Females: <5 mIU/mL

This assay measures intact HCG and free beta-HCG

General Information

Collected: 10/20/2016 9:00 AM Resulted: 10/20/2016 9:44 AM Ordered By: Eunice K Pae, MD

Result Status: Final result

Previous Next Result







EXHIBIT T-1

-21-

Zone: 4



US Equestrian Rider Report

OWENS, LAURA (5881387)

SCOTTSDALE, AZ 85254-5101

Point State: AZ

Current USEF Membership: Active: 5/2/2024-5/1/2025

 1893 2016 WEF 1
 Hunter Rating: AA - Premier
 Start Date: 1/13/2016
 End Date: 1/17/2016
 State: FL
 Zone: 4

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: C

CLASS DESCRIPTION HEIGHT PLACING COMPLETED **MONEY NAT PNT** ZRD PNT **HORSE OWNER** 2704 \$600 Adult Am. Hunter 18-35 (A) 3' 0" DNP 21 0.00 0.00 / 0.00 0.00 / 0.00 COMTICO (5355880) CPS EQUEST LLC (5311240) 2705 \$600 Adult Am. Hunter 18-35 (A) 3' 0" DNP 21 0.00 0.00 / 0.00 0.00 / 0.00 COMTICO (5355880) CPS EQUEST LLC (5311240)

TOTALS: 0.00 0.00 / 0.00 0.00 / 0.00

SECTION: MISC. HUNTER (No points earned)

SECTION RATING: N

CLASS DESCRIPTION **HEIGHT PLACING** COMPLETED **HORSE OWNER** 3070 Ariat National Medal 3' 0" 3 18 COCO CILLA (5329859) PINE HOLLOW FARM (5108623) 3094 Palm Beach Adult Medal 3' 3" 5 15 BE MY DATE (5191840) ECHOLS, KATE (4960956)

SECTION: ADULT EQUITATION 18-35
SECTION RATING: N

CLASS DESCRIPTION **HEIGHT PLACING** COMPLETED **MONEY** NAT PNT ZRD PNT **HORSE OWNER** 3018 **Equitation Adult Flat** 3' 0" 2 18 0.00 15.00 / 0.00 0.00 / 15.00 COCO CILLA (5329859) PINE HOLLOW FARM (5108623) 3019 **Equitation Adult 3** 3' 0" 5 18 0.00 5.00 / 0.00 0.00 / 5.00 COCO CILLA (5329859) PINE HOLLOW FARM (5108623) 3020* **Equitation Adult 3** DNP 18 0.00 / 0.00 COCO CILLA (5329859) PINE HOLLOW FARM (5108623) 3' 0" 0.00 0.00 / 0.00

TOTALS: 0.00 20.00 / 0.00 0.00 / 20.00

BAD POINT REASON: RIDER NOT SHOWING IN HOME ZONE, REGION, DISTRICT

5027 2016 WEF 2 Hunter Rating: AA - Premier Start Date: 1/20/2016 End Date: 1/24/2016 State: FL

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS

SECTION RATING: C

CLASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE OWNER

Date Range: 1/1/2016 - 11/30/2024

									_
328	3 Hunters		3' 0"	DNP	22			ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
707	Ariat National Adult Medal 3		3' 0"	1	4			ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
SECTION: A	DULT EQUITATION 18-35 ATING : N								
CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER
640	Amateur Flat Equitation 18 - 35		1	5	0.00	20.00 / 0.00	20.00 / 0.00	VENDETTA (5148525)	NAGLER, JULIA (4678407)
641	Amateur Equitation 18 - 35 3 - FP	3' 0"	1	5	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
642	Amateur Equitation 18 - 35 3	3' 0"	1	5	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
EQCC	Amateur Equitation 18 - 35 - CHAMPIONSHIP		1	5	0.00	40.00 / 0.00	40.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
				TOTALS:	0.00	100.00 / 0.00	100.00 / 0.00		
315309 2016	HMI EQUESTRIAN CHALLENGE	H	unter Rating: A	A - National			Start Date: 5/18	8/2016 End Date: 5/22/2016	State: CA Zone: 10
SECTION: N SECTION R	IISC. HUNTER (No points earned) ATING: N DESCRIPTION		<u>HEIGHT</u>	<u>PLACING</u>	COMPLET	<u>ED</u>		HORSE	OWNER
707	Ariat National Adult Medal 3			7	7			ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
9	\$5000 Circle Oak JR/AO Hunter Derby 33		3' 3"	DNP	23			ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
SECTION: A SECTION R	DULT EQUITATION 18-35 ATING : N								
CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER
18-35EQ	Amateur Equitation 18 - 35 CHAMPIONSHIP		1	6	0.00	40.00 / 0.00	40.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
640	Amateur Flat Equitation 18 - 35		1	6	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
641	Amateur Equitation 18 - 35 3		1	7	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
642	Amateur Equitation 18 - 35 3		3	7	0.00	10.00 / 0.00	10.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)
				TOTALS:	0.00	90.00 / 0.00	90.00 / 0.00		
327807 2016	HMI JUNE CLASSIC	Н	unter Rating: A	A - National			Start Date: 6/15	5/2016 End Date : 6/19/2016	State: CA Zone: 10
SECTION: A	DULT AMATEUR HUNTER 18-35 YEARS ATING : C								
CLASS 13	DESCRIPTION \$1000 Equus Tack Adult Am Hunter Classic	<u>HEIGHT</u> 3' 0"	PLACING 6	COMPLETED 10	MONEY 60.00	NAT PNT 0.00 / 0.00	ZRD PNT 0.00 / 14.38	HORSE ONDRUS (5064191)	OWNER OWENS , LAURA (5881387)
450	Adult Amateur Hunters 18 - 35 3 - FP	3' 0"	DNP	9	0.00	0.00 / 0.00	0.00 / 0.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
451	Adult Amateur Hunters 18 - 35 3	3' 0"	6	9	0.00	0.00 / 0.00	0.00 / 10.50	ONDRUS (5064191)	OWENS , LAURA (5881387)
452	Adult Amateur Hunters 18 - 35 3	3' 0"	1	9	0.00	0.00 / 0.00	0.00 / 19.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
453	Adult Amateur Hunters 18 - 35 3	3' 0"	7	9	0.00	0.00 / 0.00	0.00 / 10.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
454	Adult Amateur Hunters 18 - 35 U/S		3	8	0.00	0.00 / 0.00	0.00 / 13.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
	ESTRIAN RIDER REPORT					RA (5881387)		· · · · · ·	Page 7 of 88

TOTALS: 0.00 / 0.00 0.00 / 66.88

BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4)OWNER NOT ACTIVE BY 1ST DAY OF COMPETITION (GR1110.2)

OWNER NOT USHJA MEMBER

SECTION: MISC. HUNTER (No points earned)

SECTION RATING: N

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	<u>HORSE</u>	<u>OWNER</u>
500	Low Adult Amateur Hunters 29	2' 9"	1	7	ONDRUS (5064191)	OWENS , LAURA (5881387)
501	Low Adult Amateur Hunters 29	2' 9"	7	7	ONDRUS (5064191)	OWENS , LAURA (5881387)

SECTION: ADULT EQUITATION 18-35

SECTION RATING: N

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	HORSE	<u>OWNER</u>
640	Amateur Flat Equitation 18 - 35		2	7	0.00	15.00 / 0.00	15.00 / 0.00	L. ALTA VIDA (4089849)	OWENS , LAURA (5881387)
641	Amateur Equitation 18 - 35 3 - FP	3' 0"	DNP	8	0.00	0.00 / 0.00	0.00 / 0.00	L. ALTA VIDA (4089849)	OWENS , LAURA (5881387)
642	Amateur Equitation 18 - 35 3	3' 0"	DNP	8	0.00	0.00 / 0.00	0.00 / 0.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
				TOTALS:	0.00	15.00 / 0.00	15.00 / 0.00		

317301 2016 WOODSIDE CIRCUIT OPENER Hunter Rating: A - National Start Date: 6/22/2016 End Date: 6/26/2016 State: CA Zone: 10

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: C

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	<u>OWNER</u>
608	\$500 Adult Amateur Hunter Classic		1	8	150.00	0.00 / 0.00	0.00 / 22.50	ONDRUS (5064191)	OWENS , LAURA (5881387)
121	Adult Amateur Hunter 18-35 FP		1	3	0.00	0.00 / 0.00	0.00 / 13.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
122	Adult Amateur Hunter 18-35		1	3	0.00	0.00 / 0.00	0.00 / 13.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
124	Adult Amateur Hunter 18-35		2	3	0.00	0.00 / 0.00	0.00 / 9.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
125	Adult Amateur Hunter 18-35 U/S		1	3	0.00	0.00 / 0.00	0.00 / 13.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
AAYCH	Adult Amateur Hunter 18-35 Championship		1	3	0.00	0.00 / 0.00	0.00 / 26.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
				TOTALS:	150.00	0.00 / 0.00	0.00 / 96.50		

BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4)OWNER NOT ACTIVE BY 1ST DAY OF COMPETITION (GR1110.2) OWNER NOT USHJA MEMBER

SECTION: MISC. HUNTER (No points earned) SECTION RATING: N

CLASS DESCRIPTION HEIGHT **PLACING** COMPLETED **HORSE OWNER** 346 Ariat National Adult Medal 1 ONDRUS (5064191) OWENS, LAURA (5881387)

SECTION: ADULT EQUITATION 18-35 SECTION RATING: N

DESCRIPTION CLASS HEIGHT PLACING COMPLETED **MONEY NAT PNT** ZRD PNT **HORSE OWNER** 325 Equitation 18 & O 3'0 Flat 0.00 20.00 / 0.00 ONDRUS (5064191) OWENS, LAURA (5881387) 20.00 / 0.00

### Equitation 18 & O 3'0 ### ONP ### DNP #### DNP ##### DNP ##### DNP ##### DNP ##### DNP ##### DNP ###### DNP ###################################	CA Zone : 10
7362 2016 BAY AREA SUMMER FESTIVAL HUNTER 18-35 YEARS SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: A CLASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE OWNER 626 \$2500 USHJA National Hunter Derby DNP 23 0.00 0.00 / 0.00 0.00 / 0.00 0.00 / 0.00 TOTALS: 0.00 0.00 / 0.00 0.00 / 0.00 SECTION: MISC. HUNTER (No points earned) SECTION RATING: N	
SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: A	
SECTION RATING: A CLASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE OWNER 626 \$2500 USHJA National Hunter Derby DNP 23 0.00 0.00 / 0.00 0.00 / 0.00 L. ALTA VIDA (4089849) OWENS, LAUR SECTION: MISC. HUNTER (No points earned) SECTION RATING: N	A (5881387)
626 \$2500 USHJA National Hunter Derby DNP 23 0.00 0.00 / 0.00 0.00 / 0.00 L. ALTA VIDA (4089849) OWENS , LAUR TOTALS: 0.00 0.00 / 0.00 0.00 / 0.00 SECTION: MISC. HUNTER (No points earned) SECTION RATING: N	A (5881387)
SECTION: MISC. HUNTER (No points earned) SECTION RATING: N	
SECTION RATING: N	
CLASS DESCRIPTION REIGHT DLACING COMPLETED HORSE OWNER	
CLASS DESCRIPTION HEIGHT PLACING COMPLETED HORSE OWNER 276 3'0 Schooling Hunter 3'0" 8 12 L. ALTA VIDA (4089849) OWENS , LAUR	Δ (5881387)
277 3'0 Schooling Hunter 3'0" 4 7 L. ALTA VIDA (4089849) OWENS , LAUR	
	YSSA (5078030)
367 Cloverleaf Equitation Classic 3'0 3' 1 16 L. ALTA VIDA (4089849) OWENS , LAUR	
SECTION: ADULT EQUITATION 18-35 SECTION RATING: N	
CLASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE OWNER	
325 Equitation 18 - 35 3'0 Flat 1 8 0.00 20.00 / 0.00 20.00 / 0.00 L. ALTA VIDA (4089849) OWENS , LAUR	4 (5881387)
326 Equitation 18 - 35 3'0 3' 0" 3 7 0.00 10.00 / 0.00 10.00 / 0.00 L. ALTA VIDA (4089849) OWENS , LAUR	
327 Equitation 18 - 35 3'0 3' 0" 3 7 0.00 10.00 / 0.00 L. ALTA VIDA (4089849) OWENS , LAUR	
EQDD EQUITATION 18-35 3'0" - 2 9 0.00 24.00 / 0.00 24.00 / 0.00 L. ALTA VIDA (4089849) OWENS , LAUR. CHAMPIONSHIP	4 (5881387)
TOTALS: 0.00 64.00 / 0.00 64.00 / 0.00	
6665 2016 GOLDEN GATE CLASSIC Hunter Rating: A - National Start Date: 7/6/2016 End Date: 7/10/2016 State: 0	CA Zone : 10
SECTION: USHJA NATIONAL HUNTER DERBY SECTION RATING: A	
<u>CLASS DESCRIPTION</u> <u>HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE</u> <u>OWNER</u>	
626 \$2500 USHJA National Hunter Derby DNP 21 0.00 0.00 / 0.00 0.00 / 0.00 VOLTYCE (4998133) BUCHANAN, AL	YSSA (5078030)
TOTALS: 0.00 0.00 / 0.00 0.00 / 0.00	
SECTION: MISC. HUNTER (No points earned) SECTION RATING: N	
CLASS DESCRIPTION HEIGHT PLACING COMPLETED HORSE OWNER	

362	1.0m LEGIS League Jumper Medal	1 5	VOLTYCE (4998133)	BUCHANAN, ALYSSA (5078030)

SECTION: ADULT EQUITATION 18-35 SECTION RATING: N

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	HORSE	OWNER
325	Equitation 18 & O 3'0 Flat		1	4	0.00	20.00 / 0.00	20.00 / 0.00	VOLTYCE (4998133)	BUCHANAN, ALYSSA (5078030)
326	Equitation 18 & O 3'0		2	3	0.00	15.00 / 0.00	15.00 / 0.00	VOLTYCE (4998133)	BUCHANAN, ALYSSA (5078030)
327	Equitation 18 & O 3'0		1	3	0.00	20.00 / 0.00	20.00 / 0.00	VOLTYCE (4998133)	BUCHANAN, ALYSSA (5078030)
				TOTALS:	0.00	55.00 / 0.00	55.00 / 0.00		

SECTION: Non-member exempted classes

<u>CLASS</u>	DESCRIPTION	ENTRIES	PLACING	NAT PNT	ZRD PNT	HORSE	OWNER
700f	LEGIS League 12-14 Equitation Final	4	1	0.00 / 0.00	0.00 / 0.00	VOLTYCE (4998133)	BUCHANAN, ALYSSA (5078030)
725	LEGIS Jumper Medal Final	3	3	0.00 / 0.00	0.00 / 0.00	VOLTYCE (4998133)	BUCHANAN, ALYSSA (5078030)
			TOTALS:	0.00 / 0.00	0.00 / 0.00		

4810 2016 HMI EQUESTRIAN CLASSIC 1 Hunter Rating: AA - Premier **Start Date:** 7/27/2016 **End Date:** 7/31/2016 **State:** CA **Zone:** 10

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: C

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	HORSE	OWNER
15	\$1000 NAL Tack Warehouse Adult Am Hunter Classic	3' 0"	4	13	100.00	0.00 / 0.00	0.00 / 20.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
451	Adult Amateur Hunters 18 - 35 3	3' 0"	3	6	0.00	0.00 / 0.00	0.00 / 10.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
452	Adult Amateur Hunters 18 - 35 3	3' 0"	3	7	0.00	0.00 / 0.00	0.00 / 10.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
453	Adult Amateur Hunters 18 - 35 3	3' 0"	3	7	0.00	0.00 / 0.00	0.00 / 10.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
454	Adult Amateur Hunters 18 - 35 U/S		5	6	0.00	0.00 / 0.00	0.00 / 8.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
				TOTALS:	100.00	0.00 / 0.00	0.00 / 58.00		

BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4)OWNER NOT ACTIVE BY 1ST DAY OF COMPETITION (GR1110.2) OWNER NOT USHJA MEMBER

SECTION: MISC. HUNTER (No points earned) **SECTION RATING**: N

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	HORSE	<u>OWNER</u>
707	Ariat National Adult Medal 3	3' 0"	1	3	ONDRUS (5064191)	TENDLER, KARYN (4622510)
729	Hudson & Company Jr/Am Medal 33	3' 3"	5	13	ONDRUS (5064191)	TENDLER, KARYN (4622510)
730	Pickwick JrAm Medal 33	3' 3"	DNP	18	ONDRUS (5064191)	TENDLER, KARYN (4622510)

SECTION: ADULT EQUITATION 18-35 SECTION RATING: N

PLACING DESCRIPTION MONEY OWNER CLASS HEIGHT COMPLETED NAT PNT ZRD PNT HORSE TENDLER, KARYN (4622510) 640 Amateur Flat Equitation 18 - 35 0.00 20.00 / 0.00 20.00 / 0.00 ONDRUS (5064191)

42 Amateur Equitation 18 - 35 3 3°0" 3 5 0.00 10.00 / 0.00 10.00 / 0.00 ONDRUS (5004191) TOTALS: 0.00 64.00 / 0.00 64.00 / 0.00 TOTALS: 0.00 64.00 / 0.00 TOTA	_
TOTALS: 0.00 84.00 / 0.00 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	TENDLER, KARYN (4622510)
TOTALS: 0.00 64.00 / 0.00 64.00 64.00 / 0.00 64.00 / 0.00 64.00 64.00 / 0.00 64.	TENDLER, KARYN (4622510)
### ### ### ### ### ### ### ### ### ##	TENDLER, KARYN (4622510)
CTION: ADULT AMATEUR HUNTER 18-35 YEARS CTION RATING: C ASS DESCRIPTION	
LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PAT ZRD PNT HORSE 1 5 \$1000 Equine Insurance Adult Am	State: CA Zone: 1
STOOD Equine Insurance Adult Am	
3 \$1000 Equine Insurance Adult Am Hunter Classic Hunter Classic Hunter Classic Hunter Classic Hunter Classic Hunter Start Star	OWNER
Adult Amateur Hunters 18 - 35 3 7 13 0.00 0.00 / 0.00 0.00 / 14.00 ONDRUS (5064191) Adult Amateur Hunters 18 - 35 3 5 14 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) Adult Amateur Hunters 18 - 35 3 5 13 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 0.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 0.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 0.00 ONDRUS (5064191)	TENDLER, KARYN (4622510)
Adult Amateur Hunters 18 - 35 3 5 14 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) Adult Amateur Hunters 18 - 35 3 5 13 0.00 0.00 / 0.00 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 17.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 17.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 17.00 ONDRUS (5064191) BAD POINT REASON: NOT RECORDED HORSE COWNER (GR1110 4)OWNER NOT ACTIVE BY 1ST DAY OWNER NOT USHJA MEMBER CITION: MISC. HUNTER (No points earned) ECTION RATING: N LASS DESCRIPTION HEIGHT PLACING COMPLETED HORSE CITION: ADULT EQUITATION 18-35 CITION: ADULT EQUITATION 18-35 CITION: ADULT EQUITATION 18-35 CITION: ADULT EQUITATION 18-35 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 0.00 ONDRUS (5064191) TOTALS: 0.00 0.00 0.00 0.00 0.00 ONDRUS (5064191) TOTALS: 0.00 0.00 0.00 0.00 0.00 0.00 ONDRUS (5064191) TOTALS: 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	TENDLER, KARYN (4622510)
Adult Amateur Hunters 18 - 35 3 5 13 0.00 0.00 / 0.00 / 0.00 / 15.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 / 0.00 / 17.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 / 0.00 / 17.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 / 0.00 / 17.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 / 0.00 / 17.00 ONDRUS (5064191) BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4) OWNER NOT ACTIVE BY 1ST DAY OWNER NOT USHJA MEMBER CETION: MISC. HUNTER (No points earned) CETION: ANING: N LASS DESCRIPTION HEIGHT PLACING COMPLETED HORSE OWNER NOT USHJA MEMBER CETION: ADULT EQUITATION 18-35 CETION: ADULT EQUITATION 18-35 CETION: ADULT EQUITATION 18-35 CETION: ADULT EQUITATION 18-35 TOTALS: 0.00 0.00 0.00 0.00 0.00 0.00 ONDRUS (5064191) TOTALS: 0.00 0.00 0.00 0.00 0.00 0.00 ONDRUS (5064191)	TENDLER, KARYN (4622510)
TOTALS: 0.00 0.00 / 0.00 0.00 / 17.00 ONDRUS (5064191) TOTALS: 0.00 0.00 / 0.00 0.00 / 61.00 BAD POINT REASON: NOT RECORDED HORSE OWNER (GR11110.4) OWNER NOT ACTIVE BY 1ST DAY OWNER NOT USHJA MEMBER ECTION: MISC. HUNTER (No points earned) ECTION: ATING: N LASS DESCRIPTION HEIGHT PLACING COMPLETED HORSE OWNER (GR11110.4) OWNER NOT ACTIVE BY 1ST DAY OWNER NOT USHJA MEMBER ECTION: ADULT EQUITATION 18-35 ECTION: ADULT EQUITATION 18-35 ECTION RATING: N LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 10 Amateur Flait Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 20.00 / 0.00 ONDRUS (5064191) 11 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 ONDRUS (5064191) 12 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 ONDRUS (5064191) 13 TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 ONDRUS (5064191) 14 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 ONDRUS (5064191) 15 TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 ONDRUS (5064191) 16 STOTALS: 0.00 ANT PNT ZRD PNT HORSE ECTION: ADULT AMATEUR HUNTER 18-35 YEARS ECTION: ADULT AMATEUR ADULT AMATEUR HUNTER 18-35 YEARS ECTION: ADULT AMATEUR HUNTER 18-35 YEARS ECTION: ADULT AMATEUR ADULT ADULT ADULT ADULT ADULT ADULT ADULT ADULT ADULT AD	TENDLER, KARYN (4622510)
TOTALS: 0.00 0.00 / 0.00 / 61.00 BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4)OWNER NOT ACTIVE BY 1ST DATE OWNER NOT USHJA MEMBER ECTION: MISC. HUNTER (No points earned) ECTION RATING: N LLASS DESCRIPTION HEIGHT PLACING COMPLETED ONDRUS (5064191) ECTION: ADULT EQUITATION 18-35 ECTION: ADULT TOUR EQUITATION 18-35 ECTION: ADULT EQUITATION 18-35 A mateur Flat Equitation 18-35 3 3 13 0.00 10.00 / 0.00 0NDRUS (5064191) TOTALS: 0.00 40.00 / 0.00 0NDRUS (5064191) TOTALS: 0.00 40.00 / 0.00 0NDRUS (5064191) TOTALS: 0.00 40.00 / 0.00 0NDRUS (5064191) ECTION: ADULT AMATEUR HUNTER 18-35 YEARS ECTION	TENDLER, KARYN (4622510)
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BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4) OWNER NOT ACTIVE BY 1ST DAD OWNER NOT USHJA MEMBER CECTION: MISC. HUNTER (No points earned) ECTION RATING: N LASS DESCRIPTION HEIGHT PLACING COMPLETED HORSE CECTION: ADULT EQUITATION 18-35 ECTION: ADULT EQUITATION 18-35 ECTION RATING: N LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 40 Amateur Flat Equitation 18 - 35 1 9 0.00 20.00 / 0.00 ONDRUS (5064191) 41 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 0NDRUS (5064191) 42 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 10.00 / 0.00 ONDRUS (5064191) TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 TOTALS: 0.00 40.00 / 0.00 ADULT AMATEUR HUNTER 18-35 YEARS ECTION: ADULT AMATEUR HUNTER 18-35 YEARS E	
Ariat National Adult Medal 3 6 7 ONDRUS (5064191) ECTION: ADULT EQUITATION 18-35 ECTION RATING: N LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 40 Amateur Flat Equitation 18 - 35 1 9 0.00 20.00 / 0.00 20.00 / 0.00 ONDRUS (5064191) 41 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 ONDRUS (5064191) 42 Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 ONDRUS (5064191) TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 B75 2016 MENLO CHARITY HORSE SHOW Hunter Rating: AA - Premier Start Date: 8/9/2016 End Date: 8/14/2016 ECTION: ADULT AMATEUR HUNTER 18-35 YEARS ECTION RATING: C LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 140 S1000 Peninsula Equine Adult Am 5 22 70.00 0.00 / 0.00 0.00 / 0.00 ONDRUS (5064191)	,
ECTION: ADULT EQUITATION 18-35 ECTION RATING: N A	<u>OWNER</u>
ECTION RATING: N CLASS DESCRIPTION	TENDLER, KARYN (4622510)
Amateur Flat Equitation 18 - 35	
Annateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 10.00 / 0.00 ONDRUS (5064191) TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 TOTALS: Start Date: 8/9/2016 End Date: 8/14/2016 ECTION: ADULT AMATEUR HUNTER 18-35 YEARS ECTION RATING: C LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 46 \$1000 Peninsula Equine Adult Am 5 22 70.00 0.00 / 0.00 0.00 / 36.00 ONDRUS (5064191)	OWNER
Amateur Equitation 18 - 35 3 3 13 0.00 10.00 / 0.00 10.00 / 0.00 ONDRUS (5064191) TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 Totals: 0.00 40.00 / 0.00 40.00 / 0.00 Totals: 0.00 40.00 / 0.00 40.00 / 0.00 Totals: 0.00 / 0.00 / 0.00 Totals: 0.00 40.00 / 0.00 Totals: 0.00 / 0.00 Totals: 0.00 / 0.00 Totals: 0.00 / 0.00 / 0.00 Totals: 0.00 / 0.00 Totals: 0.00 / 0.00 Totals: 0.00 / 0.00 Totals: 0.00 / 0.00	TENDLER, KARYN (4622510)
TOTALS: 0.00 40.00 / 0.00 40.00 / 0.00 375 2016 MENLO CHARITY HORSE SHOW Hunter Rating: AA - Premier Start Date: 8/9/2016 End Date: 8/14/2016 ECTION: ADULT AMATEUR HUNTER 18-35 YEARS ECTION RATING: C SLASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 46 \$1000 Peninsula Equine Adult Am 5 22 70.00 0.00 / 0.00 0.00 / 36.00 ONDRUS (5064191)	TENDLER, KARYN (4622510)
### Start Date: 8/9/2016	TENDLER, KARYN (4622510)
ECTION: ADULT AMATEUR HUNTER 18-35 YEARS ECTION RATING: C LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 46 \$1000 Peninsula Equine Adult Am 5 22 70.00 0.00 / 0.00 / 0.00 ONDRUS (5064191)	
ECTION RATING: C **LASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE 46 \$1000 Peninsula Equine Adult Am 5 22 70.00 0.00 / 0.00 / 36.00 ONDRUS (5064191)	State: CA Zone: 1
246 \$1000 Peninsula Equine Adult Am 5 22 70.00 0.00 / 0.00 0.00 / 36.00 ONDRUS (5064191)	
	OWNER
Hunter Classic	OWENS , LAURA (5881387)
	OWENS , LAURA (5881387)

Date Range: 1/1/2016 - 11/30/2024

141	Adult Amateur Hunter 18 - 35 3	6	14	0.00	0.00 / 0.00	0.00 / 16.50	ONDRUS (5064191)	OWENS , LAURA (5881387)
142	Adult Amateur Hunter 18 - 35 3	3	14	0.00	0.00 / 0.00	0.00 / 19.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
143	Adult Amateur Hunter 18 - 35 3	6	14	0.00	0.00 / 0.00	0.00 / 16.50	ONDRUS (5064191)	OWENS , LAURA (5881387)
144	Adult Amateur Hunter 18 - 35 U/S	5	9	0.00	0.00 / 0.00	0.00 / 17.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
			TOTALS:	70.00	0.00 / 0.00	0.00 / 121.50		
			BAD POIN		NOT RECORDED HOP OWNER NOT USHJA	DAY OF COMPETITION (GR1110.2)		

SECTION: MISC. HUNTER (No points earned) **SECTION RATING**: N

CLASS	DESCRIPTION	<u>HEIGHT</u>	<u>PLACING</u>	COMPLETED	HORSE	OWNER
204	CPHA Foundation Equitation Medal Class		DNP	20	ONDRUS (5064191)	OWENS , LAURA (5881387)
223	Ariat National Adult Medal Class		3	14	ONDRUS (5064191)	OWENS , LAURA (5881387)
224	Dover Saddlery Adult Medal Class		2	13	ONDRUS (5064191)	OWENS , LAURA (5881387)
227	Amateur Hunt Seat Equitation Over Fences 18 - 35		DNP	15	ONDRUS (5064191)	OWENS , LAURA (5881387)
231	Amateur Hunt Seat Equitation Flat 18 - 35		2	11	ONDRUS (5064191)	OWENS , LAURA (5881387)
236	Best Adult Amateur Rider Award		DNP	12	ONDRUS (5064191)	OWENS , LAURA (5881387)

6717 2016 WINE COUNTRY CLASSIC Hunter Rating: B - Regional I **Jumper Level:** 2 **Start Date:** 8/18/2016 **End Date:** 8/21/2016 **State:** CA **Zone:** 10

SECTION: MISC. HUNTER (No points earned)

SECTION RATING: N

<u>CLASS</u>	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	<u>HORSE</u>	OWNER
290	Open Equitation 3'3		1	5	KING ARTHUR (5126437)	CRYDER, MIKALA (5090792)
291	NorCal Senior Medal 3'6		1	3	KING ARTHUR (5126437)	CRYDER, MIKALA (5090792)
305	Pickwick Junior/Amateur Medal 3'3		2	5	KING ARTHUR (5126437)	CRYDER, MIKALA (5090792)
901	\$1500 Wine Country Classic Open Hunter Derby 3' 3'3 or 3'6		DNP	20	KING ARTHUR (5126437)	CRYDER, MIKALA (5090792)

SECTION: ADULT EQUITATION 18-35

SECTION RATING: N

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER
350	Amateur Adult Equitation O/F 3'		1	5	0.00	20.00 / 0.00	20.00 / 0.00	KING ARTHUR (5126437)	CRYDER, MIKALA (5090792)
351	Amateur Adult Equitation O/F 3'		1	5	0.00	20.00 / 0.00	20.00 / 0.00	KING ARTHUR (5126437)	CRYDER, MIKALA (5090792)
				TOTALS:	0.00	40.00 / 0.00	40.00 / 0.00		

SECTION: MISC JUMPER

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER
441	.95m Jumper II2c	0.95M	9	12	0.00	0.00 / 0.00	0.00 / 0.00	KING ARTHUR (5126437)	CRYDER, MIKALA (5090792)
				TOTALS:	0.00	0.00 / 0.00	0.00 / 0.00		

3109 2016 SHOWPARK SUMMER CLASSIC Hunter Rating: AA - Premier **Start Date:** 8/24/2016 **End Date:** 8/28/2016 **State:** CA **Zone:** 10

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: C

<u>CLASS</u> 150	DESCRIPTION A/A Hunters 18-35-FP	<u>HEIGHT</u>	PLACING 3	COMPLETED 10	MONEY 0.00	NAT PNT 0.00 / 0.00	ZRD PNT 14.00 / 0.00	HORSE SIG CHESTER (5160884)	OWNER SIG INTERNATIONAL, INC. (5031134)
				TOTALS:	0.00	0.00 / 0.00	14.00 / 0.00		
SECTION: MISC. HUNTER (No points earned) SECTION RATING: N									
CLASS	DESCRIPTION		HEIGHT	PLACING	COMPLETE	<u>)</u>		HORSE	OWNER
110	Modified Jr/Am Hunters			DNP	14			CALVIN KLEIN 29 (5372496)	STONE , ADELA (5315498)
111	Modified Jr/Am Hunters			8	15			CALVIN KLEIN 29 (5372496)	STONE , ADELA (5315498)
550	CPHA Foundation Medal 22 & Over			4	26			SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
550a	CPHA Foundation Medal 22 & Over Final			6	26			SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
SECTION: A	DULT EQUITATION 18-35 I TING : N								
CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER
431	Eq. Fences 18 & Over		DNP	16	0.00	0.00 / 0.00	0.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
434	Equitation on the Flat 18 & Over		6	8	0.00	4.00 / 0.00	4.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
				TOTALS:	0.00	4.00 / 0.00	4.00 / 0.00		
SECTION: U	SEF ADULT EQUITATION								
CLASS	DESCRIPTION			ENTRIE	S PLACING	NAT PNT	ZRD P	NT HORSE	<u>OWNER</u>
506	USEF Adult Medal			16	DNP	0.00 / 0.00	0.00 / 0	0.00 SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
					TOTALS:	0.00 / 0.00	0.00 / 0	0.00	
7106 2016 S	7106 2016 STRIDES & TIDES			- National			Start Date: 9/14	/2016 End Date: 9/18/2016	State: CA Zone: 10

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: C

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	HORSE	OWNER
12	\$1000 Equine Omega Complete A/A Classic - NAL		9	11	0.00	0.00 / 0.00	0.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
450	Adult Amateur Hunters 18 - 35 3-FP		4	10	0.00	0.00 / 0.00	0.00 / 13.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
451	Adult Amateur Hunters 18 - 35 3		7	10	0.00	0.00 / 0.00	0.00 / 11.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
452	Adult Amateur Hunters 18 - 35 3		3	7	0.00	0.00 / 0.00	0.00 / 14.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
453	Adult Amateur Hunters 18 - 35 3		5	7	0.00	0.00 / 0.00	0.00 / 12.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
454	Adult Amateur Hunters 18 - 35 U/S		5	8	0.00	0.00 / 0.00	0.00 / 12.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
				TOTALS:	0.00	0.00 / 0.00	0.00 / 62.00		

SECTION: MISC. HUNTER (No points earned) **SECTION RATING**: N

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	<u>HORSE</u>	<u>OWNER</u>
680	The Equestrians Concierge Equitation Classic		8	26	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
707	Ariat National Adult Medal 3		1	2	ONDRUS (5064191)	TENDLER, KARYN (4622510)
717	CPHA Foundation Jr/Am 33		DNP	18	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
733	Hudson & Company Jr/Am Finals Rnd 1 33		DNP	31	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
734	Hudson & Company Jr/Am Finals Rnd 2 33		1	31	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
735	Hudson & Company Jr/Am Finals Overall		4	31	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)

SECTION: ADULT EQUITATION 18-35

SECTION RATING: N

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	<u>OWNER</u>
640	Amateur Flat Equitation 18 - 35		1	9	0.00	20.00 / 0.00	20.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
641	Amateur Equitation 18 - 35 3		6	7	0.00	4.00 / 0.00	4.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
642	Amateur Equitation 18 - 35 3		3	7	0.00	10.00 / 0.00	10.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
				TOTALS:	0.00	34 00 / 0 00	34 00 / 0 00		

SECTION: Non-member exempted classes

CLASS	DESCRIPTION	ENTRIES	PLACING	NAT PNT	ZRD PNT	<u>HORSE</u>	<u>OWNER</u>
752	NC Eq Classic - Gymnastics 18 - 35	10	1	0.00 / 0.00	0.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
753	NC Eq Classic - 3 18 - 35	9	2	0.00 / 0.00	0.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
754	NC Eq Classic - Overall 18 - 35	9	1	0.00 / 0.00	0.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
		TOTALS:		0.00 / 0.00	0.00 / 0.00		

241024 2016 SONOMA HORSE PARK SEASON FINALE Hunter Rating: A - National **Start Date:** 9/21/2016 **End Date:** 9/25/2016 **State:** CA **Zone:** 10

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: C

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER
450	Adult Amateur Hunters 18 - 35 FP		1	7	0.00	0.00 / 0.00	0.00 / 17.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
451	Adult Amateur Hunters 18 - 35		4	7	0.00	0.00 / 0.00	0.00 / 10.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
452	Adult Amateur Hunters 18 - 35		5	8	0.00	0.00 / 0.00	0.00 / 9.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
453	Adult Amateur Hunters 18 - 35		5	7	0.00	0.00 / 0.00	0.00 / 9.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
454	Adult Amateur Hunters 18 - 35 U/S		5	7	0.00	0.00 / 0.00	0.00 / 9.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
AAYCH	Adult Amateur Hunters 18 - 35 CHAMPIONSHIP		2	7	0.00	0.00 / 0.00	0.00 / 20.40	ONDRUS (5064191)	TENDLER, KARYN (4622510)
				TOTALS:	0.00	0.00 / 0.00	0.00 / 74.40		

BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4)OWNER NOT ACTIVE BY 1ST DAY OF COMPETITION (GR1110.2) OWNER NOT USHJA MEMBER

SECTION: MISC. HUNTER (No points earned)
SECTION RATING: N

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	<u>HORSE</u>	OWNER
372	Pickwick Medal Finals Warm Up - Open 33		5	24	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
680	The Equestrians Concierge Equitation Classic		5	18	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
717	CPHA Foundation Jr/Am 33		1	11	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
733	Pickwick Jr/Am Finals Rnd 1 33		2	21	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
734	Pickwick Jr/Am Finals Rnd 2 33		1	21	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
735	Pickwick Jr/Am Finals Overall		1	21	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)

SECTION: ADULT EQUITATION 18-35 SECTION RATING: N

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER
640	Amateur Flat Equitation 18 - 35		2	6	0.00	15.00 / 0.00	15.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
641	Amateur Equitation 18 - 35 3		1	5	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
642	Amateur Equitation 18 - 35 3		1	5	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
940	Zone 10 HOTY Amateur Flat Equitation 18 - 35		2	5	0.00	0.00 / 0.00	30.00 / 0.00	SIG CHESTER (5160884)	SIG INTERNATIONAL, INC. (5031134)
941	Zone 10 HOTY Amateur 3 Equitation 18-35		1	5	0.00	0.00 / 0.00	40.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
942	Zone 10 HOTY Amateur 3 Equitation 18 - 35		1	5	0.00	0.00 / 0.00	40.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
EQ18-35CH	Amateur Equitation 18 - 35 CHAMPIONSHIP		1	6	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
EQ18- 35ZCCH	Zone 10 HOTY Equitation 18 - 35 CHAMPIONSHIP		1	5	0.00	0.00 / 0.00	80.00 / 0.00	ONDRUS (5064191)	TENDLER, KARYN (4622510)
				TOTALS:	0.00	75.00 / 0.00	265.00 / 0.00		

279067 2016 CAPITAL CHALLENGE EQUITATION Start Date: 10/2/2016 **State:** MD **Region:** 3

SECTION: MISC. HUNTER (No points earned) **SECTION RATING**: N

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	HORSE	OWNER
156	ADULT AMATEUR EQUITATION O/F SEC A	3' 0"	3	14	VANCOUVER (5178652)	HAGMAN, JAMES (168968)
157	ADULT AMATEUR EQUITATION O/F SEC A	3' 0"	DNP	14	VANCOUVER (5178652)	HAGMAN, JAMES (168968)
158	ADULT AMATEUR EQUITATION FLAT SEC A		3	14	VANCOUVER (5178652)	HAGMAN, JAMES (168968)
166	NO.AM. AMATEUR EQ. CHAMPIONSHIPS	3' 0"	9	29	VANCOUVER (5178652)	HAGMAN, JAMES (168968)

Start Date: 10/3/2016

End Date: 10/9/2016

State: MD Zone: 3

SECTION: ADULT AMATEUR HUNTER 18-35 YEARS SECTION RATING: C

1023 2016 CAPITAL CHALLENGE HUNTER JUMPER

CLASS DESCRIPTION HEIGHT PLACING COMPLETED MONEY NAT PNT ZRD PNT HORSE OWNER

Hunter Rating: AA - Premier

73	ADULT AMATEUR HUNTER 18-35 - FP	3' 0"	DNP	42	0.00	0.00 / 0.00	0.00 / 0.00	ON BOARD (5328092)	MULLIKEN, BERNADETTE (196250)
73	ADULT AMATEUR HUNTER 18-35 - FP	3' 0"	DNP	42	0.00	0.00 / 0.00	0.00 / 0.00	SILHOUETTE (5155248)	PEDERSEN, LYN (4868308)
74	ADULT AMATEUR HUNTER 18-35 STAKE	3' 0"	DNP	42	0.00	0.00 / 0.00	0.00 / 0.00	ON BOARD (5328092)	MULLIKEN, BERNADETTE (196250)
74	ADULT AMATEUR HUNTER 18-35 STAKE	3' 0"	DNP	42	0.00	0.00 / 0.00	0.00 / 0.00	SILHOUETTE (5155248)	PEDERSEN, LYN (4868308)
75	ADULT AMATEUR HUNTER 18-35 U/S		DNP	40	0.00	0.00 / 0.00	0.00 / 0.00	ON BOARD (5328092)	MULLIKEN, BERNADETTE (196250)
75	ADULT AMATEUR HUNTER 18-35 U/S		4	40	150.00	0.00 / 0.00	0.00 / 45.00	SILHOUETTE (5155248)	PEDERSEN, LYN (4868308)
				TOTALS:	150.00	0.00 / 0.00	0.00 / 45.00		
				BAD PO	DINT REASON:	HORSE NOT SHOW	N IN HOME ZONE.	REGION, DISTRICT (GR1111.6)	

