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6 **MARICOPA COUNTY SUPERIOR COURT**

7 **STATE OF ARIZONA**

8 **LAURA OWENS,**

9 **Plaintiff,**

10 **v.**

11 **ROBERT ANDREJEV,**

12 **Defendant.**

Case No: CV2026-002304

**PLAINTIFF'S MOTION FOR
FEES/COSTS AND
SUPPORTING AFFIDAVIT**

(Assigned to Hon. Lindsey Coates)

14
15 Pursuant to A.R.S. § 12-1809(P) and Rule 39(a) of the Arizona Rules of Protective
16 Order Procedure, Plaintiff Laura Owens ("Ms. Owens") respectfully moves the Court for
17 an order awarding fees and costs against Defendant Robert Andrejev ("Mr. Andrejev").

18 The rules which apply here are clear:

19
20 **(a) Award.** After a hearing with notice to the affected party, a judicial
21 officer may order any party to pay the costs of the action, including
22 reasonable attorneys' fees, if any. *See* A.R.S. §§ 13-3602(T), 12-1809(P),
23 and 12-1810(P).

24 **(b) Considerations.** In determining whether to award costs or attorney
25 fees, the judicial officer may consider:

- 26 (1) the merits of the claim or the defense asserted by the
27 unsuccessful party;
28 (2) whether the award will pose an extreme hardship on the
unsuccessful party; and
(3) whether the award may deter others from making valid claims.

Rule 39, Ariz. R. Protective Order Procedure

1 The third factor in Rule 39(b) is largely inapplicable here. Any award of fees will
2 always have a deterrent effect on any party taking or challenging a position. Since this is
3 true in every case and is always something the Court must consider, this motion will focus
4 on the other two factors: 1.) the merits of the unsuccessful party's arguments, and 2.)
5 whether the award of fees will impose an "extreme hardship". Due to the unusual facts of
6 this case, both these factors weigh heavily in favor of awarding fees.

7 Regarding the merits of Mr. Andrejev's position, a couple of points warrant
8 attention. First, as was explained in Ms. Owens' briefing, Mr. Andrejev's Motion to Quash
9 literally accused Ms. Owens of "fabricating" parts of her claims. That is a serious
10 allegation, so let's look at exactly what he said – (the screenshot below is from page 2 of
11 the motion):

12
13 14 commentaries about issues of public concern that are fully protected by the Arizona
15 Constitution and the First Amendment. And, contrary to Owens' mischaracterizations and
16 outright fabrications of what Andrejev actually said, nothing in those livestreams meets the
17 criteria of A.R.S. § 12-1809. Not only was his speech not directed at Owens – it was
18 publicly posted online for the world to see – it did not contain *any* threatening or harassing
19 statements that would support entry of an injunction that punishes and suppresses his

20 Ms. Owens is currently charged with certain crimes arising from her prior litigation with
21 Clayton Echard who starred in ABC's *The Bachelor*. Among other things, Ms. Owens has
22 been charged with perjury and forgery. Those are serious charges. But a criminal charge
23 is, standing alone, not proof of guilt. Ms. Owens has pleaded not guilty, and she has not
24 been convicted of any wrongdoing.

25 Despite this, Mr. Andrejev appeared eager to exploit the situation by attempting to
26 portray Ms. Owens as dishonest. She was accused of lying in the past, thus Mr. Andrejev
27 tried to make this Court believe she was doing the same here. But Mr. Andrejev knew the
28 truth – he knew Ms. Owens did not lie or fabricate any part of her allegations in this case.

1 Instead, the Court saw and heard the uncontested evidence – Ms. Owens simply
2 made a typo, mistakenly referring to one video as “0272” when the correct number was
3 “0273”. Despite that extremely minor mistake, the uncontested evidence showed Mr.
4 Andrejev said every word Ms. Owens attributed to him. He knew Ms. Owens’ allegations
5 were entirely accurate, but for a single typographical error.

6 That fact strongly weighs in favor of an award of fees. As undersigned counsel told
7 the Court last week, there was simply no reason for the parties to be forced to come to court
8 to supply evidence regarding what Mr. Andrejev actually said. The only reason that was
9 necessary was because Mr. Andrejev falsely accused Ms. Owens of lying to the Court. She
10 did not lie in any way. Mr. Andrejev knew this.

