

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

**Christopher Coopriders; Aid Access
GmbH; Rebecca Gomperts,**

Defendants.

PLAINTIFF'S STATUS REPORT

The parties are attempting to negotiate a stipulated agreement to appoint a new forensics expert and provide Ms. Davis's second cell phone to that expert. The Court ordered the parties to negotiate and notify the Court of their progress by 12:00 P.M. on June 9, 2026. Ms. Davis respectfully submits this report in accordance with the Court's instructions.

The parties have exchanged proposals but have not yet reached agreement. The parties are still negotiating over the following issues:

1. Mr. Coopriders's legal team wants Russell Chozick to serve as the forensics expert. Mr. Mitchell is willing to have Mr. Chozick serve as the expert only if he agrees to accept a court appointment and report directly to the Court, and if he executes a sworn affidavit attesting that he has no prior relationship with any of the parties or attorneys in this case. Mr. Mitchell has reached out to Mr. Chozick to discuss whether he would be willing to agree to those conditions but has not yet heard back from him.

2. Mr. Mitchell wants the agreed-upon forensics expert to be appointed by the Court and report directly to the Court. Mr. Coopriders's attorneys are resisting that provision of Mr. Mitchell's draft stipulation.

3. Mr. Coopriders legal team is insisting that that stipulation compel Ms. Davis to turn over not only her second iPhone but “all devices containing potentially relevant electronic data, images, information, metadata, etc.,” including “children’s toys” in her home that “have recording technology.” *See* Exhibit 3. Mr. Mitchell is unwilling to agree to that because Mr. Coopriders has not served a discovery request of that breadth, and Mr. Mitchell would object if he did. The RFPs that Mr. Coopriders served on May 13, 2026, refer to Ms. Davis’s “current I-phone, all phones you have used between 1/1/2025 and the present and all computers you have used between 1/1/2025 and the present and iCloud remote storage.” The motion for sanctions that Mr. Coopriders filed on May 29, 2026, refers only to Ms. Davis’s second iPhone that was mentioned during her deposition, and the Court’s minute-entry order that was sent yesterday at 11:23 A.M. instructs the parties to confer on the “process for extraction of the second phone and a new expert.” Mr. Mitchell regards these demands for children’s toys as a last-minute attempt to move the goalposts and sabotage the possibility of agreement. Mr. Mitchell wants the stipulation limited to the production of the second cell phone and the appointment of a forensics expert.

Mr. Moscowitz e-mailed Mr. Mitchell at 11:34 A.M. this morning with some concessions, and Mr. Mitchell believes that there is a reasonable chance that the parties will reach agreement (or something close to a complete agreement) by the end of the week. Ms. Davis therefore respectfully asks the Court to allow the parties to continue negotiating until close of business on June 12, 2026, to see if a stipulated agreement and proposed order can be reached.

Respectfully submitted.

/s/ Jonathan F. Mitchell
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jonathan@mitchell.law

Dated: June 9, 2026

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 9, 2026, I served this document through CM/ECF upon:

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*Counsel for Defendant
Christopher Coopriider*

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Counsel for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-00220

**Christopher Coopriders; Aid Access
GmbH; Rebecca Gomperts,**

Defendants.

DECLARATION OF JONATHAN F. MITCHELL

1. My name is Jonathan F. Mitchell. I am over the age of 18 and fully competent in all respects to make this declaration.

2. I have personal knowledge of the facts stated in this declaration, and all of these facts are true and correct.

3. I represent plaintiff Liana Davis in this litigation, and I submit this declaration alongside Ms. Davis's status report of June 9, 2026.

4. The document attached as Exhibit 2 to the status report is an authentic copy of Ms. Davis's proposed stipulation and order that I e-mailed to opposing counsel on June 8, 2026 at 11:40 A.M. central time.

5. The document attached as Exhibit 3 to the status report is an authentic copy of Mr. Moscovitz's redlined edits to our proposal, which he e-mailed to me on June 9, 2026, at 10:25 A.M. central time.

6. Neither of the drafts attached as Exhibit 2 or 3 has been jointly approved by the parties, even though signature blocks appear in each of the drafts.

7. The documents attached as Exhibits 4–8 are authentic copies of e-mails that I have exchanged with Mr. Coopriders's attorneys.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts stated in this declaration are true and correct.

Jonathan F. Mitchell

JONATHAN F. MITCHELL

Dated: June 9, 2026

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

**Christopher Coopriders; Aid Access
GmbH; Rebecca Gomperts,**

Defendants.