SECTION: MISC. HUNTER (No points earned) **SECTION RATING**: N

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	HORSE	<u>OWNER</u>
13	AMATEUR WORLD CHAMPION HUNTER U/S 10		8	12	SILHOUETTE (5155248)	PEDERSEN, LYN (4868308)
23	rib ARIAT NATIONAL MEDAL FINALS		DNP	30	VANCOUVER (5178652)	HAGMAN, JAMES (168968)

7307 2016 NOR CAL MEDAL FINALS Hunter Rating: A - National Start Date: 10/12/2016 End Date: 10/16/2016 State: CA Zone: 10

SECTION: MISC. HUNTER (No points earned) **SECTION RATING**: N

<u>CLASS</u>	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	HORSE	OWNER
465	WCE Jr/Am Medal 3'7		2	5	FINDING EDEN (5247881)	P2 CAPITAL LLC (5222242)
471	Hudson & Co 3'3		4	9	FINDING EDEN (5247881)	P2 CAPITAL LLC (5222242)
602a	NorCal Senior Medal Round 1		DNP	14	FINDING EDEN (5247881)	P2 CAPITAL LLC (5222242)
602f	NorCal Senior Medal Final		DNP	13	FINDING EDEN (5247881)	P2 CAPITAL LLC (5222242)

SECTION: ADULT EQUITATION 18-35 SECTION RATING: N

<u>CLASS</u>	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	<u>OWNER</u>
423	Amateur Equitation 3'0		6	13	0.00	4.00 / 0.00	4.00 / 0.00	FINDING EDEN (5247881)	P2 CAPITAL LLC (5222242)
				TOTALS:	0.00	4.00 / 0.00	4.00 / 0.00		

300268 2016 LET'S SHOW Hunter Rating: B - Regional I Jumper Level: 3 Start Date: 10/26/2016 End Date: 10/30/2016 State: CA Zone: 10

SECTION: MISC. HUNTER (No points earned) **SECTION RATING**: N

<u>CLASS</u>	DESCRIPTION	HEIGHT	PLACING	COMPLETED	<u>HORSE</u>	OWNER
220	WCE		2	5	KAKA	LEONE EQUESTRIANS INC. (4105860)
24200	Amateur Equitation 18-41 CHAMPIONSHIP		2	2	ONDRUS (5064191)	OWENS , LAURA (5881387)

Date Range: 1/1/2016 - 11/30/2024

450 \$15,000 Haunted Hunter Derby 3'0 DNP 43 ONDRUS (5064191) OWENS , LAURA (5881387)

SECTION: ADULT EQUITATION 18-35

SECTION RATING: N

CLASS	DESCRIPTION	<u>HEIGHT</u>	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	HORSE	OWNER
224	Amateur Equitation 18-41 Flat		1	5	0.00	20.00 / 0.00	20.00 / 0.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
229	Amateur Equitation Champ 18-41 Flat		3	5	0.00	10.00 / 0.00	10.00 / 0.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
235	Amateur Equitation 18-41 3'0		2	6	0.00	15.00 / 0.00	15.00 / 0.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
242	Amateur Equitation Champ 18-41 3'0		2	4	0.00	15.00 / 0.00	15.00 / 0.00	ONDRUS (5064191)	OWENS , LAURA (5881387)
				TOTALS:	0.00	60.00 / 0.00	60.00 / 0.00		

SECTION: MISC JUMPER

DESCRIPTION **CLASS HEIGHT PLACING** COMPETED MONEY NAT PNT ZRD PNT **HORSE OWNER** LEONE EQUESTRIANS INC. 346 1.00m Jumpers 2.2c 3'3 1.00M 7 11 0.00 0.00 / 0.00 0.00 / 0.00 KAKA (4105860)

TOTALS: 0.00 0.00 / 0.00 0.00 / 0.00

SECTION: English Pleasure Hunter Seat

CLASS DESCRIPTION **ENTRIES PLACING** NAT PNT ZRD PNT **HORSE OWNER** 510 English Pleasure 18&O 8 1 0.00 / 36.00 0.00 / 0.00 ONDRUS (5064191) OWENS, LAURA (5881387) 513 Eng PI Hunt Seat \$1000 Mocha Grande Champ Open 15 2 0.00 / 28.00 0.00 / 0.00 ONDRUS (5064191) OWENS, LAURA (5881387)

TOTALS: 0.00 / 64.00 0.00 / 0.00

BAD POINT REASON: NOT RECORDED HORSE OWNER (GR1110.4)OWNER NOT ACTIVE BY 1ST DAY OF COMPETITION (GR11110.2)

315300 2016 MURIETA AUTUMN CLASSIC Hunter Rating: B - Regional I Jumper Level: 2 Start Date: 11/2/2016 End Date: 11/6/2016 State: CA Zone: 10

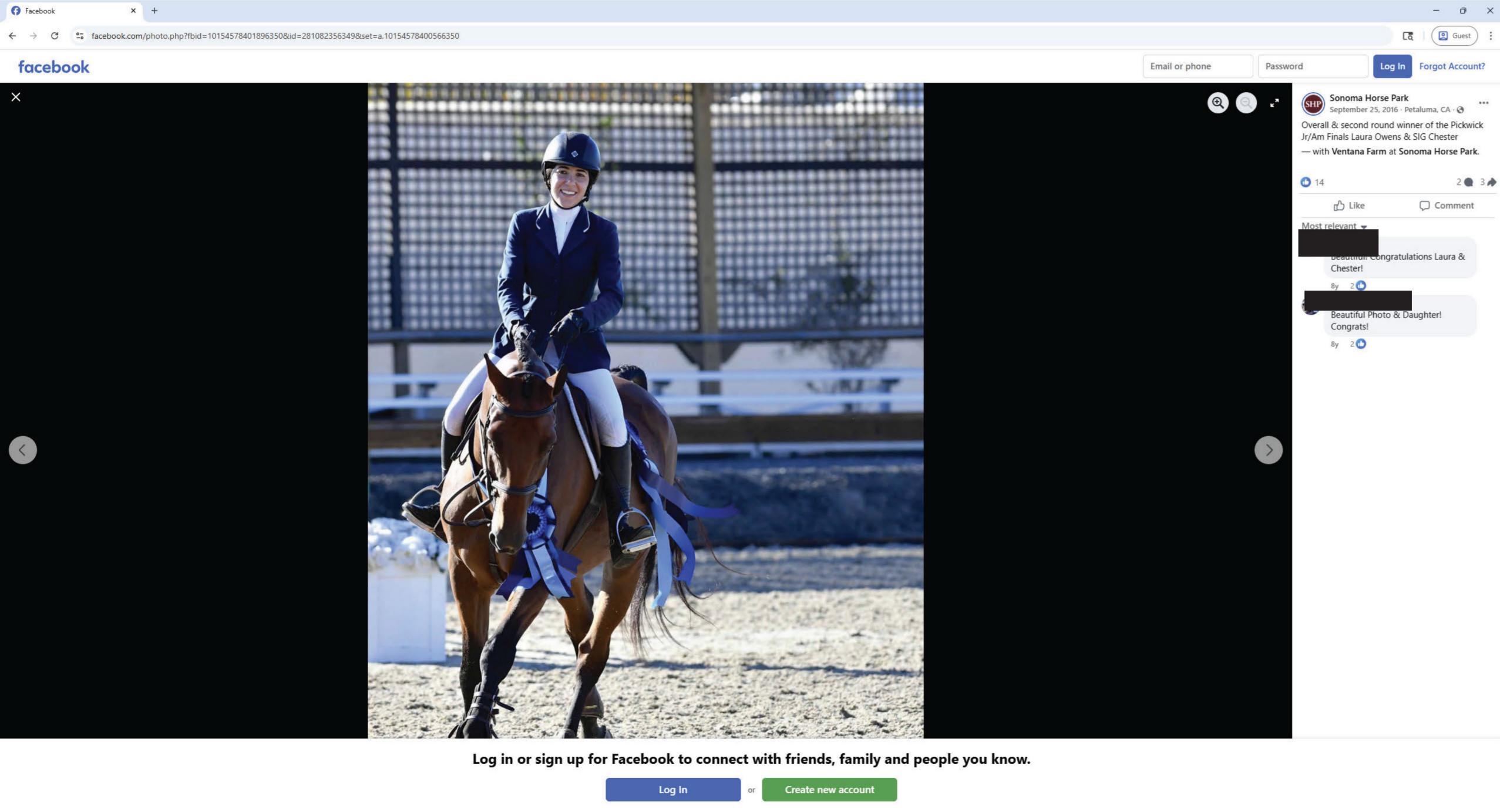
SECTION: ADULT AMATEUR HUNTER

SECTION RATING: C

CLASS	DESCRIPTION	HEIGHT	PLACING	COMPLETED	MONEY	NAT PNT	ZRD PNT	<u>HORSE</u>	OWNER	
500	\$100 Adult Amateur Hunters 18 & Over 3'0-FP		DNP	18	0.00	0.00 / 0.00	0.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)	
501	\$100 Adult Amateur Hunters 18 & Over - Handy 3'0		DNP	19	0.00	0.00 / 0.00	0.00 / 0.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)	
502	\$100 Adult Amateur Hunters 18 & Over 3'0		1	20	30.00	0.00 / 0.00	0.00 / 28.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)	
503	\$100 Adult Amateur Hunters 18 & Over 3'0		4	20	10.00	0.00 / 0.00	0.00 / 21.00	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)	
504	Adult Amateur Hunters 18 & Over U/S		6	9	0.00	0.00 / 0.00	0.00 / 19.50	ONDRUS (5064191)	MC NOBLE, DOROTHY (4073562)	
				TOTALS:	40.00	0.00 / 0.00	0.00 / 68.50			

BAD POINT REASON: OWNER NOT ACTIVE BY 1ST DAY OF COMPETITION (GR1110.2)HORSE NOT SHOWN IN HOME ZONE, REGION, DISTRICT (GR1111.6)OWNER NOT USHJA MEMBER

EXHIBIT T-2







Love this photo of our horseback-riding younger daughter, Laura, leading the victory gallop after her win today in the Pickwick Junior/Amateur Finals at Sonoma Horse Park on board the horse, SIG Chester. She's worked hard for many years to win the Pickwick Medal today and I'm a proud father, as you can tell. Congratulations, Laura!





Sonoma Horse Park · Follow

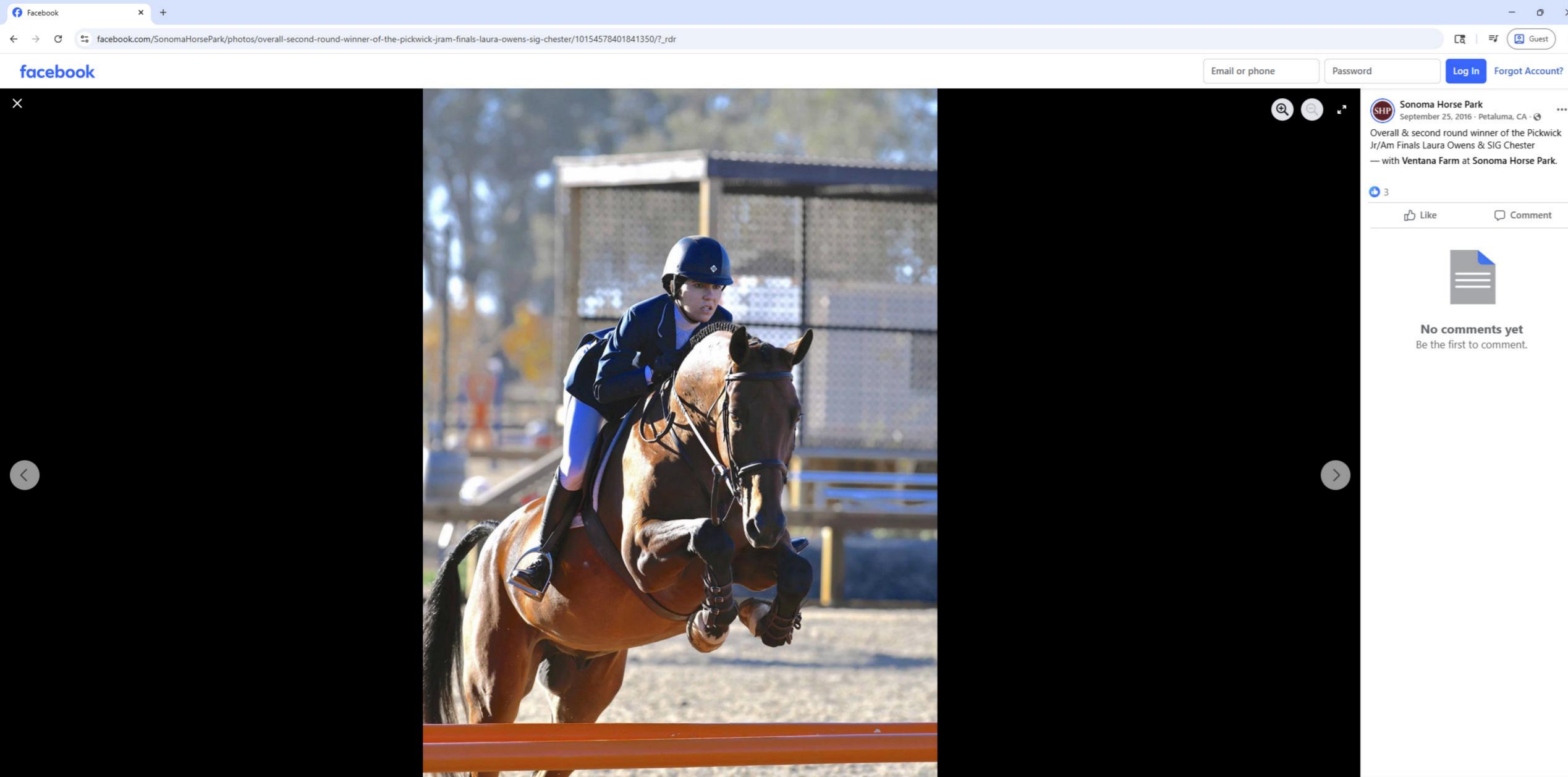
September 25, 2016 · Petaluma, CA · 🕙

Overall & second round winner of the Pickwick Jr/Am Finals Laura Owens & SIG Chester—with Ventana Farm and Carroll Benson Training Stables at Sonoma Horse Park.













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iMessage
2016-10-02 21:20:00 (UT
Sender: (415)
Participants: (415)
                                                ), Self (
Indoor ring
http://www.capitalchallenge.org/photo--video.html
I go 9th so actually prob around 30 min til I am in
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☐ Guest



NorCal Hunter Jumper Association Home MEMBERSHIP STANDINGS ▼ SHOWS

RESULTS ARE IN FOR THE 2016 NORCAL EQUITATION CLASSICS

Home » Results are in for the 2016 NorCal Equitation Classics

RULES & SPECS ▼ SPONSORS ▼ CONTACT



Results are in for the 2016 NorCal Equitation Classics

Sep 21st '16 · Eq Classic

← → C ° norcalhunterjumpers.com/news/results-are-2016-norcal-equitation-classics

Congratulations to all riders who competed in the 2016 NorCal Equitation Classic at the Sonoma Horse Park.



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Notices



June 2025 | Buletin No. 2 Jun 16th '25



Introducing Digital Bulletins for 2025!

Apr 2nd '25



EHMA & NorCal sessions @ Sacramento International Sep 24th '24



Sign the petition for a USEF West Coast competition calendar advisory committee

Jun 25th '24

Class 735 - Pickwick Jr/Am Finals Overall

Entries Order of Go Results

WELLS F	ARGO GP ARENA			09/25/2016
		21 Trips	Status	: Completed
Rank	Horse	Rider	Score	
1st _▽	589 - SIG CHESTER	LAURA OWENS	0	>
2nd _♥	325 - CINTAS		0	>
3 rd	464 - LAUSBUB		0	>
4 th _{\mathbb{V}}	542 - CARINUS		0	>
5th 図	560 - NO REGRETCZ		0	>
6 th	161 - CLOONEY		0	>
7 th	155 - RIMPOCHE		0	>
8 th	534 - PROTOTYPE		0	>
9 th	162 - KAIRO		0	>
10 th	156 - WIN VISION		0	>

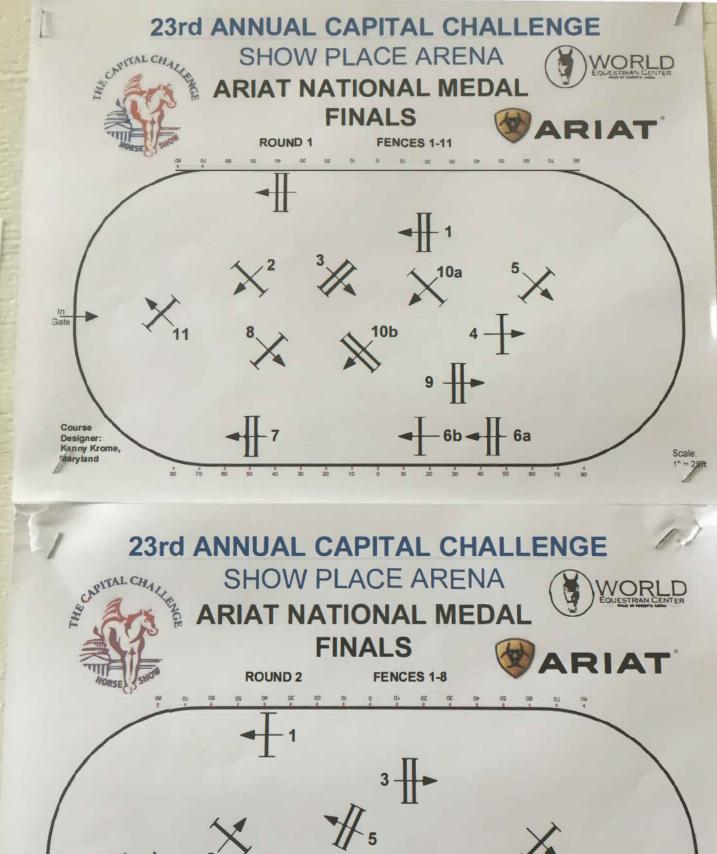


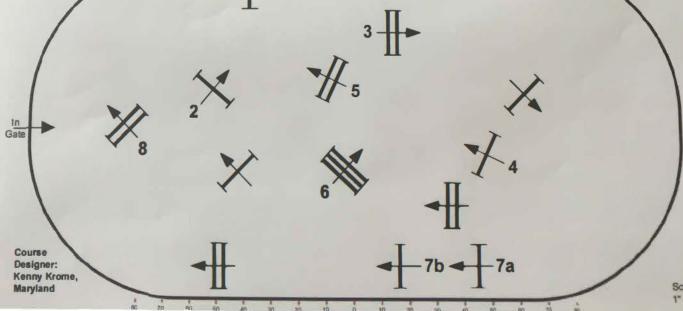
2:30 PM

chronofhorse.com

-Result: Class 5, MEDIUM GREEN PONY MODEL **SCORES** Scoring mode of Hunter Score. This class has not been ordered. ORDER ENTRY # HORSE NAME RIDER NAME OWNER SCORE PURCHASE 1817 EDITOR'S NOTE AUGUSTA IWASAKI LAURA OWENS 262.980 2 474 ANDY WARHOL HIGHRIDGE FARM 257.880 3 759 ARNABY BODACIOUS 255.500 4 858 CARTWHEEL TRULY SCRUMPTIOUS 251.640 5 993 OUT OF THE BLUE JORI GREENE STEPPING STONE FARM 249.180 6 948 FOXMOR WIGGLESWORTH PONIES 248.260 7 874 NOT SO SECRET 247.880 8 493 247.870 9 786 THAT'S THE SCOOP 247.670 10 512 YANKEE BLUE M LLC 244.870 11 727 C.E. REMARKABLE COMPETITION EQUESTRIAN LLC 242.870 12 706 JACKI O BLUE 242.470 13 731 NANTUCKET 242.150 14 684 LULULEMON 241.710 15 794 CHARMER CAROLINE PASSARELLI 241.000 16 572 BEST OF LUCK 240.030 17 552 PURE PLATINUM 239.470 18 662 CAPICHE 238.890 19 922 MIDNIGHT SHIMMER 237.280 20 325 FACE VALUE 236.960 21 824 3 WISHES 235.910 22 953 FALLING MOON 235.730 23 596 WESTWOOD OLIVER TWIST 235.590 24 541 MY MANE SQUEEZE 235.460 25 487 SMOKIN' BOY BLUE 234.830 26 989 WHISPERING 234.800













Blenheim EquiSports

August 27, 2016 · Del Mar, CA · 🕙

Congratulations to the TOP 10 from Round One of the CPHA FOUNDATION 22 & Over Medal Finals! #ThePlaceToBe for testing the Top 4, 6, 8, 10 or anyone with an 80 or better....is at the Showpark Summer Classic! Good luck tomorrow in Round Two & the FINAL!

From left to right:

- 4. Laura Owens 80.5

- with and 8 others at Del Mar Horse Park.





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RESULTS ARE IN FOR THE 2016 NORCAL EQUITATION CLASSICS

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Results are in for the 2016 NorCal Equitation Classics

Sep 21st '16 · Eq Classic

← → C º= norcalhunterjumpers.com/news/results-are-2016-norcal-equitation-classics

Congratulations to all riders who competed in the 2016 NorCal Equitation Classic at the Sonoma Horse Park.

36 & over	
Champion:	
Reserve:	
18 to 35	
Champion: Laura Owens (Trainer: Benson Carroll))
Reserve:	
15 to 17	
Champion:	
Reserve:	
12 to 14	
Champion	
Reserve: "	
11 and under	

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Sign the petition for a USEF West Coast competition calendar advisory committee

Jun 25th '24

EXHIBIT U

RANDY SUE POLLOCK Attorney at Law (CSBN 64493) Superior Court of California County of San Francisco 286 Santa Clara Avenue Oakland, CA 94610 MAR 28 2018 3 Telephone: (510) 763-9967 Facsimile: (510) 380-6551 rsp@rspollocklaw.com 5 Attorney for Respondent 6 MICHAEL MARRACCINI 7 SUPERIOR COURT OF STATE OF CALIFORNIA 8 COUNTY OF SAN FRANCISCO 9 UNIFIED FAMILY COURT 10 -000-11 LAURA OWENS, COURT NO. FDV-18-813693 12 Petitioner, DECLARATION OF WITNESS 13 COLIN SCANLON IN SUPPORT OF RESPONDENT VS. 14 MICHAEL MARRACCINI, 15 Trial: April 13, 2018 Time: 1:30 p.m. 16 Respondent. **Dept: 403** Judge: Honorable Roger C. Chan 17 I, Colin Scanlon, declare and state as follows: 18 1. I am the boyfriend of Respondent's sister, Stephanie Marraccini, 19 2. I am 37 years old and am employed as a Real Estate Analyst. I am a resident of San 20 Francisco and live in the Marina District; 21 3. I had met Laura Owens several times while she was dating Michael Marraccini, including 22 a dinner with her family at The House of Prime Rib; 23 I specifically remember being called by Michael to come to Laura's apartment in 24 December 2016 for a meeting with Laura and her father to discuss Laura's desire to continue the 25 relationship with Michael. Laura had been claiming that she was pregnant and had been threatening 26 Mike with not having an abortion if he ceased dating her. Additionally, Laura had been indicating to 27 28

DECLARATION OF WITNESS COLIN SCANLON IN SUPPORT OF RESPONDENT, OWENS v. MARRACCINI, NO. FDV-18-813693

1

Mike that she was contemplating suicide at the thought of their relationship ending. Mike wanted me to be there as a witness;

- 5. During the meeting, which her father Ron Owens steered, Mr. Owens told Michael that his daugher had a tendency to exaggerate or even flat out make things up. Laura was complaining of depression and suicidal thoughts at the fear of her relationship with Michael ending and was very distraught.
- 6. During that meeting there was no discussion of Michael ever having been physically or psychologically abusive towards Laura. She did not complain at all about Michael's conduct towards her. Laura admitted that she was in fact not pregnant, and there was no need for an abortion. She also apologized for threatening to commit suicide. The meeting ended with no final decision on the relationship, just the agreement that Mike would not rush a decision, and for the two of them to continue to work through things. Mr. Owens was very thankful as he, Michael and myself left the apartment. Mr. Owens advised Michael in the elevator on the way out of the building that he appreciated Michael agreeing to not end the relationship outright and see how it goes, and then advised him to get out in a few weeks when his daughter had a chance to calm down and get a handle on her depression.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct to the best of my knowledge. Executed this 27 day of March 2018 in San Francisco, CA.

COLIN SCANLON

1 Q. Okay. And when you say her family, are you 2 talking specifically about Ron? 3 Α. I don't -- okay. So I think that all three of them knew what she was doing. So -- meaning Laura, her 4 5 mother, and Ron knew that she was lying to me and that they were, essentially, covering up for her until that night because none of the story made sense. And that's 7 why I had the meeting with Ron, Laura, my sister's 8 boyfriend, and myself. 9 10 MS. COURSON: What was the story that didn't 11 make sense? 12 THE WITNESS: That she was -- that she had an 13 abortion. 14 MS. COURSON: But when was the story that --15 THE WITNESS: She said that she went through with an abortion or she said that she went through with 16 an abortion and that she was pregnant. And that night, 17 18 her dad said no, that she made up a story and went along with it. And that was why I had my sister's boyfriend 19 20 there to witness that. 21 BY MS. JUSSEN-COOKE: 22 Q. Did he explain what the story was that she made 23 up? I don't remember looking back now. There was a 24 25 lot going on.

EXHIBIT V

DREAMY BRAW SUSTICE COURT

21 AUG 12 PM 3:51

Dreamy Draw Justice Court/AZ007133J/0708 18380 N. 40th St Phoenix, AZ 85032

Plain	ntiff	☐ Employer-Plaintiff if Workplace Injunction	Defendant		Case No.	
Greg	ory Gillespie		Laura M Owens	s	CC2021129159	
☐ On behalf of minor/person in need of protection named:			Defendant's address Defendant's phone 415-		PETITION for: ☑ Order of Protection □ Injunction Against Harassment □ Workplace Injunction	
Agent's name (if Workplace Injunction)						
The state of the s					t the court has ordered, see "Order" form before filling out this form.	
1.	Defendant/Plaintif	f Relationship (or rel	ationship betwee	en Defendan	nt and minor/person in need of protection)	
	•	ner as intimate partner kual relationship (past I in common		brother, sis ☐ Live/lived	as parent, grandparent, child, grandchild, ster (or in-law/step) d together but not as intimate partners out not romantic or sexual)	
2.					nity, paternity, annulment, legal separation, uperior Court, Case #	
3. Name of court, if any, in which any other p			•	related to th	is conduct has been filed.	

(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.)
	The Defendant and I went on three dates. We had a sexual relationship one evening. I Politely ended the relationship 9 days after our first encounter. She did not take the rejection well at which point I understood, listened but politely let her know that there will not have a future relationship together and to stop contacting me. She continued to harass me for 48 hours. I asked her to stop reaching out. 24 hours went by with no contact. 11 days after we were sexually intimate, she sent me a photo of a positive pregnancy test though we used 2 forms of protection during our one encounter. She continued to harass me via text messages through 14 different email accounts and I-Messages all of which I have since blocked. She threatened to reach out to my family, located them on public records, reached out to my mother, threatened to "expose" me on her Apple iTunes self help podcast. She sent me photoshopped images of an ultrasound that is from an article on google dated Jan 12th 2015. I had an OBGYN confirm this ultrasound she is claiming to be hers of twins, is an exact from the google article from 2015. Laura Owens (def.) Has shown up to my home 2 times after being asked not to come there. After blocking all 14 i message accounts which she has continually harassed me from since july 9th, She now is reaching out to me making threats of lawsuits to my work email address. Sgh has contacted the HR department in my company to confirm my email address and is threatening my career and reputation at my place of work as of yesterday and today. She is showing no sign of stopping. The Def. is stating she is in "Love" with me after 3 dates roughly 2 hours each date and is promising to have an abortion and dismiss pressing charges if I commit to loving her, marrying her and starting a family with her within the next two years. I have repeatedly asked the Def. to stop contacting myself, my family and my place of work and to also stop coming to my home - banging on my door and ringing my doorbell. I have all text messages and e

- 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 Circa Lighting: 4201 N marshal Way, Scottsdale, AZ 85254

Circa Lighting: 4201 N marshal Way, Scottsdale, AZ 85254

- ☐ 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: For the defendant to stop contacting my personal and work cell phones. For the defendant to stop contacting my work.;

contacting my work.;		
		
Jnder penalty of perjury, I swear or affirm the above statements are tru	ue to the best of my knowledge, and I-request an	
Order / Injunction granting relief as allowed by law.		
/ 4 // 4	AUG 72 21	021
/s/ Gregory Gillespie / Attest:		
Plaintiff	Judicial Officer/Clerk/Notary Date	

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY

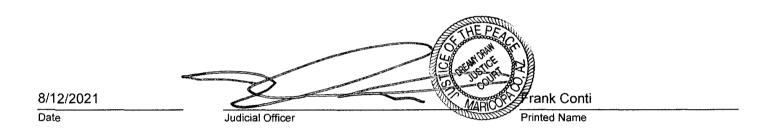
Dreamy Draw Justice Court/AZ007133J/0708 18380 N. 40th St Phoenix, AZ 85032

				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	Cas	se No. CC2	2021129159		
Order of Protection		urt ORI No.	AZ007133J		
[] Amended Order	Coi	unty Ma rico	ра	s	tate AZ
DLAINTIEF			IDENTIFIED		
PLAINTIFF Gregory Gillespie		12/30/1985	IDENTIFIER	<u> </u>	
First Middle Last		Plaintiff's D	When head of the World St. Co., and the co.		
			ate of Birtin		
And on behalf of any minor family member or other Protected F	Person lis	ted below:			
V.					
DEFENDANT	DEFENI	DANT IDEN	TIFIERS		
Laura M Owens	SEX	RACE	DOB	HT	WT
First Middle Last	Female	White		5' 4"	110
Defendant/Plaintiff Relationship: We have or had a romantic	EYES	HAIR			ts Release of
or sexual relationship.	Brown	Brown		· · · · · · · · · · · · · · · · · · ·	ty Numbers
Defendant's Address:	DRIVER	S LICENSE #	STATE	EXP D/	ATE
11440 N 69th Street, Scottsdale , AZ 85254	I I Feti	mated Date		<u>. l</u>	
CAUTION: [] Weapon Alleged in Petition	[] L3tii	nated bate	OI DII III		
§ 922(g)(8) or state, tribal, territorial, or local law. If you have a possess or purchase a firearm, you should consult an attorney. 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: [x] RESIDENCE. Plaintiff is granted exclusive use and possess [x] LAW ENFORCEMENT STANDBY. Defendant may return personal belongings. Neither law enforcement nor this prote furniture, finances, real estate, or other ownership issues. PROTECTED LOCATIONS. Defendant shall not go to or near [x] Residence (confidential) [x] Workplace: • Circa Lighting: 4201 N marshal Way, Scottsdale, [] School:	urn once vective ord	with a law e ler can resol	nforcement o	fficer to ver prop	obtain necessary
[] 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:

Defendant shall not follow or come within 100 yards of plaintiff or any protected person named herein.



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 decistion-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 (2) 8:354m

L. Deputy

Superior Court of Arizona/AZ007035J/0700 201 W. Jefferson Phoenix, AZ 85003 Case No. Defendant **Plaintiff** □ Employer-Plaintiff if Workplace Injunction FN2021-004799 Gregory Gillespie Laura Owens Defendant's address □ On behalf of minor/person in need of protection named: □ Order of Protection ☐ Injunction Against Harassment ☐ Workplace Injunction Defendant's phone Agent's name (if Workplace Injunction) 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) ☐ Related as parent, grandparent, child, grandchild, ☐ Married (past or present) brother, sister (or in-law/step) ☐ Live/lived together as intimate partners ☐ Live/lived together but not as intimate partners ⋈ Romantic or sexual relationship (past or present) ☐ Dating (but not romantic or sexual) ☐ Parent of a child in common □Other: ☐ 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.

	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 to do offend him?".
10/29/2021	On October 29, I was unable to login to my computer. After a three-hour support call and an inperson 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 exgirlfriend, 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 harrassment 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 choser 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.
The following persons should also be on this order. They should be protected because Defendant is a danger to them:
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
 □ 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.
□ 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.
Other requests:
r penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge, and I request an r / Injunction granting relief as allowed by law. Laura Owens Attest: Judicial Officer/Cierk/Notary Date

CLERK OF THE SUPERIOR
COURT
FILED
11-2-2023 2:02 PM

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032 Monday-Friday 8:00-5:00

C. Curley
DEPUTY CLERK

Injunction Against Harassment						
_		Case No. CV	2023-0539	52		
[] Amended Order	(Court ORI No.	. AZ00703	5J		
[] Sexual violence—no service fee		County Mario	сора	St	ate AZ	
PLAINTIFF		PLAINTIFF	IDENTIFIER	RS		
Clayton Echard						
First Middle Last		Plaintiff's Da	ate of Birth			
And on behalf of any minor family member or other Protecte	ed Persor	listed below:				
V.						
DEFENDANT	DEFE	NDANT IDEN	TIFIERS			-
Laura Owens	SEX	RACE	DOB	HT	WT	1
First Middle Last	Female		4 rises at	Unknown	Unknown Release of	-
Defendant/Plaintiff Relationship: The Defendant and I are	EYES	MAIR wn Unknown		Security		
dating or have dated and have not had a romantic or		R'S LICENSE #	STATE	EXP DATE		1
sexual relationship.				1/1/1900		1
Defendant's Address:	[] Es	timated Date	of Birth			_
CAUTION: [] Weapon Alleged in Petition						
WARNINGS TO DEFENDANT: This injunction shall be enforced bistrict of Columbia, any U.S. Territory, and may be enforced territorial or tribal boundaries to violate this injunction may be court, in writing, can change this injunction.	ed by Trib	al Lands (18	U.S.C. § 22	65). Cross	sing state,	
This order is effective for one year from date of service	e.					
This order is effective for one year from date of services. THE COURT HEREBY FINDS THAT: It has jurisdiction over the parties and subject matter. [] Defendant received actual notice of this Hearing an THE COURT, finding reasonable evidence of harassment of the granted before Defendant can be heard in opposition, and Defendant or there are reasons why notice should not be go no CRIMES. Defendant shall not commit any act of har 23-371) against Plaintiff or Protected Persons. [x] NO CONTACT. Defendant shall have no contact with Find and as checked: [] Phone [] Electronic (email, text, some contact with Find and some contact with F	d had an or that gre and there given, HER irassment	eat or irreparal are specific fa REBY ORDEF (A.R.S. § 12- ccept through	ble harm wo acts attesting RS: 1809(T)) or attorneys, le	ould result g to efforts sexual vio	s to give notice plence (A.R.S	S. §

County Sheriff's Office or other local law enforcement agency.

OTHER ORDERS:

The Court finds reasonable evidence of harassment of the Plaintiff by the Defendant or that great or irreparable harm would result to the Plaintiff if the Injunction is not granted before the Defendant can be heard in opposition, and that there are specific facts attesting to the efforts to give notice to the Defendant or that there are reasons why notice should not be given. Defendant is not to have contact with Plaintiff or the protected party[ies] at any time by any means, including but not limited to any in-person, physical, verbal, nonverbal, telephonic (text, email, apps), internet (social media, instant messaging, apps) or third-party contact. Defendant shall not record by video or audio Plaintiff or the protected party[ies] using any device, including but not limited to cell phones, cameras or other recording devices. Defendant shall not approach Plaintiff or the protected party[ies] at their residence, workplace, school or vehicle. The Maricopa County Superior Court does not give specific distance instructions in its injunctive orders. However, Plaintiff and or protected party may make a report to law enforcement if Defendant is close enough to cause concern or make contact. Defendant shall not be near Plaintiff and/or any protected party. Defendant shall not approach Plaintiff or a protected party in public places.

11/2/2023	J'Did	Cynthia Gialketsis	
11/2/2023			
Date	Judicial Officer	Printed Name	

WARNING: This is an official court order. If you disobey this order, you may be arrested and prosecuted 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 injunction, you have the right to request a hearing, which will be held within 10 business days after your written request has been filed in the court that issued this injunction. Violations of this injunction should be reported to a law enforcement agency, not the court.

ADDITIONAL WARNINGS TO DEFENDANT: Nothing the plaintiff does can stop, change, or undo this Injunction without the court's written approval. You must appear in court to ask a judge to change (modify) or dismiss (quash) this Injunction.

All Courts in Arizona/NCIC#/DPS# Address, City, AZ Zip Telephone Number

Plaintiff C Clayton Echard	Employer-Plaintiff if Workplace Injunction	Defendant Laura Ower	Case No M-0751-CV-2023012527
On behalf of m		Defendant's address Scallde, 12 85	PETITION for:
Agent's name (if	Workplace Injunction)	Defendant's birth date Defendant's phone	☐ Unjunction Against Harassment ☐ Workplace Injunction
Tilispaining of	and the second second	Tipele Monage Top	નાંતા ને કોળ દાસ હિલ્લા પ્રાપ્ત છે.

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

1	Defendant/Plaintiff Relationship. Choose the options that best describe your relationship to the defendant *If y are applying on behalf of another person, choose the relationship between the other person and the defendant				
	☐ Marned (past or present) ☐ Live/lived together as intimate partners	☐ Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step)			
	☐ Parent of child in common	☐ Live/lived together but not as intimate partners			
	One party is pregnant by the other	Tother (describe) "hookup", one time			
	☐ Romantic/sexual (past or present)	only			
2.	If checked, Defendant and I have a pending action separation, dissolution, custody, parenting time, or su County Superior Court, Case #FC2023 -0	apport in Maricopa			
3	Name of court, if any, in which any other protective	order related to this conduct has been filed			
	Court name C	ase #			
	12-2				

(Continue to next page)

Effective 9/24/2022

Page 1 of 2

Adopted by Administrative Directive 2022-07 ACCDVPO2F-092422 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) hookup occured, defendant claimed she became pregnant from it, Sexual intercoulle never ocurred defendant has not shown viable pregnancy required Defendant has sent over low emails, despite being blocked required has texted me from at least 7 I block one the creates a new required me online despite her repeated defaming required of acculing men the 3rd person she has accujed. The following persons should also be on this order. They should be protected because Defendant is a danger to them Birthdate Burthdate. Burthdate Burthdate 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 Leave blank if address is confidential ☐ School/other Leave blank if address is confidential 7a Defendant owns or carries a firearm or other weapons. 7b 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 mmor 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 I request an order or an injunction granting relief as allowed by law

Effective 9/24/2022

Page 2 of 2

Adopted by Administrative Directive 2022-07
AOCDVPO2F-092422

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	05/20/23 - 09/26/23 - o defendent has sent over 100+
	05/20/23 - 04/26/23 - detendent her four
	enails despite as me not responding to them. She has
	been blocked via email for the last 3 months
	I blocked her phone number around the beginning of
	. June and she has contacted me from at least 5
	other numbers since then
	she is contacting me and threatening to see for defamation,
	but as a public Egure, I am the one the is defining.
1	·
	j.
	/ / / / / / / / / / / / / / / / / / / /



Scottsdale City Court • 3700 N 75th Street Scottsdale, AZ 85251 • (480) 312-2442

Fax: (480) 312-2764 • court@scottsdaleaz.gov • www.ScottsdaleAZ.gov/Court
ORI: AZ007111J • Maricopa County, Arizona

ECHARD, CLAYTON VS. OWENS, LAURA SCOTTSDALE, AZ 85254	Case # M-0751-CV-2023012527	

PROTECTIVE ORDER COVER SHEET

Injunction Against Sexual Violence	hours Harassment	☐ Granted ☐ Denied ☐ Withdrawn	Set Pre-Issa Modified	Jance Hearing
☐ Other	laintiff except [
☐ Include Other Pro				
No contact with O	ther Protected Persons ex	cept Phone		
Protected Locations Residence Work School Other			Restricted Yes Yes Yes	
☐ Defendant granted ☐ Allegation of a We ☐ Defendant not to p ☐ Arizona State ☐ Exclusive care, cust	exclusive use of residence I standby with law enforce apon possess firearms/ammunit Statute §13-3602(G)(4) tody, or control of any anii	ement on during the duration of Brady - Title 18 U S C 9 mal	the order	
Judge's Initials	Blahr	Date	9-26-23.	