11 Under the circumstances, facing an allegation of lying which she knew was untrue,
12 Ms. Owens reasonably felt she had to defend herself against that claim. And because Mr.
13 Andrejev chose to retain experienced counsel, Ms. Owens felt obligated to do the same.
14 Given these facts, it would be patently unfair to deny an award of fees, when the only
15 reason any fees were incurred was to ensure this Court was not misled by Mr. Andrejev’s
16 false claims about Ms. Owens.

17 This leads to the second issue regarding the merits. In his Motion to Quash, Mr.
18 Andrejev made legal arguments which were, at best, highly misleading if not outright false.
19 He argued that in a case involving social media/online speech, direct defendant-to-victim
20 contact was required. That assertion was made on page 5 of the Motion to Quash:

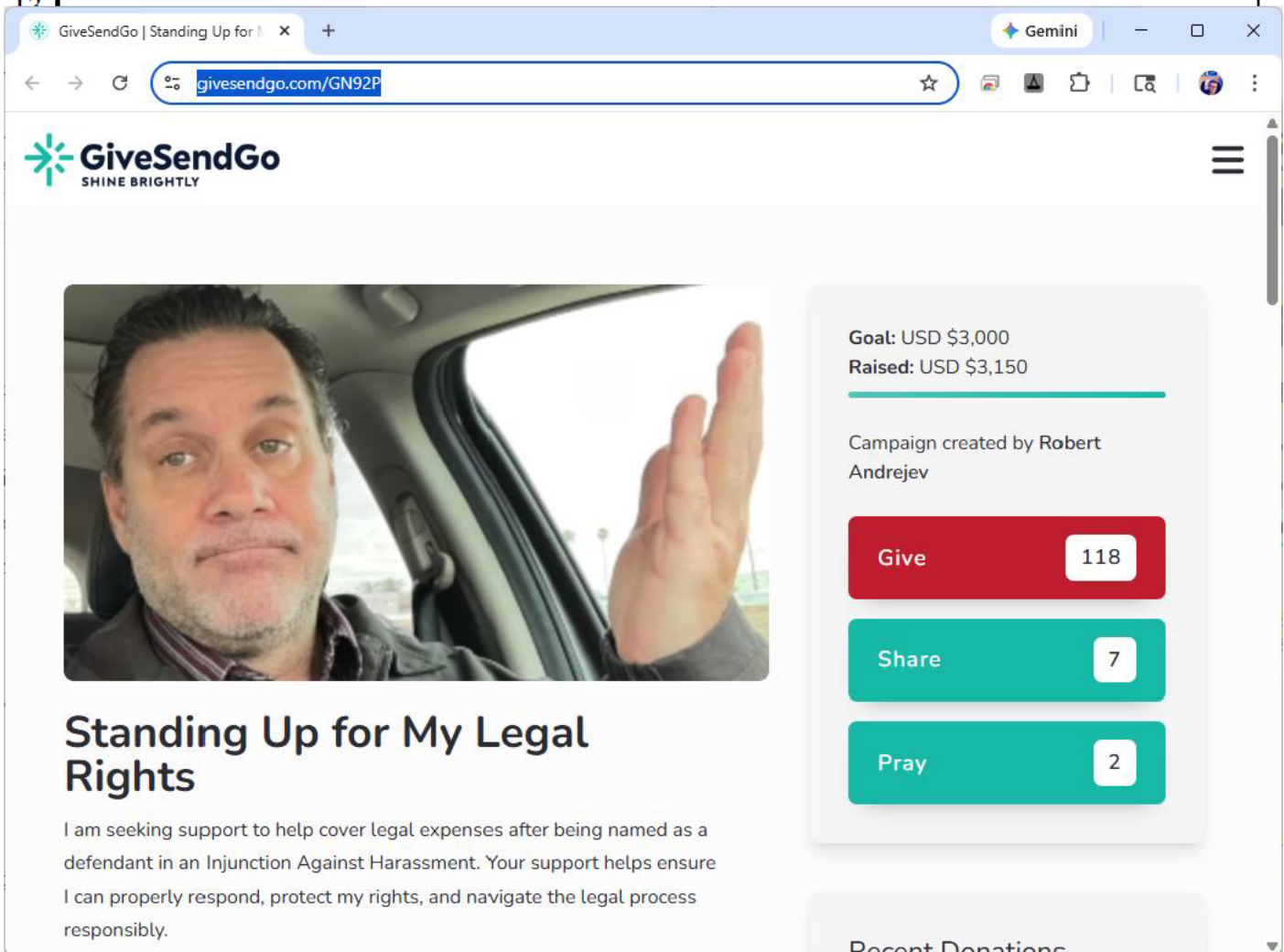
21 communicated with her. Andrejev Decl. at ¶ 6. The law’s requirement that the harassment
22 be directed at the plaintiff means that statements made to others do not qualify, even if the
23 plaintiff becomes aware of them. *LaFaro v. Cahill*, 203 Ariz. 482, 485-86 ¶ 13 (App.
24 2002). In *LaFaro*, the plaintiff political activist obtained an injunction against a Tempe
25
26