PARTIES' STIPULATION AND PROPOSED ORDER

The parties stipulate and respectfully ask the Court to order as follows:

1. The parties will agree upon and recommend to the Court a new forensics expert who will be appointed by the Court and report directly to the Court.
2. The Court-appointed forensics expert will secure and securely hold the data evidence as a custodian for the duration of the case. At the conclusion of the case, the court-appointed forensics expert will destroy all of the data evidence and passwords and will provide a certification of destruction.
3. George Vasiliou and Russell Chozick will provide to the court-appointed forensics expert the mirror images that they have previously made of Mr. Coopriders and Ms. Davis's cell phones, tablets, computers, and other devices. Mr. Coopriders's attorneys will bear the costs, if any, incurred by the need to transfer these data.
4. Under no circumstance may the parties or their attorneys or representatives communicate with the court-appointed forensics expert unless the opposing party's counsel and the Court are notified and the Court approves the proposed communication in advance.
5. Under no circumstance may the court-appointed forensics expert examine or search the data evidence unless he is provided with a signed order of the Court. The court-appointed forensics expert must notify the Court and counsel for each party before examining or searching any of the data evidence.

6. Under no circumstance may the parties or their attorneys or representatives access or attempt to access the data evidence held by the court-appointed forensics expert unless the opposing party's counsel and the Court are notified and the Court approves the requested access in advance. The court-appointed forensics expert must notify the Court and counsel for each party if anyone accesses or attempts to access the data evidence in his possession, custody, or control.
7. Any attorney who accesses data or communicates with the court-appointed forensics expert in violation of this stipulation and order will be sanctioned.
8. Ms. Davis will provide to the court-appointed forensics expert the cell phone used to record Mr. Coopriider on the night of April 5, 2025. Ms. Davis will provide this phone within seven days of the Court's appointment.
9. Ms. Davis will provide to the court-appointed forensics expert the cell phone used to record Mr. Coopriider on the night of April 5, 2025. Ms. Davis will provide this phone within seven days of the Court's appointment.
10. George Vasiliou, Christopher Coopriider, and each of Mr. Coopriider's attorneys and representatives must preserve all communications between or among them relating to Ms. Davis's iPhone or other devices or any data on those devices, as well as all documents, data, content, analyses, reports, or records that they have possessed or prepared that relate in any way to the information on Ms. Davis's iPhone or other devices.
11. George Vasiliou, Christopher Coopriider, and each of Mr. Coopriider's attorneys and representatives shall produce to Ms. Davis's attorneys all or the communications, documents, data, content, analyses, reports, or records described in paragraph 10 no later than 5:00 p.m. central time on June 12, 2026.

Dated: June 8, 2026

Respectfully submitted.

/s/ Jonathan F. Mitchell
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Counsel for Defendant
Christopher Coopriider

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Christopher Coopriider*

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Counsel for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

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Case No. 2:25-cv-220

**Christopher Coopriider; Aid Access
GmbH; Rebecca Gomperts,**

Defendants.

PARTIES' STIPULATION AND PROPOSED ORDER

The parties stipulate and respectfully ask the Court to order as follows:

1. The parties agree and recommend to the Court that Russell Chozick be approved by the Court to serve as a neutral custodian of the previously collected and still to-be-collected electronic data evidence.¹ The data previously collected by forensics expert George Vasiliou has all been preserved as collected, and Mr. Vasiliou is sending the imaged data to Austin, Texas so that the transfer to Mr. Chozick may be immediately facilitated once the Court has approved. Mr. Coopriider's attorneys will bear the costs, if any, incurred by the need to transfer these data.
2. The agreed upon forensics expert will secure and securely hold the data evidence as a custodian for the duration of the case or until such time as he or she is released by the Court. At the conclusion of the case, which is defined as either a final appealable Order from this Court or a final Order from either the Fifth Circuit Court of Appeals or the United States Supreme Court, the agreed upon forensics expert will destroy all of the data evidence and passwords and will provide a certification of destruction.

¹ Mr. Chozick's firm is located in Austin, Texas and has no prior relationship with the parties in this case and was selected as convenient for Ms. Davis to travel in order to be present and facilitate access to the data maintained in her cloud-based services. Due to Ms. Davis's device and Apple security settings, no remote downloads can be performed without her physical presence.

3. The parties or their attorneys or representatives may communicate with the agreed upon forensics expert about scheduling the transfer of data from George Vasiliou, arranging for the collection of electronic devices, or other procedural matters related to the transfer of data or collection of electronic devices provided counsel of record are copied on any such communication.
4. Under no circumstance may the agreed upon forensics expert examine or search the data evidence unless he is provided with a signed ESI Order of the Court.
5. Under no circumstance may the parties or their attorneys or representatives access or attempt to access the data evidence held by the agreed upon forensics expert unless the opposing party's counsel and the Court are notified and the Court approves the requested access in advance.
6. Ms. Davis will provide to the agreed upon forensics expert all containing potentially relevant electronic data, images, information, metadata, etc., including but not limited to the cell phone used to record Mr. Coopridier on the night of April 5, 2025. Ms. Davis will provide this phone, and any other device containing potentially relevant electronic data, images, information, metadata, etc. within three (3) days of this Order.
7. Ms. Davis will cooperate fully and timely in accommodating the parties' reasonable requests to provide the agreed upon forensics expert with the necessary passwords, two-step security protocol approvals, and so forth to access, retrieve, mirror, secure, and securely hold all potentially relevant data stored on any cloud-based accounts including social media sites, email service providers, data storage providers, etc.
8. Ms. Davis and Ms. Davis's attorneys and representatives must provide certification by June 12, 2026 that they have completed a full search of all Ms. Davis's devices to identify, preserve, and produce all such devices containing discoverable electronic data, under the penalty of sanctions.²