CLERK OF THE SUPERIOR COURT

TRIAL COURTS OF ARIZONA IN MARICOPA COUNTY

Superior Court of Arizona/AZ007035J/0700 602-506-7353 Monday - Friday 8am - 5pm

18380 N. 40th St Phoenix, AZ 85032

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		L.	Brown, D	eputy			

			Electronically recorded
		f Protection ended Order	Case No. FC2023-052771 Court ORI No. AZ007035J County Maricopa State AZ
PLAINTIFF Laura		Owens	PLAINTIFF IDENTIFIERS
First	Middle	Last	Plaintiff's Date of Birth

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

DEFENDAN	Τ	
Clayton	Ray	Echard
First	Middle	Last

Defendant/Plaintiff Relationship: One of us is pregnant by the other, We have or had a romantic or sexual relationship.

Defendant's Address:

DEFENDANTIDENTIFIERS					
SEX	RACE		DOB	НТ	WT
Male					
EYES	HAIR				ts Release of
			Soc	ial Securit	y Numbers
DDIVED'S LICENSE #		STATE	EVD D	\TE	

12:00:00 AM

ΑZ

[] Estimated Date of Birth

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.

Any order served on or after 9/24/2022 is in effect for two years from date of service. Any order served before 9/24/2022 is in effect 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 [] Electronic (email, text, etc.) [] Mail [x] Other: through legal counsel and court proceeding, and through electronic mail only regarding matters pertaining only to the paternity matter.

THE COURT FURTHER ORDERS:

[X] RESIDENCE. Plaintiff is granted exclusive use and possession of the residence currently shared with Defendant. [X] 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 Plaintiffs or other Protected Person's:

the physical safety of Plaintif	. Under A.R.S. § 13-3602(G)(4), the court finds th f or Protected Persons. Therefore, Defendant sha same within 24 hours of service to:	
[] ANIMALS. Plaintiff is grante kept, or held by the plaintiff, defendant. Defendant is orde an act of cruelty or neglect in	d the exclusive care, custody, or control of any anothe defendant, or a minor child residing in the residered to stay away from the animal and shall not tan violation of section 13-2910, or otherwise dispos	idence or household of the plaintiff or the ke, transfer, encumber, conceal, commit
committed an act of domestic vi shall have no contact with Plain as outlined herein. Defendant sl	se to believe that the Defendant may commit an a olence within the past year (or good cause exists tiff other than as outlined herein and shall not cau hall not communicate or post untrue or harassing ocial media, and shall not cause others to commu- line or otherwise.	to consider a longer period). Defendant se others to contact Plaintiff other than comments regarding Plaintiff online,
10/6/2023	Judicial Officer	Gary Popham
Date	Judicial Officer	Printed Name

WARNING: This is an official court order. If you disobey this order, you may be arrested and prosecuted 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 decistion-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.

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

10/6/2023 @ 10:43AM

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032 602-506-7353 Monday - Friday 8am - 5pm

Plaintiff	☐ Employer-Plaintiff if Workplace Injunction	Defendant	Case No. FC2023 - 052771
Laura Owens	:	Clayton Ray Echard	FC2025-052+11
☐ On behalf of minor/person in		Defendant's address	PETITION for:
need of protection	named:		☑ Order of Protection
			☐ Injunction Against Harassment☐ Workplace Injunction
Agent's name (if Wo	orkplace Injunction)	Defendant's birth date	
		Defendant's phone	

This is NOT a court order.

This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

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

1.	Defendant/Plaintiff Relationship (Choose the options that best describe your relationship to the defendant. *If
	you are applying on behalf of another person, choose the relationship between the other person and the defendant)

☐ Married (past or present)	☐ Related as parent, grandparent, child, grandchild,
☐ Live/lived together as intimate partners	brother, sister (or in-law/step)
☐ Parent of a child in common	☐ Live/lived together but not as intimate partners
☑ One party is pregnant by the other	☐ Other (describe):
☑ Romantic or sexual relationship (past or present)	, ,

- 2. ☑ If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in Maricopa County Superior Court, Case # FC2023-052114.
- Name of court, if any, in which any other protective order related to this conduct has been filed. Court name_Case #_
- 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.)
6/1/2023	Clayton has sent threatening messages since discovering I was pregnant, such as: I legitimately hate you right now. my hatred will only grow if you decide to put me through all of this. My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever My hate is toward you and you only. If you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more.
9/21/2023	Clayton Echard was The Bachelor and has many diehard loyal fans. He and I are involved in a very public paternity case that is being covered by every major media outlet. Clayton posted to a story to his 270k followers to look me up, which they have, and I have been sent threatening and harassing messages by his followers. I explained this to him and asked him to take down the post, which he did not. By posting personal and sensitive information about me publicly (and without my consent), he has made me feel humiliated and embarrassed.

9/2	21/2023	harassment in and of itself, coupled with the fact that he was inciting his followers to harass me as well. Despite this call, Clayton still did not take down the post.
10	1/5/2023	Between 9/22 and 10/5. Clayton has posed as several users on Reddit, including and others. He has posted private and confidential information, including facts about my medical history, that is known only to him because of our paternity case. This is why it is 100% traceable back to him. He has also been writing defamatory and very hurtful things about me, including comments about how I have gained weight (I am pregnant), how I am not attractive, how my photos are so poorly edited that it is laughable, how I am bad at my job (a self-help podcaster), and how my prior abusive relationship, which inspired a TEDx talk, never happened, despite mountains of evidence. He is doing everything in his power to ruin and hurt my reputation. As a result of what he has posted, I have gotten harassing messages that have told me to harm myself as a result of becoming pregnant with his twins. I am getting other threatening messages as well, and all of this attention from the general public that he has incited is very much unwanted. As a result of this public shaming, he has caused me extreme psychological harm and disrupted my peace. I have asked Clayton to stop the harassment on Reddit and social media so many times, but he won't. I have reported his accounts and posts to Reddit, but he continues to write unacceptable, cruel things about me. He has multiple accounts now and so even if one is blocked, he can create another one. As a result of him spreading false and damaging information under pseudonyms, I feel demeaned, humiliated, and like my deepest sense of privacy has been invaded. In addition, he has been in communication with my ex, who I have an order of protection against, and who he knows is dangerous. I have asked him to stop talking to him because it will put me in danger, but he continues to communicate with him.
10	/6/2023	When combined, all of this has led me to feel extreme anxiety and fear for my safety. I have not left my house since September 28th because of this.
the 6. Det	m: fendant sho	persons should also be on this order. They should be protected because Defendant is a danger to build be ordered to stay away from these locations at all times, even when I am not present.
⊠ ⊠		(confidential) ness
	Defendant s	owns or carries a firearm or other weapons. should be ordered NOT to possess firearms while this order is in effect because of the risk of harm to otected persons.
		should be ordered to stay away from any animal that is owned, possessed, leased, kept or held by t, or a minor child living in either my household or Defendant's household.
9. Oth	ner requests	s: No cyberharassment or cyberbullying under real name or pseudonyms.;
		ury, I swear or affirm the above statements are true to the best of my knowledge, and I request an inting relief as allowed by law.
/s/ Laur	ra Owens	Attest: \(\frac{1}{2} \) \(\frac{10/6/2003}{2} \)

Plaintiff

Judicial Officer/Clerk/Notary

Date

EXHIBIT W

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iMessage 2016-07-06 23:21:36 (UTC) [1] Sender: (415) (415) ), Self (Whoa that was longer than I thought

iMessage 2016-07-06 23:21:36 (UTC) [1] Sender: (415) (415) ), Self (
```

I'm really sorry for the late response, been with the horses and service is scattered here. I also really appreciate you breaking that down for me.

The moving situation makes a lot of sense. I also definitely wouldn't be opposed to moving, especially to San Diego, at some point in the future if it was the right situation.

Wanting to settle down isn't so much to do with my age as much as it is the fact that I personally have these views about wanting to just be with one person. This situation really shocked me and made me realize I need to be upfront with what I want because I haven't been in relationships in the past because I was afraid of scaring the other person off. However, this has certainly added more depth to our relationship early on and I feel like the responsible thing for both of us to do from it is to either maturely move forward or end it and it seems like we are on the same page there.

It really hurt me to read the last paragraph of your text because I feel horrible that I have made you feel that way. I really do only want to bring you up and make you feel good about yourself and I'm sorry that I have been moody and insecure. You are exactly who I want to be with and I think once we are on the same page about feelings, I will be able to take a breath and trust it. I guess I've just been questioning you and your feelings about the future because you aren't where I'm at now and I'm nervous you won't get there. Or that you won't integrate me into your life with your family and friends. Trust me, I want nothing more than to relax and enjoy our relationship.

The stress from the pregnancy is really straining it and making me have these mood swings that I hate myself for and I'm sorry for that. I also do really hate to end the pregnancy when we both see a future together and this would probably be a super kid we are missing out on, but I guess there's time for that in the future. If I think about it logically, I want to establish a solid relationship with you and make memories without kids involved because we aren't there yet. I just feel bad. But I don't want to ever make you feel bad so I won't question you. I love you and I trust you.

```
iMessage
[2] 2016-07-07 00:21:20 (UTC)
Sender: Self ( ), Self ( )

It did. I haven"t read it because I"m in a meeting

iMessage
[1] 2016-07-07 00:21:20 (UTC)
Sender: Self ( )
Participants: (415) ((415) ), Self ( )
```

EXHIBIT X

Communications Message

```
iMessage
2017-03-16 00:00:00 (UTC) [1]
Sender: (415)
                                                  , Self (
Participants: (415)
They obviously want to go but my mom is being ridiculously picky
iMessage
2017-03-16 00:40:32 (UTC) [1]
Sender:
Participants:
                                                  Self (
Hello?
iMessage
2017-03-16 00:40:32 (UTC) [2]
Sender: (415)
                                                  Self (
Participants: (415)
Hello?
                                                                                        iMessage
                                                         [2] 2017-03-16 01:33:52 (UTC)
Sender: Self (
               Participants: (415) 8
                                                               ), Self (
                                                                                         Outside
iMessage
2017-03-16 01:33:52 (UTC) [2]
Sender: (415)
Participants: (415)
                                                 , Self (
Walking downstairs 🔓
                                                                                        iMessage
                                                                [1] 2017-03-16 01:33
                                                                 Self (
               Participants: (415)
                                                                , Self
                                                                                         Outside
iMessage
2017-03-16 01:33:52 (UTC) [1]
Sender: (415)
Participants: (415)
                                                 ), Self (
Walking downstairs 🔓
iMessage
2017-03-16 05:51:53 (UTC) [1]
Sender: (415)
Participants: (415)
                                                 ), Self (
We all love your family and had a great time with them. Love you more than you know and am
thinking about you now.
iMessage 2017-03-16 05:51:53 (UTC) [2]
Sender: (415)
Participants: (415)
                                                  , Self (
```

We all love your family and had a great time with them. Love you more than you know and am thinking about you now.

```
iMessage
2017-03-17 04:01:04 (UTC) [3]
Sender: (415)
                        (415)
Participants: (415)
                                                ), Self (
Did you guys meet with them>?
iMessage
2017-03-17 04:01:04 (UTC) [1]
                        ((415)
Sender: (415)
Participants: (415)
                                                ), Self (
Did you guys meet with them>?
iMessage
2017-03-17 05:20:00 (UTC) [1]
Sender: (415)
                        (415)
                                                ), Self (
Participants: (415)
                              (415)
Mike, I love you so much. I just have to say iy.
iMessage
2017-03-17 05:20:00 (UTC) [3]
Sender: (415)
                        ( (4<u>1</u> 5)
Participants: (415)
                                                ), Self (
Mike, I love you so much. I just have to say iy.
iMessage
2017-03-17 <u>05:43:28 (</u>UTC) [3]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
                              (415)
I'm so embarrassed
iMessage
2017-03-17 05:43:28 (UTC) [1]
Sender: (415)
                        ((4<u>1</u>5)
Participants: (415)
                                                ), Self (
I"m so embarrassed
iMessage
2017-03-17 06:28:16 (UTC) [1]
                        ((415)
Sender: (415)
Participants: (415)
                              (415)
                                                ), Self (
Our anniversary is March 25.
iMessage
2017-03-17 06:28:16 (UTC) [3]
Sender: (415)
Participants: (415)
                                                ), Self (
Our anniversary is March 25.
```

```
iMessage
2017-03-18 06:06:56 (UTC) [3]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             (415)
Bunch of stuff for the horses. It's been nuts,
iMessage
2017-03-18 06:06:56 (UTC) [1]
Sender: (415)
                                                ), Self (
Participants: (415)
Bunch of stuff for the horses. It's been nuts,
iMessage
2017-03-18 06:06:56 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
I'm good, just been working since I got home from dinner.
                                                                                       iMessage
                                                               [1] 2017-03-18 06:06:56 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                           (415)
                                                                              Working on what?
iMessage
2017-03-18 06:09:04 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                                               ), Self (
Seeing you handle all of this so gracefully and being so supportive of your mom and sister has
made me fall even harder for you xoxo
iMessage
2017-03-18 06:09:04 (UTC) [3]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
Seeing you handle all of this so gracefully and being so supportive of your mom and sister has
made me fall even harder for you xoxo
iMessage
2017-03-18 06:17:36 (UTC) [3]
Sender: (415)
                        ((4)
                                               ), Self (
Participants: (415)
I hope that didn't make you uncomfortable
iMessage
2017-03-18 06:17:36 (UTC) [3]
Sender: (415)
                        ((415)
Participants: (415)
                                               ), Self (
Trying to give you a compliment
```

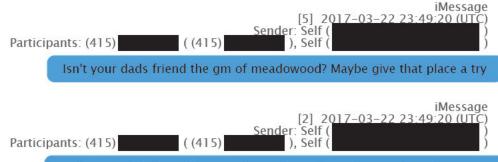
```
iMessage
2017-03-20 00:17:04 (UTC) [2]
Sender: (415)
Participants: (415)
The key word is deliberately
iMessage
2017-03-20 <u>00:38:24 (</u>UTC) [2]
Sender: (415)
                         ((4\dot{1}5)
Participants: (415)
                              (415)
                                                ), Self (
I really don"t know what else you want me to do. I"m not going to tell you that I was
deliberately trying to screw you because I would NEVER do that. I talked to my dad at length
about you and the job today and certainly didn"t do that. All I am trying to do is help. Sorry
you don"t think I am doing a good job.
iMessage
2017-03-20 00:38:24 (UTC) [1]
                        ((415)
Sender: (415)
                                                ), Self (
Participants: (415)
                              (415)
I really don't know what else you want me to do. I'm not going to tell you that I was
deliberately trying to screw you because I would NEVER do that. I talked to my dad at length
about you and the job today and certainly didn't do that. All I am trying to do is help. Sorry
you don't think I am doing a good job.
iMessage
2017-03-20 02:54:56 (UTC) [1]
Sender: (415)
                              5)
                                                ), Self (
Participants: (415)
                              ((415)
So are you just going to ignore me then? I'm going to the station early tomorrow AM to work
with Lena and get the shows up and my dad is talking to three people on your behalf
iMessage
2017-03-20 02:54:56 (UTC) [2]
Sender: (415)
                        ((415)
Participants: (415)
                                                ), Self (
                              (415)
So are you just going to ignore me then? I"m going to the station early tomorrow AM to work
with Lena and get the shows up and my dad is talking to three people on your behalf
iMessage
2017-03-20 04:01:04 (UTC) [2]
                        ((4)5)
Sender: (415)
Participants: (415)
                                                ), Self (
                              (415)
I don"t know what you want me to do and I"m really sad and upset
iMessage
2017-03-20 04:01:04 (UTC) [1]
Sender: (415)
                        (41
Participants: (415)
I don't know what you want me to do and I'm really sad and upset
iMessage
2017-03-20 04:03:12 (UTC) [1]
Sender: (415)
                        ((41
                                               ), Self (
Participants: (415)
                              ((415))
I don't know how my dad and I are supposed to push this tomorrow if you're completely
unreachable
```

```
iMessage
2017–03–20 04:03:12 (UTC) [2]
Sender: (415) (415)
Participants: (415)
I don"t know how my dad and I are supposed to push this tomorrow if you"re completely
unreachable
                                                                                         iMessage
                                                                 [2] 2017-03-20 04:05:20 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                            (415)
                                                               ), Self (
                                                           I"m not unreachable, I"ll call you soon
                                                                                         iMessage
                                                         [1] 2017-03-20 04:05:20 (UTC)
Sender: Self (
                                                               ), Self (
               Participants: (415)
                                             (415)
                                                            I'm not unreachable, I'll call you soon
                                                                                         iMessage
                                                                 [1] 2017-03-20 06:21
                                                                                         :52 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                           ((415)
                                                               ), Self (
                                                                                          You up?
                                                                                         iMessage
                                                                 [2] 2017-03-20 06:21
                                                                                         :52 (UTC)
                                                         Sender: Self (
                                                               ), Self (
               Participants: (415)
                                            (415)
                                                                                          You up?
iMessage
2017-03-20 <u>07:55:44 (</u>UTC) [2]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
                              (415)
I miss you so much baby
iMessage
2017-03-20 07:55:44 (UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
I miss you so much baby
iMessage
2017-03-20 17:31:44 (UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                              (415)
                                                ), Self (
iMessage
2017-03-20 <u>17:31:44 (</u>UTC) [2][6]
Sender: (415)
                         ((4)5)
                                                ), Self (
Participants: (415)
```

```
iMessage
2017–03–20 17:31:44 (UTC) [2][7][8]
Sender: (415) (415)
Participants: (415) (415)
                                                    ), Self (
IMG_2397.JPG
                                                                                                 iMessage
                                                                       [2] 2017-03-20 17:38:08 (UTC)
                                                              Sender: Self (
                Participants: (415)
                                               ((415)
                                                                    ), Self (
                                                                                                    Coolio
                                                                                                 iMessage
                                                              [3] 2017-03-20 17:38:08 (UTC)
Sender: Self (
                Participants: (415)
                                                (415)
                                                                     ), Self (
                                                                                                    Coolio
iMessage
2017-03-20 18:33:36 (UTC) [3]
Sender: (415)
                           ((4)5)
Participants: (415)
                                                     ), Self (
                                 (415)
My dad is going to talk to David after his work lunch
iMessage
2017-03-20 18:33:36 (UTC) [2]
                           ((415)
Sender: (415)
Participants: (415)
                                                     ), Self (
My dad is going to talk to David after his work lunch
iMessage
2017-03-20 19:20:32 (UTC) [2]
Sender: (415)
                           ((4)5)
Participants: (415)
                                                     ), Self (
miss you
iMessage
2017–03–20 19:20:32 (UTC) [3]
Sender: (415) (415)
Participants: (415) (44
miss you
```

```
iMessage
                                                                 [3] 2017-03-20 21:11:28 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                                               ), Self (
                                                            Yea, I've been in meeting all morning
iMessage
2017-03-20 21:11:28 (UTC) [3]
Sender: (415)
                         ((415)
Participants: (415)
                              (415)
                                                ), Self (
You ok?
iMessage
2017-03-20 21:11:28 (UTC) [2]
Sender: (415) (415)
Participants: (415)
                                                 ), Self (
                              (415)
You ok?
                                                                                         iMessage
                                                                 [2] 2017-03-20 21:11
                                                                                         :28 (UTC)
                                                         Sender: Self (
                                                              ), Self (
              Participants: (415)
                                            (415)
                                                            Yea, I"ve been in meeting all morning
iMessage
2017-03-20 21:15:44 (UTC) [2]
Sender: (415)
                         ((4)5)
                              ((415)
                                                ), Self (
Participants: (415)
What"s going on?
iMessage
2017–03–20 21:15:44 (UTC) [3]
Sender: (415) (415)
Participants: (415)
                                                ), Self (
What's going on?
iMessage
2017-03-21 02:59:12 (UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                ), Self (
                              (415)
What happened in the meeting?
iMessage
2017-03-21 02:59:12 (UTC) [2]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
What happened in the meeting?
iMessage
2017-03-21 22:24:00 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                                ), Self (
How are you doing?
```

```
iMessage
2017-03-21 <u>22:24:00 (</u>UTC) [2]
Sender: (415)
                        ((415)
Participants: (415)
I miss you so much :(
iMessage
2017-03-21 22:24:00 (UTC) [4]
Sender: (415)
                        (415)
                             ((415)
Participants: (415)
                                               ), Self (
How are you doing?
iMessage
2017-03-21 22:24:00 (UTC) [4]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                             (415)
I miss you so much :(
iMessage
2017-03-22 15:02:24 (UTC) [5]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                             (415)
Been trying to get work done this morning but I keep getting distracted. I can't stop thinking
about how much I miss you, care about you, and love you so, so much
iMessage
2017-03-22 15:02:24 (UTC) [2]
                        ((415)
Sender: (415)
                                               ), Self (
Participants: (415)
                             (415)
Been trying to get work done this morning but I keep getting distracted. I can't stop thinking
about how much I miss you, care about you, and love you so, so much
iMessage
2017-03-22 19:46:08 (UTC) [2]
                        (415)
Sender: (415)
                                               ), Self (
Participants: (415)
                             (415)
Hello
iMessage
2017-03-22 19:46:08 (UTC) [5]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
Hello
                                                                                      iMessage
                                                               [5] 2017-03-22
                                                                                22:36:48 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                           (415)
                                                               Self (
                                                                  I've called you multiple times
                                                                                      iMessage
                                                       [2] 2017-03-22
Sender: Self (
                                                                                   36:48 (UTC)
              Participants: (415)
                                        ((415)
                                                            ), Self (
                                                                  I"ve called you multiple times
```



Isn"t your dads friend the gm of meadowood? Maybe give that place a try

Notes	
[1] Source Device	BCF1237.E01/Macintosh HD
[1] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-03-19/+1 (415) on 2017-03-18 at 17.53.20.ichat
[2] Source Device	BCF1237.E01/Macintosh HD
[2] Source File	/Users/michaelmarraccini/Library/Messages/chat.db
[3] Source Device	BCF1237.E01/Macintosh HD
[3] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-03-20/+1 (415) on 2017-03-20 at 00.55.44.ichat
[4] Source Device	BCF1237.E01/Macintosh HD
[4] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-03-21/+1 (415) on 2017-03-21 at 15.24.00.ichat
[5] Source Device	BCF1237.E01/Macintosh HD
[5] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-03-22/+1 (415) on 2017-03-22 at 08.02.24.ichat
[6] External Item	IMG_2397.JPG
[7] Associated File	/Users/michaelmarraccini/Library/Messages/Attachments/63/03/D99B1E7 8-801F-42EF-AC57-2B35AC96AC65/IMG_2397.JPG
[8] External Item	IMG_2397.JPG

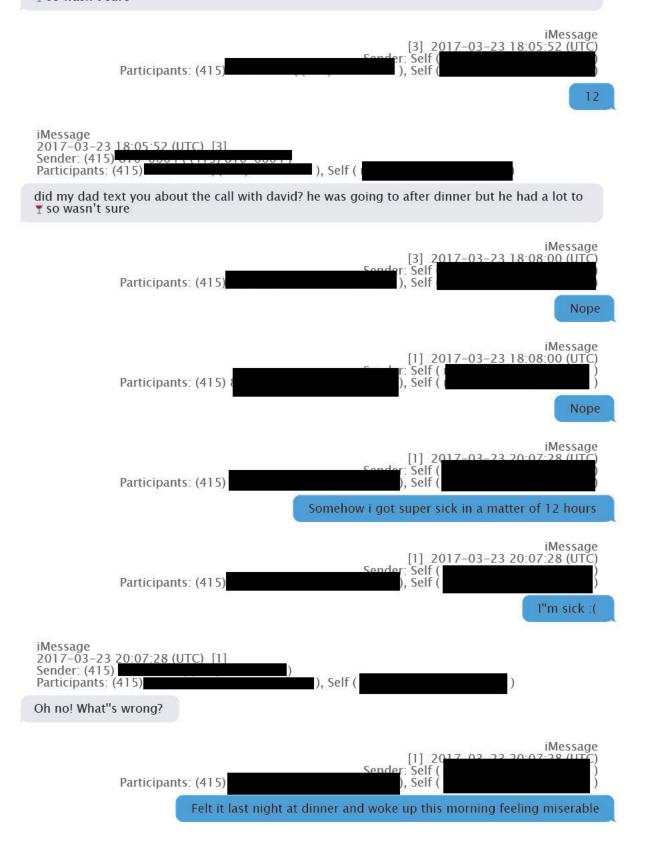
Tag: Laura text messages (13001-13100 of 19636)

Communications Message

iMessage 2017-03-23 00:22:19 (UTC) [1] Sender: (415) (415)) Participants: (415) (415)), Self (

```
I"ll check it out. Did you get my text from this morning? Didn"t get anything back
iMessage
2017-03-23 00:22:19 (UTC) [2]
Sender: (415)
                         ((4)5)
                              (415)
                                                 ), Self (
Participants: (415)
I'll check it out. Did you get my text from this morning? Didn't get anything back
iMessage
2017-03-23 02:22:56 (UTC) [2]
Sender: (415)
                         ( (415)
( (415)
                                                 ), Self (
Participants: (415)
iMessage
Message
2017-03-23 02:22:56 (UTC) [1]
Sender: (415) (415)
Participants: (415) (415)
                                                 ), Self (
iMessage
2017-03-23 17:31:44 (UTC) [1]
Sender: (415)
                         ((4)5)
                                                 ), Self (
Participants: (415)
                               (415)
what size shoe are you?
iMessage
2017-03-23 17:31:44 (UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
what size shoe are you?
iMessage
2017-03-23 17:40:16 (UTC) [3]
                         ((415)
Sender: (415)
                                                 ), Self (
                              (415)
Participants: (415)
iMessage
2017-03-23 17:40:16 (UTC) [1]
Sender: (415)
                         ( (415)
( (415)
Participants: (415)
                                                  ), Self (
                                                                                          iMessage
                                                          [1] 2017-03-23 18:05:52 (UTC)
Sender: Self (
                                                                ), Self (
               Participants: (415)
                                             (415)
                                                                                                 12
iMessage
2017-03-23 18:05:52 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
                               (415)
```

did my dad text you about the call with david? he was going to after dinner but he had a lot to $\frac{1}{2}$ so wasn't sure



```
iMessage
2017–03–23 20:07:28 (UTC) [1]
Sender: (415) ((415)
Participants: (415)
Cold?
                                                                                           iMessage
                                                                  [3] 2<u>017-03-23 20:07:28 (UTC)</u>
                                                          Sender: Self (
                                                                 ), Self (
               Participants: (415)
                                              (415)
                                                                                          I'm sick :(
iMessage
2017-03-23 20:07:28 (UTC) [3]
Sender: (415)
                         ((415)
                                                  ), Self (
Participants: (415)
Oh no! What's wrong?
                                                                                           iMessage
                                                                  [3] 2017-03-23 20:07:28 (UTC)
                                                          Sender: Self (
                                                                ), Self (
               Participants: (415)
                                              (415)
                                                 Somehow i got super sick in a matter of 12 hours
                                                                                           iMessage
                                                                  [3] 2017-03-23 20:07:28 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             ((415))
                                                                ), Self (
                            Felt it last night at dinner and woke up this morning feeling miserable
iMessage
2017–03–23 20:07:28 (UTC) [3]
Sender: (415) (415)
                                                  ), Self (
Participants: (415)
Cold?
iMessage
2017-03-23 20:16:00 (UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                  ), Self (
                               (415)
Are you still ok for tomorrow?
iMessage
2017-03-23 20:16:00 (UTC) [1]
Sender: (415)
                         ((4)5)
                                                  ), Self (
Participants: (415)
                               ((415))
Are you still ok for tomorrow?
                                                                                           iMessage
                                                                  [1] 2017-03-23 20:58:40 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             ((415))
                                                                ), Self (
                                                                Yea, I should be good for tomorrow
```

```
iMessage
                                                                [3] 2017-03-23 20:58:40 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                                             Yea, I should be good for tomorrow
iMessage
2017-03-23 22:11:12 (UTC) [3]
Sender: (415)
                        ((415)
Participants: (415)
                              (415)
                                                ), Self (
Is it a cold?
                                                                                       iMessage
                                                                [3] 2017-03-23 22:11:12 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                          ((415)
                                                              ), Self (
                                                                                             Yes
                                                                                       iMessage
                                                                [3] 2017-03-23 22:11
                                                                                       :12 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                            (415)
                                                              ), Self (
                                                                 You know I've called you, right?
iMessage
2017-03-23 22:11:12 (UTC) [1]
Sender: (415)
                                                ), Self (
Participants: (415)
                              (415)
Is it a cold?
                                                                                       iMessage
                                                                [1] 2017-03-23 22:11
                                                                                       :12 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                                                             Yes
                                                                                       iMessage
                                                                [1] 2017-03-23 22:11:12 (UTC)
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
                                           (415)
                                                                You know I"ve called you, right?
iMessage
2017-03-23 22:12:21 (UTC) [1]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
No. I just got into service. I"ve been at the barn. I don"t get calls.
iMessage
2017-03-23 22:12:21 (UTC) [3]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
No. I just got into service. I've been at the barn. I don't get calls.
```

```
iMessage
2017–03–23 23:14:33 (UTC) [3]
Sender: (415) ((415)
                                               ), Self (
Participants: (415)
Just got home so call me whenever
iMessage
2017-03-23 23:14:33 (UTC) [1]
                        ((415)
Sender: (415)
Participants: (415)
                             (415)
                                               ), Self (
Just got home so call me whenever
iMessage
2017-03-24 01:55:11 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                                                ), Self (
Chinese food tomorrow sounds amazing
iMessage
2017-03-24 01:55:11 (UTC) [3]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
                             (415)
Chinese food tomorrow sounds amazing
                                                                                       iMessage
                                                               [3] 2017-03-24 03:01:20 (UTC)
                                                        Sender: Self (
                                           (415)
                                                             ), Self (
              Participants: (415)
                                                                            What are you doing?
                                                                                       iMessage
                                                               [1] 2017-03-24 03:01:20 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                                            What are you doing?
iMessage
2017-03-24 03:03:28 (UTC) [1]
Sender: (415)
                        ((41
                             5)
Participants: (415)
                                               ), Self (
                             (415)
At din w my mom, we are still waiting for my dad to come out of surgery. You?
                                                                                       iMessage
                                                               [1] 2017-03-24 03:03:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                                                    I'm sorry :/
                                                                                       iMessage
                                                               [1] 2<u>017-03-24 03:03:28 (UTC)</u>
                                                        Sender: Self (
              Participants: (415)
                                           ((415))
                                                             ), Self (
                                                                     I"m just watching tv shows
```

```
iMessage
                                                                [3] 2017-03-24 03:03:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                              ), Self (
                                                                                    I'm sorry:/
iMessage
2017-03-24 <u>03:03:28 (</u>UTC) [3]
Sender: (415)
                        (415)
Participants: (415)
                             (415)
                                               ), Self (
At din w my mom, we are still waiting for my dad to come out of surgery. You?
                                                                                       iMessage
                                                               [3] 2017-03-24 03:03:28 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                             ), Self (
                                                                     I'm just watching tv shows
iMessage
2017-03-24 03:13:02 (UTC) [3]
Sender: (415)
                        ((415)
Participants: (415)
                                               ), Self (
                             (415)
Which ones?
iMessage
2017-03-24 03:13:02 (UTC) [1]
Sender: (415)
Participants: (415)
                                               ), Self (
                             (415)
Which ones?
                                                                                       iMessage
                                                               [1] 2017-03-24 03:13:24 (UTC)
                                                        Sender: Self (
                                           (415)
              Participants: (415)
                                                              ), Self (
                                                                                        Billions
                                                                                       iMessage
                                                               [3] 2017-03-24 03:13:24 (UTC)
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
                                         ((415)
                                                                                        Billions
                                                                                       iMessage
                                                               [3] 2017-03-24 03:13:32 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                                 Just started the second season
                                                                                       iMessage
                                                               [1] 2<u>017-03-24 03:13:</u>32 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                             ), Self (
                                                                 Just started the second season
```

```
iMessage
2017-03-24 03:18:24 (UTC) [1]
Sender: (415)
Participants: (415)
Without me?
iMessage
2017-03-24 03:18:24 (UTC)
Sender: (415)
Participants: (415)
                                               ), Self
Without me? 🥞
                                                                                       iMessage
                                                                [3] 2017-03-24 03:19:41 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                                             ), Self
                                                                  I can watch it with you tonight
                                                                                       iMessage
                                                                [1] 2<u>017-03-24 03·19·41 (IIT</u>
                                                               : Self (
              Participants: (415)
                                                               ). Self (
                                                                  I can watch it with you tonight
iMessage
2017-03-24 03:20:19 (UTC) [1]
Sender: (415)
Participants: (415)
                                               ), Self (
Tonight? Are you home?
iMessage
2017-03-24 03:20:19 (UTC)
                              [3]
Sender: (415)
Participants: (415)
                                                ), Self (
Tonight? Are you home?
                                                                                       iMessage
                                                                [3] 2017-03-24 03:20:32 (UTC)
                                                        Sender:
                                                                Self (
              Participants: (415)
                                                              ), Self (
  I just got here. I was going to come over if you were there. I wanted to spend an extra night
  with you since I'm heading home Saturday
                                                                                       iMessage
                                                                [1] 2017-03-24 03:20:32 (UTC)
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
  I just got here. I was going to come over if you were there. I wanted to spend an extra night
  with you since I'm heading home Saturday
iMessage
2017-03-24 03:24:05 (UTC)
Sender: (415)
Participants: (415)
                                                , Self (
Yes I would love that
```

```
iMessage
2017-03-24 <u>03:24:05 (</u>UTC) [3]
Sender: (415)
Participants: (415)
Yes I would love that
                                                                                       iMessage
                                                               [3] 2<u>017-03-24 03:24:48 (UTC)</u>
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                        Let me know when you're on the way back to your place
                                                                                       iMessage
                                                               [1] 2017-03-24 03:24:48 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                       Let me know when you're on the way back to your place
iMessage
2017-03-24 03:26:56 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
I was just at amicis and am just walking in to my place
                                                                                       iMessage
                                                               [1] 2017-03-24 03:26:56 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                             ), Self (
                                                                  K. Want me to head over now?
iMessage
2017-03-24 <u>03:26:56 (</u>UTC) [3]
Sender: (415)
                        ((4)5)
Participants: (415)
I was just at amicis and am just walking in to my place
                                                                                       iMessage
                                                               [3] 2017-03-24 03:26:56 (UTC)
                                                        Sender: Self (
                                           (415)
              Participants: (415)
                                                              ), Self (
                                                                  K. Want me to head over now?
                                                                                       iMessage
                                                               [1] 2017-03-24 03:37:36 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
                                                            Start watching it to the 15 min mark
                                                                                       iMessage
                                                               [1] 2017-03-24 03:46:08 (UTC)
                                                        Sender: Self (
              Participants: (415)
                                    ((415)
                                                             ), Self (
                                               I"m here. Do you want to come down and get me
```

```
iMessage
2017-03-25 00:27:44 (UTC) [1]
Sender: (415)
Participants: (415)
Sorry been on the phone
                                                                                           iMessage
                                                          [1] 2017-03-25 00:29:52 (UTC)
Sender: Self (
               Participants: (415) 810-0604 ( (415) 810-0604 ), Self (
                                                                                    I"m just chilled
                                                                                           iMessage
                                                                  [1] 2017-03-25 00:29:52 (UTC)
                                                          Sender: Self
               Participants: (415) 810-0604 ( (415) 810-0604 ), Self
                                                                                             Chillin
                                                                                           iMessage
                                                                  [1] 2<u>017-03-25 00:29:52 (UTC)</u>
                                                                er: Self (
               Participants: (415)
                                                                ), Self (
                                        I want to try hr cake but didn"t want to have it without ya
iMessage 2017-03-25 00:32:00 (UTC) [1]
Sender: (415)
Participants: (415)
                                                   , Self (
Good thing you reminded me to get milk!
iMessage
2017-03-25 18:20:48 (UTC) [1]
Sender: (415)
Participants: (415)
                                                    Self (
Love you 💚
                                                                                           iMessage
                                                                  [1] 2017-03-25 19:05:36 (UTC)
                                                                   Self (
               Participants: (415)
                                                                   Self (
                                                                           How"s your pops doing?
                                                                                           iMessage
                                                                  [1] 2017-03-25 19:37:36 (UTC)
                                                                   Self (
               Participants: (415)
                                                                 ), Self (
                                                                                           Miss you
                                                                                           iMessage
                                                                  [1] 2017
                                                                  Self
               Participants: (415
                                                                 ), Self
                                                                                          Good talk
```

```
iMessage
2017–03–26 01:42:24 (UTC) [1]
Sender: (415) ((4<u>1</u>5)
Sender: (415)
Participants: (415)
                                                ), Self (
I said love you and you ignored that
                                                                                        iMessage
                                                                [1] 2017-03-26 01:48:48 (UTC)
                                                         Sender: Self (
                                                              ), Self (
              Participants: (415)
                                            (415)
                                                                                   I said miss you
iMessage
2017-03-26 01:55:12 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                                                ), Self (
                              (415)
I know. Happy anniversary
iMessage
2017-03-26 02:01:36 (UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                             (415)
                                                ), Self (
My feelings for you are just very strong and it just stung a little. It"s fine.
                                                                                        iMessage
                                                                [1] 2017-03-26 02:12:16 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                           (415)
                                                              ), Self (
iMessage
2017-03-26 02:27:12 (UTC) [1]
                        ((4)5)
Sender: (415)
                                                ), Self (
Participants: (415)
What does that mean
iMessage
2017-03-26 02:27:12 (UTC) [1]
Sender: (415)
                         ((4)
                              5)
Participants: (415)
                              (415)
                                                ), Self (
I don"t know what that"s in response to
iMessage
2017-03-26 02:48:32 (UTC) [1]
                        ((4)5)
Sender: (415)
Participants: (415)
                                                ), Self (
iMessage
2017-03-26 03:26:56 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                                ), Self (
I have to go to bed soon. The race starts at 6:15am
```

```
iMessage
2017-03-30 03:41:52 (UTC) [2]
Sender: (415)
                        ((415)
                                              ), Self (
Participants: (415)
What's up?
iMessage
2017-03-30 04:13:52 (UTC) [2]
Sender: (415)
                        (415)
Participants: (415)
                             (415)
                                               ), Self (
I really miss you baby :(
iMessage
2017-03-30 04:13:52 (UTC) [1]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                             (415)
I really miss you baby :(
                                                                                     iMessage
                                                              [1] 2017-03-30 04:26:40 (UTC)
                                                       Sender: Self (
                                                            ), Self (
              Participants: (415)
                                           (415)
                                          Hey, I'm just finishing dinner. I'll call you in a second
                                                                                     iMessage
                                                              [2] 2017-03-30 04:26:40 (UTC)
                                                       Sender: Self (
                                                            ), Self (
              Participants: (415)
                                           (415)
                                           Hey, I'm just finishing dinner. I'll call you in a second
iMessage
2017-03-30 04:28:48 (UTC) [2]
                        ((415)
Sender: (415)
                                               ), Self (
Participants: (415)
Ok
iMessage
2017-03-30 04:28:48 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
                             (415)
Ok
iMessage
2017-03-30 04:43:44 (UTC) [1]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
I have an important question for you. are you at all more suede that I'm your
"one"?
iMessage
2017-03-30 04:43:44 (UTC) [2]
Sender: (415)
                        ((4)5)
                                               ), Self (
Participants: (415)
I have an important question for you. are you at all more suede that I'm your
"one"?
```