26 Ms. Owens’ response explained this was a clear misstatement of the law, at least
27 when social media/online speech is at issue. Because Ms. Owens is not a lawyer, it was
28 clearly necessary and appropriate for her to seek advice from counsel to determine if Mr.

1 Andrejev’s position was correct. Since his position was *not* correct, it would again be unfair
2 to allow Mr. Andrejev to avoid responsibility for the costs needed to ensure this Court
3 received *accurate* information about the law. For those two reasons, Rule 39(b)(1) weighs
4 in favor of awarding fees to Ms. Owens.

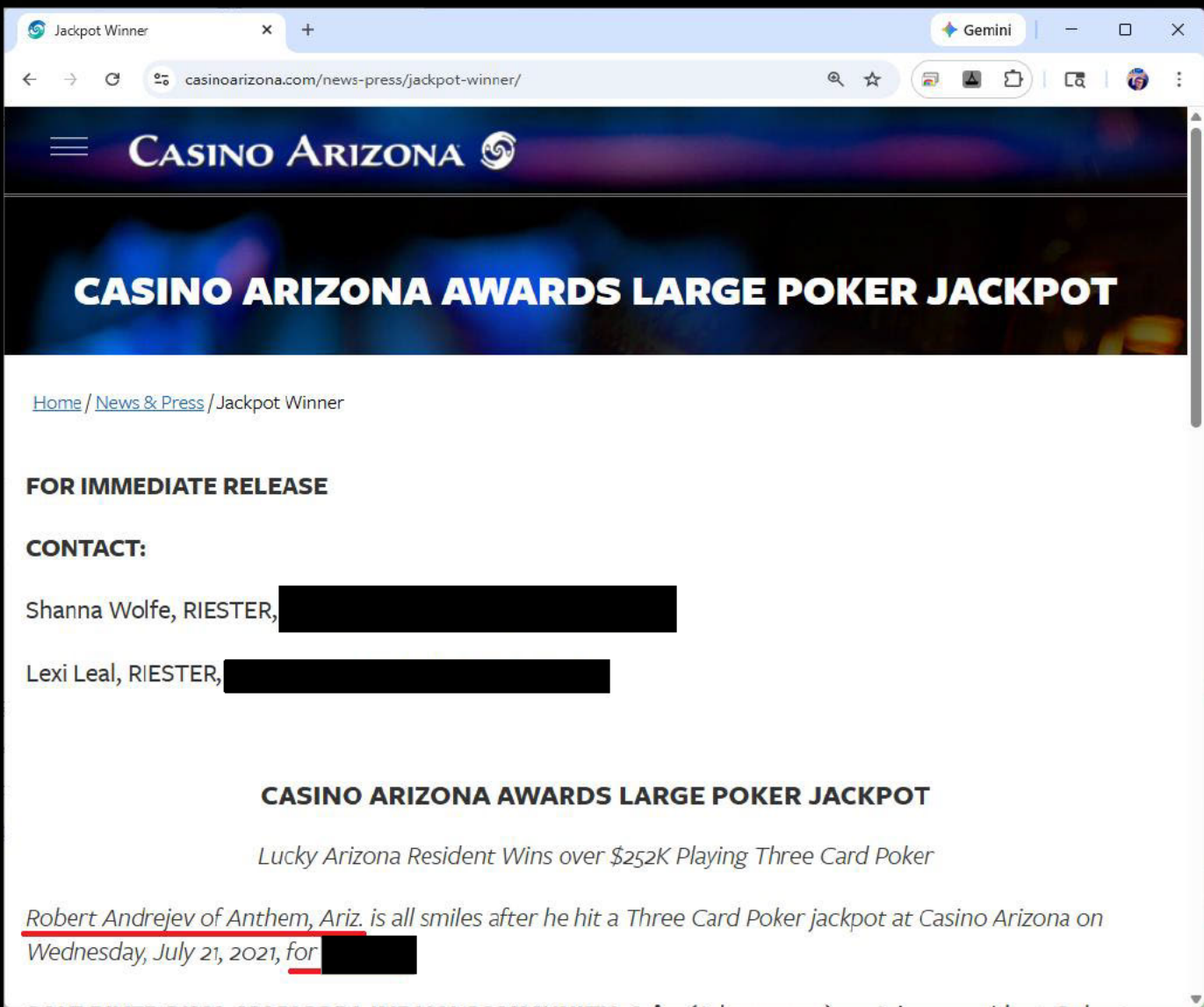
5 The next question, per Rule 39(b)(2), is whether such an award would pose an
6 “extreme hardship” on Mr. Andrejev. This question does not present a close call, again for
7 two somewhat odd reasons.