² During her deposition of May 28, 2026, Ms. Davis testified for example that she has "various pieces of technology" in her home that have recording technology including "children's toys," "old cell phones", etc. *See, e.g.*, L. Davis 5-28-2026, 114:11-23.

Dated: June 8, 2026

Respectfully submitted.

/s/ Jonathan F. Mitchell
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Counsel for Defendant
Christopher Coopridner

CERTIFICATE OF SERVICE

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Counsel for Defendant
Christopher Coopridner

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Counsel for Plaintiff



From: Jonathan Mitchell jonathan@mitchell.law

Subject: draft stipulation and order

Date: June 8, 2026 at 9:40 AM

To: Moscovitz, Barry BMoscowitz@thompsoncoe.com

Cc: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com

Counsel:

Our draft stipulation and order is attached. Comments and proposed edits are welcome. Please make any edits in redline.

—Jonathan

**Davis v. Coopriders
Joint Status Report ...**



**Davis v. Coopriders
Joint Status Report ...**



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From: Moscowitz, Barry BMoscowitz@thompsoncoe.com 
Subject: RE: draft stipulation and order [IMAN-TCLAW.FID2728850]
Date: June 8, 2026 at 11:59 AM
To: Jonathan Mitchell jonathan@mitchell.law
Cc: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com

We will review and get back to you with redlines.

Take care.



Barry Moscowitz • Partner
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From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Monday, June 8, 2026 11:40 AM
To: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>
Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thor
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From: Moscowitz, Barry BMoscowitz@thompsoncoe.com 
Subject: RE: draft stipulation and order [IMAN-TCLAW.FID2728850]
Date: June 9, 2026 at 8:25 AM
To: Jonathan Mitchell jonathan@mitchell.law
Cc: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com

Attached are the following documents:

- A redlined version reflecting our changes to the draft Joint Report
- A clean version reflecting our changes to the draft Joint Report
- A propose initial ESI protocol

We are good with the filing of all the attached documents, but if you have any changes or would like to discuss further, feel free to give me a call.

Take care.



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Subject: draft stipulation and order

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—Jonathan


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 Joint Status Report... 
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 Joint Status Report... 
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From: Jonathan Mitchell jonathan@mitchell.law
Subject: Re: draft stipulation and order [IMAN-TCLAW.FID2728850]
Date: June 9, 2026 at 9:19 AM
To: Moscovitz, Barry BMoscovitz@thompsoncoe.com
Cc: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com

Barry:

- (1) I did not see a "proposed initial ESI protocol" as an attachment to your e-mail of 10:25 a.m. this morning.
- (2) The stipulation must provide that the forensics expert will be appointed by the Court and report directly to the Court. That is a deal-breaker for me.
- (3) Your definition of "the conclusion of the case" in paragraph 2 is inadequate. If the case settles or if a party voluntarily dismisses the case, there will be no "final appealable Order from this Cour
- (4) I reached out to Russell Chozick yesterday but have not heard back from him. I am willing to have Mr. Chozick serve as the custodian if he executes a sworn affidavit denying that he has any p
- (5) Your revisions to paragraph 4 are unacceptable. You told George Vasiliou that you had a "signed ESI order of the Court" when you accessed the contents of my client's cell phone and insisted a "signed ESI order." We need explicit language that will stop you from repeating what you did with George Vasiliou.
- (6) There must be a provision for sanctions if an attorney accesses data or communicates with the court-appointed forensics expert in violation of the stipulation.
- (7) I will not have Ms. Davis agree to turn over "all devices containing potentially relevant electronic data, images, information, metadata, etc. within three (3) days of this Order."

You have not served a discovery request of that breadth, and I would object if you did. The RFPs that you served on May 13, 2026, refer to "your current I-phone, all phones you have used between The motion for sanctions that you filed on May 29, 2026, refers only to Ms. Davis's second iPhone that was mentioned during her deposition, and the Court's minute-entry order that was sent yest

You are (once again) moving the goalposts at the last minute by including a demand for "children's toys" that "have recording technology" when you never served a discovery request for that and appointment of a forensics expert.