```
iMessage
Participants: (415)
Important to answer
iMessage
2017-03-30 <u>04:56:32 (</u>UTC) [1]
                        ( (415)
( (415)
Sender: (415)
Participants: (415)
                                               ), Self (
Important to answer
iMessage
2017-03-30 05:28:32 (UTC) [1]
Sender: (415)
Participants: (415)
                        ((415)
                                               ), Self (
                             (415)
I love you Mike
iMessage
2017-03-30 05:28:32 (UTC) [2]
Sender: (415)
                        ((415)
                                               ), Self (
Participants: (415)
                             (415)
I love you Mike
iMessage
2017-03-30 06:09:04 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                             (415)
                                               ), Self (
I just wish we were at the same place. I can't be the one who loves more forever and that has
been at the forefront of my mind.
iMessage
2017-03-30 <u>06:09:04 (</u>UTC) [1]
                        ((415)
Sender: (415)
                                               ), Self (
Participants: (415)
                             (415)
I just wish we were at the same place. I can"t be the one who loves more forever and that has
been at the forefront of my mind.
iMessage
2017-03-30 16:44:48 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                             ((415)
                                               ), Self (
Hello
                                                                                      iMessage
                                                               [1] 2017-03-30 16:44:48 (UTC)
                                                       Sender: Self (
              Participants: (415)
                                          (415)
                                                             ), Self (
                                                                                            Hi
```

Notes		
[1] Source Device	BCF1237.E01/Macintosh HD	
[1] Source File	/Users/michaelmarraccini/Library/Messages/chat.db	
[2] Source Device	BCF1237.E01/Macintosh HD	

/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-03-30/+1 (415) on 2017-03-27 at 11.20.48.ichat	
IMG_2518.PNG	
/Users/michaelmarraccini/Library/Messages/Attachments/35/05/C21226 D3-17A9-4714-9AC9-67CF509618C8/IMG_2518.PNG	
IMG_2518.PNG	
IMG_5916.PNG	
/Users/michaelmarraccini/Library/Messages/Attachments/95/05/CCFA76 46-D96B-43E2-88EA-820EB45DEB29/IMG_5916.PNG	
IMG_5916.PNG	
IMG_5917.PNG	
/Users/michaelmarraccini/Library/Messages/Attachments/cb/11/C68A1C 7B-7533-401C-9956-D2FF8CD855F4/IMG_5917.PNG	
IMG_5917.PNG	

```
Tag: Laura text messages (13201-13300 of 19636)
                                    Communications Message
iMessage
2017-03-30 <u>16:44:48 (</u>UTC) [1]
Sender: (415)
                              (415)
Participants: (415)
                                                 ), Self (
Hello
                                                                                          iMessage
                                                                  [1] 2017-03-30 16:44:48 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                                ), Self (
                                                                                                Hi
iMessage
2017-03-30 <u>16:49:04 (</u>UTC) [1]
Sender: (415)
Participants: (415)
                               (415)
                                                 ), Self (
did you read what I sent?
iMessage
2017-03-30 16:49:04 (UTC) [1]
Sender: (415)
                         ((4\dot{1}5)
Participants: (415)
                              (415)
                                                 ), Self (
Well it's just how I Feel and it's been on my mind a lot lately.
                                                                                          iMessage
                                                                  [1] 2017-03-30 16:49:04 (UTC)
                                                          Sender: Self (
                                                               ), Self (
               Participants: (415)
                                            (415)
  You told you last night on the phone you need to stop saying that type of stuff and you then
  text it. So yes, I read what you sent
iMessage
2017-03-30 16:49:04 (UTC) [2]
Sender: (415)
                         ((415)
                                                 ), Self (
Participants: (415)
                               (415)
did you read what I sent?
```

```
IMessage
[2] 2017-03-30 16:49:04 (UTC)
Sender: Self (
                                                                                        iMessage
              Participants: (415)
                                                                 Self (
  You told you last night on the phone you need to stop saying that type of stuff and you then
  text it. So yes, I read what you sent
iMessage
2017-03-30 16:49:04 (UTC) [2]
Sender: (415)
Participants: (415)
Well it's just how I Feel and it's been on my mind a lot lately.
iMessage
2017-03-30 16:53:20 (UTC) [2]
Sender: (415)
                         ((4)5)
Participants: (415)
                              (415)
                                                ), Self (
I don't think you get how much it bothers me.
iMessage
2017-03-30 16:53:20 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                 ), Self (
                               (415)
I don't think you get how much it bothers me.
iMessage
2017-03-30 16:57:36 (UTC) [1]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
                              (415)
I tried to call you. I'm gonna leave soon.
iMessage
2017-03-30 16:57:36 (UTC) [2]
Sender: (415)
Participants: (415)
                                                ), Self (
                              ((415)
I tried to call you. I'm gonna leave soon.
iMessage
2017-03-30 17:06:08 (UTC) [2]
Sender: (415)
                        ((415)
                                                 ), Self (
Participants: (415)
So are you not gonna get back to me or what
iMessage
2017-03-30 17:06:08 (UTC) [1]
Sender: (415)
                         ((41
                                                ), Self (
Participants: (415)
                              (415)
So are you not gonna get back to me or what
                                                                                        iMessage
                                                                 [1] 2017-03-30 17:08:16 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                            (415)
                                                               ), Self
```

I was in the shower laura

```
iMessage
[2] 2017-03-30 17:08:16 (UTC)
Sender: Self (
                Participants: (415)
                                         ((415)
                                                                      ), Self (
                                                                                 I was in the shower laura
iMessage
Message
2017-03-30 17:10:24 (UTC) [2]
Sender: (415) (415)
Participants: (415) (415)
                                                      ), Self (
Ok
iMessage
2017-03-30 17:10:24 (UTC) [1]
Sender: (415) (415)
Sender: (415)
Participants: (415)
                                                      ), Self (
                                 (415)
Ok
iMessage
2017-03-30 17:12:32 (UTC) [1]
Sender: (415)
                           ((415)
Participants: (415)
                                                      ), Self (
                                 (415)
iMessage
2017-03-30 17:12:32 (UTC) [2]
Sender: (415)
                           ( (415)
( (415)
Participants: (415)
                                                      ), Self (
iMessage
2017–03–30 17:21:04 (UTC) [2]
Sender: (415) (415)
Participants: (415) (4
                                                      ), Self (
Did I miss something?
iMessage
2017-03-30 17:21:04 (UTC) [1]
                           ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                      ), Self (
Did I miss something?
iMessage
2017-03-30 17:25:20 (UTC) [1]
Sender: (415)
                           ((415)
                                                      ), Self (
Participants: (415)
On flight
iMessage
2017-03-30 17:25:20 (UTC) [1]
                           ((415)
Sender: (415)
Participants: (415)
                                 (415)
                                                      ), Self (
Ok
```

```
[1] 2017-03-30 17:25:20 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                                                ), Self (
                                                                                        I'm driving
                                                                                         iMessage
                                                                 [1] 2017-03-30 17:25:20 (UTC)
                                                          Sender: Self (
                                                                ), Self (
               Participants: (415)
                                             (415)
iMessage
2017-03-30 17:25:20 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
                               (415)
I have messaging and that's it
iMessage
2017-03-30 17:25:20 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                 ), Self (
                              (415)
I'm on the plane
                                                                                         iMessage
                                                                 [1] 2017-03-30 17:25:20 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                           ((415)
                                                               ), Self (
                                                                    I've tried calling multiple times
iMessage
2017–03–30 <u>17:25:20 (UTC)</u> [2]
Sender: (415) ((4<u>1</u>5)
Sender: (415)
                                                 ), Self (
Participants: (415)
On flight
                                                                                          iMessage
                                                         [2] 2017-03-30 17:25
Sender: Self (
                                                                                          20 (UTC)
                                                                ), Self (
               Participants: (415)
                                             (415)
                                                                   I"ve tried calling multiple times
iMessage
2017-03-30 17:25:20 (UTC) [2]
                         ((4)5)
Sender: (415)
                                                 ), Self (
Participants: (415)
I"m on the plane
iMessage
2017-03-30 17:25:20 (UTC) [2]
Sender: (415)
                         ((4)5)
                              ((415)
                                                 ), Self (
Participants: (415)
I have messaging and that"s it
```

```
iMessage
[2] 2017–03–30 17:25:20 (UTC)
Sender: Self (
                                            ((415)
                Participants: (415)
                                                                   ), Self (
                                                                                                        K
                                                             iMessage
[2] 2017-03-30 17:25:20 (UTC)
Sender: Self (
                                                                   ), Self (
                Participants: (415)
                                                (415)
                                                                                             I"m driving
iMessage
2017-03-30 17:25:20 (UTC) [2]
Sender: (415) (415)
Sender: (415)
Participants: (415)
                                                    ), Self (
                               (415)
Ok
iMessage
2017-03-30 18:08:00 (UTC) [2]
Sender: (415)
                          ((415)
                                                    ), Self (
Participants: (415)
                               (415)
Still driving?
iMessage
2017-03-30 18:08:00 (UTC) [1]
Sender: (415)
                          ((415)
Participants: (415)
                                ((415)
                                                    ), Self (
Still driving?
                                                                                               iMessage
                                                             [1] 2017-03-30 18:14:24 (UTC)
Sender: Self (
                Participants: (415)
                                               (415)
                                                                   ), Self (
                                                                                                      Yes
                                                                                               iMessage
                                                             [2] 2017-03-30 18:14:24 (UTC)
Sender: Self (
                                                                   ), Self (
                Participants: (415)
                                               (415)
                                                                                                      Yes
iMessage
2017-03-30 [8:40:00 (UTC) [2]
Sender: (415) (415)
Participants: (415)
                                                    ), Self (
I just landed
iMessage
2017-03-30 18:40:00 (UTC) [1]
                          ((415)
Sender: (415)
Participants: (415)
                               ((415)
                                                    ), Self (
I just landed
```

```
see
iMessage
2017-03-31 <u>20:13:52 (</u>UTC) [2]
Sender: (415)
                         (415)
                                                ), Self (
Participants: (415)
I'm in love with this horse and I also have two sales ponies here that I would love for you to
see
iMessage
2017-04-01 <u>04:34:41 (</u>UTC) [2]
Sender: (415)
                         (415)
Participants: (415)
                                                 ), Self (
Back in sac?
iMessage
2017-04-01 <u>04:34:41 (</u>UTC) [3]
Sender: (415)
                         ((415)
Participants: (415)
                             (415)
                                                 ), Self (
Back in sac?
iMessage
2017-04-01 04:55:20 (UTC) [3]
Sender: (415)
                         (415)
                                                 ), Self (
Participants: (415)
                              ((415))
Just wanted to tell you how much I care about you.
iMessage
2017-04-01 <u>04:55:20 (</u>UTC) [2]
Sender: (415)
                         ((415)
                                                 ), Self (
Participants: (415)
Just wanted to tell you how much I care about you.
iMessage
2017-04-01 05:09:20 (UTC) [2]
Sender: (415)
                         (41
                                                ), Self (
Participants: (415)
                              (415)
It was important to me express my feelings. I need to. Please cal me.
iMessage
2017-04-01 <u>05:09:20 (</u>UTC) [3]
Sender: (415)
                         ((4)
                                                ), Self (
Participants: (415)
It was important to me express my feelings. I need to. Please cal me.
iMessage
2017-04-01 05:18:41 (UTC) [3]
Sender: (415)
                         ((415)
Participants: (415)
                              (415)
                                                 ), Self (
```

It's really impossible to communicate my feelings via text. We need to talk.

I'm in love with this horse and I also have two sales ponies here that I would love for you to

```
iMessage
2017-04-01 <u>05:18:41 (</u>UTC) [2]
Sender: (415)
Participants: (415)
It"s really impossible to communicate my feelings via text. We need to talk.
iMessage
2017-04-01 <u>05:24:16 (</u>UTC) [2]
Sender: (415)
                         ((4)5)
Participants: (415)
                              (415)
                                                 ), Self (
I had a big convo with my parents and we need to
Talk
iMessage
2017-04-01 <u>05:24:16 (</u>UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                              (415)
                                                 ), Self (
I had a big convo with my parents and we need to
Talk
iMessage
2017-04-01 <u>05:30:02 (</u>UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
Are you alive??? Should I call your mom or sis?? Giving it 5 min and then I will.
iMessage
2017-04-01 <u>05:30:02 (</u>UTC) [2]
Sender: (415)
Participants: (415)
                                                 ), Self (
                                (415)
Are you alive??? Should I call your mom or sis?? Giving it 5 min and then I will.
                                                                                          iMessage
                                                                 [2] 2017-04-01 05:30:40 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                               ), Self (
                                                                      Laura, I"m alive. What"s up?
                                                                                          iMessage
                                                                 [2] 2017-04-01 05:30:40 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                           ((415)
                                                               ), Self (
                                                                                     I"m at dinner
                                                                                         iMessage
                                                                 [3] 2017-04-01 05:30:40 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                             (415)
                                                                ), Self (
                                                                       Laura, I'm alive. What's up?
                                                                                          iMessage
                                                          [3] 2017-04-01 05:30:40 (UTC)
Sender: Self (
               Participants: (415)
                                         ((415)
                                                               ), Self (
                                                                                      I'm at dinner
```

```
iMessage
                                                                         [3] 2017-04-01 05:57:34 (UTC)
                                                                 Sender: Self (
                 Participants: (415)
                                                                       ), Self (
                                                                                                       Hello?
                                                                iMessage
[2] 2017–04–01 05:57:34 (UTC)
Sender: Self (
                                                                       ), Self (
                 Participants: (415)
                                                   (415)
                                                                                                       Hello?
iMessage
2017-04-01 07:04:32 (UTC) [2]
Sender: (415)
                            ((415)
                                                       ), Self (
Participants: (415)
I'm calling your sister. This is unreal.
iMessage
2017-04-01 07:04:32 (UTC) [2]
Sender: (415)
                            ((4)5)
Participants: (415)
                                  (415)
                                                       ), Self (
God my parents would be fucking livid
iMessage
2017-04-01 <u>07:04:32 (</u>UTC) [4]
Sender: (415)
                                                       ), Self (
Participants: (415)
                                  (415)
I'm calling your sister. This is unreal.
iMessage
2017-04-01 07:04:32 (UTC) [4]
Sender: (415)
                            ((4)5)
                                                      ), Self (
Participants: (415)
God my parents would be fucking livid
iMessage
2017-04-01 07:10:56 (UTC) [4]
Sender: (415)
                            ((41
                                  5)
                                                      ), Self (
Participants: (415)
                                  (415)
I'm sure you're not with a group of people who has done .008 as much for you as I have and
yet you choose to ignore me. I'll call my dad if you want to talk to him but I thought I could break it down a little better than how he wanted to
iMessage
2017-04-01 07:10:56 (UTC) [2]
Sender: (415)
                            ((4)5)
                                  ((415)
Participants: (415)
                                                       ), Self (
I"m sure you"re not with a group of people who has done .008 as much for you as I have and yet you choose to ignore me. I"ll call my dad if you want to talk to him but I thought I could
break it down a little better than how he wanted to
```

Notes	
[1] Source Device	BCF1237.E01/Macintosh HD

[1] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-03-30/+1 (415) on 2017-03-27 at 11.20.48.ichat
[2] Source Device	BCF1237.E01/Macintosh HD
[2] Source File	/Users/michaelmarraccini/Library/Messages/chat.db
[3] Source Device	BCF1237.E01/Macintosh HD
[3] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-03-31/+1 (415) on 2017-03-31 at 10.46.40.ichat
[4] Source Device	BCF1237.E01/Macintosh HD
[4] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-04-01/+1 (415) on 2017-04-01 at 00.04.32.ichat

Tag: Laura text messages (13301-13400 of 19636)

Communications Message

```
iMessage
2017-04-01 <u>07:40:48 (</u>UTC) [1]
Sender: (415)
                         ((415)
                                                  ), Self (
Participants: (415)
                               (415)
You"ve broken my heart and my family"s as well.
iMessage
2017–04–01 07:40:48 (UTC) [2]
Sender: (415) (415)
Sender: (415)
Participants: (415)
                                                  ), Self (
You've broken my heart and my family's as well.
iMessage
2017-04-02 19:46:08 (UTC) [3]
Sender: (415)
                         ((415)
Participants: (415)
                              ((415)
I just don't understand why you talk to me like that. Now I'm really upset.
iMessage
2017-04-02 19:46:08 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                  ), Self (
                               (415)
I just don"t understand why you talk to me like that. Now I"m really upset.
iMessage
2017–04–02 21:39:12 (UTC) [1]
Sender: (415) (415)
                         ((415)
((415)
Participants: (415)
Hello?
iMessage
2017-04-02 21:39:12 (UTC) [3]
Sender: (415)
Participants: (415)
                               (415)
                                                  ), Self (
Hello?
```

```
[4] 2017-04-02 21:43:28 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                                               ), Self (
                                                                                                Hi
                                                                                         iMessage
                                                                 [4] 2017-04-02 21:43:28 (UTC)
                                                         Sender: Self (
                                                               ), Self (
               Participants: (415)
                                             (415)
                                                                               I'll call you in a bit
                                                                                         iMessage
                                                                 [1] 2017-04-02 21:43:28 (UTC)
                                                         Sender: Self (
               Participants: (415)
                                            (415)
                                                               ), Self (
                                                                                                Hi
                                                                                         iMessage
                                                                 [1] 2017-04-02 21:43:28 (UTC)
                                                         Sender: Self (
                                                               ), Self (
               Participants: (415)
                                             (415)
                                                                               I"ll call you in a bit
iMessage
2017-04-03 00:44:48 (UTC) [1]
Sender: (415)
                         ((415)
                              (415)
                                                 ), Self (
Participants: (415)
We are so delayed!!! Ughhhhhhh
iMessage
2017-04-03 00:44:48 (UTC) [4]
Sender: (415) (415)
Sender: (415)
Participants: (415)
                                                 ), Self (
We are so delayed!!! Ughhhhhhh
iMessage
2017-04-03 01:44:32 (UTC) [4]
Sender: (415)
                         ((415)
Participants: (415)
                              (415)
                                                 ), Self (
What are you doing?
iMessage
2017-04-03 01:44:32 (UTC) [1]
Sender: (415)
                         ((415)
                                                 ), Self (
Participants: (415)
What are you doing?
iMessage
2017-04-03 02:31:28 (UTC) [1]
Sender: (415)
                         ((4)5)
                             (415)
                                                ), Self (
Participants: (415)
Marriott Laguna cliffs could be cool
```

```
iMessage
2017-04-03 02:31:28 (UTC) [4]
Sender: (415)
                                                 ), Self (
Participants: (415)
Marriott Laguna cliffs could be cool
iMessage
2017-04-03 <u>03:03:28 (</u>UTC) [4]
                         ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                 ), Self (
Taking off, love you
iMessage
2017-04-03 03:03:28 (UTC) [1]
Sender: (415)
                         ((415)
                                                 ), Self (
Participants: (415)
                               (415)
Taking off, love you
iMessage
2017-04-03 05:00:48 (UTC) [1]
Sender: (415)
                         ((415)
Participants: (415)
                                                 ), Self (
                              (415)
Hello
                                                                                          iMessage
                                                                  [1] 2017-04-03 05:00:48 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                           ((415)
                                                                ), Self (
                                                                           Hey, I"ve been at dinner
                                                                                           iMessage
                                                          [1] 2017-04-03 05:00:48 (UTC)
Sender: Self (
                                             (415)
               Participants: (415)
                                                                ), Self (
                                                                                         You home?
                                                                                          iMessage
                                                          IMessage
[4] 2017-04-03 05:00:48 (UTC)
Sender: Self ( )
), Self ( )
               Participants: (415)
                                             (415)
                                                                           Hey, I've been at dinner
iMessage
2017-04-03 <u>05:00:48 (</u>UTC) [4]
Sender: (415)
                         ((4\dot{1}\dot{5})
Participants: (415)
                                                 ), Self (
                              ((415)
Hello
                                                                                           iMessage
                                                                  [4] 2017-04-03 05:00:48 (UTC)
                                                          Sender: Self (
               Participants: (415)
                                            (415)
                                                                ), Self (
                                                                                         You home?
```

```
iMessage
2017-04-03 06:09:04 (UTC) [4]
Sender: (415)
                                                 ), Self (
Participants: (415)
 Just walked in the door
iMessage
2017-04-03 Q6:09:04 (UTC) [1]
Sender: (415)
Participants: (415)
                                                   Self (
 Just walked in the door
                                                                                          iMessage
                                                                  [1] 2017-04-03 06:26
                                                                                          OR (LITC)
                                                          Sender: Self (
), Self (
               Participants: (415)
                                                                      Nice! You happy to be home
                                                                                          iMessage
                                                                  [4] 2017-04-03 06:26:08 (UTC)
                                                                r: Self (
               Participants: (415) 8
                                                                ), Self (
                                                                      Nice! You happy to be home
iMessage 2017-04-03 <u>06:30:24 (UTC) [4]</u>
Sender: (415)
Participants: (415)
                                                 ), Self (
Where'd you go to din?
iMessage
2017-04-03 06:30:24 (UTC) [4]
Sender: (415)
                                                   Self (
Participants: (415)
□Perfection 💥 💥 💥 💆 🛒
iMessage
2017-04-03 06:30:24 (UTC) [1][7]
Sender: (415)
Participants: (415)
                                                  , Self (
□Perfection 💥 💥 💥 💥 💥 🎉
iMessage
2017-04-03 06:30:24 (UTC) [1][8][9]
Sender: (415)
Participants: (415)
                                                 ), Self (
```



```
IMG_2758.JPG
 iMessage
  2017-04-03 06:30:24 (UTC) [1]
 Sender: (415)
                                                                                                                                                                                     ), Self (
 Participants: (415)
Where"d you go to din?
                                                                                                                                                                                                                                                                                                                                           iMessage
                                                                                                                                                                                                                                                  [1] 2<u>017-04-03 06:41:04 (UTC</u>
                                                                                                                                                                                                                      Sender: Self (
), Self (
                                                        Participants: (415)
                                                                                                                                                                                                                                                                                                    It"s looking good:)
                                                                                                                                                                                                                                           iMessage
[4] 2017-04-03 06:41:04 (UTC)
er: Self (
), Self (
                                                        Participants: (415)
                                                                                                                                                                                                                                                                                                     It's looking good:)
 iMessage
  2017-04-03 07:02:24 (UTC) [4]
  Sender: (415)
 Participants: (415)
                                                                                                                                                                                      ), Self
Like good enough for two people to live in? "
 iMessage
  2017-04-03 07:02:24 (UTC) [1]
  Sender: (415)
 Participants: (415)
                                                                                                                                                                                        ), Self (
Like good enough for two people to live in? The state of 
                                                                                                                                                                                                                                                                                                                                          iMessage
                                                                                                                                                                                                                                                  [1] 2017-04-03 07:04:32 (UTC)
                                                                                                                                                                                                                      Sender: Self (
                                                        Participants: (415)
                                                                                                                                                                                                                                                , Self (
                                                                                                                                                                                                                                                                                                                         Not right now
                                                                                                                                                                                                                                                                                                                                           iMessage
                                                                                                                                                                                                                                                  [4] 20<u>17-04-03 07:04:32 (UTC)</u>
                                                                                                                                                                                                                                                    Self (
                                                        Participants: (415)
                                                                                                                                                                                                                                                  Self (
                                                                                                                                                                                                                                                                                                                         Not right now
```

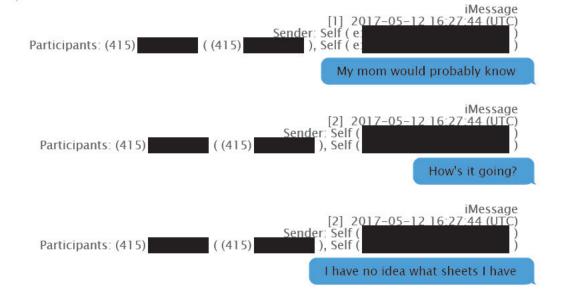
```
Awww! I'm so glad she's here. She's the best!
iMessage
2017-05-12 15:17:20 (UTC) [4]
Sender: (415)
                         (415)
                                                 ), Self (
Participants: (415)
                              (415)
Awww! I'm so glad she's here. She's the best!
iMessage
2017-05-12 <u>15:17:20 (</u>UTC) [3]
Sender: (415)
                                                 ), Self (
Participants: (415)
Awww! I"m so glad she"s here. She"s the best!
iMessage
2017–05–12 15:36:32 (UTC) [3]
Sender: (415) (415)
Participants: (415)
                                                 ), Self (
What kind of sheets do you have? Need to order new ones
iMessage
2017-05-12 15:36:32 (UTC) [4]
Sender: (415)
                              5)
                                                 ), Self (
Participants: (415)
                              (415)
What kind of sheets do you have? Need to order new ones
iMessage
2017-05-12 <u>15:36:32 (</u>UTC) [1]
Sender: (415)
                        ((415)
Participants: (415)
                                                 ), Self (e:
What kind of sheets do you have? Need to order new ones
iMessage
2017-05-12 <u>16:10:40 (</u>UTC) [4]
Sender: (415)
                         (415)
                              (415)
Participants: (415)
                                                 ), Self (
Wish you were here
iMessage
2017-05-12 <u>16:10:40 (</u>UTC) [1]
Sender: (415)
                                                 ), Self (e
Participants: (415)
Wish you were here
iMessage
2017-05-12 <u>16:10:40 (</u>UTC) [3]
Sender: (415)
                         ((415)
Participants: (415)
                              (415)
                                                 ), Self (
Wish you were here
                                                                                         iMessage
                                                                  [3] 20<u>17-05-12 16:27:44 (UTC</u>)
                                                          Sender: Self (
               Participants: (415)
                                          ((415)
                                                               ), Self (
```

How"s it going?

Notes	
[1] Source Device	BCF1237.E01/Macintosh HD
[1] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-05-14/+1 (415) on 2017-05-14 at 11.31.28.ichat
[2] Source Device	BCF1237.E01/Macintosh HD
[2] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-05-11/+1 (415) on 2017-05-11 at 08.02.24.ichat
[3] Source Device	BCF1237.E01/Macintosh HD
[3] Source File	/Users/michaelmarraccini/Library/Messages/chat.db
[4] Source Device	BCF1237.E01/Macintosh HD
[4] Source File	/Users/michaelmarraccini/Library/Containers/com.apple.iChat/Data/Library/Messages/Archive/2017-05-12/+1 (415) on 2017-05-12 at 07.00.32.ichat
[5] External Item	IMG_2653.MOV.mov
[6] Associated File	/Users/michaelmarraccini/Library/Messages/Attachments/1b/11/4FCDBFD D-6FE2-4EA2-87C7-65CA0B7A922D/IMG_2653.MOV.mov
[7] External Item	IMG 2653.MOV.mov

Tag: Laura text messages (15501-15600 of 19636)

Communications Message



```
[2] 2017-05-12 16:27:44 (UTC)
               Sender: Self (m.marraccini@gmail.com)
Participants: (415) 810-0604 ( (415) 810-0604 ), Self (m.marraccini@gmail.com)
                                                                       My mom would probably know
                                                                                               iMessage
                                                           [1] 2017-05-12 16:27:44 (UTC)
Sender: Self ( e:m.marraccini@gmail.com )
              Participants: (415) 810-0604 ( (415) 810-0604 ), Self (e:m.marraccini@gmail.com)
                                                                     I have no idea what sheets I have
                                                                                               iMessage
                                                                      [1] 2017-05-12 16:27:44 (UTC)
              Sender: Self (e:m.marraccini@gmail.com)
Participants: (415) 810-0604 ( (415) 810-0604 ), Self (e:m.marraccini@gmail.com )
                                                                                         How's it going?
iMessage
2017-05-12 17:14:40 (UTC) [2]
Sender: (415)
Participants: (415)
                                                     ). Self (
It's going really well!!! Your sis is here too 💗 I love all you guys!!
iMessage
2017-05-12 1<u>7:14:40 (UTC)</u> [1]
Sender: (415)
                                                    ), Self (
Participants: (415)
It's going really well!!! Your sis is here too 💖 I love all you guys!!
iMessage
2017-05-12 17:14:40 (UTC) [3]
Sender: (415)
Participants: (415)
It"s going really well!!! Your sis is here too 💖 I love all you guys!!
iMessage
2017-05-12 18:14:24 (UTC) [3][5]
Sender: (415)
                                                    ), Self (
Participants: (415)
iMessage
2017-05-12 18:14:24 (UTC) [3][6][7]
Sender: (415)
Participants: (415)
```



IMG_2676.JPG

```
iMessage
Message
2017-05-12 18:14:24 (UTC) [1]
Sender: (415) (415)
Participants: (415) (415)
                                                                             ), Self (e:
iMessage
2017-05-12 18:14:24 (UTC) [2]
Sender: (415) (415)
                                      ( (415)
( (415)
                                                                             ), Self (
Participants: (415)
iMessage
2017-05-12 20:43:44 (UTC) [1]
Sender: (415) (415)
Participants: (415) (445)
                                       ( (415)
( (415)
                                                                             ), Self (e:
How are you?
iMessage
2017–05–12 20:43:44 (UTC) [2]
Sender: (415) (415)
Participants: (415) (415)
How are you?
iMessage
2017-05-12 20:43:44 (UTC) [3]
Sender: (415) (415)
Participants: (415) (415)
                                                                             ), Self (
How are you?
```

Participants: (415)

((415)

Sender: Self ()), Self ()

I'm struggling right now

iMessage
[3] 2017-05-12 21:52:00 (UTC)
Sender: Self ()

Participants: (415)

((415)

Sender: Self ()

Sender: Self ()

Sender: Self ()

I'm good

```
iMessage
2017-05-14 <u>01:55:12 (</u>UTC) [3]
Sender: (415)
Participants: (415)
Would love to have you come over and spend time w me later
iMessage
2017-05-14 <u>01:55:12 (</u>UTC) [2]
Sender: (415)
                         (415)
Participants: (415)
                              (415)
                                                ), Self (e
Would love to have you come over and spend time w me later
iMessage
2017-05-14 01:55:12 (UTC) [1]
Sender: (415)
                        ((415)
                                                ), Self (
Participants: (415)
I left the door unlocked at my place
iMessage
2017-05-14 01:55:12 (UTC) [1]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
                              (415)
Would love to have you come over and spend time w me later
iMessage
2017-05-14 <u>01:55:12 (</u>UTC) [2]
Sender: (415)
                                                ), Self (e:
Participants: (415)
I left the door unlocked at my place
                                                                                        iMessage
                                                                 [1] 2017-05-14 02:03:44 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                            (415)
                                                               ), Self (
                                                         Oh my this theatre is so uncomfortable
                                                                                        iMessage
                                                                [2] 2<u>017-05-14 02:03:44</u> (UTC)
                                                       Sender: Self ( e:
             Participants: (415)
                                          (415)
                                                             ), Self (e
                                                          Oh my this theatre is so uncomfortable
                                                                                        iMessage
                                                                [3] 2017-05-14 02:03:44 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                            (415)
                                                               ), Self (
                                                          Oh my this theatre is so uncomfortable
iMessage
2017-05-14 02:05:52 (UTC) [3]
Sender: (415)
                        ((4)5)
                                                ), Self (
Participants: (415)
                             (415)
The marina one is newer than presidio. Btw let"s get really good sushi early in the week
```

```
iMessage
2017-06-02 01:26:29 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
15
                                                                                        iMessage
                                                                [2] 2017-06-02 01:35
                                                                                        28 (UTC)
                                                        Sender: Self (
                                                              ), Self (
              Participants: (415)
                                            ((415))
                                                                              Not tonight darling
                                                                                        iMessage
                                                                [4] 2017-06-02 01:35:28 (UTC)
                                                       Sender: Self ( e:
            Participants: (415)
                                         (415)
                                                            ), Self (e
                                                                              Not tonight darling
iMessage
2017-06-02 13:21:36 (UTC) [5]
Sender: (415)
                        ((4)5)
                                                ), Self (e:
Participants: (415)
                              (415)
Happy, happy birthday to my favorite guy! Love having all these great adventures with you and
look forward to many, many more. Thanks for getting me out of my comfort zone and always
being there for me. Xoxoxo
iMessage
2017-06-02 <u>13:21:36 (</u>UTC) [2]
Sender: (415)
Participants: (415)
                        ((41
                                                ), Self (
Happy, happy birthday to my favorite guy! Love having all these great adventures with you and
look forward to many, many more. Thanks for getting me out of my comfort zone and always
being there for me. Xoxoxo
                                                                                        iMessage
                                                                [2] 2017-06-02 13:40:11 (UTC)
                                                         Sender: Self (
              Participants: (415)
                                            (415)
                                                              ), Self (
                     ) thank you darling, I really appreciate it. We. Ring the best out of wachoter
                                                                                        iMessage
                                                       [5] 2017-06-02 13:40:11 (UTC)
Sender: Self ( e: )
            Participants: (415)
                                          (415)
                                                             ), Self (e
                     ) thank you darling, I really appreciate it. We. Ring the best out of wachoter
iMessage
2017-06-02 14:30:13 (UTC) [5]
Sender: (415)
                        ((4)5)
Participants: (415)
                              (415)
                                                ), Self (e
Couldn't agree more. Can't wait for lots more of that ahead!! Xoxo
iMessage
2017-06-02 14:30:13 (UTC) [2]
Sender: (415)
                        ((4)5)
Participants: (415)
                                                ), Self (
                             (415)
```

Sender: Self (e:m.marraccini@gmail.com)

Participants: (415) 810-0604 ((415) 810-0604), Self (e:m.marraccini@gmail.com)

iMessage 2017-07-18 02:52:47 (UTC) [3] Sender: (415) Participants: (415)), Self (Up to you but I have a temperature 😕 I just don't want to get you sick. Obviously want to see you but I know you have your test. Your choice iMessage 2017-07-18 02:52:47 (UTC) [2] Sender: (415) Participants: (415) , Self (Up to you but I have a temperature 😕 I just don"t want to get you sick. Obviously want to see you but I know you have your test. Your choice iMessage [2] 20<u>17-07-18 02:57:</u>35 (UTC) Sender: Self (Participants: (415) Self (Can"t afford to get sick, sorry darling iMessage 2017-07-18 02:57:35 (UTC) [3] Sender: Self Participants: (415)), Self Can't afford to get sick, sorry darling iMessage 2017-07-18 03:15:18 (UTC) [3] Sender: (415) Participants: (415)), Self (You could come keep me company 😃 iMessage 2017-07-18 03:15:18 (UTC) [2] Sender: (415) Participants: (415)), Self (1 You could come keep me company 🤐 iMessage 2017-07-18 03:20:38 (UTC) [2] Sender: (415) Participants: (415) Self I understand if you don"t want to get sick though. I am just trying to be upfront because I know how important your test is. Will get antibiotics tomorrow and then maybe you can come over tomorrow night as long as I"ve started on them. iMessage 2017-07-18 03:20:38 (UTC) [3] Sender: (415) Participants: (415 , Self (

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iMessage
2017-07-22 03:34:45 (UTC) [2]
Sender: (415) (415)
Participants: (415)
I'm so sorry! When does the wedding stuff start?
                                                                                           iMessage
                                                          [2] 2017-07-22 03:54:56 (UTC)
Sender: Self (
               Participants: (415)
                                              (415)
                                                                 ), Self (
                            Tomorrow evening is the rehearsal dinner then the wedding is Sunday
                                                                                           iMessage
                                                                   [1] 2017-07-22 03:54:56 (UTC)
                                                         Sender: Self ( e
             Participants: (415)
                                            (415)
                                                               ), Self (e.
                            Tomorrow evening is the rehearsal dinner then the wedding is Sunday
iMessage
2017-07-22 04:14:44 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                  ), Self (e
                              (415)
That sounds fun
iMessage
2017-07-22 <u>04:14:44 (UTC)</u> [2]
Sender: (415)
                               (415)
                                                  ), Self (
Participants: (415)
That sounds fun
iMessage
2017-07-22 04:14:46 (UTC) [2]
Sender: (415) (415)
Participants: (415)
                                                  ), Self (
I sure miss ya
iMessage
2017-07-22 04:14:46 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                  ), Self (e:
                               (415)
I sure miss ya
                                                                                           iMessage
                                                                   [1] 2017-07-22 04:15:08 (UTC)
                                                         Sender: Self ( e.
             Participants: (415)
                                            (415)
                                                              ), Self (e
                                                                                       Miss you too
                                                                                           iMessage
                                                                   [2] 2<u>017-07-22 04:15:</u>08 (UTC)
                                                           Sender: Self (
               Participants: (415)
                                             ((415))
                                                                ), Self (
                                                                                       Miss you too
```

```
iMessage
2017-09-03 22:59:35 (UTC) [2]
Sender: (415) (415)
Participants: (415) (415)
                                                     ), Self (e:
I miss you:(
SMS
2017-09-03 22:59:35 (UTC) [3]
Sender: (415) (415)
Participants: (415) (415)
                                                      ), Self ( e: )
I miss you:(
SMS
2017–09–05 03:11:01 (UTC) [3]
Sender: (415) (415)
Sender: (415)
Participants: (415)
                                                      ), Self (e:)
                                 (415)
Hello ... ?????
iMessage
2017-09-05 03:11:01 (UTC) [2]
Sender: (415)
                           ((415)
Participants: (415)
                                 (415)
                                                      ), Self (e:
Hello...????
iMessage
2017-09-05 <u>03:11:01 (</u>UTC) [1]
Sender: (415)
                           ((415)
Participants: (415)
                                  ((415)
                                                      ), Self (
Hello ... ?????
                                                                                                   iMessage
                                                                         [1] 2017-09-05 04:19:54 (UTC)
                                                                Sender: Self (
                Participants: (415)
                                                 (415)
                                                                      ), Self (
                                                                                                  In shower
                                                                                                   iMessage
                                                              [2] 2017-09-05 04:19:54 (UTC)
Sender: Self ( e:
                                                                     ), Self (e:
              Participants: (415)
                                                (415)
                                                                                                  In shower
SMS
2017-09-05 04:19:54 (UTC) [3]
Sender: Self ( e:
Participants: (4 15)
                                                      ), Self ( e: )
                                 ((415)
In shower
SMS
2017-09-06 04:56:24 (UTC) [3]
Sender: Self (e:
Participants: (4 15)
                                 ((415)
                                                      ), Self ( e: )
I just got home
```