8 Reason #1 – after Ms. Owens obtained the initial IAH, Mr. Andrejev started a
9 crowdfunding campaign to raise money for this case. In his post, which remains online
10 here: <https://www.givesendgo.com/GN92P>, Mr. Andrejev set a fundraising goal of \$3,000.
11 As of the date of this writing, that effort bore fruit to the tune of \$3,150. Goal set; goal
12 exceeded.



The screenshot shows a web browser window displaying a GiveSendGo crowdfunding page. The browser's address bar shows the URL [givesendgo.com/GN92P](https://www.givesendgo.com/GN92P). The GiveSendGo logo is visible in the top left corner. The main content area features a video thumbnail of a man in a car, with his hand raised. To the right of the video, the campaign details are displayed: Goal: USD \$3,000, Raised: USD \$3,150. Below this, it states 'Campaign created by Robert Andrejev'. There are three buttons: 'Give' with 118, 'Share' with 7, and 'Pray' with 2. At the bottom, the text reads: 'Standing Up for My Legal Rights' and 'I am seeking support to help cover legal expenses after being named as a defendant in an Injunction Against Harassment. Your support helps ensure I can properly respond, protect my rights, and navigate the legal process responsibly.'

1 And as if this case did not already involve enough strange facts, we are left with this
2 tidbit – according to a press release issued by Casino Arizona, in 2021, Mr. Andrejev was
3 fortunate enough to win [REDACTED] playing three-card poker
4 (the exact amount of his win: [REDACTED]). See [REDACTED]
5 [REDACTED]



26 Given these facts, it is hard to imagine a case *more* deserving of a fee award than
27 this one. Mr. Andrejev terrorized and attacked a young woman with hundreds of videos
28 containing language so vulgar and disturbing, this Court declined to quote it. He then

1 attempted to mislead (if not lie) about the facts, falsely accusing Ms. Owens of
2 “fabricating” details which he knew were completely true (but for a single typo). He did
3 this on a *monetized* YouTube channel (an additional point he lied about). And he did so
4 while seeking (and obtaining) thousands of dollars in donations from a crowdfunding
5 campaign. If these facts don’t justify a full award of fees and costs, no facts ever could.

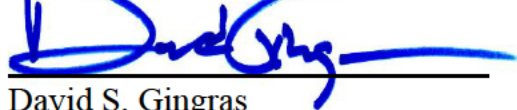
6 In terms of the amount requested, the attached affidavit seeks the following amounts,
7 and to be clear – these totals do not reflect the actual time spent on this matter. Rather, as
8 explained in the attached affidavit, these totals represent a *downward* adjustment from the
9 actual time spent.

Category	Amount
Pre-hearing briefing/investigation/research	\$4,600.00
Hearing preparation/presentation	\$2,600.00
Fee Application	\$1,200.00
Costs	\$76.70
TOTAL	\$8,476.70

17 A proposed form of judgment is submitted herewith.

18 DATED February 26, 2026.

19 GINGRAS LAW OFFICE, PLLC

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21 David S. Gingras
22 Attorney for Plaintiff Laura Owens

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and **COPIES** e-delivered Feb. 26, 2026 to:

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