- (8) I am willing to drop paragraphs 10 and 11 of my initial draft from the stipulation but do not interpret that as a concession that I am no longer demanding that you and George Vasiliou turn ove Our status report to the Court is due in 40 minutes. I will draft a report informing the Court that we have exchanged proposals and I will attaching our e-mailed correspondence. I will also ask the

—Jonathan

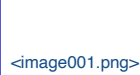
On Jun 9, 2026, at 8:25 AM, Moscovitz, Barry <BMoscovitz@thompsoncoe.com> wrote:

Attached are the following documents:

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- A clean version reflecting our changes to the draft Joint Report
- A propose initial ESI protocol

We are good with the filing of all the attached documents, but if you have any changes or would like to discuss further, feel free to give me a call.

Take care.

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Counsel:

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—Jonathan

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| <Davis v. Coopriider Joint Status Report BAM Edits (6.9.26) (clean).docx><Davis v. Coopriider Joint Status Report (Def redlines).docx>

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See my responses below in red.



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Mitchell <jonathan@mitchell.law>

Sent: Tuesday, June 9, 2026 11:20 AM

To: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>

Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>

Subject: Re: draft stipulation and order [IMAN-TCLAW.FID2728850]

Barry:

(1) I did not see a "proposed initial ESI protocol" as an attachment to your e-mail of 10:25 a.m. this morning. **Sorry about that. I have attached it to this e-mail. It is meant to be**

(2) The stipulation must provide that the forensics expert will be appointed by the Court and report directly to the Court. That is a deal-breaker for me. **I'm fine with the expert be that change and I will review.**

(3) Your definition of "the conclusion of the case" in paragraph 2 is inadequate. If the case settles or if a party voluntarily dismisses the case, there will be no "final appealable O **Then propose your change to the relevant paragraph and I will review.**

(4) I reached out to Russell Chozick yesterday but have not heard back from him. I am willing to have Mr. Chozick serve as the custodian if he executes a sworn affidavit denyin directly to the Court. **Fine by me. Let me see the affidavit you would like him to execute. See also my comments to (2) above.**

(5) Your revisions to paragraph 4 are unacceptable. You told George Vasiliou that you had a "signed ESI order of the Court" when you accessed the contents of my client's cell i order of May 14, 2026, as a "signed ESI order." We need explicit language that will stop you from repeating what you did with George Vasiliou. **I don't really know what you are**

(6) There must be a provision for sanctions if an attorney accesses data or communicates with the court-appointed forensics expert in violation of the stipulation. **I don't think th going to be communicating directly with Mr. Chozick other than what is provided for in the proposed stipulation, and I suspect you are similarly not going to contact him. What if sanctioned for that.**

(7) I will not have Ms. Davis agree to turn over "all devices containing potentially relevant electronic data, images, information, metadata, etc. within three (3) days of this Order." **and (2) what Judge Morales stated during our last hearing where explicitly told you he did not want to learn that there is a third or fourth cell phone/device. He wants this done ;**

You have not served a discovery request of that breadth, and I would object if you did. The RFPs that you served on May 13, 2026, refer to "your current I-phone, all phones you remote storage."

The motion for sanctions that you filed on May 29, 2026, refers only to Ms. Davis's second iPhone that was mentioned during her deposition, and the Court's minute-entry order expert."

You are (once again) moving the goalposts at the last minute by including a demand for "children's toys" that "have recording technology" when you never served a discovery re phone and the appointment of a forensics expert.

(8) I am willing to drop paragraphs 10 and 11 of my initial draft from the stipulation but do not interpret that as a concession that I am no longer demanding that you and George **That is fine.**

Our status report to the Court is due in 40 minutes. I will draft a report informing the Court that we have exchanged proposals and I will attaching our e-mailed correspondence. **like to get this finalized sooner in the sense that we either come to full agreement on these issues or we decide we will submit our difference in a Joint Status Report. Let's get i me the proposed correspondence with the Court before you submit it.**

—Jonathan

On Jun 9, 2026, at 8:25 AM, Moscowitz, Barry <BMoscowitz@thompsoncoe.com> wrote:

Attached are the following documents:

- A redlined version reflecting our changes to the draft Joint Report
- A clean version reflecting our changes to the draft Joint Report
- A propose initial ESI protocol

We are good with the filing of all the attached documents, but if you have any changes or would like to discuss further, feel free to give me a call.

Take care.

<image001.png>

Barry Moscowitz • Partner
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From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Monday, June 8, 2026 11:40 AM

To: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>

Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>

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Counsel:

Our draft stipulation and order is attached. Comments and proposed edits are welcome. Please make any edits in redline.

—Jonathan

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papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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<Davis v. Coopridger Joint Status Report BAM Edits (6.9.26) (clean).docx><Davis v. Coopridger Joint Status Report (Def redlines).docx>

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