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Okay
SMS
2017-11-11 03:00:10 (UTC) [1]
                         ((415)
Sender: (415)
                                                 ), Self (e:)
                              (415)
Participants: (415)
Okay
SMS
2017-11-11 03:00:16 (UTC) [1]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (e:)
                               (415)
I□ wish we could get dinner
iMessage
2017-11-11 <u>03:00:16 (</u>UTC) [2]
Sender: (415)
Participants: (415)
                         ((4)5)
                                                 ), Self (e:
                               (415)
I□ wish we could get dinner
iMessage
2017-Ĭ1-11 <u>03:00:16 (</u>UTC) [3]
Sender: (415)
                         ((4)5)
Participants: (415)
                                                 ), Self (
                               (415)
I□ wish we could get dinner
iMessage
2017-11-11 03:00:27 (UTC) [3]
Sender: (415)
                         ((415)
Participants: (415)
                                                 ), Self (
Let's get a drink at tipsy
SMS
2017-11-11 03:00:27 (UTC) [1]
Sender: (415)
                         ((4)5)
                              (415)
                                                 ), Self ( e: )
Participants: (415)
Let's get a drink at tipsy
iMessage
2017-Ĭ1-11 03:00:27 (UTC) [2]
                         ( (415)
( (415)
Sender: (415)
Participants: (415)
                                                 ), Self (e:
Let's get a drink at tipsy
                                                                                          iMessage
                                                        [2] 2017-11-11 03:18:02 (UTC)
Sender: Self ( e: )
             Participants: (415)
                                            (415)
                                                              ), Self (e
                                                                             K. I'll text you in a bit
SMS
2017-11-11 03:18:02 (UTC) [1]
Sender: Self ( e:
Participants: (415)
                                                 ), Self ( e: )
                              ((415)
```

EXHIBIT Y

From: David Gingras <	p3
Sent: Wednesday, May 08, 2024 3:35 PM	
To: Gregg Woodnick <	>
Cc: Isabel Ranney <	>; Maribeth Burroughs <

Subject: RE: Owens v. Echard

Gregg,

Just to follow up – I'm in the process of looking for a computer person in San Fran to look at Mike's laptop. Laura wants to move forward with that review, and while I'm not confident it will change anything, I do think it may help her remove doubts about what the laptop shows. That alone could be worth the effort.

As discussed, I'd also appreciate you setting up a call w/ Marraccini if you can. I guess there's also a technical issue with that – Mike is (to my knowledge) represented by Randy Sue Pollock, and I don't have her consent to talk with him. So if Mike is open to having a call (which I hope he is), I'd just need to make sure I have consent from his counsel to speak with him.

One last thing – after talking with Laura about this, she said she has lots of questions for Mike. I told her my preference is to have her send me any specific questions, and I'll see if Mike wants to answer them. She also said she's willing to speak directly with him, but that may not be appropriate in light of the restraining order. On the other hand, if Mike has a strong preference in favor of directly speaking with Laura, maybe we can make that happen (I'm licensed in CA and can probably do some sort of stipulation with Randy to modify the CA order to allow this, just to be safe).

P.S. This goes without saying, but to the extent I suggested Mike would be arrested if he comes to court in AZ, that suggestion is completely and totally withdrawn. I only said that because I didn't want Mike to show up without giving me the chance to at least interview him (as I would with *any* normal witness). As long as Mike agrees to have a reasonable call to answer to some questions, I'll stipulate and agree his appearance in AZ is NOT a violation of anything and will not expose him to arrest or any other legal consequences.

David Gingras, Esq.

Gingras Law Office, PLLC



Tel.:

Fax:

EXHIBIT Z

Clerk of the Superior Court
*** Electronically Filed ***
M. Cain, Deputy
9/24/2021 10:52:28 AM
Filing ID 13416503

1	1747 E. Morten Avenue, Suite 205
2	Phoenix, Arizona 85020 Telephone:
3	Facsimile:
4	
5	Gregg R. Woodnick, Kaci Y. Bowman,
6	Attorneys for Defendant
7	IN THE SUPERIOR

VOODNICK LAW DITC

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

LAURA OWENS,

Plaintiff,

And

GREGORY GILLESPIE,

Defendant.

Case No.: CV2021-052893

MOTION TO DISMISS

(Assigned to the Hon. Alison Bachus)

Defendant GREGORY GILLESPIE, by and through undersigned counsel, hereby respectfully moves to <u>dismiss</u> Plaintiff's Complaint pursuant to Rule 12(b)(6), *Arizona Rules of Civil Procedure*, as Plaintiff has failed to state a claim upon which relief can be granted. As and for his Motion, Mr. Gillespie states and alleges as follows:

- Upon information and belief, Plaintiff is <u>not</u> pregnant, and all claims being alleged against Mr. Gillespie must fail as a result.
- Plaintiff filed her Complaint on August 11, 2021 alleging that she became pregnant with Mr. Gillespie's child on their second date.

- 3. Prior to filing her Complaint, Plaintiff provided sonographic images to Mr. Gillespie on August 6 and August 8 of 2021. However, a reverse Google Images search revealed that the images were identical to a sonogram found on a blog post from 2015.
- 4. Upon information and belief, Plaintiff altered the images by adding her name, date of birth, alleged location of the sonogram, and altered the appearance of the image to distinguish it from the one located on the aforementioned blog post.
- 5. To further this fictitious pregnancy, Plaintiff sent Mr. Gillespie a fabricated email exchange dated August 19, 2021 and August 22, 2021 between herself and California attorneys Alison E. Cordova and Joe Cotchett of Cotchett, Pitre and McCarthy, LLP. Toni Stevens, believed to be a legal assistant at the firm, is also cc'd on the email dated August 19, 2021.
- 6. In the fraudulent email dated August 19, 2021, Associate, Alison E. Cordova, allegedly emailed Plaintiff, in pertinent part, the following (with the subject line of RE: SENT ON BEHALF OF JOE COTCHETT RE: LAURA OWENS PREGNANCY):

"Everything you told us about – pregnancy test and ultrasounds – aligned with the timing you provided us. There were no past pregnancies on your record and the three obstetricians you saw felt that pregnancy was very consistent with intercourse that took place between June 30 and July 1st. [...] It must feel like you have the weight of the world on you, but I have no doubt that the jury will sympathize with your situation. The next step is to fill out the attached retention agreement"

7. Subsequently, Joe Cotchett allegedly emailed Plaintiff, in pertinent part, the following on August 22, 2021 (with the subject line of SENT ON BEHALF OF JOE COTCHETT RE: LAURA OWENS PREGNANCY:

"I'm ready to get started on this the second you give me the go ahead [...] I'm always here for you (and the whole Owens family!) whenever you need me and if you want me to go after this guy, I will make this case a top priority (shhh...)

because I really feel for you right now. Allison sent me over the retention agreement and medial files [...] This may be very needy and we could make this a public interest story with the snap of a finger."

8. In response, Plaintiff allegedly emailed Joe Cotchett back on August 22, 2021 stating, in pertinent part, as follows:

"I think the best call is to pursue alternative service and try to get him twice: once by posting on his house door and the other by calling his company and finding a co-worker to serve him. I think you're right that you would be better at making those phone calls than me. I texted you the co-workers who we could ask to serve."

- 9. Plaintiff's alleged email exchange with Alison E. Cordova and Joe Cotchett was emailed to Mr. Gillespie on August 22, 2021 (with the subject line, Urgent: copy of conversation with Joe Cotchett & contract) along with a manufactured/fabricated Contingent Fee Agreement between Plaintiff and Cotchett, Pitre, and McCarthy, LLP, dated August 23, 2021.
- 10. Upon information and belief, neither Alison E. Cordova nor Toni Stevens is currently employed at the firm, nor were they employed at the firm as of August 19 and August 22 of 2021.
- 11. Believing that there was fraud in Plaintiff's underlying Complaint, undersigned counsel reached out to the purported attorneys in California who appear to completely disavow any connection to this cause as an email dated August 24, 2021 <u>SENT ON BEHALF OF</u>

 <u>JOSEPH W. COTCHETT</u> indicated the firm does not represent Plaintiff in this matter. All subsequent emails from undersigned counsel requesting to speak with Joseph Cotchett about the seemingly fraudulent emails purportedly authored by Joseph Cotchett and lawyers that have not worked at the firm for quite some time, went without any substantive response.

- 12. In addition to fabricating documents, <u>Plaintiff has refused to take a non-invasive prenatal paternity test</u>, despite undersigned counsel informing her on August 27, 2021 that they had scheduled the test for her.
- 13. In response, Plaintiff stated she was "willing to take a paternity test to prove that the child's is Greg's [sic]" but that it would be possible that she would **not** be pregnant, as "I'm unsure what the purpose is because if the pregnancy is not viable, that proves that his coercion did result in the end of the pregnancy." Essentially, Plaintiff has fabricated the abortion coercion allegation to explain why a paternity test would show that she is **not** pregnant. Additionally, as of filing, Plaintiff has not taken a paternity test despite Mr. Gillespie's repeated offers to pay for the test.
- 14. Upon information and belief, Plaintiff's allegations of abortion coercion, intentional infliction of emotional distress and domestic violence are, quite simply, blatant fabrications that underly her real intention to force Mr. Gillespie into a relationship with her.
- 15. In an email with undersigned counsel on August 23, 2021, Plaintiff stated "he can contact me at if he **rethinks his decision regarding a relationship** and if he would like to be a part of pregnancy decisions going forward" (emphasis added).
- 16. Furthermore, if Plaintiff were actually pregnant, this should be an establishment action pursuant to A.R.S. § 25-806, not actions for domestic violence, abortion coercion, and intentional infliction of emotional distress.
- 17. Finally, if this Complaint is not dismissed for failure to state a claim upon which relief can be granted, Mr. Gillespie will immediately be filing counterclaims for fraud pursuant to A.R.S. § 12-543(3), intentional infliction of emotional distress pursuant to A.R.S. § 12-

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23	///
24	111
25	///
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542(1) a request for attorney's fees and costs pursuant to A.R.S. §§ 12-341, 12-349, and Rule 11, *Arizona Rules of Civil Procedure*, and a subsequent claim for wrongful prosecution of a civil action when he ultimately prevails over Plaintiff regarding her claims.

WHEREFORE, Defendant hereby respectfully requests the following:

- A. That this Court dismiss Plaintiff's Complaint in its entirety with prejudice;
- B. That this Court award Defendant his attorneys' fees and costs pursuant to A.R.S. §§ 12-341, 12-349, and Rule 11, *Arizona Rules of Civil Procedure*; and
- C. That this Court grant such other and further relief as deemed appropriate.

RESPECTFULLY SUBMITTED this 24th day of September 2021.

WOODNICK LAW, PLLC

Gregg R. Woodnick Kaci Y. Bowman

Attorneys for Defendant

1	ORIGINAL of the foregoing e-filed This 24th day of September 2021, with:
2	This 24th day of September 2021, with.
3	Clerk of Court
4	Maricopa County Superior Court Central Court Building
5	201 W. Jefferson Street
6	Phoenix, Arizona 85003
7	Honorable Alison Bachus
8	Maricopa County Superior Court
9	COPY of the foregoing document
10	e-mailed the same day to:
11	Laura Owens
- 1	Goodfalla A.Z.
12	Scottsdale, AZ
13	Plaintiff Pro Per
14	By: <u>/s/Sara Seeburg</u>
15	zy. <u></u>
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VERIFICATION

I, GREGORY GILLESPIE, being first duly sworn upon his oath, deposes and says:

That I am the Defendant in the foregoing cause of action; that as such, I am authorized to make this Verification; that I have read the foregoing Motion to Dismiss and know the contents thereof to be true of my own knowledge, except as to those matters stated on information and belief, and as to such, I believe the same to be true.

ORY GILLESPIE

STATE OF ARIZONA)
)ss
COUNTY OF MARICOPA)

SUBSCRIBED AND SWORN to before me this date: _

<u>⊋₀⊋1</u>, by GREGORY GILLESPIE.



Seal/My Commission Expires: 10-16-22

1747 E Maden # 205

Street Address

Phoenix AZ City, State, Zip Code

1	WOODNICK LAW, PLLC 1747 E. Morten Avenue, Suite 205
2	Phoenix, Arizona 85020 Telephone:
3	Facsimile:
4	Gregg R. Woodnick,
5	Kaci Y. Bowman, Attorney for Defendant
6	Allorney for Defendam
7	IN THE SUPERIOR
8	IN AND FOI
9	In Re the Matter of:
10	
11	LAURA OWENS,
12	Plaintiff,
13	

GREGORY GILLESPIE,

Defendant.

OR COURT OF THE STATE OF ARIZONA OR THE COUNTY OF MARICOPA

RESPONSE TO PLAINTIFF'S MOTION TO SEAL COURT RECORDS

Case No.: CV2021-052893

(Assigned to the Hon. Alison Bachus)

Defendant, GREGORY GILLESPIE, by and through undersigned counsel, hereby responds and objects to Plaintiff's Motion to Seal.

Plaintiff's Motion fails to meet the requirements to seal pursuant to Rule 5.4, Arizona Rules of Civil Procedure and only serves to highlight why the matter must be dismissed pursuant to the pending Rule 12(b)(6) Motion. This Response is supported by the following Memorandum.

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MEMORANDUM

I. RULE 5.4 CONTROLS SEALING OF COURT RECORDS.

Rule 5.4, Arizona Rules of Civil Procedure, permits the court to seal the court record upon finding the following grounds:

• •

(c) Order Permitting a Document to Be Filed Under Seal.

• • •

- (2) Requirements. Unless a statute, rule, or prior court order authorizes a document to be filed under seal, a court may order that a document may be filed under seal only if it finds in the written order that:
 - (A) an overriding interest exists that supports filing the document under seal and overcomes the right of public access to it;
 - (B) a substantial probability exists that the person seeking to file the document under seal (or another person) would be prejudiced if it is not filed under seal;
 - (C) the proposed restriction on public access to the document is no greater that necessary to preserve the confidentiality of the information subject to the overriding interest; and
 - (D) no reasonable, less restrictive alternative exists to preserve the confidentiality of the information subject to the overriding interest.

II. BACKGROUND

Plaintiff filed her Complaint on August 11, 2021. Plaintiff alleges she became pregnant with Defendant's child on their second date. Instead of properly filing a Paternity action pursuant to Title 25, Plaintiff's Complaint contains <u>bizarre</u> allegations. Among other things, Plaintiff alleges Defendant "forced Plaintiff to have multiple pregnancy tests and a doctor's appointment" and "Defendant employed false promises, and verbal and emotional abuse."

Plaintiff's preposterous claim of "abortion coercion" is addressed in Defendant's *Motion* to *Dismiss* filed on September 24, 2021. The salacious allegations were presented by Plaintiff in her pro per Complaint. As a brief summary for this Court:

- 1. Plaintiff provided a sonographic image to Defendant on August 6, 2021 (Exhibit A). A reverse Google Images search revealed the images were identical to a sonogram found on a blog post from 2014. (Exhibit B).
- 2. Plaintiff sent Defendant a fabricated email exchange on August 22, 2021 purportedly between herself and California attorneys. One of the attorneys and the legal assistant on the exchange were not employed at the firm at the time of the alleged emails and the law firm has denied involvement in this matter. (Exhibit C).
- 3. As absurd as it sounds, Plaintiff has attempted to weaponize this civil litigation in order to force Defendant to date her. On August 23, 2021, Plaintiff informed Defendant's counsel that Defendant could contact Plaintiff if he "rethinks his decision regarding a relationship." In an email to Defendant's Counsel on August 23, 2021, Plaintiff states:
 - If he chooses to stand behind his words, I will file to dismiss with prejudice all charges related to CV2021-052893 and not file the Criminal and Family Law cases.
 - All I am asking him to do is keep his word. If he does that, everything will be dropped.
 - He can contact me at if he rethinks his decision regarding a relationship
 (Exhibit D) (Emphasis added).
- 4. On September 1, 2021, Defendant, through counsel, informed Plaintiff that she would be facing Fraud allegations (Counterclaim) for what has occurred and that it would be wise to abandon her malicious claim to end this nonsense (**Exhibit E**).

III. PLAINTIFF'S MOTION TO SEAL IS DEFICIENT.

Sealing a case is reserved for matters where "an overriding interest exists" to support filing the document under seal. Here, a self-aggrandizing podcaster who has refused a paternity

test, ignored Title 25, doctored images and who may have entered into this bizarre and nonsensical civil suit as a fodder for her podcast is not entitled to Rule 5.4 relief.

Rather than allege an "overriding interest," Plaintiff states she is a "popular self-help podcaster and victim's advocate." Plaintiff also alleges that her desire is for any money "won" to be donated to a women's charity and that she "does not wish to have her pure intentions and desire for justice" to be public. She filed the confounding complaint, and this is certainly not an "overriding interest." Plaintiff's purported career and popularity is insufficient grounds.

Further, Plaintiff now requests this court seal **only Defendant's Motion to Dismiss** despite stating that her Complaint was of an "extremely private nature." Plaintiff's Complaint created the very problem Plaintiff now seeks to make private. She had multiple opportunities to dismiss the matter (**Exhibit E**). Clearly, Defendant's Motion to Dismiss showed Plaintiff that her Complaint backfired, and that Defendant is not going to be <u>forced into a relationship</u> with her. That Plaintiff seeks only to seal Defendant's Motion to Dismiss demonstrates that Plaintiff knows she has been caught fabricating allegations and that she will be facing allegations of fraud in a public court forum. Plaintiff cannot benefit by having Defendant's Motion to Dismiss sealed and have her salacious complaint remain unsealed.

This entire litigation is **nothing more than a paternity action** (if she is actually pregnant) and there is a pending Motion to Dismiss because Plaintiff has not stated a legally cognizable claim. Plaintiff's Motion to Seal is an overt attempt to further her fictional narrative and possibly even a ruse to gain more podcast followers. Plaintiff simply cannot be permitted to seal Defendant's Motion to Dismiss because it reveals the false nature of her behavior. The court need merely look at **Exhibit A** and **Exhibit B**.

WHEREFORE, Defendant hereby respectfully requests the following:

- A. That this Court deny Plaintiff's Motion to Seal Court Records;
- B. That this Court dismiss Plaintiff's Complaint in its entirety with prejudice;
- C. That this Court award Defendant his attorneys' fees and costs pursuant to A.R.S. §§ 12-341, 12-349, and Rule 11, Arizona Rules of Civil Procedure; and
- D. That this Court grant such other and further relief as deemed appropriate.

RESPECTFULLY SUBMITTED this 6th day of October 2021.

WOODNICK LAW, PLLC

Gregg R. Woodnick Kaci Y. Bowman

Attorneys for Defendant

By: /s/Sara Seeburg

VERIFICATION

I, GREGORY GILLESPIE, declare under penalty of perjury that I am the Defendant in the above-captioned matter; that I have read the foregoing *Response to Plaintiff's Motion to Seal Court Records* and know the contents thereof to be true of my own knowledge, except as to those matters stated on information and belief, and as to such, I believe the same to be true.

GREGORY GILLESPIE

Exhibit "A"







iMessage Fri, Aug 6, 8:24 PM



Looks like you're gonna be a dad to one or two babies. Was sick enough to go to the clinic this afternoon and had to get an ultrasound to make sure I wasn't having an ectopic pregnancy. I wasn't. I found out that I've been pregnant with twins. Looks like one of them passed or isn't doing well, probably because of the medicine I took. I had the option of a surgical abortion and elected not to. If I'm going through this on my own, I will let God decide if he wants both, one, or none to be born. And the kid (s) would deserve to know their father's side of the family.

I'm aiving you one more shot to









Exhibit "B"

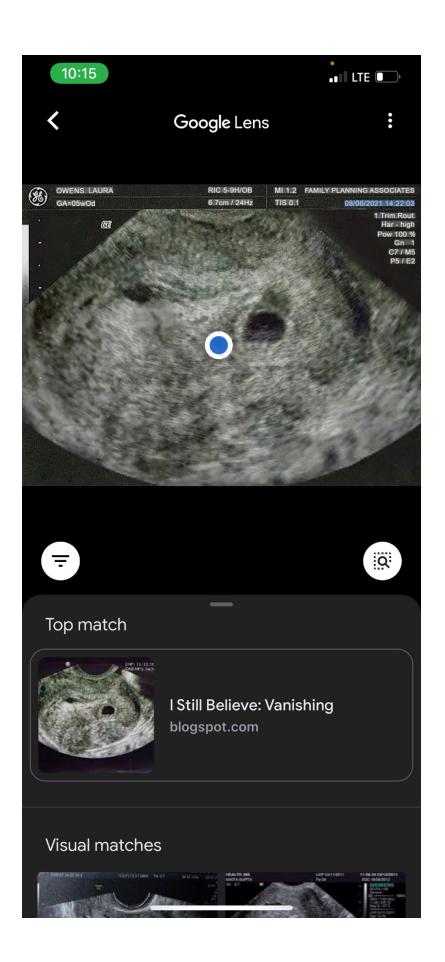




Exhibit "C"

Kaci Bowman

From:

Greg Gillespie

Sent:

Sunday, August 22, 2021 11:36 PM

To:

Gregg Woodnick; Kaci Bowman

Subject:

Fwd: Urgent: copy of conversation with Joe Cotchett & contract

Attachments:

CotchettContractOwens.pdf

From: Laura Owens

Sent: Sunday, August 22, 2021 10:49:44 PM

To: Greg Gillespie

Subject: Urgent: copy of conversation with Joe Cotchett & contract



First of all, I hope you had a great weekend and that the smoke didn't get as bad on the peninsula as you thought it would! I miss our dinners and hope you get out here soon, although I've yet to find another House of Prime Rib, so lower your standards for now!

Again, thank you SO much for the enormous help you've been in this sad situation that I am in. Here's where I am at:

- after many emails, I heard from Greg this morning. He wanted to discuss things tomorrow at 7pm. I was surprised, but certainly wanted to give him the benefit of the doubt since all I have wanted is for him to keep his word.
- Since his initial message, I have sent more messages that I know he has read and they have been left unresponded to.
- as much as i want to give him more and more chances, I don't think he wants them.
- I think the best call is to pursue alternative service and try to get him twice: once by posting on his house door and the other by calling his company and finding a co-worker to serve him. I think you're right that you would be better at making those phone calls than me. I texted you the co-workers who we could ask to serve.
- Once that happens, we can file for the punitive damages like you recommended. I really do stand firm in staying under \$100,000 in punitive damages, but I guess it also depends on the damages to the child, although wouldn't that also be covered in family court?
- I will think about what you said about trying to go for a settlement straight out of the box. I don't want to play this nasty. Honestly, I just wish this never happened and that we could just be happy like he said we could be.

Here's hoping he proves us wrong. I'm giving him one more change.

Love, Laura

From: Joe Cotchett

Sent: Sunday, August 22, 2021 7:42 PM

To: Laura Owens

Subject: SENT ON BEHALF OF JOE COTCHETT RE: LAURA OWENS PREGNANCY

Importance: High

Laura - what's the update?! I'm ready to get started on this the second you give me the go ahead! As much as I want this guy to be exactly the man he's told you that he is, I'm not convinced that he is. I'm always here for you (and the whole Owens family!) whenever you need me and if you want me to go after this guy, I will make this case a top priority (shhh...) because I really feel for you right now.

Allison sent me over the retention agreement and medical files. Every test result that came into our office matched what you had said. You have an easy open and shut case. This guy has nothing going his way here and I think he could

provide for a real landmark case regarding abortion coercison. This may be very needy and we could make this a public interest story with the snap of a finger. However, in your interest, we could also just follow for judgment immediately so that you could start receiving money immediately.

Remember, any man would feel like the luckiest man alive to have you by his side. You were polite, kind, and thoughtful as a little girl and those qualities got even better as you got older. Regardless of what happens, I am by your side.

Uncle :) Joseph W. Cotchett

Founding Partner

COTCHETT, PITRE & McCARTHY, LLP

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone:

Facsimile:

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From: Alison Cordova

Sent: Thursday, August 19, 2021 11:47 AM

To: Toni Stevens ; Laura Owens

Subject: RE: SENT ON BEHALF OF JOE COTCHETT RE: LAURA OWENS PREGNANCY Importance: High

Laura – Please see below. Joe's secretary informed me that we had actually received the medical authorizations from you. Thank you! Everything you told us about - pregnancy tests and ultrasounds - aligned with the timing you provided us. There were no past pregnancies on your record and the three obstetricians you saw felt that pregnancy was very consistent with intercourse that took place between June 30 and July 1st. They have all also said that the abortion pills will play a big role in your child's devleopment. It must feel like you have the weight of the world on you, but! have no doubt that the jury will sympathize with your situation.

The next step is to fill out the attached retention agreement.
Thank you!
Best,
Alison E. Cordova
Associate
COTCHETT, PITRE & McCARTHY, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone:
Facsimile:

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Greg Gillespie	

CONTINGENT FEE AGREEMENT

IN CONSIDERATION of the legal services to be rendered by the LAW OFFICES OF COTCHETT, PITRE & McCARTHY, LLP and the advancement by them of all costs necessary to the prosecution of all claims against party responsible for injuries and damages sustained LAURA OWENS on or about June 30, 2021 the undersigned CLIENT, employs said attorneys to commence and prosecute said claims.

INITIALS

ATTORNEYS' FEES

CLIENT agrees to pay attorneys' fees on the following basis. It is understood that no specific fee is set by law, and that this fee has been specifically agreed to between the parties.

1.	The sum of Twenty-three percent (23%) of the net amount recovered by compromise or trial.	10
2.	"Net amount recovered" is that sum received from the responsible parties after deduction of all costs.	10
3.	Attorneys' Fee Payment on Structured Settlement: In the event CLIENT'S recovery will be by some form of periodic payment, the lawyers' fees shall be based on the estimated present value of recovery. These fees shall be due in full immediately upon settlement, verdict, or upon entering into a periodic payment agreement. CLIENT agrees that lawyers shall not be required to recover their fees as a pro rata share of the periodic payments.	20
4.	The said fees do not include fees for appeal and/or retrial of the case. In the event an appeal is prosecuted and/or retrial is ordered, additional fee arrangements will be negotiated between the parties.	<i>LO</i>

5. Associate counsel may be employed at the discretion and expense of the attorneys but these associate counsel fees shall not be an additional expense to the CLIENT and shall be deducted from the fees paid to the law firm.

10

ATTORNEYS' COSTS

The law firm shall advance costs as in their judgment are necessary for the prosecution of these claims, and these costs advanced shall be returned out of the recovery in the case. These costs advanced may include, without limitation, travel expenses, photocopying charges and long distance telephone expenses. The attorneys may in their discretion employ outside investigators and other experts whose fees shall be charged as advanced costs.

ATTORNEYS' LIEN AND SPECIAL POWER

Said LAW OFFICES OF COTCHETT, PITRE & McCARTHY, LLP is hereby granted a lien upon any recovery for all sums of money advanced by them for attorneys' fees and costs. The attorney is granted the CLIENT'S special power of attorney to endorse all documents in CLIENT'S name which are necessary to finalize or complete the settlement, including the endorsement of a check and/or draft. ATTORNEYS do not have the authority to decide whether to settle or compromise CLIENT'S claims without the express authorization of CLIENT. It is agreed that the law firm may retain fees and costs out of the amount finally collected by settlement or judgment.

REPRESENTATIONS

It is acknowledged that the law firm has made no representation whatsoever regarding the successful termination of said claim.

WAIVER OF JURY TRIAL REGARDING DISPUTES BETWEEN CLIENT AND ATTORNEYS

By agreeing to arbitration of disputes relating to this Agreement or ATTORNEYS' performance of services hereunder, CLIENT acknowledge that (1) CLIENT is waiving the right to a jury trial as to such disputes; (2) parties' ability to conduct discovery, or get information, is much more limited in arbitration than in court proceedings; and (3) there is limited appellate review of an arbitration. CLIENT knowingly waives the right to a jury trial of any dispute with ATTORNEYS relating to this Agreement, pursuant to Schatz v. Allen Matkins Leck Gamble & Mallory LLP (2009) 45 Cal.4th 557, 2009 Cal. LEXIS 125. CLIENT also knowingly waives the right to the full extent of discovery and appellate review that would apply if such a dispute were brought and litigated in court.

RIGHT TO SEEK INDEPENDENT LEGAL ADVICE

Before entering into this agreement, COTCHETT, PITRE & McCARTHY, LLP have specifically advised CLIENT of his or her right to seek the advice of an independent attorney concerning the terms and conditions of this agreement. CLIENT has been encouraged to seek such independent advice as he or she desires concerning any questions on this matter.

INSURANCE COVERAGE

THE LAW OFFICES OF COTCHETT, PITRE & McCARTHY, LLP maintain errors &		
omissions insurance applicable to the legal services to be rendered.		LO
DATED at Scottsdale	, Arizona, this 23rd day of August, 2021.	
(A duplicate copy of this contract has been provided to me.)		
Laura Owens		
LAURA OWENS		
Joe Cotchett		

for COTCHETT, PITRE & McCARTHY, LLP

Exhibit "D"

Sara Seeburg

From: Laura Owens

Sent: Monday, August 23, 2021 2:23 PM

To: Kaci Bowman Subject: CV2021-052893

Ms. Bowman,

I want to be clear that the reason I am filing this specificcase (CV2021-052893) against Mr. Gillespie is because he coerced me into taking abortion pills and the personal damages I have suffered as a result of it.

I am planning on filing a separate case this week through the Family Law Court. I would, of course, be willing to have a prenatal paternity test done at ARCLabs when I am able to, which they say is when the pregnancy is at least nine weeks along. The only two times I have had sex since February 2020 were with Mr. Gillespie, on June 30th and July 1st. There's no question that my pregnancy was as a result of intercourse with him and I would be happy to prove that. In fact, I asked him in writing many times if he would do that. I just want to make sure that we keep these separate. Regardless of whether or not the pregnancy had survived because of the abortion at Mr. Gillespie's coercicion, the result would be extremely damaging, either resulting in no child when I was clear that I wanted to proceed with the pregnancy on my own if not for his prescense in my life, or one likely compromised child (and possibly a second that did not survive) as a result of his pressure tactics. Quite frankly, I don't see how either would work in his favor.

I will be amending the current lawsuit for the additional punitive damages of \$75,000. I would never waste my time and energy filing a lawsuit were it not for the fact that his actions were not only morally and ethically wrong, but they destroyed lives. He was *very* clear on the impact this would have on me if he were to leave after the abortion and it is all documented.

I have spoken informally today with the attorney who I plan to represent me in CV2021-052893 and he was concerned about the motives behind Mr. Gillespie's messages yesterday. He said that I had been very clear in my messages to him that I did not want him to contact me unless he wanted to maintain the promises that he made me in order to get me to have an abortion. He said that he thought it was odd that Mr. Gillespie would have asked to meet up, responded to my statement that I did not want to get together for any reason other than what I had written to him, and then responded with a time, only never to follow up with where or why. He had clearly hired your firm's services at this point and based on his lack of response, did not want to resolve this privately, so it seems probable that he wanted to lure me into a dangerous situation. This isn't unrealistic of me to think given the many threatening and intimidating texts he sent me to get me to take abortion pills (in my complaint) and his strong desire to not have a 'bastard child'. I also have legally admissible evidence of him telling me the night after I took the pills that if he were to see me, he would call the cops and, "have them take care of me if [he] hadn't already done it himself." The attorney is worried for my personal safety because he believes Mr. Gillespie will stop at nothing to ensure that this child is not born.

Please consider the situation that I was in; it is beyond cruel to coerce someone to get an abortion and then the day after, call them a 'psychopath' for believing that a relationship with me was what he wanted, block them on every form of social media, and then say that if they were to be contacted, they would take these sort of extreme actions.

He also told me for days how sick he was with COVID and had me walk into a trap. He complained early one evening that he felt terrible, then was unresponsive. I kept asking him if he was okay and that I wondered if I should come by to make sure if he was okay (with a mask - my dad is very compromised and I don't want him to get sick). Around 11am, I decided to come by there on my way home from the gym, which was three minutes away. He didn't respond to repeated knocks on the door and I didn't know what to do. I've checked on people before, but they have always been okay andI honestly had no idea what a person is supposed to do

if they suspect otherwise. I didn't know if I should call 911 or what, but it was a very helpless situation. I stayed for 20-30 minutes, then got a text from him as I was driving out saying he was sleeping and asked me why I would come by. I explained that since he had COVID badly and did not respond to messages, I thought he might be dead. He responded by saying that people don't die from COVID. Unbeknownst to me, he was there the whole time and had snapped a photo of me at the door, clearly clueless as to what to do. The day after the abortion, he said he could file harrassment charges for me being at his door. I walked into a trap. I am unsure what his intentions are with me, but he seems to be calculated in his actions.

Unfortunately, there is no evidence or indication that Mr. Gillespie meant to keep his word. I have never wanted to be wrong more so than I do now. I most certainly did not force him into a relationship or to love me. I told him many times that I thought he didn't like me or even hated me, and he said I was talking in circles and that he had been consistent in his decision to be with me. If he didn't like me, he could have just let me make my own choice. I told him that I was more than fine with that. If he had to pay child support down the line, he could have been a man, paid it, and avoided me. That would have been fine. He knew my strong desire to keep the pregnancy because of my faith and clearly acted with an evil, selfish mind to get me to do what he wanted at any and all costs. I didn't force him into a relationship, but he did force me to take medical abortion pills.

If my legal counsel was incorrect in thinking that Mr. Gillespie's text message sent yesterday regarding meeting up for tonight was malicious, intending to cause physical or emotional abuse, please let me know. I would love nothing more than for him to be the man who I thought he was and blame his actions on a breakdown because of his COVID and stress. If he chooses to stand behind his words, I will file to dismiss with prejudice all charges related to CV2021-052893 and not file the Criminal and Family Law cases. He can contact me directly if that is the case and we can move forward.

I'm very clear of my motives and stance. This has nothing to do with money and everything to do with being a man of integrity. All I am asking him to do is to keep his word. If he does that, everything will be dropped. However, it seems to me that he did whatever he could to get me to have an abortion and say whatever I wanted to hear in order to get me to do that. It doesn't seem like a good idea for him to enter this case trying to defend himself when there is so much evidence that he lied.

If, indeed, his intentions were at best cruel and manipulative and at worst, dangerous, then I would like to know how he can be served for the other cases that would presumably not be handled by your firm. I am sending a copy of this to him to get that information regarding other cases without contacting him privately. My process server said that Greg was home each time he tried to serve him and I won't go through the same fruitless process again to serve additional lawsuits. I would appreciate an address that would be best to serve him at.

I hope that he is who he claimed to be at the start of this process and not who he seems to be now. I will leave it up to him to decide how he wants to move forward and if he was lying so elaborately that he would take a \$120,000 lawsuit, a Criminal Law case for domestic violence, a Family Law cases to establish paternity and child support, and resulting legal fees, over being a man of his word. If he is going to stand behind that lie, I would like to know his intentions behind texting me yesterday.

He can contact me at	if he rethinks his decision regarding a relationship and if he would like	e to
be a part of pregnancy decis	ons going forward.	

All the best,

Laura Owens

×

On Mon, Aug 23, 2021 at 12:34 PM Kaci Bowman wrote:

Ms. Owens,

Attached hereto are the Notice of Appearance and Acceptance of Service that we e-filed this morning (along with confirmation the filings were received). We will be sure to provide you with conformed copies as soon as we receive the same.

In the meantime, it appears from a brief review of the pleadings that have been filed to date that a non-invasive prenatal paternity test should be ordered. Mr. Gillespie is willing to pay for the test. Please let us know if you are agreeable.

If so, we believe that ARCpoint labs in Scottsdale can administer the test and we would be happy to contact them and forward additional details about the testing process. I am attaching ARCpoint's website, below, for your review.

https://www.arcpointlabs.com/scottsdale-north/paternity/

Thanks in advance.

Kaci

From: Kaci Bowman

Sent: Monday, August 23, 2021 6:43 AM

To:

Cc: Gregg Woodnick Subject: CV2021-052893

Ms. Owens,

Please note that we have been retained to represent Gregory Gillespie regarding the Civil Complaint you recently filed in Maricopa County Superior Court. We will be filing a Notice of Appearance and Acceptance of Service of the Complaint today. Therefore, please direct all future communications to our firm, or if represented, please provide us with your attorney's contact information so that we can communicate with them moving forward.

Kaci Y. Bowman, Esq.

×	
×	
Telephone:	
Facsimile:	
www.woodnicklaw.com	

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Exhibit "E"

Sara Seeburg

From: Gregg Woodnick

Sent: Wednesday, September 1, 2021 10:11 AM

To:

Cc: Sara Seeburg; Kaci Bowman

Subject: Gillespie/Owens

Laura,

You should have received the confirmation data from ARCpoint regarding the prenatal paternity testing. As I trust you will be advised by counsel, it is your choice to participate in the testing <u>at this point</u>. As litigation proceeds that will <u>not</u> be the case as the court will order the same pursuant to ARS 25-814 and relevant case law.

You should be in receipt of our Notice of Appearance. The Court issued permission for alternate service but that is not necessary as we have notified the court that we represent Mr. Gillespie. We are in the process of drafting a Response to your Complaint and a Counter Petition.

You can avoid both litigation expenses and exposure to a sizable civil judgment by promptly filing to dismiss your civil suit. Please be advised, as I am sure your Uncle Joe warned you was forthcoming, the counter petition will contain a Fraud allegation as the images you sent to Mr. Gillespie were confirmed to be a recycled ultrasound from 2015.

Greg has advised that he will suspend his counter claim and related litigation once you promptly file to dismiss your civil suit and confirm that you are not pregnant.

Gregg

WOODNICK LAW, PLLC

1747 E. Morten Ave., Suite 205

Phoenix, AZ 85020

Phone: Fax:

www.woodnicklaw.com

Email:

From: Sara Seeburg

Sent: Friday, August 27, 2021 12:40 PM

To

Cc: Kaci Bowman < >; Gregg Woodnick <

Subject: Paternity Test

Laura,

You should receive an email from ARCpoint Labs of Scottsdale later today setting your appointment for non-invasive prenatal paternity testing for next week.

Thank you.

Sara

Sara Seeburg, Paralegal WOODNICK LAW, PLLC 1747 E. Morten Ave., Suite 205 Phoenix, AZ 85020

Phone:

Fax:

www.woodnicklaw.com

Email:

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CV 2021-052893 12/14/2021

HONORABLE ALISON BACHUS

CLERK OF THE COURT
C. Lett
Deputy

LAURA OWENS LAURA OWENS

v.

GREGORY GILLESPIE

KACI YOUNG BOWMAN

JUDGE BACHUS

MINUTE ENTRY

Pending before the Court are the following motions, which are now ripe for disposition: (1) Defendant's Motion to Dismiss, filed September 24, 2021; (2) Plaintiff's Motion to Seal Court Records, filed September 24, 2021; (3) Defendant's Motion to Strike Petitioner's "Declaration of Fraud, Perjury, Impersonation, Extortion, and Additional Illegal Actions taken by the Defendant and His Counsel," filed October 7, 2021; and (4) Plaintiff's Motion to Modify Date of Service, filed October 13, 2021. After considering thee filings, the Court has concluded that the issues presented have been fully briefed and oral argument will not assist a decision. *See* Maricopa Cty. Loc. R. 3.2(d).

After considering the filings and applicable law and rules, the Court addresses each of the motions in turn:

Defendant's Motion to Dismiss, filed September 24, 2021

First, the Court observes that Defendant failed to comply with Rule 12(j) of the Arizona Rules of Civil Procedure, which requires that a good faith consultation certificate be filed with a motion to dismiss brought under Rule 12(b)(6). On that basis alone (assuming the motion was

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timely-filed), the motion would be rejected. Furthermore, the motion fails on its merits. A motion to dismiss is not a procedure for resolving disputes about the facts or merits of a case. Coleman v. City of Mesa, 230 Ariz. 352, 363 (2012). Instead, the narrow question presented by a motion to dismiss for failure to state a claim is whether facts alleged in a complaint are sufficient "to warrant allowing the [plaintiff] to attempt to prove [its] case." Id. "Arizona follows a notice pleading standard." Id. at 356 (quoting Cullen v. Auto-Owners Ins. Co., 218 Ariz. 417, 419 (2008)). The purpose of a complaint is to "give the opponent fair notice of the nature and basis of the claim and indicate generally the type of litigation involved." Cullen, 218 Ariz. at 419 (quoting Mackey v. Spangler, 81 Ariz. 113, 115 (1956)). Dismissal on a 12(b)(6) motion is permitted only when a "plaintiff[] would not be entitled to relief under any interpretation of the facts susceptible of proof." Fid. Sec. Life Ins. Co. v. State Dep't of Ins., 191 Ariz. 222, 224 (1998) (emphasis added). Moreover, a motion to dismiss requires a court to accept all material facts alleged by the nonmoving party as true [Acker v. CSO Chevira, 188 Ariz. 252, 255 (App. 1997) (citing Lakin Cattle Co. v. Engelthaler, 101 Ariz. 282, 284 (1966))], view those facts "in the light most favorable to the nonmoving party" [Mirchandani v. BMO Harris Bank, N.A., 235 Ariz. 68, 69, (App. 2014)], and "indulge [the nonmoving party] all reasonable inferences" that the pleaded facts permit [Cullen v. Auto-Owners Ins. Co., 218 Ariz. at 419].

Therefore, in ruling on a Rule 12(b)(6) motion to dismiss, the Court will "assume the truth of the well-pled factual allegations and indulge all reasonable inferences therefrom." *Cullen*, 218 Ariz. at 419. The Court may grant the motion only if the plaintiff is not entitled to relief "under any facts susceptible of proof in the statement of the claim." *ELM Ret. Ctr.*, *LP v. Callaway*, 226 Ariz. 287, 289 (App. 2010) (quoting *Mohave Disposal*, *Inc. v. City of Kingman*, 186 Ariz. 343, 346 (1996)). The Court will not "speculate about hypothetical facts that might entitle the plaintiff to relief." *Cullen*, 218 Ariz. at 420. Nor will the Court "accept as true allegations consisting of conclusions of law, inferences or deductions that are not necessarily implied by well-pleaded facts, unreasonable inferences or unsupported conclusions from such facts, or legal conclusions alleged as facts." *Jeter v. Mayo Clinic Ariz.*, 211 Ariz. 386, 389 (App. 2005).

In the case at bar, Defendant moves to dismiss the claims against him because Plaintiff was not actually pregnant with his child as she claimed in the Complaint, she fabricated documentation to support her false assertion that she was indeed pregnant, and she is motivated by her desire to resume a relationship with Defendant. Those bases, though, are typically found in a motion for summary judgment, rather than a motion to dismiss. When considering a motion to dismiss, the Court must assume the facts in the Complaint are true and view those facts in the light most favorable to Plaintiff, per the case law. Therefore, after assuming the facts are true and viewing them in the light most favorable to Plaintiff, the Court concludes that the Complaint states a claim upon which relief may be granted. Defendant vehemently argues that Plaintiff cannot carry her burden, but that question is for another day, not a motion to dismiss.

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Therefore, the Court will deny the motion to dismiss for the reasons stated above.¹

Plaintiff's Motion to Seal Court Records, filed September 24, 2021

Plaintiff moves to seal "court records in regards to this case due to the extremely private nature of the Complaint, which relates to abortion coercion." She alleges that Defendant's motion to dismiss contained "fraudulent charges that, if on public record, could destroy the Plaintiff's credibility." Defendant opposes the motion. Rule 5.4(c) of the Arizona Rules of Civil Procedure govern procedures for sealing court records and states in pertinent part:

- (2) Requirements. Unless a statute, rule, or prior court order authorizes a document to be filed under seal, a court may order that a document may be filed under seal only if it finds in a written order that:
- (A) an overriding interest exists that supports filing the document under seal and overcomes the right of public access to it;
- (B) a substantial probability exists that the person seeking to file the document under seal (or another person) would be prejudiced if it is not filed under seal:
- (C) the proposed restriction on public access to the document is no greater than necessary to preserve the confidentiality of the information subject to the overriding interest; and
- (D) no reasonable, less restrictive alternative exists to preserve the confidentiality of the information subject to the overriding interest.

¹ The Court notes, however, that Plaintiff cited to the criminal domestic violence statute in her Complaint. To the extent that Plaintiff asserted a claim based solely on the criminal domestic violence statute, that claim would fail because "[t]he general rule is that 'no private cause of action should be inferred based on a criminal statute where there is no indication whatsoever that the legislature intended to protect any special group by creating a private cause of action by a member of that group." Ward v. Fireman's Fund Ins. Cos., 152 Ariz. 211, 216 (App. 1986) (affirming summary judgment in a civil claim that was based on a criminal statute and noting the criminal statute "does not contain any provision that can reasonably be construed as authorizing a private cause of action"), overruled in part on other grounds, Transamerica Fin. Corp. v. Superior Ct., 158 Ariz. 115, 117, n. 1 (1988). However, the Complaint is not entirely clear if Plaintiff is asserting a claim based on that statute, or whether she is merely citing to it for some other purpose.

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(emphasis added).

After considering the Rules, applicable law, and the parties' filings, the Court concludes Plaintiff has not demonstrated good cause under Rule 5.4(c)(2). Finally, the Court notes that Plaintiff filed her Complaint, which included the allegation of "abortion coercion," as she has phrased it in the motion to seal, and she did not seek to seal at that time. Rather, it was only when Defendant filed his motion challenging Plaintiff's claims that Plaintiff sought to seal documents. Because Plaintiff did not carry her burden under Rule 5.4(c)(2), the motion to seal is denied.

<u>Defendant's Motion to Strike Petitioner's "Declaration of Fraud, Perjury, Impersonation, Extortion, and Additional Illegal Actions taken by the Defendant and His Counsel," filed October 7, 2021</u>

Pursuant to Rule 7.1 of the Arizona Rules of Civil Procedure, Defendant moves to strike Plaintiff's "Declaration of Fraud, Perjury, Impersonation, Extortion, and Additional Illegal Actions taken by the Defendant and His Counsel" that she filed on October 4, 2021. The motion will be granted, as good cause appears.

The Court recognizes that Plaintiff is self-represented, but the Court is required by Arizona law to hold Plaintiff to the same standard as a licensed attorney. Requests for relief must be made by motion, and filings such as the "Declaration" in question are improper.

Plaintiff's Motion to Modify Date of Service, filed October 13, 2021

In her motion, Plaintiff contends that defense counsel's paralegal e-mailed Plaintiff on September 23, 2021 "to notify [Plaintiff] that they were accepting service on [Defendant's] behalf." Plaintiff further contends that the first acceptance of service filed by Defendant reflected that date, September 23, 2021. Plaintiff goes on to state that Defendant then filed a second acceptance of service with the incorrect date of September 27, 2021. Plaintiff argues that the service date on file with this Court should be reflected as September 23, 2021.

At the outset, the Court notes that Plaintiff's month in her motion and reply appear incorrect. Plaintiff repeatedly states service occurred in September, but the docket shows the month in question was August 2021. The acceptance of service with which Plaintiff takes issue was reflected on docket as being filed August 27, 2021. It appearing to the Court that Plaintiff erroneously stated September 2021 when she intended to plead August 2021, the Court will therefore deem Plaintiff's motion to be requesting the correct date of service to be reflected as August 23, 2021.

SUPERIOR COURT OF ARIZONA MARICOPA COUNTY

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In response to the motion to modify, Defendant asserts the acceptance of service filed August 23, 2021 was correctly dated, but the document reflected Coconino County. Defendant states that the August 27, 2021 acceptance of service was filed only to ensure the correct county was also reflected.

Thus, the parties' filings demonstrate there is no dispute as to the service date for Defendant. The record will be ordered to reflect that Defendant was served by acceptance of service on August 23, 2021. Even with that date, however, the Court notes that default would not be entered in this case because Defendant has been actively litigating the matter. To proceed by default would not be in the interests of justice.

As a final note, the Court observes that this motion appears to be an example of an issue that could have been easily resolved with a simple e-mail between Plaintiff and opposing counsel, and a stipulation being filed to reflect the correct service date. In the future, the parties shall make attempts to confer with one another to determine if consensus may be reached before filing such motions. The parties are also reminded to abide by the Arizona Rules of Civil Procedure in all respects, including regarding timely filing of motions, proper form of motions, and good faith consultation certificates.

Conclusion

Based on the foregoing,

IT IS THEREFORE ORDERED denying Defendant's Motion to Dismiss, filed September 24, 2021. An Answer shall be filed no later than 20 days from the date this Order is entered by the Clerk.

IT IS FURTHER ORDERED denying Plaintiff's Motion to Seal Court Records, filed September 24, 2021.

IT IS FURTHER ORDERED granting Defendant's Motion to Strike Petitioner's "Declaration of Fraud, Perjury, Impersonation, Extortion, and Additional Illegal Actions taken by the Defendant and His Counsel," filed October 7, 2021. Plaintiff's "Declaration of Fraud, Perjury, Impersonation, Extortion, and Additional Illegal Actions taken by the Defendant and His Counsel," filed October 4, 2021, is stricken.

IT IS FURTHER ORDERED denying Plaintiff's Motion to Modify Date of Service, filed October 13, 2021. The record in this matter shall reflect that Defendant was served by acceptance of service on August 23, 2021.

EXHIBIT A-1

			To: Clayton	Removing the video - order of protection - Clayton, I was just granted an order of protection against you. As part of that accurage the	
			To: Clayton 2	Removing your video with false results - I am getting harassed by so many people online right now. Your post needs to calk LELLE ATE	Det 6
				Call Ravgen 10	
			To: bvallecillo	URGENTIII - Brett, Clayton has just posted this: Clayton Echard on Instagram: "Anybody love some good news on a Friday as muc	Oct 6
			To: Bonnie 2	Inbox Emails re: zoom call to go over ultrasound - This is so helpful! Thank you so much, Bonnie! I really appreciate it. All the best	Oct 6
				Re: Zoom call? RE: Zoom call? Clayton Echard 9+	
	☆	W	To: tips	Clayton Echard paternity update - Hi, I am the "anonymous woman" and I just heard from the lab. Here is the relevant part of the	Oct 6
				Call Ravgen 10	
	☆	N	To: Bonnie, Joshua 5	Inbox Sonogram from SMIL - So much for Clayton's claim that he didn't see an ultrasound! This was the family attorney who repr	GD Oct 6
4			To: z 2	Inbox Petition 219600 - Hi, My name is Laura Owens. I had a hearing last week, but many events have happened since and I woul	Octo
			To: Clayton 2	Virtual hearing - Clayton, I am hoping the test results come back right the first time, but if they are inconclusive, I am willing to do	Oct 5
				MG_8287.jpeg	
	☆	W	To: Ksenia 4	Inbox Clayton Echard story - Thank you so much, Ksenia! I really appreciate it!	Oct 5
	☆	w	To: byallecillo 11	Inbox If there is an inconclusive result Hi Brett, I am including Clayton on this email because I wanted you to clarify for him wh	Oct 5
			To: Davis 4	Inbox Cease and Desist for Dave Neal - Nope. All the best, Laura Owens Nobody Told Mel' Quartet Farms TEDx talk Now availa	Oct 4
			To: Joshua 4	Inbox M-0751-CV-2023012527 - LAURA OWENS - Forgot to attach what I'd written All the best, Laura Owens Nobody Told Mel'	Oct 4
				Minute Order C	
П	÷	N	To: connect	Being victim shamed - from the "anonymous woman" in the Clayton Echard case - Hi, My name is Laura Owens and I am the daug	Oct 4

EXHIBIT A-2

-30-

Person Filing: Laura Ov Address (if not protected): City, State, Zip Co SCO Felephone: 415 Email Address:			Clerk of the Superior Company Spratt, Deputy Date 08/01/2023 Time 14:58:15 Description Amo IV-D N PATRNTY/MATRNTY 622 344. TOTAL AMOUNT 344.	ont
-awyer's Bar Number: Representing ⊠ Self, wit	hout a Lawyer or Attorney	for Petitioner		
	SUPERIOR COL	URT OF ARI OPA COUNT		
Laura Owens		Case Number:	FC2023-052114	4 .
Name of Petitioner / Party	A	Ouse Humber.		=======================================
			OR COURT ORDER FOR and (check box below if applicable)	
Clayton Echard Name of Respondent / Pa	etu B	⊠ LEGAL DE	CISION-MAKING (legal custo	dy)
name of Respondent / Pa	ity B	⊠ PARENTIN	IG TIME	
		○ CHILD SUI	PPORT	
		Department	CORDS (Check this box if the of Vital Records is ordered to cha ords of a child born in Arizona.)	nge
A. STATEMEN	TS TO THE COURT:	B		
1. INFORMATIO	N ABOUT ME:			
Name:	Laura Owens			
Address:			e :	
Date of Birth:	05/14/1990			
Occupation:	Horse sales/podcast h	ost		
My relationship	to the children listed in Pet	ition:		
	Father (or may be the	father)		
	Other: (Explain)			

2. **INFORMATION ABOUT OTHER PARTY:** Clayton Echard Name: Address: Date of Birth: Occupation: Other Party's relationship to the children listed in this Petition: Mother X Father (or may be the father) Other: (Explain) 3. **VENUE:** (Check here if the following statement is true): X This is the proper court to bring this lawsuit under Arizona law because it is the county of residence of either party or of the minor children. JURISDICTION: WHY I AM FILING THIS COURT CASE AGAINST THE OTHER 4. **PARTY IN ARIZONA:** (Place a check mark in the boxes that are true.) X The person is a resident of Arizona I believe that I will personally serve the person in Arizona (see packet on service to know about this.) [X]The person agrees to have the case heard here and will file written papers in the court case; The person lived with the minor child in this state at some time; The person lived in this state and provided pre-birth expenses or support for the minor child; The minor child lives in this state as a result of the acts or directions of the person, |X|The person had sexual intercourse in this state as a result of which the minor child may have been conceived;

help you determine this).

The person signed an affidavit acknowledging paternity that is filed in this state;

The person did any other acts that substantially connect the person with this state (see a lawyer to

Case	No.			

B. STATEMENTS ABOUT PATERNITY:

5.		YOU THINK THE PERSON IS THE FATHER OF THE MINOR CHILD(REN): which box applies)
		AFFIDAVIT: Both parties signed an Affidavit of Paternity acknowledging that ☐ Party A or ☐ Party B is the minor child(ren)'s natural father. A copy is attached.
		BIRTH CERTIFICATE: Party A or Party B is named as the natural father on one or more minor child(ren)'s birth certificate(s). Copy (or copies) attached.
		BLOOD TEST: DNA Testing indicates Party A or Party B is the minor child(ren)'s natural father. Report(s) of test results attached.
		PARTIES LIVING TOGETHER: Parties A and B were not married to each other at any time during the ten months before birth of the minor child(ren). However, the parties lived together during the period(s) when the minor child(ren) could have been conceived.
	⊠ .	SEXUAL INTERCOURSE: Parties A and B were not living together but had sexual intercourse at the probable date(s) of conception of the minor child(ren). The mother of the minor children did not have sexual intercourse with anyone else during the periods in which the minor child(ren) could have been conceived.
		OTHER: (explain)
6.	ABOL	JT MARRIAGE (if applicable, check one box.)
	\boxtimes	Mother was not married at the time minor child(ren) were born or conceived or at least 10 months before minor child(ren) were born or conceived, OR
		Mother was married when minor child(ren) were born or conceived or at least 10 months before minor child(ren) were born or conceived, but the Mother's spouse is not a parent of the minor child(ren). (Mother's spouse is a party to this court case because of marriage.)

2000	NI.		
Case	NO.		

C. INFORMATION ABOUT MINOR CHILDREN:

7 .	INFO	DRMATION ABOUT CHILD SUPPORT FOR MINOR CHILDREN:					
		There is an order for Child Support, datedfrom (name of court)					
		This order needs does not need to be changed.					
		There is a pending child support petition or modification currently filed in this court or another.					
	\boxtimes	To my knowledge there is no child support order for the minor child(ren) and the court should order child support in this case along with legal decision-making (custody), and parenting time.					
		Party A Party B made voluntary/direct support payments in the amount of					
		\$ that need to be taken into account, if past support is requested.					
		Party A Party B owes past support for the period between:					
		the date this petition was filed and the date current child support is ordered. OR –					
		the date the parties started living apart, but not more than three years before the date of this petition was filed, and the date current child support is ordered. OR -					
		the date the parties started living apart, which is MORE THAN three years before the date of this petition was filed, and the date current child support is ordered. * If you check this box, you must explain why the Court should award past support for this time period.					
		EXPLAIN:					
		~					
•		D/DEANIO masidana as					
8. 		.D(REN)'S residence:					
A. 0	Child's Na	me: Unborn Gender: Female Male					
		Place of Birth: Date of Birth:					
	Current Ac						
	How long at this address: County:						
	Lived with	Party A Party B Other (Name & Relation to Child):					
		(If less than 5 years, provide 5 years previous address information for each child.)					
F	Previous A	Address:					
	How long	at this address: Lived with Party A Party B Other					
F	Previous A	Address:					
	How long	at this address: Lived with Party A Party B Other					

	Case No
B. Child's Name: Unborn	
Current Address:	
How long at this address:	County:
Lived with Party A P	arty B Other (Name & Relation to Child):
(If less than 5 ye	ears, provide 5 years previous address information for each child.)
Previous Address:	
How long at this address:	Lived with Party A Party B Other
Previous Address:	
How long at this address:	Lived with Party A Party B Other
C. Child's Name:	Gender: Female Male
Place of E	Birth: Date of Birth:
Current Address:	
How long at this address:	County:
Lived with Party A Pa	rty B Other (Name & Relation to Child):
(If less than 5 ye	ears, provide 5 years previous address information for each child.)
Previous Address:	
How long at this address:	Lived with Party A Party B Other
Previous Address:	
How long at this address:	Lived with Party A Party B Other
D. Child's Name:	Gender: Female Male
Place of E	Birth: Date of Birth:
Current Address:	-
How long at this address:	· County:
Lived with Party A P	arty B Other (Name & Relation to Child):
(If less than 5 ye	ears, provide 5 years previous address information for each child.)
Previous Address:	
How long at this address:	Lived with Party A Party B Other:
Previous Address:	
How long at this address.	Lived with 🔲 Party A 🔲 Party B 🔲

Continues on attached page(s) made part of this document by reference.

Other:

 COURT CASES INVOLVING PHYSICAL CUSTODY, LEGAL DECISION-II (LEGAL CUSTODY) OR PARENTING TIME, RELATED TO CHILDREN UNDER 10 OLD: (Check one box) I HAVE I HAVE NOT been a party or witness or participated in any court case involved physical custody, legal decision-making (legal custody), or parenting time for any of the minor named above in this state or in any other state (If you have, explain below, using extra necessary. IF NOT, GO ON). 	
physical custody, legal decision-making (legal custody), or parenting time for any of the mind named above in this state or in any other state (If you have, explain below, using extra	18 YEARS
	or children
Name of each child:	
Court State: Court location (county/city):	
Court case number: Current case status:	
Nature (type) of court proceeding:	
Summary of any Court Order:	
10. COURT CASES NOT INVOLVING PHYSICAL CUSTODY, LEGAL DECISION-N (LEGAL CUSTODY) OR PARENTING TIME RELATED TO THE CHILDREN U YEARS OLD: (check one box) I HAVE I DO NOT HAVE information regarding any court action in this state or	NDER 18
state involving the minor child(ren) listed above that could affect this case including court enforcement and relating to domestic violence, protective orders, termination of parer and adoptions (If you have, explain below, using extra pages if necessary. IF NOT, GO ON.)	
Name of each child: Court location (county/city):	

Court case number: _____ Current case status: ____

How the minor children are involved:

Summary of any Court order: ______

I DO NOT KNOW a person other than the Party A or the Party B who has physical custody or who claims legal decision-making (legal custody) or parenting time rights to any of the minor children named above. (If you do, explain below, using extra pages if necessary. IF NOT, GO ON). The party B who has physical custody or who claims legal decision-making (legal custody) or parenting time rights to any of the minor children named above. (If you do, explain below, using extra pages if necessary. IF NOT, GO ON). The party B custody or who claims rights to any of the minor children pages if necessary. IF NOT, GO ON). The party B custody or parenting time rights to any of the minor children pages if necessary. IF NOT, GO ON). The party B custody or parenting time rights to any of the minor children pages if necessary. IF NOT, GO ON). The party B custody or parenting time rights to any of the minor children pages if necessary. IF NOT, GO ON). The party B custody or parenting time rights to any of the minor children, in proportion to their respective pages in pages if necessary. IF NOT, GO ON).
HER STATEMENTS TO THE COURT: DICAL EXPENSES: There are OR There are no unreimbursed medical expenses red by the mother, resulting from the birth of the minor child(ren). If there are, these costs and expenses ald be awarded to Party A OR Party B according to law. HER EXPENSES: The parties should be ordered to divide between them any uninsured medical, al, or health expenses, reasonably incurred for the minor children, in proportion to their respective
HER STATEMENTS TO THE COURT: DICAL EXPENSES: There are OR There are no unreimbursed medical expenses red by the mother, resulting from the birth of the minor child(ren). If there are, these costs and expenses all be awarded to Party A OR Party B according to law. HER EXPENSES: The parties should be ordered to divide between them any uninsured medical, al, or health expenses, reasonably incurred for the minor children, in proportion to their respective
DICAL EXPENSES: There are OR There are no unreimbursed medical expenses red by the mother, resulting from the birth of the minor child(ren). If there are, these costs and expenses ald be awarded to Party A OR Party B according to law. HER EXPENSES: The parties should be ordered to divide between them any uninsured medical, al, or health expenses, reasonably incurred for the minor children, in proportion to their respective
rred by the mother, resulting from the birth of the minor child(ren). If there are, these costs and expenses all be awarded to Party A OR Party B according to law. HER EXPENSES: The parties should be ordered to divide between them any uninsured medical, al, or health expenses, reasonably incurred for the minor children, in proportion to their respective
al, or health expenses, reasonably incurred for the minor children, in proportion to their respective
mes.
RENT INFORMATION PROGRAM (PIP): is required for persons seeking legal decision-making ority (legal custody) or parenting time.
MESTIC VIOLENCE: (If you are asking for joint legal decision-making (joint legal custody), check
Domestic Violence has not occurred between the parties. OR
There <u>has</u> been domestic violence in this relationship and no legal decision-making (legal custody) should be awarded to the party who committed the violence.
Domestic Violence has occurred but it was committed by both parties or it is otherwise still in the best interests of the minor child(ren) to grant joint or sole legal decision making (joint or sole legal

16.	DRU	G / ALCOHOL CON	IVICTION WITHIN LAST TWELVE	E MONTHS: (Check one box.)
	\boxtimes	Neither parent has talcohol in the last twe	oeen convicted for a drug offense or dri	ving under the influence of drugs or
			s have been convicted for a drug offen e last twelve (12) months.	se or driving under the influence of
			Party B was convicted, however, the ne arrangement I am requesting appropria	
		Explain how this arra	ngement appropriately protects the childre	en
E.	REG	QUESTS TO THE	COURT:	
1.	PATI	ERNITY: Order that (legal name of the father, as on his birth co	ertificate, or his current legal name)
		First	Middle	Last
	Cla	yton	minor child(ren).	Echard
	is th	e natural lather of the i	mmor child(ren).	
2.	BIRT	H CERTIFICATE:		
	Ž	Order that the name certificate:	of the father listed in "A" above be a	added to each minor child's birth
			•	
3.	NAM	E CHANGE: (check t	he box and fill in the blank if you want this	3) :
		Order each minor cl	nild's <u>last</u> name (only) be changed to:	
	OR	Order as follows:		

Case No. _____

Case No.				
	$C_{\alpha e \alpha}$	No		

De De	clare NEITHER parent's home is designated as the primary residence, OR clare Party A's home as the primary residence for the following named children: clare Party B's home as the primary residence for the following named children: ARENTING TIME: Award parenting time as follows:
De PA	clare Party B's home as the primary residence for the following named children:
P#	
	ARENTING TIME: Award parenting time as follows:
X	
	Reasonable parenting time rights as described in the Parenting Plan, OR
	Supervised parenting time between the children and Party A OR Party B, OR
	No parenting time rights to the Party A OR Party B.
Su	pervised or no parenting time is in the best interests of the child(ren) because:
	Explanation continues on attached pages made part of this document by reference.
	Name this person to supervise:
	2. Order cost of supervised parenting time (if applicable) to be paid by:
	Party A
	Party B
	Shared equally by the parties

PRIMARY RESIDENCE OF MINOR CHILDREN, PARENTING TIME, AND AUTHORITY

4.

	c.	LEGAL DECISION-MAKING (legal custody): Award legal decision-making concerning the child(ren) as follows:
		AWARD SOLE LEGAL DECISION-MAKING (sole legal custody) to: Party A Party B
		OR
		AWARD JOINT LEGAL DECISION MAKING (joint legal custody) to BOTH PARENTS. Party A and Party B will agree to act as joint legal decision-makers concerning the minor child(ren) and will submit a Parenting Plan and Joint Legal Decision-Making Agreement signed by the both parties. (For the court to order "joint" legal decision-making, there must have been no "significant" domestic violence according to Arizona law, A.R.S. § 25-403.03).
	(Check be	elow if you are asking for a child support order or a change of child support in this case.)
5.	CHILI	SUPPORT: Order that child support shall be paid by
		Party A OR Party B as follows, EITHER:
		in the amount set forth in the Child Support Worksheet filed with this Petition and incorporated by this reference.
		OR
		in the amount of \$, which is a deviation from the amount set forth under
		the Arizona Child Support Guidelines. I am requesting a deviation because: (EXPLAIN)
		Order that past child support for the period stated under #7 above, be paid by Party A Party B in an amount determined by using a retroactive application of the Arizona Child Support Guidelines taking into account any amount of temporary or voluntary / direct support that has been paid.
6.	MOTH	HER'S EXPENSES: Order that Party A OR Party B pay a reasonable amount to cover
	unreim	bursed expenses incurred by the mother related to the birth of each child(ren).
7.		CAL, DENTAL and VISION CARE INSURANCE FOR MINOR CHILDREN: r that:
	☐ Pa	rty A should be responsible for providing:
	☐ Pa	rty B should be responsible for providing:
	he	der that both parties pay for all reasonable unreimbursed medical, dental, vision care, and alth-related expenses incurred for the minor child(ren) in proportion to their respective incomes as scribed on the Child Support Order, which shall be submitted with the Judgment and Order.

Case No.

Case	No.		

В.	TESTING and COSTS: Order that if paternity is contested, Party A and Party B be ordered to submit to
	such blood and tissue tests as may be necessary by this Court to establish paternity, and that the other
	party must pay all costs and expenses of this lawsuit, if he/she contests these proceedings, including costs
	of the blood tests, other genetic testing; filing each child's birth certificate; attorneys' fees and court costs.

9. TAX EXEMPTION. Allocate tax exemptions for the minor child(ren) as determined by the Court under the Arizona Child Support Guidelines and in a manner that allows each party to claim allowable federal dependency exemptions proportionate to adjusted gross income in a reasonable pattern that can be repeated.

Under the Affordable Care Act, the parent who claims the child as a dependent on a federal tax return has the obligation to ensure that the child is covered by medical insurance and may be penalized by the IRS for failing to do so.

	Parent entit	lled to claim	Name of minor child	in Tax Year
	⊠Party A	☐Party B	Unborn	
	☐Party A	⊠Party B	Unborn	
	☐Party A	☐Party B	1	
	Party A	Party B		
	<u></u> P	attern shall repe	eat for subsequent years.	
10.	OTHER OF	RDERSIAM F	REQUESTING (explain request here):	

F. **SIGNATURES**

UNDER OATH OR AFFIRMATION

I swear or affirm under penalty of perjury that the contents of this document are true and correct to the best of my knowledge and belief.

07/30/2023	saura Muchelle Vwens	
Date	Signature	
STATE OF _Texas		
COUNTY OF Collin		
Subscribed and sworn to or affirmed before me this:	07/30/2023	_
	(date)	
By Laura Michelle Owens	·	
	1 -	

(notary seal)



Hunter Vincent Mauer

ID NUMBER 13431718-5 COMMISSION EXPIRES April 20, 2027

Deputy Clerk or Notary Public
Notarized online using audio-video communication

Clerk of the Superior Court

*** Electronically Filed ***

M. Cain, Deputy

12/28/2023 12:00:11 PM

Filing ID 17104680

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

In Re the Matter of:

LAURA OWENS,

Petitioner,
and

Respondent.

CLAYTON ECHARD,

Case No.: FC2023-052114

PETITIONER'S MOTION TO DISMISS PETITION TO ESTABLISH PATERNITY, LEGAL DECISION-MAKING, PARENTING TIME, AND CHILD SUPPORT <u>WITH</u> PREJUDICE

(The Honorable Julie Mata)

Petitioner, **LAURA OWENS**, moves this Court to dismiss her Petition to Establish Paternity, Legal Decision-Making Authority, Parenting Time, and Child Support, filed August 1, 2023. Petitioner is not now pregnant with Respondent's children. Under A.R.S. § 25-801, this Court has "jurisdiction...to establish maternity or paternity." Here, there is no paternity or maternity to establish, as Petitioner is no longer pregnant. Accordingly, this case must be dismissed.

I. FACTUAL BACKGROUND

The underlying Petition was filed on August 1, 2023. Respondent filed a Response on August 21, 2023. On December 27, 2023, Petitioner's counsel sent Respondent's counsel a draft Stipulated Motion to Dismiss with Prejudice. Respondent does not agree to the dismissal and instead seeks to utilize family court resources for a case that does not

involve a family.

II. LEGAL ARGUMENT

Because Respondent has filed a Response to the Petition, this case may be dismissed only by party agreement or by a court order. *See* Ariz. R. Fam. L. P. 36(a)(1)(B)-(C). And because Respondent does not consent to a stipulated dismissal, Petitioner requests that the Court order dismissal pursuant to Rule 36(a).

a. The family court does not have jurisdiction to hear a case involving unmarried parties without a minor child.

A.R.S. § 25-801 grants this court "original jurisdiction in proceedings to establish maternity or paternity." Here, there is no maternity or paternity to establish, as Petitioner is no longer pregnant. Accordingly, this Court no longer has jurisdiction, and the underlying Petition must be dismissed.

Additionally, it is well-established that courts cannot decide moot cases. Contempo-Tempe Mobile Home Owners Ass'n v. Steinert, 144 Ariz. 227, 229 (App. 1985). "A case is moot when it seeks to determine an abstract question which does not arise upon [the] existing facts..." Id. Because Petitioner is no longer pregnant, this case is now moot and there is no need for this case to proceed.

b. Respondent's only potentially viable claim is for attorney's fees, which he did not personally incur.

On December 12th, Respondent filed a Motion for Leave to Amend his Response. The proposed Amended Response requests the following relief: (1) an order of non-paternity; (2) an order compelling Ravgen Inc., a non-party, to produce fetal DNA records; (3) Rule 26 sanctions against Petitioner; and (4) attorney's fees from Petitioner.

Items 1 and 2 are now moot because Petitioner is not now pregnant. Regarding item 2, the Request for Relief of a Response is not the appropriate place to request a Court to order discovery from a non-party. As to item 3, Respondent failed to comply with any of Rule 26(c)'s prerequisite requirements. Specifically, Respondent did not "attempt to

1 | re | P | 3 | tl | 4 | se

resolve the matter by good faith consultation as provided by Rule 9(c)." Ariz. R. Fam. L. P. 26(c)(2)(A). Even if he had tried to resolve this dispute, Respondent did not "provide the opposing party with written notice of the specific conduct that allegedly violates section (b)." Ariz. R. Fam. L. P. 26(c)(2)(B).

Additionally, sanctions cannot be requested as part of a Response (or of any other pleading for that matter). Pursuant to Rule 26(c)(3)(A), a motion for sanctions must be made separately from any other motion. Respondent also failed to attach a Rule 9(c) good faith consultation certificate and/or "attach a copy of the written notice provided to the opposing party under subpart (c)(2)(B)." Ariz. R. Fam. L. P. 9(c)(3).

Accordingly, the *only* remaining viable claim in this entire case is Respondent's claim for attorney's fees from Petitioner. Respondent, however, crowd-sourced his attorney's fees through GoFundMe. Exhibit A, Mr. Echard's GoFundMe. Respondent did not personally incur attorney's fees and it is doubtful that he intends to reimburse all 331 people¹ who donated to his "cause." Respondent could easily have no attorney's fees moving forward if he agrees to the requested dismissal. Any fees incurred moving forward are a result of Respondent attempting to inappropriately utilize the family court's resources for a non-familial dispute.

WHEREFORE, Petitioner respectfully requests this Court dismiss her Petition to Establish Paternity with Prejudice because the family court does not have jurisdiction over any perceived remaining issues.

RESPECTFULLY SUBMITTED this 28th day of December 2023.

MODERN LAW

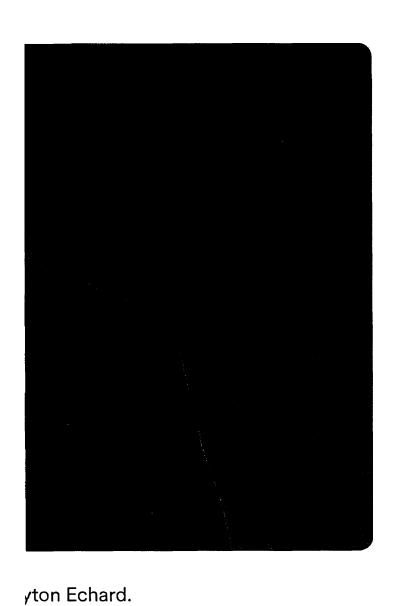
By: <u>/s/ Alexis Lindvall</u>
Alexis Lindvall
Attorney for Petitioner

¹ Number of donors at the time of filing.

1	ORIGINAL of the foregoing eFiled this 28th day of December 2023 with:
2	
2 3	Clerk of the Superior Court Maricopa County Superior Court
4	COPIES of the foregoing delivered
5	this 28th day of December 2023 to:
6	Honorable Julie Mata
7	Maricopa County Superior Court
8	Gregg Woodnick, Esq.
9	WOODNICK LAW, PLLC
10	office@woodnicklaw.com Attorney for Respondent
11	By: /s/ Sarah Saxon
12	Sarah Saxon
13	
14	
15	
16	
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19	
20	
21	
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EXHIBIT A





\$8,080 raised of \$10,000 goal

331 donations

Share

Donate now



Anonymous **\$25** 3 d



Anonymous \$20 7 d



Rachael Lurker \$20 7 d



Anonymous

Clerk of the Superior Court

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C. Brown, Deputy

1/3/2024 1:00:21 PM

Filing ID 17124769

1 WOODNICK LAW, PLLC

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Gregg R. Woodnick, #020736 Isabel Ranney, #038564 Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

Case No.: FC2023-052114

LAURA OWENS,

Petitioner,

and

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RESPONSE/OBJECTION TO PETITIONER'S MOTION TO DISMISS PETITION TO ESTABLISH PATERNITY, LEGAL DECISION-MAKING, PARENTING TIME, AND CHILD SUPPORT WITH PREJUDICE

(Assigned to The Honorable Julie Mata)

CLAYTON ECHARD,

Respondent,

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Respondent, CLAYTON ECHARD, by and through undersigned counsel, hereby responds and objects to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with Prejudice. Petitioner's Motion must be denied, as a Motion alleging (without any proof that Petitioner was pregnant in the first place) that Petitioner is now without child is insufficient cause for a dismissal under Rule 29(a)(1). Permitting Petitioner to bring this action, seek out media attention, force Respondent into court to Respond to baseless and malicious allegations (in three (3) different court cases before three (3) different Maricopa County Superior Court judges)

to then absolve herself by suddenly claiming, without any evidence, that she is not pregnant would be a gross miscarriage of justice.

Petitioner continues to demonstrate that she is eager to utilize the media to support her fabricated pregnancy narrative and she will continue to claim that she was pregnant by Respondent unless this Court adjudicates this matter with a finding of non-paternity. On or about January 2nd, 2024, Petitioner again contacted *The Sun* and stated she "firmly stands by everything" and "she had a positive pregnancy test at one point" that 'confirmed' her pregnancy" (Exhibit 1). The current existence of her pregnancy, as explained below, is insufficient cause for a dismissal. An adjudication that she was never pregnant or, at least, that she was never pregnant by Respondent is what justice requires.

To the extent applicable, Respondent's pending Motion for Leave to Amend Respondent's Response to Petition to Establish Paternity, Notice of Filing Affidavit of Non-Paternity, and Expedited Motion to Extend Dismissal Date on Inactive Calendar (together, "Pending Pleadings") are incorporated herein by reference.

Petitioner's Motion (as well as all of Petitioner's filings in this matter) lacks evidentiary support, misstates well-established Arizona law and policy surrounding subject matter jurisdiction, and would deprive Respondent of basic access to justice *after* he was involuntarily dragged into court to defend himself. Put plainly, Petitioner's Motion cannot be granted and to do so, would be to commit grave and clear error. As and for his Response/Objection, Respondent provides as follows:

1. A Motion stating that Petitioner "is no longer pregnant" creates evidentiary issues that must be resolved by this Court. After repeatedly claiming and insisting that she

was "100%" pregnant by Respondent in filings, under oath in various court hearings (FC2023-052771; CV2023-05392), and in hundreds of social media posts, Petitioner cannot be permitted to suddenly claim, without any evidence, that she is no longer pregnant.

Critically, Petitioner stated, under oath and without any medical evidence, that she was "24 Weeks" pregnant and due on "February 14, 2024" as of November 2, 2023.² Petitioner also appeared in Court before Judge Gialketsis via video on October 24, 2023 with what appeared to be a pregnant stomach (which, upon information and belief, was actually a "moon bump" or a fake stomach to appear pregnant). At this time, Petitioner also requested Judge Gialketsis permit her to <u>show</u> Respondent her stomach to "verify" she was pregnant (which Judge Gialketsis denied).



¹ FTR at 2:55:07 for hearing Nov 2, 2023.

² FTR at 2:56:34 and 2:57:09 for hearing Nov 2, 2023.

If Petitioner is now alleging that she is no longer pregnant because of a miscarriage, a third trimester abortion or whatever she is claiming (her Motion to Dismiss curiously lacks any explanation), she <u>must</u> provide documentation to support the same. A miscarriage this late in an alleged pregnancy would require medical attention (if not full hospitalization) and there would be a fetal death certificates filed with Vital Records consistent with A.R.S. § 36-239 (requiring a fetal death certificate to be filed within seven (7) days of fetal death where the fetus is past twenty (20) weeks or 350 grams in weight). If she otherwise disposed of the twin fetuses, a criminal investigation would be warranted to locate the remains. Petitioner must provide Respondent and this Court with evidence to support the existence and, now, nonexistence of a pregnancy.

Petitioner's ability to provide this evidence, or any evidence that complies with Rule 2, is *highly dubious* and any testimony she provides should be carefully assessed, as Petitioner is entirely lacking in credibility. As outlined in Respondent's Pending Pleadings, Petitioner has **provided no verifiable medical evidence** to support her claim that she was <u>ever</u> pregnant (instead, Petitioner offered unverifiable screenshots of appointments, positive HCG tests, a sonogram video taken from a seven-year-old YouTube video, and a demonstratively fabricated sonogram). Out of three (3) fetal DNA tests, two (2) have come back showing "little to no fetal DNA" (one was allegedly lost in transit). A conclusive paternity determination has now been made impossible, as Petitioner refused to comply with the fourth test and ostensibly has determined that stating she is no longer pregnant will allow her to evade the paternity issue and continue to perpetuate the false narrative that she *was* pregnant by Respondent (*see* Petitioner's December 8th, 2023 Medium Article - Exhibit 2; *see also*

Respondent's Expedited Motion to Extend Dismissal Date). The Court must be provided with concrete and verifiable evidence to establish this critical fact (that Petitioner was pregnant by Respondent and is no longer pregnant with Respondent's twins) to determine whether there is cause to go forward.

Without belaboring the point, Petitioner has NOT provided: any Rule 49 disclosure, any verified sonogram reports, any fetal anatomy scans, any sonograms from weekly checks ups, any documentation to support her statement under oath that she was 24 weeks pregnant on November 2, 2023, or any medical records supporting the existence of pregnancy at all. She refuses to sign a simple HIPAA form to permit the release of records from the various medical professionals that *she claimed*, under oath on November 2, 2023, that she was being seen by for her "high risk pregnancy." She now seeks to have the action she filed dismissed by claiming that she "is no longer pregnant," still without providing any evidence to support the same. This cannot be permitted.

with Rule 2 (that Petitioner curiously invoked, despite never providing any verifiable evidence to any court): (1) that she was pregnant due to conduct on May 20, 2023, (2) that she was pregnant with Respondent's twins (through records held by Ravgen, which Respondent is requesting this Court Order be released) AND (3) that she is no longer pregnant, with medical records confirming the date and week of gestation that the pregnancy terminated. Petitioner simply cannot evade her evidentiary burden, as Respondent is entitled to a resolution as to whether she was pregnant, whether she was pregnant with his twins, and if she was pregnant, what happened to the twin fetuses.

2. This Court has subject matter jurisdiction, as such jurisdiction attaches at date of filing and subsequent acts by parties does not deprive the Court of jurisdiction.

Subject matter jurisdiction is "established at the time of filing of the lawsuit and cannot be ousted by subsequent actions or events." *Fry v. Garcia,* 213 Ariz. 70 (Ariz. App. 2006), *Resolution Trust Corp. v. Foust,* 177 Ariz. 507, 517, 869 P.2d 183, 193 (App.1993) (citations omitted); *see also State v. Howell,* 107 Ariz. 300, 301, 486 P.2d 782, 783 (1971) ("Jurisdiction depends upon the state of affairs existing at the time it is invoked... and once having attached is not lost by subsequent events.") (citations omitted). "Ordinarily, a court that has acquired jurisdiction of a case cannot be deprived of jurisdiction by subsequent events in the course of its proceedings, even if those subsequent events would have prevented jurisdiction from attaching in the first place." 20 Am.Jur.2d *Courts* § 111 (1995) (internal footnotes omitted). Arizona public policy favors "retention of jurisdiction rather than divestiture." *Fry*, 213 Ariz. at 73; *see also Pritchard v. State*, 163 Ariz. 427, 430 ("[A] presumption exists in favor of retention of jurisdiction, and a divestiture of jurisdiction cannot be inferred but must be clearly and unambiguously found.").

That Petitioner is allegedly "no longer pregnant" does not divest the Court of jurisdiction. Subject matter jurisdiction attached when Petitioner she filed her verified Petition to Establish on August 1st, 2023, alleging that Respondent was the father of her unborn twins. Nothing has occurred that would divest this Court of jurisdiction over this matter. There is (1) no statute that explicitly and clearly divests this Court of jurisdiction, (2) jurisdiction cannot be ousted by subsequent events, and (3) Arizona law presumes retention of jurisdiction unless divestiture is clearly and unambiguously found. See Fry, 213 Ariz. at

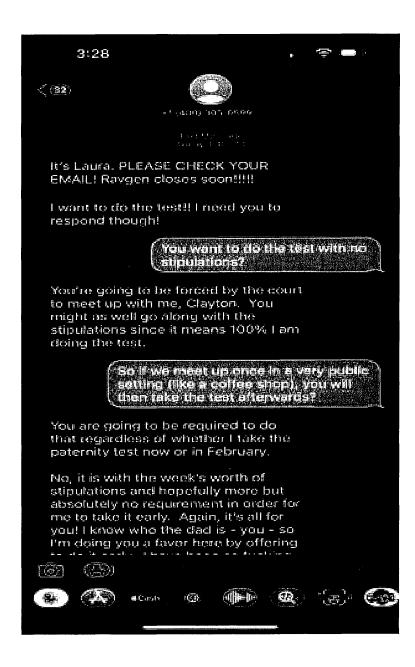
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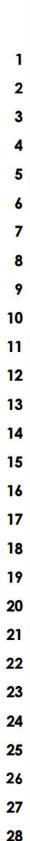
3. The Rule 9(c) requirement for Rule 26 sanctions has been met or, if this Court determines it has not been met, compliance with Rule 9(c) would have been futile.

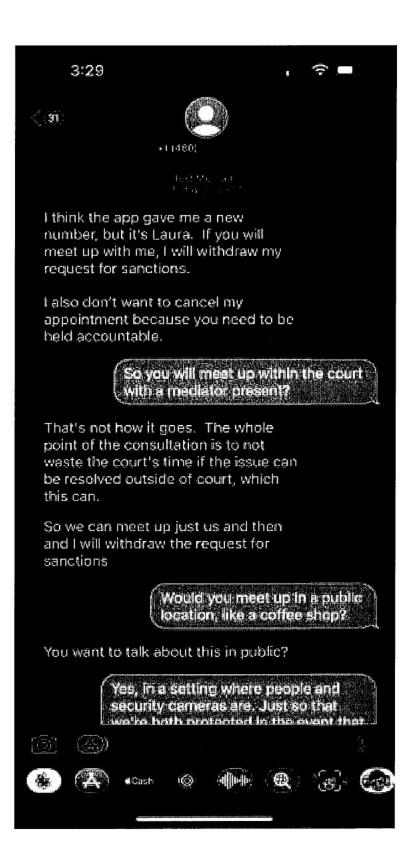
Rule 9(c), Arizona Rules of Family Law Procedure, requires that parties "demonstrate that a party has made a good faith attempt to resolve the issue" and the "attempted consultation required by this rule must be in person or by telephone and not merely by letter or email." Here, Respondent sent Petitioner countless text messages reiterating his position that Petitioner's Petition to Establish was in bad faith as she could not have been pregnant by him after one encounter of oral sex. (see text messages inserted below). Respondent thereafter blocked Petitioner's numbers (she created at least 13 different phone numbers), leading her to send over 500+ text messages and emails threatening to take Respondent to Court if he did not speak to her. Judge Gialketsis affirmed that these communications were harassment and served no legitimate purpose, as Respondent had made it clear that he did not want to engage in Petitioner, when she granted his Injunction Against Harassment against her (CV2023-05392).

Petitioner, despite knowing that Respondent <u>vehemently</u> denied she could be pregnant by him, filed a "Motion to Communicate" and "Motion for Contempt" (denied by this Court) to try to force Respondent to communicate with her. Put plainly, all of Respondent's attempts to resolve this issue by explaining to a harassing and emotionally volatile *pro per* that she cannot in good faith file a Petition to Establish as she was *not pregnant by him* went unrecognized. Respondent even offered to meet Petitioner in person with a mediator present at a public location, which Petitioner rejected (**insert below**).

Respondent paid for and engaged in three (3) different paternity tests to *further* disprove this possibility to Petitioner in the hopes that medical science would resolve the issue. Nothing would deter her, not even two (2) DNA tests showing "*little to no fetal DNA*." Respondent has more than complied with Rule 9(c).







Should this Court determine that Respondent's communications with Petitioner are insufficient under Rule 9(c), compliance would have been futile as both parties have restraining orders against one another. Petitioner has an Order of Protection against Respondent (FC2023-052771) and has allegedly attempted to get the police involved in this matter (Exhibit 3). Respondent has an Injunction Against Harassment against Petitioner (CV2023-05392). Although the parties are permitted to communicate regarding ongoing court proceedings, Petitioner's commitment to going to the media and harassing Respondent made all of Respondent's efforts to reason with Petitioner futile. Petitioner made it clear that she had no interest in dropping this action despite her knowledge that Respondent denied that she could be pregnant by him due to oral sex when she: posted "I am the anonymous woman in the Clayton Echard scandal. Here's my story" on Reddit and Medium.com, reached out directly to the media (The Sun, People Magazine, Page Six, etc), contacted Respondent's Father, she filed her "Motion to Communicate" and "Motion to Compel" to force Respondent to speak with her, etc. Petitioner even went as far as to threaten to harm herself if Respondent did not communicate with her (Exhibit 4).

Petitioner's relentless crusade to accuse Respondent of impregnating her, lash out at anyone who disagreed with her, made it impossible for Respondent to try to explain to her that she was not pregnant by him and could not be. Put plainly, Respondent could not guarantee his safety around Petitioner, which led him to seek an Injunction Against Harassment (which was granted). Therefore, Rule 9(c) either was met long ago or could not have been reasonably complied with.

Respondent's is entitled to an evidentiary hearing on his request for Rule 26

sanctions and attorney's fees. Petitioner's conduct is precisely the type of litigiousness and malicious prosecution that Rule 26 seeks to punish and a separate Motion for Rule 26 sanctions is being filed contemporaneously. This is not an "abstract question" that renders the matter moot, as Petitioner claims. Petitioner has been steadfast in her insistence that she is "100%" pregnant by Respondent, despite offering no verifiable medical evidence as oral sex does not result in pregnancy. That Petitioner is suddenly admitting that she is not pregnant, only after Respondent filed his amended response and Notice of Non-Paternity, does not address whether she was pregnant to begin with or whether she was pregnant with Respondent's twins. Respondent is entitled to, at minimum, compliance with discovery aimed at determining whether she was pregnant at all (and records from the doctors she testified to being seen by, under oath, on November 2, 2023) and an opportunity to be heard for his requested relief and redress for abuse of process and attorney's fees. Situations like these are precisely why Rule 36 requires that, once a Response is filed, dismissal can only be by agreement or court order. Petitioner cannot unilaterally decide this Court no longer has jurisdiction.

4. Respondent is entitled to his reasonable attorney's fees, regardless of the source of the fees. Petitioner has acted unreasonably from the very beginning of this action and continues to act unreasonably in her filings. Respondent has had to obtain community support to defend the allegations from Petitioner. Note, Petitioner has a history of fabricating pregnancies and reasons for why she all of the sudden is not pregnant (see CV2021-052893, where another man was accused of getting Petitioner pregnant with twins and she claimed she had an abortion as a result [again, without any medical evidence to support the same]).

Petitioner's motive to fabricate pregnancies to coerce relationships and then to somehow "terminate" the pregnancy if they capitulate to her demands to date her is disturbing. See Respondent's Motion for Leave to Amend ("for a period of one week, while determining the best court [sic] of action for their pregnancy, Party A and Party B, will exclusively explore a relationship;" "I have offered to give you control over the outcome of the pregnancy if we date exclusively).

Petitioner cites no law (as none exists) that makes the <u>source</u> of attorney's fees a defense to the Court ordering fees (and under separate cover sanctions) under A.R.S. § 25-324. In fact, Petitioner admits that Respondent has a viable claim to attorney's fees. While Petitioner can invent pregnancies, she cannot invent the law.

Petitioner has acted unreasonably if not diabolically by bringing this baseless Petition to Establish despite knowing she was not, and could not, be pregnant by Respondent and Respondent has incurred attorney's fees as a result. Again, this is a pattern of behavior that that occurred in prior litigation with other men (CV2021-052893) and Petitioner shows no sign of stopping. Here, Respondent has incurred thousands in attorney's fees and costs responding to Petitioner's relentless, malicious, and bad faith pleadings. Respondent has had to further incur more attorney's fees and costs attempting to get a resolution on this matter that will further deter and prevent Respondent from continuing to maintain the false narrative that she was pregnant by Petitioner. It is not Respondent who is inappropriately attempting to utilize the family court's resources.

As further demonstration of her unreasonableness and for the sole purposes of attorney's fees, Petitioner refused to sign a stipulation to dismiss this action as she claimed

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that stating she was "never pregnant by" Respondent would be her committing **perjury** (**Exhibit 5**). It is frankly astounding that Petitioner is now concerned with perjury, after repeatedly perjuring herself in three (3) different court cases and despite the only evidence of "paternity" showing "little to no fetal DNA."

12/27/23: This resolves, now or in court, with Ms. Owens admitting she was never pregnant by Clayton. Her exposure at the evidentiary hearing (which we will insist on) is testimony and evidence before the Court that she was never pregnant by anyone and that she fabricated medical documents (in addition to repeatedly lying under oath). I appreciate that your client wants to put an end to this. Due to her past behavior, we have legitimate concerns that this will become another situation where she runs to an outlet (TedTalk/Medium/etc) to clear her own image with a fabricated story after she brought this upon herself by filing her Petition and reaching out to social media. The proposed language in the Exhibit A will prevent her from doing this. As you are aware, your client has a history of lashing out against anyone who sees the world differently than she does (that appears to be most people). Be it the Bar complaints, allegations that I was somehow involved in coordinating a sexual assault on her, claiming under oath that Mr. Gillespie hacked into her email accounts and fabricated text messages, etc. She even lashed out at Clayton, contacted his family, slandered him impacting possible work opportunities, and overtly attempted to harm his reputation, all based on the most unhinged effort to preserve a relationship that never was. She can end this Title 25 matter by acknowledging she was never pregnant by Clayton.

12/28/23 (Petitioner): Laura is not willing to commit perjury by signing the Affidavit you sent over. The Court will not be able to order her to sign it. She concedes she is not pregnant. There cannot be a finding of non-paternity for a non-existent child. Clayton's only viable claim at this point is for attorney's fees. If he insists on proceeding with a deposition when a motion to dismiss is pending, he's racking up needless fees.

- 5. **WHEREFORE**, Respondent respectfully requests that this Court enter the following orders:
 - A. <u>Deny Petitioner's Motion to Dismiss in its entirety;</u>
- B. Issue an Order declaring Respondent was not the father of any children carried by Petitioner or, in the alternative, that Petitioner was not pregnant due to conduct with

Respondent on May 20, 2023;

- C. Issue an Order compelling Ravgen Inc to produce all records and documents related to the fetal DNA testing in this matter;
- D. Issue an Order compelling Vital Records to produce all records and documents related to a fetal death certificate under A.R.S. § 36-239 for alleged twin fetuses born to Petitioner;
- E. Schedule an evidentiary hearing on the issue of Rule 26 sanctions, attorney's fees, and to make factual findings consistent with the above;
- F. For such other and further relief as the Court deems just and proper under these circumstances.

RESPECTFULLY SUBMITTED this 3rd day of January, 2024.

WOODNICK LAW, PLLC

Gregg R. Woodnick

Isabel Ranney

Attorneys for Respondent

ORIGINAL of the foregoing e-filed this 3rd day of January, 2024 with:

Clerk of Court

Maricopa County Superior Court

COPY of the foregoing document

delivered/emailed this 3rd day of January, 2024, to:

The Honorable Julie Mata

Maricopa County Superior Court

Alexis Lindvall

MODERN LAW

1744 S. Val Vista Drive, Suite 205

Mesa, Arizona 85204
<u>Alexis.lindvall@mymodernlaw.com</u> *Attorney for Petitioner*

By: <u>/s/ MB</u>____

VERIFICATION

I, CLAYTON ECHARD, declare under penalty of perjury that I am the Respondent in the above-captioned matter; that I have read the foregoing Response/Objection to Petitioner's Motion to Dismiss Petition to Establish Paternity, Legal Decision-Making, Parenting Time, and Child Support With Prejudice and I know of the contents thereof; that the foregoing is true and correct according to the best of my own knowledge, information and belief; and as to those things stated upon information and belief, I believe them to be true.

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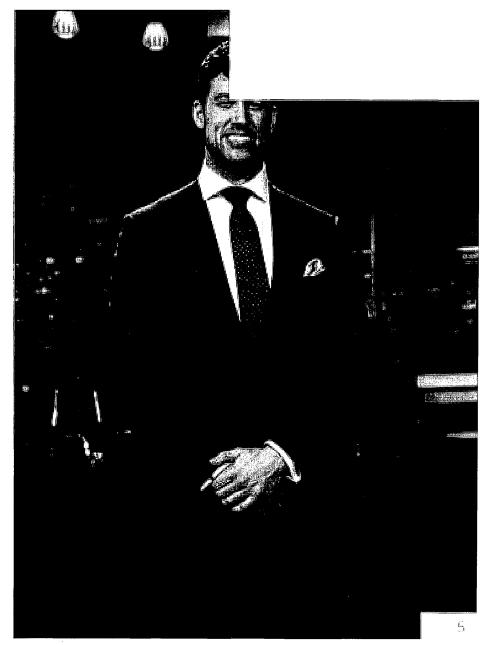
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BABY BOMBSHELL Bachelor Clayton Echard's ex-fling claims she's 'no longer pregnant' after demanding he take paternity test in court

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Arizona court filing.



Clayton Echard's ex-fling has claimed she's no longer pregnant, according to court docs exclusively obtained by The U.S. Sun Credit Gatty

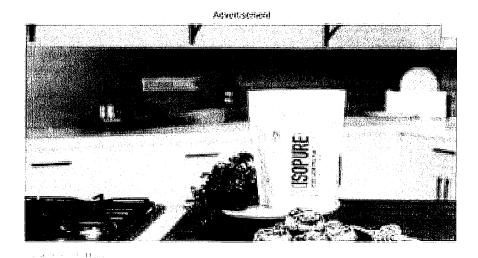


The Bachelor star was sued in August after an anonymous woman said she was pregnant with his twins Credit Instagram/@daytonechard

On December 28, the former <u>Bachelor's</u> ex-fling filed a motion to dismiss with prejudice her petition that was initially filed in August to establish paternity, legal decision-making, parenting time, and child support.

With prejudice means the case can be dismissed permanently and not be brought back to court.

pregnant with Respondent's child, meaning there is no paternity to establish."



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She continued: "There is nothing left for this Court to adjudicate, and this case should be dismissed."

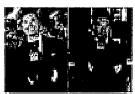
The Petitioner further described her current state as "not now pregnant."

She initially said she expected to give birth to twins on February 14.

There was no explanation given as to what had happened



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actorney's fees and costs and a virtual evidentiary hearing to hash things out between her and Clayton through the court.

The U.S. Sun has reached out to the Petitioner for comment.

Clayton, for his part, told The U.S. Sun in a statement: "This filing by her was not a surprise to me, as not only is she 'no longer pregnant,' but she was never pregnant at any point in time with my children.

"My hope is that the judicial system will bring her to justice here soon through exposing the many false accusations that she has made."

After publication, the Petitioner told The U.S. Sun that she "firmly stands by everything" she had previously claimed and that she had a positive pregnancy test at one point, which was also documented in court clocs, that "confirmed" her pregnancy and "was corroborated by a test at a medical facility."

MONEY TROUBLES

The anonymous woman has argued in the court docs that Clayton "crowd-sourced his attorney's fees through GoFundMe" Clayton's goal on the GoEundMe page is \$10,000.

The fundraiser was organized by a person named Dave Neal, who said that Clayton "can use the help of friends and family that want a fair legal battle."

He also noted that Clayton "never wanted to ask for a handout."

The exact amount of attorney's fees the Arizona realtor needs to pay has not been indicated online or in court docs.

CLAYTON FIGHTS BACK

Prior to the Petitioner filing her motion to dismiss, Clayton filed an expedited motion to extend the dismissal date on the inactive calendar since the case was set to be dismissed on February 2.

He requested in a December 13 filing, obtained by The U.S. Sun, that an evidentiary hearing be set since, at the time, he wanted proof from his ex-fling that she was progrant since he had not received any proof to date.

He argued: "Petitioner has never provided Respondent with any substantive proof of her alleged pregnancy and all paternity tests have indicated there is 'little to no fetal DNA."

He then claimed that she provided a video of a sonogram that appeared to have been "borrowed" from a YouTube video from seven years ago.

He believed the video showed her "pregnant stomach," which he also believed was "edited and/or depicts Petitioner wearing a fake stomach."

The TV personality also claimed she "has not provided any verified sonogram reports, fetal anatomy scans (required at 18-22 weeks), sonogram images from various checkups showing the progression of the pregnancy, or any additional medical information that would be typical of the high-risk pregnancy with twins that Petitioner is claiming."

He also noted that she took three <u>paternity tests</u>, two of which showed little to no fetal DNA and one was reportedly lost in

In his affidavit, the Missouri native shared with the court details of his sexual encounter with the Petitioner.

"[Petitioner] and I had one sexual encounter on May 20, 2023 where she performed oral sex on me," he wrote.

"We never had sexual intercourse or engaged in conduct that could lead to conception."

He then went on to claim that she went to court after he "did not want to have any relationship with her, romantic or otherwise, after she performed oral sex on him on May 20, 2023."

Clayton claimed in his amended response filed December 12: "Petitioner drafted a 'contract' for Respondent to sign that promised 'for a period of one week, while determining the best court [sic] of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with 'intention'."

The ex-fling had reportedly wrote in the relationship contract: "I have offered to give you control over the outcome of the pregnancy if we date exclusively and care for one another."

Clayton was granted an injunction against harassment during a hearing that took place on November 2 in Maricopa County.

This was ordered after Clayton had brought to the court's attention that the mystery woman had sent "over 500 messages from different phone numbers and email accounts."

He informed the court: "Upon information and belief.
Petitioner suffers from mental health issues, and has caused Respondent to become concerned that she is stalking him."

Separately, the pedcast host was given an order of protection against Clayton on October 6, according to court documents obtained by The U.S. Sun.

She claimed in the docs that Clayton had sent her threatening and harassing messages.

"All of this has led me to feel extreme anxiety and fear for my safety," she noted in the filing.

While the majority of Bachelor Nation has remained silent during the proceedings, Clayton's ex, <u>Susia Evans</u>, spoke out in an interview with The U.S. Sun.

"I've always known Clayton to be a very honest human being, a very good person, and I think that what he's going through is really unfortunate," Susie, 30, said back in November.

The Season 26 contestant is standing by Clayton, but does not know exactly what went down between him and the anonymous girl.

"At the end of day, yeah, you want to know what happened, but based on what I've been told from Clayton and then also what I've seen kind of publicly. I think it would be really hard to believe at this point that there's any reason to believe that he's the father." The Bachelor alum remarked.

The "friendly exes" have been in touch since announcing their breakup in a joint Instagram post in September 2022.

Despite living in different states - him in <u>Arizona</u> and her in <u>California</u> - the former couple catches up from time to time.

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Susie continued: "I think we went through something really traumatic together. And so I think he'll always have a place in my heart."

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Clayton's nasty court battle has taken a turn after his ex-fling revealed she was not now pregnant Credit Instagram/Clayton Ethasd

Bochelor Clayton Echard's ex-fling claims she's 'no longer pregnant' after demanding he take paternity tast in court The US Sun

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Clayton and the mystery woman are now battling over attorney's fees and costs Credit: Getty

1/3/24, 9:49 AM

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Clatyon's ex Susie Evans told The U.S. Sun that what the reality star is going through is 'really unfortunate,' but she's standing by his side Credit: Getty

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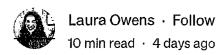


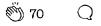
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Unveiling the Unbearable: My Battle Against Cyberbullying and Online Harassment







It's incredibly hard to put this into words and share what's been going on. I've never asked my friends or family for emotional support, but I'm feeling truly shattered, defeated, mentally drained, and worthless due to the events of these past several months. I have been the subject of a smear campaign that I wouldn't wish on my worst enemy, and the target of cyberbullying, cyberharassment, and cyberstalking at a level that I truly think no one would believe was imaginable. My heart has been torn to shreds, and it seems like nobody beyond my family truly sees or understands who I am anymore. Maybe that's my fault, since the sheer embarrassment of it all has been so overwhelming that I've found myself hiding from the world.

Since around mid-September, I've been noticeably absent from social media and pretty much detached from the life I used to lead. I can count on one hand the times I've stepped out of my home since then, but the number of times I've found myself in tears is beyond calculation. Earlier this morning, around 4:30, I found myself on the floor, overwhelmed with emotions,

feeling more bullied and alone than I've ever felt. It struck me that maybe it's time to stop concealing what I've desperately tried to keep under wraps for months now. I've come to understand that by not being public about what I'm struggling with, I've made this battle harder for myself. It's now abundantly clear that the only way to stand up to bullies is by confronting them directly.

I know that some of you caught wind of the rumors that I got pregnant by Clayton Echard, the star of The Bachelor's season 26. Clayton had briefly been my real estate agent, and during a May evening, our professional dealings turned into something more personal. Following three positive pregnancy tests — one taken at home, another at an urgent care center, and the final one done in Clayton's presence — it was evident that I was indeed expecting. Soon after, I discovered I was pregnant with twins, and I knew with 100% certainty that he was the father. Clayton went radio silent when it came time to take a paternity test, despite my persistent requests — twentynine times, to be exact — at a lab he had selected previously. When he finally responded, he dared me to reach out to the tabloids, a move I knew would compel him to comply with the test. Before the news hit the public, I pleaded with the media to keep my identity under wraps, and they agreed. However, their description of me as the "anonymous woman" contained enough details for those familiar with me to make connections and for strangers to track me down online.

Like many, I was familiar with Reddit before news about my pregnancy became public, but I had no grasp of the level of dedication its members had. Shortly after the initial articles surfaced, a friend reached out, informing me that self-proclaimed "sleuths" were actively discussing and mentioning me by name in "subreddits" centered around *The Bachelor*. There was a barrage of misinformation circulating, and initially, I wrote back to

correct those who were getting the facts twisted. However, these so-called 'keyboard warriors', shielded by anonymous usernames, only seemed to intensify their interest in my life once they knew I was engaging with them.

Things took a truly devastating turn when an abusive ex decided to reach out to Clayton, telling him that I had 'done this before'. He was referring to two prior pregnancies — a part of my life I've guarded fiercely, not just from the wider audience I'm speaking to now, but from everyone. Rather than having a private discussion with me about it, Clayton broke the news to his hundreds of thousands of followers, and Redditors, like relentless detectives, latched onto this snippet of my personal history. They dove deep into my life, tearing through layers I desperately wanted to keep hidden and, truth be told, deservedly so. My life was becoming a mere public spectacle, and it caught the eye of a *Bachelor* content creator named Dave Neal, a major figure on Reddit, who has completely turned my world upside down.

Dave has blatantly victim-shamed me for my reproductive decisions, stating that my life would hold no interest for him if it weren't for two prior abortions. The source of the misinformation he's spreading traces back to two men I'd been pregnant by before. Their animosity against me, triggered by the restraining orders I have against them, is the driving force behind the distorted tales being circulated about me, and ones they have shared with Dave. They supplied him with court documents containing entirely baseless, never-seriously-considered-by-a-judge claims about me, which Dave has disseminated as if they were factual. Although their accusations were unequivocally untrue, they were mortifyingly embarrassing and not something I wanted anyone to know. My decision to stay silent inadvertently bolstered Dave's platform, giving him free rein to harass me without facing any consequences.

The allegations they had previously made against me in response to cases I filed against them were horrendous, alleging that I falsified my pregnancies, tampered with records regarding my past pregnancies, and fabricated the severity of the injuries I sustained due to abuse. In a desperate effort to get him to stop spreading false and extremely damaging information about me, I offered to sign a release to have my previous pregnancy records sent directly to him from my providers. I sent him proof that I was one of only 630 patients accepted into the Domestic Violence Brain Injury Program at Barrow Neurological Institute, the only one of its kind in the nation, as a result of "multiple strangulation injuries" resulting in me developing epilepsy. However, he ignored my offers, revealing that he cared little for the truth.

Dave's motivation in continuing to create content about me has been the massive surge in viewers and listeners on his monetized platforms by peddling sensationalized, entirely untrue tales about my life. He claims that he "doesn't take a shit without monetizing it", and so his motivation is clearly financial. Dave puts out so much content that it feels like doing damage control is a full time job: he posts three shows, usually one about me, to YouTube and two podcasts a day. Each time, it sparks a fresh wave of discussions that only add more fuel to this never-ending fire.

Dave's enormous following on Reddit has made my life incredibly difficult. They've created countless threads in Bachelor-related subreddits, and in the ultimate showing of targeted harassment, one person even went as far as creating a subreddit in my name just to bully me. I was taken aback when I read a post purported to be from a high school peer with outrageously farfetched and blatantly false allegations, claiming that during that time, I was pregnant by multiple men, including a special needs student and fathers of my peers. One fabricated story claimed that my father offered one student

\$6000 to buy new speakers for his car if he would date me for a month. The reality was quite different — I was extremely introverted throughout high school, never attended a party, and had my first kiss during the week of graduation. These claims hold no resemblance to reality, yet they've left me feeling utterly powerless and deeply ashamed. It feels as though the reputation I painstakingly built and every achievement I've held dear have been ruthlessly torn apart and relentlessly mocked in profoundly disheartening posts.

The comments said about me have been brutal, such as, "I hope she's an organ donor so something good can come out of her pathetic existence", and that I am "a complete waste of skin and bones". I've been told to kill myself, with comments suggesting it might help my family move past the supposed disgrace they claim I've brought upon them. My dad's Wikipedia has even been edited several times by trolls to state that he only has one daughter, my sister.

Dave claims to have only referred to me by "Jane Doe", but my name has appeared in his content many times, and his fixation on me has reached the level of an obsession. Since September, he's churned out over fifty videos about me, boldly claiming that the count might escalate to "more than one hundred and forty" as he continues to probe into my life. Moreover, he's generated well over a hundred hours of podcast content solely focused on me and actively pursued opportunities to appear on any podcasts, offering to fly anywhere in the country to do so, because he is so eager to discuss my life through his lens of lies.

I would be lying if I said I wasn't afraid of Dave. During one of his live streams, he inadvertently displayed a map leading to my home. In an interview just this week, his comments became even more alarming as he said he wished I had been a passenger on the missing Malaysian flight 370. Adding insult to injury, he shamelessly exhibited a picture of me in a bra with an exposed pregnant belly during one of his episodes. When I requested its removal, he callously dismissed my concerns, laughing as he told his audience, "Bra or no bra, who cares?". He's joked about me having a miscarriage, which is something that is not remotely funny.

As a last resort, I filed for an Injunction Against Harassment against Dave due to his obsessive interest in me and his flat out refusal to stop making videos and podcasts about me when asked. However, when I informed him that he would be served by a process server, he turned the tables. Deceptively, he began painting himself as fearful of me. His followers swiftly joined in, spreading these unfounded notions that I might pose a threat. I've been called "unhinged" an innumerable amount of times and his followers have posted countless times that I need to be institutionalized. It's been outrageous, entirely unwarranted, and incredibly upsetting.

My physical appearance has been a relentless subject of mockery. Multiple memes have been created, emphasizing my looks and targeting me with hurtful comments about my looks. People claimed to be stunned that Clayton chose to be intimate with me for just one night after having numerous beautiful women to select from during his time as The Bachelor. Clayton himself mentioned I didn't look as pretty as I appeared in some Instagram photos he scrolled through.

I thought that maybe if I were able to change my identity on the outside, I might get back to feeling like myself on the inside. After a lot of thought, I decided to file for a legal name change, which was discovered by Dave the day after I filed the petition with the court, and my new identity as Emily

Wilson was disclosed to his audience, making it obsolete. I felt like I had run out of ideas to escape the relentless nightmare I was living in.

My integrity means everything to me. I've never lied about being pregnant nor the extent to which I've been abused, and I have medical records to back both of those things up. However, I won't be sharing updates regarding the status of my pregnancy with Clayton. I kindly ask not to receive congratulations or engage in discussions about Clayton and my pregnancy. This post is not intended for that purpose. What I can confirm is that I sought an order of protection against him. Despite my only sending him pregnancy updates, interestingly, a month later, he obtained an Injunction Against Harassment against me.

Dave's followers have chosen to write my full name on Reddit and in the comments sections on his YouTube videos because they say that in doing so, they will alter the SEO algorithm so that these blatant lies about me are shown at the top of Google search results. He has incited hatred, harassment, and threats against me, and I am just exhausted from it.

Over the last few months, I've often questioned: What is the allure of a 33-year-old woman, confirmed to be pregnant three times, to him and his audience? How much more content can he create, and how much more can I take? Although I would be more than entitled to file a defamation lawsuit against Dave, I have no desire to have my life drained by the legal system and simply want him to stop and remove the videos. If you want to watch how cruelly, and flat-out bizarrely, Dave has spoken to and about me, you can watch this video.

I'm sure this post will spark more hateful content from Dave, and he will incite his followers to make more cruel comments about me. Despite

outwardly claiming to my family that I've become desensitized to anything that can be said to me at this point, Dave's videos still deeply affect me, as do the words of his supporters. While I *know* I will advocate against cyberbullying in the future, right now, I just wish for this torment to stop. His relentless bullying has pushed me to the brink, causing moments where I've felt close to the edge of despair. I've even expressed to him that the blood would be on his hands if I harmed myself due to his relentless harassment, but it had no impact on him. It just provided him with something else to talk about on his shows. And why would he stop talking about me? Spreading misinformation generates profit for him, and that appears to be his sole concern. It's an ongoing struggle to try to rise above this situation.

My life has changed after witnessing how cruel people can be, and while I'm a changed person after all of this (how could I not be?), I still want to be Laura Owens, not Emily Wilson. I'm anxious about how people might perceive me once I share my story, but holding all of this inside hurts. In the face of relentless cyberbullying, I yearn for the torment to cease, hoping that someday, my story will speak louder than the falsehoods, and the strength I find within will reclaim the identity they sought to shatter.

Cyberharassment

Cyberbully

Struggle

Overcoming Obstacles

Empowerment



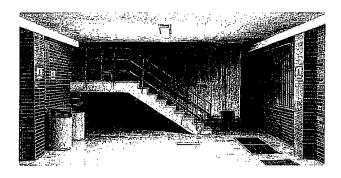
Written by Laura Owens



9 Followers

Sharing my story isn't about seeking sympathy; it's about reclaiming power, standing up against online abuse, and empowering others along the way.

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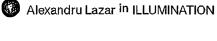


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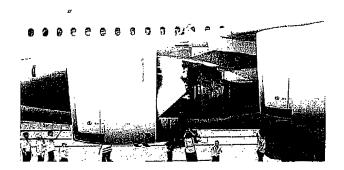
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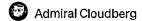
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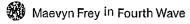




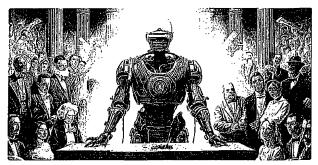








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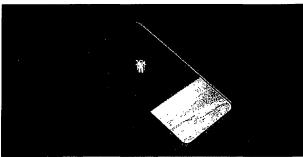
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EXHIBIT 4

To: Scottsdale Police Department

Report prepared by: Laura Owens

Subject: Threats, intimidation, verbal abuse, endangerment and extortion from Clayton Echard

Date: July 31, 2023

To Whom It May Concern:

Clayton Echard is the father of my unborn twins. When I told him I was pregnant, he started writing erratic, illogical and threatening messages. He has been clear that being a father has not been in his life plan and would get in the way of his dating and professional life. These would be followed by periods of silence and him blocking me, then unblocking me to demand alternative forms of proof of pregnancy beyond the medical report I had provided him from Banner Health Urgent Care confirming it.

Clayton has said he would file legal charges (criminal fraud) against me for stating that he is the father of my unborn twins. Extortion is a crime under ARS 13-1804. He alleges I am being untruthful; however, I have even done a test in front of him that he purchased himself. It was positive. In addition, he has been provided with medical test results, recorded phone calls with doctor's offices confirming the viability of the pregnancy, and screenshots of my patient portals. I also agreed to take a prenatal paternity test through a lab he found called Ravgen, but he has now gone MIA and will not allow me to schedule the test, which would prove to him once and for all that the twins are his. Finally, I told him that I would sign a HIPAA release to allow him to speak to any and all of my medical providers regarding the validity of the pregnancy.

I have included written correspondence with Clayton to date that clearly demonstrate his potentially violent, threatening and intimidating behavior. I have invited him to attend a doctor's appointment on August 7th at Scottsdale Permatal Associates with Dr. Makhoul for a consultation and ultrasound. His paranoia extends to the level that he believes I will have hired someone to pretend to be a doctor and who will confirm the pregnancy. He simply refuses to believe that I am pregnant, despite seeing a test with his own eyes, and that he is the father, despite my willingness to take a paternity test.

Clayton also demanded contact information for my abusive ex, whose attempts to kill me I did a TEDx talk about, and which Clayton linked to in the message fer his request. I have a CLETS restraining order against the man he wanted to speak to, and engaging him in communication would put me in a vulnerable position. Endangerment is a crime under ARS 13-1201.

I am very concerned about my safety and I don't know what actions Clayton will take because he is so votatile, controlling, demeaning and hateful. I have asked him on many occasions to reassure me that he will not hurt me or our unborn babies, and he will not respond to that simple question. I told him I would file a police report if he didn't. I have proof that Clayton has read

those messages, which I am attaching. Crimes of intimidation and threats, by word or conduct, are listed as a criminal offense under ARS 13-3601.

A domestic violence offense against a pregnant person is a felony offense under ARS 13-3601. For all of the reasons above, I am concerned that Clayton will cause physical harm/injury to me. Please enter all attached documents and recordings into evidence and include them with this report.

Thank you,

Laura Owens





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EXHIBIT "5"

From: Alexis Lindvall .

Sent: Thursday, December 28, 2023 12:57 PM

To: Isabel Ranney 4

Cc: Gregg Woodnick ≤

Tiffany Benz ·

; Sarah Saxon

Subject: Re: Owens/Echard

Isabel,

By now you have probably seen the motions that we filled earlier today. Is your client willing to postpone the deposition until we have a ruling on the dismissal? If not, I will be filing an expedited Motion to Quash the deposition sometime tomorrow. Even if it is not quashed, I am not available on 1/12 at 9:00 a.m. I have a hearing in a dependency matter scheduled for 10:45 a.m. (I am assuming you plan to depose my client for a while).

Laura is not willing to commit perjury by signing the Affidavit you sent over. The Court will not be able to order her to sign it. She concedes she is not pregnant. There cannot be a finding of non-paternity for a non-existent child. Clayton's only viable claim at this point is for attorney's fees. If he insists on proceeding with a deposition when a motion to dismiss is pending, he's racking up needless fees.

Please let me know whether you will agree to postpone the deposition as soon as possible. If I don't hear from you or If you don't agree, I will proceed with filing the Motion to Quash.

Thank you,

Lexi Lindvall, Esq. Attorney i Modern Law

Mesa | Peoria | Scottsdate www.mymodernlaw.com

Modern law is a paperless office and hard copies of documents will not be mailed unless requested. ***

This email contains confidential, legal information. If you realize this email was not intended for you, please ignore the content, immediately notify me that you received it, then delete it. Otherwise bad legal stuff could happen.

Please be advised, this communication does not constitute an agreement pursuant to Rule 69, Arizona Rules of Family Law Procedure. Any statement concerning settlement is made pursuant to Rule 408, Arizona Rules of Evidence, and shall be considered protected from use in any future litigation.

Lexi,

Please see the attached Notice of Deposition for your client at our office on January 12, 2024 at 9:00 a.m. If this time does not work for you, we are also available on January 17th at 9:00 a.m. or 1 p.m. I am more than happy to reschedule it to better accommodate your schedule, but our preference is sooner rather than later.

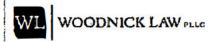
You will also find attached Exhibit A, consistent with Rule 57(b)(2), Arizona Rules of Family Law Procedure. This was initially sent to your client weeks ago, so she is well aware of her Rule 49 disclosure obligations as well as her duty to produce the documents requested. If you need me to send along a blank HIPAA release for your client to sign, I am happy to do so (one was included in our December 12th email to her).

Thank you,

Isabel Ranney

ISABEL RANNEY

Attorney



1747 E. Morten Ave., #205

Phoenix, Arizona 85020

Phone: 602-449-7980

Fax: 602-396-5850

www.woodnicklaw.com

Email

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From: Isabel Ranney Sent: Wednesday, December 27, 2023 3:58 PM To: Alexis Lindvall
Cc: Gregg Woodnick ≤ ; Sarah Saxon
Subject: Owens/Echard
Lexi,
I am glad you are involved in this case, and I am happy that Laura found another attorney. As you are aware, there has been a parade of counsel with the collateral (and malignant) litigation here, but I am confident that this chapter could end with your help. As we discussed, I am attaching the draft Stipulation with an Affidavit for Laura to sign confirming that she was never pregnant by Clayton.
Laura's behavior has been in the realm of abominable. It is publicly known that my office represented Mr. Gillespie who dealt with nearly <i>identical</i> allegations (yes, Laura attempted to secure that relationship with a similar fake twin pregnancy).
What we are not going to have here is a situation where Laura attempts to spin this into her saying she was bullied into a "miscarriage" (which appears to be her plan, given her December 8th Medium article and recent Facebook videos [available online]). Your client has used her public social media platform before (her January TedTalk, the Medium

article, her Reddit and public Facebook posts). While Clayton cannot stop Laura from fabricating nonsense for another TedTalk, Clayton can insist that this Title 25 court make appropriate findings and address attorney's fees based on a mailgnant filing.

To be clear, you client has already, under oath (it is public in video), claimed that she was 24 weeks pregnant (in addition to the verified Petition she signed, Medium.com article she wrote, and press releases to the Sun, Daily Mail, and whomever else she reached out to). Frankly, we do not believe she was EVER pregnant, and certainly not by

Clayton. We also do not believe she had a miscarriage (impossible to have without a pregnancy). Additionally, though your client may claim that she was pregnant at some point (or whatever she is claiming), she did state under oath in **November** that she was being seen by various pregnancy specialists (Dr. Makhoul, Dr. Higley, Dr. Jones, and Tamara Lister, NP).

At an evidentiary hearing, we would demand documentation that would show (or not show) that she informed these doctors that she had miscarried (or otherwise lost the pregnancy) in her second or third trimester. And, of course, medical records with verifiable medical documentation to support the same as a miscarriage at 24 weeks would require comprehensive medical attention, if not full hospitalization. (See https://www.mayoclinic.org/diseases-conditions/pregnancy-loss-miscarriage/diagnosis-treatment/drc-20354304; D&C Procedure After a Miscarriage: Risks & Complications (americanpregnancy.org)). Arizona law also requires a fetal death certificate to be filed within 7 days of fetal death where the fetus is past twenty (20) weeks or 350 grams in weight. A.R.S. 36-239.

To be clear, a letter from a care provider that states she had a miscarriage will not suffice — we will request <u>all</u> medical records from every provider she testified to being seen by under oath in the injunction hearing in November. Recall, there is a history here of providing correspondence that the authors deny having written. We will not accept an arts and crafts project from your client, as Clayton is entitled to all of the relevant records from the source.

This resolves, now or in court, with Ms. Owens admitting she was never pregnant by Clayton. Her exposure at the evidentiary hearing (which we will insist on) is testimony and evidence before the Court that she was <u>never</u> pregnant by anyone and that she fabricated medical documents (in addition to repeatedly lying under oath).

I appreciate that your client wants to put an end to this. Due to her past behavior, we have legitimate concerns that this will become another situation where she runs to an outlet (TedTalk/Medium/etc) to clear her own image with a fabricated story after she brought this upon herself by filing her Petition and reaching out to social media. The proposed language in the Exhibit A will prevent her from doing this. As you are aware, your client has a history of lashing out against anyone who sees the world differently than she does (that appears to be most people). Be it the Bar complaints, allegations that I was somehow involved in coordinating a sexual assault on her, claiming under oath that Mr. Gillespie hacked into her email accounts and fabricated text messages, etc.

She even lashed out at Clayton, contacted his family, slandered him impacting possible work opportunities, and overtly attempted to harm his reputation, all based on the most unhinged effort to preserve a relationship that never was. She can end this Title 25 matter by acknowledging **she was never pregnant by Clayton**. If she has any desire to hang onto this myth that babies can arise from non-intercourse, then she is going to have to file her Motion to Dismiss with Judge Mata and we will respond demanding our evidentiary hearing and pursuing this for attorney's fees and a finding of non-paternity.

I do not know what motivated Laura here. Be it serious mental health issues or a con gone rogue to persuade men into staying in relationships with her, what we do know is that it was never predicated on evolutionary biology or the

science of reproduction. If she wants to move on from this family court matter in Maricopa County Superior Court, she needs to fully acknowledge that she was never pregnant by Clayton.

No, Clayton will not agree that this be under seal or to limit his own ability to address the reputational damage caused by your client's behavior.

DICTATED

Gregg Woodnick

ISABEL RANNEY

Attorney



1747 E. Morten Ave., #205

Phoenix, Arizona 85020

Phone: 602-449-7980

Fax: 602-396-5850

Ema _____

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AFFIDAVIT I, LAURA OWENS, being duly sworn upon my oath under penalty of perjury, depose, and say: 1. I was never pregnant with Clayton Echard's child or children. 2. Consistent with this affidavit, in Family Court in Maricopa County under cause number FC2023-052114, I am asking the Court to dismiss my Petition to Establish Paternity, Legal Decision-Making, Parenting Time and Child Support with prejudice. Laura Owens STATE OF ARIZONA)ss. County of Maricopa SUBSCRIBED AND SWORN to me before this ____ day of _____, 2023, by Laura Owens. My Commission Expires: Notary Public

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David S. Gingras, #021097

Attorney for Petitioner Laura Owens

MARICOPA COUNTY SUPERIOR COURT STATE OF ARIZONA

In Re Matter of:

LAURA OWENS,

Petitioner,

And

CLAYTON ECHARD,

Respondent.

Case No: FC2023-052114

MOTION IN LIMINE

(Assigned to Hon. Julie Mata)

(ORAL ARGUMENT REQUESTED)

Pursuant to Rule 35(a)(a) and Rule 65(b), Ariz. R. Fam. L. P., and Rule 404(b) of the Rules of Evidence, Petitioner Laura Owens ("Ms. Owens" or "Petitioner") moves for an order excluding the testimony of three witnesses: 1.) Greg Gillespie; 2.) Michael Marraccini; and 3.) Matthew Mulvey. As explained below, these three witnesses should be precluded from testifying at trial in this case for two different reasons.

First, it appears Respondent intends to call these witnesses for the sole purpose of establishing they had *similar experiences* with Ms. Owens; i.e., each witness may claim Ms. Owens "faked" a pregnancy while in a relationship with them, thus "if she did that to me, she must have done the same thing to Mr. Echard." Such "other wrongs" testimony is plainly inadmissible in this case pursuant to Rule 404(b) of the Arizona Rules of Evidence.

Second, each of these witnesses should be precluded from testifying pursuant to Rule 65(b)(1) because Mr. Echard has failed to comply with the disclosure requirements of Rule 49(a). In short, Mr. Echard has provided zero disclosure "fairly describing the substance of each witness's expected testimony", leaving Ms. Owens and undersigned counsel to guess as to what, if anything, each witness intends to say. For that reason, separate and apart from the issue of Rule 404(b), none of these witnesses should be allowed to testify at trial.

I. DISCUSSION

a. Respondent Has Failed To Timely Disclose Information Required By Rule 49(i)

Taking the easiest issue first, the Court should issue an order precluding Mr. Echard from calling Greg Gillespie, Michael Marraccini, or Matthew Mulvey on the basis that Mr. Echard has failed to timely disclose these witnesses as required by Rule 49(i). The text of that rule is clear: "Each party must disclose the names, addresses, and telephone numbers of any witness whom the disclosing party expects to call at trial, along with a statement fairly describing the substance of each witness's expected testimony."

The purpose of this rule is well-settled; the disclosure rules are intended to avoid unfair surprise at trial. *See Carlton v. Emhardt*, 138 Ariz. 353, 355, 674 P.2d 907, 909 (App. 1983) ("[T]rial by ambush is a tactic no longer countenanced in Arizona courts.") Adequate disclosure "should fairly expose the facts and issues to be litigated, as well as the witnesses and exhibits to be relied upon." *Jimenez v. Wal-Mart Stores, Inc.*, 206 Ariz. 424, 426 (App. Div. 2 2003).

Although this is a somewhat flexible standard, disclosures which only outline issues "summarily" are *per se* insufficient to satisfy the rule. *See Bryan v. Riddel*, 178 Ariz. 472, 477, 875 P.2d 131, 136 (1994) (finding disclosure statement did not contain sufficient detail to comply with the rule where it simply stated witnesses would testify about "all matters referred to in deposition" or "all matters in the complaint of which the witness has knowledge.")

Here, the disclosures provided by Mr. Echard concerning the <u>substance</u> of anticipated testimony from Messrs. Gillespie, Marraccini and Mulvey fail to offer *any* insight into what, if anything, each witness will say. Specifically, as to Mr. Mulvey, the entirety of Mr. Echard's disclosure was as follows: <u>"This witness is expected to testify about his prior interactions with Petitioner, including his personal knowledge about her alleged fabricated pregnancy back in 2014."</u>

A single sentence identifying "prior interactions" with Ms. Owens and generally referring to an "alleged fabricated pregnancy" does nothing to identify the <u>substance</u> of what Mr. Mulvey plans to say about those topics. Based on the lack of any substance to this disclosure, it is entirely possible Mr. Mulvey may appear at trial and say that he initially believed Ms. Owens "faked" being pregnant when she was with him, but he later realized his suspicious was groundless and he is now 100% certain that Ms. Owens was pregnant at the time. Or maybe he will say the exact opposite. Who knows? Because Mr. Echard has failed to disclose *anything* in terms of the substance of Mr. Mulvey's testimony, Ms. Owens has no idea what to actually expect.

The same problem exists with respect to both Mr. Marraccini and Mr. Gillespie. Contrary to the mandatory duties imposed by Rule 49, Mr. Echard has disclosed literally nothing about the <u>substance</u> of what either of these witnesses intends to say. Given that trial is barely 40 days away, Mr. Echard's failure to comply with his disclosure obligations is inherently prejudicial and inexcusable, meaning the only appropriate remedy is exclusion. See Zuern by & Through Zuern v. Ford Motor Co., 188 Ariz. 486, 489 (App. Div. 2 1996) (affirming exclusion of late-disclosed information on the basis untimely disclosure occurred less than 60 days before trial). See Family Law Rule 65(b)(1)(B) (where party fails to timely disclose information, the Court may issue order "prohibiting the disobedient party from supporting or opposing designated arguments, or from introducing designated matters in evidence")

Because Mr. Echard has failed to timely disclose information about the substance of these witnesses' testimony, he should be precluded from calling them at trial.

b. Evidence Of "Other Wrongs" Is Inadmissible

Mr. Echard has made public statements claiming he believes Ms. Owens "faked" pregnancies with one or more prior boyfriends including the three individuals listed here 1.) Greg Gillespie; 2.) Michael Marraccini; and 3.) Matthew Mulvey. As noted above, Mr. Echard has *not* formally disclosed anything about the substance of each witnesses' expected testimony beyond an extremely general suggestion each witness will say *something* about a past experience with Ms. Owens involving an "alleged" fake pregnancy.

This type of "other wrongs" evidence is inadmissible under Rule 404(b) of the Arizona Rules of Evidence. That rule provides: "Except as provided in Rule 404(c) evidence of other crimes, wrongs, or acts is not admissible to prove the character of a person in order to show action in conformity therewith." (emphasis added).

Rule 404(b) is simple. It provides when a person is accused of a specific act of wrongdoing in Case #1, it is improper to prove guilt (or civil liability) by offering evidence the person did something similar in Cases #2, 3 or 4. See, e.g., Elia v. Pifer, 194 Ariz. 74, 79 (App. Div. 1 1998) (concluding under Rule 404(b), "Character evidence [of other wrongs] is barred because it has slight probative value and because admission of such evidence gives rise to a strong likelihood of prejudice. Such evidence subtly permits the trier of fact to reward the good man and to punish the bad man because of their respective characters despite what the evidence in the case shows actually happened.") (cleaned up) (quoting Bell v. State, 143 Ariz. 305, 308, 693 P.2d 960, 963 (App. 1984)); see also State v. Jones, 188 Ariz. 388, 395 (Ariz. 1997) (evidence one child was given a "hard spanking" by mother inadmissible under Rule 404(b) to prove mother injured different child on different occasion); Hudgins v. Southwest Airlines, Co., 221 Ariz. 472, 483 (App. Div. 1 2009) (evidence showing party broke the law in past was "explicitly prohibited by Rule 404(b)" to show the same party broke the law on later occasion).

One of the clearest (and most analogous) examples of how Rule 404(b) applies in this situation occurred literally days ago, when the highest court in the State of New York

(the Court of Appeals) reversed the rape conviction of infamous movie producer Harvey Weinstein. In that case, Weinstein was convicted of sexual assault and rape as to three specific victims (identified as Victims A, B & C), but at trial, the prosecution allowed three *other* women to testify that Weinstein had also raped them.

The Court of Appeals explained this testimony violated a New York common law rule which is functionally identical to Arizona's Rule 404(b): "The general rule is against receiving evidence of another offence. A person cannot be convicted of one offence upon proof that they committed another" *People v. Weinstein*, 2024 N.Y. LEXIS 590 *22; 2024 NY Slip Op 02222 40, 49 (N.Y.App. April 25, 2024). The Court explained the rule exists to ensure basic fairness:

Testimonies from three individuals about their own unwanted sexual encounters with defendant were therefore "unnecessary". Instead, the testimony served to persuade the jury that, if he had attempted to coerce those three witnesses into nonconsensual sex, then he did the same to the victims on the dates and under the circumstances as charged. That is pure propensity evidence and it is inadmissible

Over a century later, we reaffirm that no person accused of illegality may be judged on proof of uncharged crimes that serve only to establish the accused's propensity for criminal behavior. At trial, a defendant stands to account for the crimes as charged. Proof of prior crimes and uncharged bad acts are the rare exception to this fundamental rule of criminal law.

Id. at 2024 N.Y. LEXIS 590 *37-38, *49-50 (emphasis added).

Of course, Mr. Echard will surely note evidence of other acts *MAY* be admitted for some other purpose such as establishing "motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident." But in the unique context of this case, none of those exceptions apply. Evidence showing Ms. Owens made a false allegation of pregnancy in the past does <u>nothing</u> to demonstrate her "motive, opportunity, intent, preparation, plan" in <u>this</u> case. This is so because the alleged <u>motive/plan</u> here is entirely self-explanatory—Mr. Echard believes Ms. Owens faked being pregnant as a way of trying to "trap" him and/or to force him into continuing a relationship with her.

This theory is obvious on its face without the need for support from other witnesses. It is essentially a purely rhetorical argument that could be made in *any* similar situation (including in cases where the pregnancy results in the birth of a healthy child). Men who find themselves in Mr. Echard's position have *always* accused women in Ms. Owens' position of lying about being pregnant as a way of gaining leverage. That same classic theme forms the plotlines of countless films, including the 1987 thriller *Fatal Attraction* (in which Michael Douglas has an extra-marital affair with Glenn Close, who later claims she is pregnant, before she repeatedly stalks Douglas, kills his family's pet bunny by boiling it in a pot, and famously warns: "*I'm not gonna be ignored, Dan.*" 1).

If Mr. Echard believes Ms. Owens wanted to trap him, he does not need to call any other witnesses as backup. He can offer that argument based entirely on his own personal beliefs, and the Court can either accept it or reject it.

Of course, it is undisputed this "plan" did not work in this case (assuming a plan even existed, which Ms. Owens completely denies). After their one night together, Mr. Echard flatly refused to have any further romantic relationship with Ms. Owens. If Ms. Owens' intent was to "trap" Mr. Echard, that plan was a complete and total failure in every respect. In and of itself, this would strongly *negate* any suggestion Ms. Owens falsely claimed to be pregnant as part of some sinister plan.

Thus, even if Ms. Owens did somehow fake being pregnant in past prior cases (which she denies), that fact would have absolutely no bearing on the issue of whether she was actually pregnant in this case (a point which is supported by objective medical proof). These contested stories about past relationships do nothing (at least nothing meaningful) to support the idea Ms. Owens falsely claimed to be pregnant in order to trick or trap Mr. Owens into dating her.

Instead, Mr. Echard's intent here is obvious—he wants to offer testimony from one or more of Ms. Owens' past ex-boyfriends to show: "She lied about being pregnant with them, therefore she probably lied about being pregnant with me." As New York's highest

¹ See https://www.youtube.com/watch?v=KYKDX-egZjk

court explained in *Weinstein*, "That is pure propensity evidence and it is inadmissible" The same is true here.

II. CONCLUSION

For all the reasons stated above, Petitioner moves the Court for an order precluding Mr. Echard from calling Greg Gillespie, Michael Maraccini, and/or Matthew Mulvey as trial witnesses.

DATED April 30, 2024.



David S. Gingras
Attorney for Petitioner
Laura Owens

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

GOOD FAITH CONSULTATION CERTIFICATE

Pursuant to Rule 9(c) Ariz. R. Fam. L. P., the undersigned certifies that he has made a good faith attempt to resolve the issues in this motion by consulting with opposing counsel, but those efforts were not successful.

EXECUTED ON April 30, 2024.

David S. Gingras

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Original e-filed and COPIES e-delivered April 30, 2024 to:

Gregg R. Woodnick, Esq. Isabel Ranney, Esq. Woodnick Law, PLLC 1747 E. Morten Avenue, Suite 505 Phoenix, AZ 85020 Attorneys for Respondent



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

Representing: Respondent

SUPERIOR COURT OF ARIZONA IN MARICOPA COUNTY

In the matter of:

LAURA OWENS

Petitioner

VS.

CLAYTON ECHARD

Respondent

Case No.: FC2023-052114

SUBPOENA IN A FAMILY CASE

TO: MICHAEL MARACCINI

c/o Randy Sue Pollock, Attorney at Law

For Attendance of Witness at Hearing or Trial:

YOU ARE ORDERED TO APPEAR in the Superior Court of Arizona in Maricopa County at the place, date, and time specified below to testify at a trial in the above-named case, before:

Judicial Officer: The Honorable Julie Mata

Place: Northeast Regional Center

18380 N 40th St Phoenix, AZ 85032

Room: 102

Date: 06/10/2024

Time: 8:45 AM Arizona Time

Your Duties In Responding To This Subpoena

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

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

- (1) you timely object (see below, the procedures for objecting); or
- (2) you are not a party or a party's officer and this subpoen acommands you to travel to a place other than:
 - (1) the county where you reside or you transact business in person; or
 - (2) the county in which you were served with the subpoena or within forty (40) miles from the place of service; or
 - (3) such other convenient place fixed by a court order.

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

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

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

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

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

COMBINED SUBPOENA: You should note that a command to produce certain designated materials, or to permit the inspection of premises, may be combined with a command to appear at a trial, hearing or deposition.

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

Your Right To Object To This Subpoena

- I. If you have concerns or questions about this subpoena, you should first contact the party or attorney who served the subpoena. The party or attorney serving the subpoena has a duty to take reasonable steps to avoid imposing an undue burden or expense on you. The Superior Court enforces this duty and may impose sanctions upon the party or attorney serving the subpoena if this duty is breached.
 - You may object to this subpoena if you feel that you should not be required to respond. You
 must make any objection within 14 days after the subpoena is served upon you, or before
 the time specified for compliance, by providing a written objection to the party or attorney
 serving the subpoena. *
 - If you object to the subpoena in writing, you do not need to comply with the subpoena until
 a court orders you to do so. It will be up to the party or attorney serving the subpoena to
 seek an order from the court to compel you to provide the documents or inspection
 requested, after providing notice to you. *

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

- If you seek payment of expenses other than routine clerical and per-page costs as allowed by A.R.S. §12-351, you must object on the grounds of undue burden to producing the materials without the subpoenaing party's payment, and send an advanced estimate of those expenses to the subpoenaing party before the time specified for compliance or within 14 days after the subpoena is served, whichever is earlier. *
- You need not comply with those parts of the subpoena that are the subject of the objection,
 unless the Court orders you to do so. The court may enter an order conditioning your
 response to the subpoena on payment of your additional expenses, including ordering
 payment of those expenses in advance. *
- II. PROCEDURE FOR OBJECTING TO A SUBPOENA FOR ATTENDANCE AT A HEARING, TRIAL OR DEPOSITION:
 - Form and Time for Objection.
 - (i) A person commanded to comply with a subpoena may object to the subpoena in writing on the basis that the information requested is not reasonably accessible or because complying with the subpoena would cause an undue burden or expense. The objection must state the basis for the objection, and must include the name, address, and telephone number of the person, or the person's attorney, serving the objection. The objection must be served on the party or attorney serving the subpoena before the time specified for compliance or within 14 days after the subpoena is served,

whichever is earlier.

(i) A person served with a subpoena that combines a command to produce materials or to permit inspection, with a command to attend a deposition, hearing, or trial, may object to any part of the subpoena. A person objecting to the part of a combined subpoena that commands attendance at a deposition, hearing, or trial must attend and testify at the date, time, and place specified in the subpoena, unless excused from doing so by the party or attorney serving a subpoena, by a court order, or by any other provision of Rule 52.

B. Procedure After Objecting.

- (i) A person objecting to a subpoena to produce materials or to permit inspection need not comply with those parts of the subpoena that are the subject of the objection, unless ordered to do so by the issuing court.
- (i) The party serving the subpoena may move under Rule 65(a) to compel compliance with the subpoena. The motion must be served on the subpoenaed person and all other parties under Rule 43.
- (iii) Any court order to compel must protect a person who is neither a party nor a party's officer from undue burden or expense resulting from compliance.

C. Claiming Privilege or Protection.

- (i) A person withholding subpoenaed information under a claim that it is privileged or subject to protection as work-product material must promptly identify in writing the information, document, or electronically stored information withheld and describe it in a manner that, without revealing information that is privileged or protected, will enable other parties to assess the claim.
- (i) If information subject to a claim of privilege was accidentally produced in response to a subpoena, the party who accidentally produced the information may notify any other party that the information was privileged. After being notified of such a claim, a party who received the information has several obligations. They must promptly return, sequester, or destroy the information and any copies they have. They must not disclose the information until the claim is resolved, and if they have already disclosed it, they must take reasonable steps to retrieve the information. They must also present the information to the court under seal for a decision as to whether it is subject to privilege. The party who accidentally disclosed the information must preserve it until the privilege claim is resolved.

^{*}See Arizona Rules of Family Law Procedure (A.R.F.L.P.) Rule 52, and the "Your Right to Object to this Subpoena" section.

III. COURT MODIFIES or VOIDS (quashes) CIVIL SUBPOENA

- A. The court <u>must</u> quash or modify a subpoena if . . .
 - (1) the subpoena does not provide a reasonable time for compliance;
 - (2) unless the subpoena commands your attendance at a trial, if you are not a party or a party's officer and if the subpoena commands you to travel to a place other than:
 - a. the county in which you reside or transact business in person;
 - b. the county in which you were served with a subpoena, or within forty (40) miles from the place of service; or
 - c. such other convenient place fixed by a court order; or
 - (3) the subpoena requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (4) the subpoena subjects you to undue burden.
- B. The court <u>may</u> quash or modify a subpoena if . . .
 - (1) the subpoena requires you to disclose a trade secret or other confidential research, development or commercial information;
 - (2) you are an unretained expert and the subpoena requires you to disclose your opinion or information resulting from your study that you have not been requested by any party to give on matters that are specific to the dispute;
 - (3) you are not a party or a party's officer and the subpoena would require you to incur substantial travel expense; or
 - (4) the court determines that justice requires the subpoena to be quashed or modified.

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

- a. the party or attorney serving the subpoena shows a substantial need for the testimony or material that cannot otherwise be met without undue hardship; and
- b. the person's travel expenses or the expenses resulting from the production are at issue, the party or attorney serving the subpoena assures that the subpoenaed person will be reasonably compensated for those expenses.

ADA Notification

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

Interpreter Notification

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

SIGNED AND SEALED this 7th day of May, 2024 Jeff Fine, CLERK



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



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Incident Number 202400000846311	CFS Incident # 202400846311
Report Type	
Incident Report	Page 3 of 4
Date / Time Occurred	Date / Time Reported

						06/10/2024 00:	:00 to		06/10/202	4 08:17
Primary Langua	age	Nickname		Race VHITE	Sex MA		SSN	Date of Birth /1987	Age 37	Age Range to
Height	Weight	Driver's Li		DL State			Can Id	lentify Suspect?		
Place of Birth				Citizenship			Ethni UNK	city (NOWN	Marital Sta	tus
ICE Contact Da	ate ICE	Phone #	ICE Respons	е						
Home Phone	Cell	Phone	Email Address				A	Additional Email or Social I	Media Handle	Social Media Types
					Other Person Hom	e Address				
Street Address										
City				State			Zip	Country Code		
					Employment Info	ormation				
Student	H	lomeless	Employer / Sc	hool		Occu	upation			
Street Address										
City				State			Zip	Country Code		
					Details					
Work Phone		Hours of Er	mployment			Color		Hair Len		Glasses
Eye Color		Build		Facial Hair	r	Voice		Comple	xion	
Resident			Teeth							
					Gang Informa	ation				
[Primary			Primary Gang Name			Prima	ary Gang Membership Info)	
Primary Gang L	ocation Info	0			Rival	Gang Name				
Colors/Logos										
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Clothing o	r Colors	Ganç	g Tattoos	Paraphernalia or Ph	notographs Self I	Proclomation	Witness Tes	stimony/Statement	Written/Ele	ctonic Correspondance
Other										
					Guardian Infor					
Guardian N	lotified	Guardian Not	ified By			Noti	fied Method		Gu	ardian Notified On
Guardian Of							Guard	ian Relationship		

Narrative Information

ORDER OF PROTECTION FDV18-813693 SUPERIOR COURT OF CALIFORNIA DAT ISSUED: 7/19/2018 JUDGE: RUPER CHAN

ON 06/10/2024 AT 0817 HOURS, OFFICER PETERS 5822 AND I RESPONDED TO THE MARICOPA COUNTY SUPERIOR



Incident Number 202400000846311	CFS Incident # 202400846311
Report Type Incident Report	Page 4 of 4
Date / Time Occurred	Date / Time Reported
06/10/2024 00:00 to	06/10/2024 08:17

COURT COMPLEX LOCATED AT N 40TH STREET IN REFERENCE TO AN ORDER OF PROTECTION VIOLATION. PREVIOUSLY, THE REQUEST WAS MADE TO MCSO DEPUTIES ON DUTY. THE CALLER WAS NOT SATISFIED WITH THEIR RESPONSE AND REQUESTED PHOENIX PD TO RESPOND.

UPON ARRIVAL, THERE WAS A MEDIA EVENT INVOLVING A PAST BACHELOR TV SHOW PARTICIPANT CLAYTON ECHARD AND HIS EX-GIRLFRIEND LAURA OWENS AT THIS LOCATION. THE CASE WAS CIVIL IN NATURE AND UNRELATED TO THIS CALL. THE REASON POLICE RESPONDED WAS BECAUSE ONE OF THE WITNESSES (MICHAEL MARRACCINI) RECEIVED A SUBPOENA TO APPEAR IN COURT AND TESTIFY ON BEHALF OF CLAYTON. LAURA HAS AN ORDER OF PROTECTION AGAINST MICHAEL AND HER LAWYER DAVID GINGRAS REQUESTED THAT HE NOT BE ALLOWED TO ENTER THE COURT BUILDING.

THE JUDGE PRESIDING OVER THE CASE ALLOWED MICHAEL INTO THE COURT TO GIVE HIS TESTIMONY. DAVID GINGRAS SAID HE WILL MAKE AN APPEAL TO THE COURTS IN CALIFORNIA AND REQUEST CHARGES AGAINST MICHAEL FOR VIOLATING THE ORDER. NO CRIME AT THIS TIME.

Public Narrative

EXHIBIT A-3

Clerk of the Superior Court
*** Electronically Filed ***
I. Osuna, Deputy
6/25/2025 10:40:55 AM
Filing ID 20086939

RACHEL H. MITCHELL
MARICOPA COUNTY ATTORNEY

Edward Leiter
Deputy County Attorney
Bar ID #: 025593

225 W Madison St, 6th Floor

Phoenix, AZ 85003

Telephone: (602) 372-7016 sp2div@mcao.maricopa.gov MCAO Firm #: 00032000 Attorney for Plaintiff

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

THE STATE OF ARIZONA,

CR2025-006831-001

Plaintiff,

STATE'S NOTICE OF DISCLOSURE AND REQUEST FOR DISCLOSURE

VS.

(Assigned to the Honorable Monica S Garfinkel, Div. CMC06)

LAURA MICHELLE OWENS,

Defendant.

The State of Arizona, by and through undersigned counsel, hereby gives notice of disclosure pursuant to Rule 15.1, Arizona Rules of Criminal Procedure, and requests disclosure pursuant to Rule 15.2. If this case involves a victim, the State has made every attempt to comply with A.R.S. § 13-4434 and Rule 39 of the Rules of Criminal Procedure by redacting the victim's "identifying and locating information." If, for any reason, victim identifying or locating information has inadvertently been disclosed the State requests that defense counsel immediately notify the State so that it may substitute the disclosure

with a copy that conforms to the requirements of A.R.S. § 13-4434 and Rule 39. The State further requests that any copies of documents containing victim identifying or locating information not be further disseminated to anyone, including the Defendant.

Rule 15.1(b) Witnesses

The State may call the following witnesses in the case in chief or as rebuttal witnesses:

W	itn	ess
VV	ILII	C22

Julie Alrich

Witness

Deandra Arena

Witness

Jan Black Owens

Police

Officer/Aide/Deputy

Michael Blasko

Badge: 1396

Scottsdale Police

Department

8401 E. Indian School Road

Scottsdale AZ 85251

Police

Officer/Aide/Deputy

Detective Terje Boe

Badge: 808

Maricopa County

Attorney's Office 225 W. Madison St

Phoenix AZ 85003

Police

Officer/Aide/Deputy

Brandon Buckner

Badge: 1422

Scottsdale Police

Department

9065 E. Via Linda Scottsdale AZ 85258

Witness Joe Cotchett

200

Burlingame, CA 94010

840 Malcolm Road Suite

Police

Officer/Aide/Deputy

Logan Craun

Badge: 1527

Scottsdale Police

Department

8401 E. Indian School Road

Scottsdale AZ 85251

Witness

Lisa Daniels

Witness

Samantha Deans

Victim

Clayton Ray Echard

Witness

Doribel Estrella

Witness

Jeanie Fabre

Witness

John Fantauzzi

Police

Officer/Aide/Deputy

Detective Baron Fulp

Badge: 1429

Scottsdale Police

Department

8401 East Indian School

Road

Scottsdale AZ 85251

Wit-Vic Protected

Address

Greg Gillespie

Witness

David Gingrich

Police

Officer/Aide/Deputy

Andrew Gomez

Badge: 1586

Scottsdale Police Department

8401 E. Indian School Road

Scottsdale AZ 85251

Police

Officer/Aide/Deputy

Gabriel Gonzalez

Badge: 820

Maricopa County Attorney's Office

225 W. Madison St Phoenix AZ 85003

Police

Officer/Aide/Deputy

Detective Thomas

Goodson

Badge: 1203

Scottsdale Police

Department

9065 E. Via Linda

Scottsdale AZ 85258

Witness

Dustin Griswald

Witness

Heather Hall

Witness

Doug Haws

Witness

Jeffrey Higley

Witness

Rosanne Huebener

Witness

Jones MD

TBD

Police

Officer/Aide/Deputy

Heather Krimm

Badge: 824

Maricopa County Attorney's Office

301 W. Jefferson, 8th Floor

Phoenix AZ 85003

Police

Officer/Aide/Deputy

Officer Andrew

Lackowski

Badge: 1537

Scottsdale Police

Department

8401 E. Indian School Road

Scottsdale AZ 85251

Witness

Tamara Lister

Witness	Makhoul	
Witness	Michael Marraccini	
Witness	Roberta Martinez	
Witness	Hunter Mauer	
Witness	Michael Tom Medchill MD	246 SW 44th Street Cape Coral, FL 33914
Witness	Stormy Lynn Mitchell	
Witness	Angela Moffat	
Witness	Carmen Mora	1500
Witness	Matt Mulvey	
Witness	Sarah Navarro	
Witness	Dave Neal	
Witness	Ronn Owens	
Police	Detective Maxwell	Scottsdale Police

Officer/Aide/Deputy

Patton

Badge: 1403

Department

9065 E. Via Linda Scottsdale AZ 85258

Police

Officer/Aide/Deputy

Daniel S Peckham

Badge: 752

Maricopa County

Attorney's Office 225 W. Madison St Phoenix AZ 85003

Witness

Bonnie Platter

40 N Central Ave., Suite

2310

Phoenix, AZ

Police

Officer/Aide/Deputy

Detective Joe Plummer

Badge: 263

Maricopa County Attorney's Office

225 W. Madison St Phoenix AZ 85003

Witness

Ana Reyes

Witness

Shawn Roanhorse

Witness

Nicholas San Filippo

Witness

Jeannine Sander

Police

Officer/Aide/Deputy

Christopher Scott

Badge: 868

Maricopa County

Attorney's Office 225 W. Madison St Phoenix AZ 85003

Police

Officer/Aide/Deputy

Michael Seemiller

Badge: 1187

Scottsdale Police

Department

9065 E. Via Linda Scottsdale AZ 85258 Police

Officer/Aide/Deputy

Anthony Silva

Badge: 1545

Scottsdale Police

Department

8401 E. Indian School Road

Scottsdale AZ 85251

Witness

Madeline Sobek

Police

Officer/Aide/Deputy

Kyle Swan

Badge: 1440

Scottsdale Police

Department

9065 E Via Linda Scottsdale AZ 85258

Witness

Cathy Swann

Police

Officer/Aide/Deputy

Ryan Sylvester

Badge: 1635

Scottsdale Police

Department

8401 E. Indian School Road

Scottsdale AZ 85251

Custodian Of

Records

Mary Valenzuela-Resto

MBA, RHIA

Banner Health - Release of

Information Center

Witness

Jessica Valenzula

Police

Officer/Aide/Deputy

Detective James Weege

Badge: 811

Maricopa County Attorney's Office

301 W. Jefferson, 8th Floor

Phoenix AZ 85003

Witness

Andrew Williams

Custodian Of

Records

Amber Wood

Witness

Gregg Woodnick

Witness

Zieman

Other Witnesses

- Any custodian of records for any disclosed item or document Maricopa County Sheriff's Office, MVD, Banner Hospital, Barrow Dignity Health, Honor Health, MedSpa, MomDoc, Planned Parenthood LA, 1060 OBGYN, Family Planning Associates, Innova Med Spa, Scottsdale Perinatal Associates, SMIL, Sonora Quest Labs, Suddenly Slimmer Med Spa, Vida Bella Med Spa, Women's Care Phoenix, and Social Media.
- 2. Any witness from the defense disclosure.
- 3. Any individual named or referred to in the preliminary hearing transcript, grand jury transcript, police report, or other State's disclosure.
- 4. Cell Phone Examiner/Analyst, Cell Phone/Cell Site Expert, and Computer Forensics Expert
- Fingerprint Technician, Forensic Document Examiner/Questionable Documents, Latent Print Examiner, and Handwriting Expert.

Rule 15.1(b) Evidence

The State may introduce into evidence:

Crime/Crime Scene Evidence

- 1. Pictures, reproductions, PowerPoint presentations, charts or diagrams of the crime, crime scene, or any damage or injuries that were a result of the crime.
- All physical evidence taken from the defendant.
- 3. Any fingerprints, footprints, hairs, fibers, blood, bodily fluids, chemicals or

- other forensic evidence found as a result of the investigation of the crime and their analyses.
- 4. All physical evidence taken as a result of medical exams and the analysis of that evidence.

Identification Evidence

- 1. Any arrest/booking report or photograph of the defendant related to the charged offenses.
- 2. MVD records, prior conviction records or other records demonstrating a prior identification of the defendant.
- 3. Any photographic line-ups.

Victim Evidence

- 1. Photographs of the victim.
- 2. All medical records of the victims, if relevant to the crime charged.
- 3. All statements made by witnesses for purposes of medical diagnosis or treatment, if relevant or applicable.

Document Evidence

- 1. Any written instruments including but not limited to: checks, receipts, applications for credit, accounts, or check-cashing services.
- 2. Any computer or account access devices, including but not limited to: credit cards, debit cards, passwords, account numbers, password generators.
- Any forgery devices, including but not limited to: computer software, check blanks, driver's license blanks, social security card blanks, laminator.
- 4. Samples of handwriting and related analyses.

- Bank account records, credit account records, or other receipts or transaction records, including but not limited to: Transaction records, emails.
- 6. MVD records including but not limited to driver's license(s), ID card(s).
- 7. Vehicle Registration and/or application(s) for same.

Other Evidence

- 1. Any statements of the defendant or of any co-conspirators mentioned or contained in the police reports or other disclosed materials.
- 2. Any writing or recording of the defendant or witnesses.
- 3. Any object, representation of an object, thing, or document referred to in the defense disclosure or disclosed by the defense or used or referred to at trial by the defense.
- 4. Any grand jury, preliminary hearing, or deposition transcript.
- 5. Any object, representation of an object, thing, or document referred to in the preliminary hearing transcript, grand jury transcript, police report, or in any of the State's disclosure, including but not limited to:
 - Any evidence arising out of DR(s):
 DR 2024031 Maricopa County Attorney's Office and any supplements.
- 6. Any video and/or audio recording obtained from on-officer camera.
- 7. Any surveillance video.
- 8. The State gives notice that it may introduce FTR recordings of testimony in this case in evidence or use them during closing arguments.

Rule 15.1(b) Notices

- Any other witnesses or evidence will be disclosed seasonably according to Rule
 15.6.
- 2. The State has no obligation to provide witness telephone numbers. The only witness telephone numbers to be disclosed are those that are already included in police reports or other disclosure materials.
- 3. All of the listed witnesses' existing relevant written statements have already been provided in the police reports, are provided with this notice or will be provided seasonably. Any other statement of a witness that any witness may remember may be obtained through witness interviews.
- 4. All existing written statements of the Defendant have already been provided in the police reports, are provided with this notice or will be provided seasonably. Any other statement of the defendant that any witness may remember may be obtained through witness interviews.
- 5. Audio, video, or digitally recorded statements or images are available for review, and copies of such recorded statements or images, if not already provided, will be provided upon request after sufficient arrangements are made, including providing blank tapes or compact disks and paying any reasonable costs associated with making copies.
- 6. Any exhibit presented to the grand jury has already been disclosed to the defense except insofar as disclosure may be prohibited by A.R.S. § 13-2812 or any other statute

or rule. The State cannot identify for disclosure exhibits that were not admitted or presented to the grand jury.

- 7. Defense counsel shall be responsible for recording any witness statement made at an interview of the witness.
- 8. Experts to be called as witnesses in this case are listed in the witness list. The names and addresses of experts along with completed results of physical examinations, scientific tests, experiments, or comparisons have already been provided, are provided with this notice, or will be provided upon completion.
- 9. Any police officer listed above may be called as an expert witness with respect to an area within the officer's training and experience, including expert knowledge of illegal drugs, their possession or sale, useable amounts, or any other topic.
- 10. Any criminalist, fingerprint analyst, identification technician, or other similar witness will be called as an expert in his/her respective field.
 - a. All Forensic Scientists' Analyst Permits, Affidavits, and Curricula Vitae for Phoenix Police Department Laboratory Services Bureau are located at https://www.lawphx.net/disclosurecenter/phxpros.html.
 - b. All Forensic Scientists' Analyst Permits, Affidavits, and Curricula Vitae for Scottsdale Police Department Laboratory Services Bureau are located at https://www.scottsdaleaz.gov/attorney/lab-disclosure

- 11. Unless otherwise indicated, the State wishes to be present during the interviews of all potential State's witnesses. The State's witnesses will be made available for defense interviews, except those who testified at a preliminary hearing or juvenile transfer hearing.
- 12. There was no electronic surveillance. There was a search warrant. There was no informant whose existence the defendant is entitled to know under Rule 15.4(b)(2).
- 13. All existing original and supplemental reports prepared by a law enforcement agency in connection with this case have already been provided or are provided with this notice or will be provided seasonably.
- 14. The State is unaware of any existing material or information, unknown to the defense, that would tend to mitigate the defendant's guilt or punishment. Pursuant to *Kyles v. Whitley*, 514 U.S. 419, 437-438, 115 S. ct. 1555, 1567-1568 (1995), the State will review any evidence in its possession, determine if any of it is exculpatory, and, if so, turn such evidence over to the defense.

Rule 15.1(d) Prior Felony Convictions

1. The State intends to use at trial any prior felony convictions of the defendant or defense witness for impeachment purposes pursuant to Rule 609, Arizona Rules of Evidence. Furthermore, the State intends to use defendant's prior felony convictions as aggravating circumstances pursuant to A.R.S. § 13-701 and for sentence enhancement under §13-703 and §13-704.

- 2. If applicable, the State has provided or will be providing a list of the defendant's prior felony convictions in a separate allegation.
- 3. The State will provide a list of prior felony convictions of witnesses the state intends to impeach or call at trial thirty days before trial or thirty days after a request. The State cannot provide a list of felony convictions for defense witnesses without an accurate name, date of birth, and social security number for each defense witness.
- 4. The following witnesses may be called, and the following exhibits may be used to prove any prior conviction(s):
 - a. A fingerprint technician/analyst.
 - b. The fingerprints of the defendant.
 - c. The original court files on the priors.
 - d. The custodian of the original court files.
 - e. The defendant's defense attorney on the prior(s).
 - f. The arresting officers on the prior offenses.
 - g. Any present/past Adult Probation Officers or Parole Officers of the Defendant.
 - h. Any probation/parole files on the prior(s).
 - Any booking photographs on the prior(s).
 - j. Any prior fingerprints taken of the defendant.
 - k. Any certified copies.

- I. Any "pen packs" from a State/Federal Prison/Penitentiary.
- m. Department of Corrections records custodian.
- n. MCSO Detention Officers.
- MCSO Custodian of Records.
- p. MCSO Booking Records/ Booking Photo(s).

Other Evidence Upon Request

- The State will make recordings of existing 911 calls available to defense after a
 written request by providing an authorization form to be presented to the
 appropriate custodian of record.
- 2. Examination notes made by experts listed in Rule 15.1(b)(1) and 15.1(b)(4) shall be provided within thirty days of a written request.
- 3. All requests to examine or scientifically test items of evidence must be in writing.

Evidence of Other Acts

Pursuant to Rule 404(b), Arizona Rules of Evidence, the State intends to use evidence of other crimes, wrongs, or acts to prove motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident, or for any other relevant purpose and for impeachment purposes that is not otherwise contained in the police reports. It is the State's position that any acts mentioned in the police reports are intrinsic to the charged crimes and evidence of such are admissible separate and apart from the provisions of Rule 404(b). If matters contained in the police reports are deemed

evidence of other crimes, wrongs, or acts the State gives notice that it may use such evidence pursuant to Rule 404(b). The State will provide notice of specific acts not

contained in the police reports and the witnesses it intends to call at trial in a separate

notice.

State's Request for Disclosure

1. The State requests a list of all papers, documents, photographs, and other tangible

objects that the defendant intends to use at trial.

2. The State requests any completed written reports, statements and examination

notes made by experts the defense intends to call at trial.

3. The State requests copies of any recorded statements made during interviews

conducted without the presence of a Deputy County Attorney.

4. The State requests, pursuant to Rule 15.2(a)(3), (4) and (6), that defendant submit

to being fingerprinted, palm-printed, foot-printed, photographed or permit the

taking of samples of his/her hair, blood or saliva at any scheduled court hearing.

Submitted June 25, 2025.

RACHEL H. MITCHELL

MARICOPA COUNTY ATTORNEY

BY: /s/

Edward Leiter

Deputy County Attorney

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Copy e-mailed/e-filed June 25, 2025, to:

The Honorable Monica S Garfinkel Judge of the Superior Court

Sandra Schutz 1650 N 1st Ave Phoenix, AZ 85003 Sandra@kolsrudlawoffices.com Attorney for Defendant

BY: /s

Edward Leiter

Deputy County Attorney

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