

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

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

Defendants.

PARTIES' JOINT STATUS REPORT

Defendant's statement: Since January 15, 2026 Defendant has pursued complete and accurate responses to RFP 2 with *no exceptions*. On March 11, 2026 the Court ordered that Plaintiff produce her telephone communications by March 25, 2026 by 5:00 pm with *no exceptions*. The Plaintiff did not comply by the deadline and has claimed that only extraction was ordered, not actual production.

After the deadline Plaintiff produced communications with two of the ten witnesses. A Motion to Compel was filed on March 27, 2026 at 3:00 pm. After the motion was filed, Plaintiff produced approximately 13,000 texts between herself and Coopridier. On March 29, 2026 Plaintiff claims she "found" messages from Yvonne Yakopovich she had deleted. Conferral continued, and during live conferral Defendant made it clear that all communications from *all witnesses* listed in RFP 2 must be produced and that Defendant would not play "catch me if you can." Defendant indicated that Plaintiff was unreliable and a preservation of her phone data was necessary. To shut down this discovery, Plaintiff submitted a false declaration to the Court Doc 50-2. (Contrast the Declaration of Liana Davis with Exhibits A audio recording of Liana Davis deleting texts to gain advantage in her child custody proceedings, and Exhibits B, C, and D Rule

1006 summaries of her texts that she produced in discovery.) On April 11, 2026 Defendant reminded Plaintiff to produce communications with Casey Pyle, Magistrate Madrigal, Devin Davis Liana Davis's husband, Marshall a/k/a Marshall Allen Bowling (the man who impregnated Davis twice in 2025), Ami Amoroso, Mary Anna Ziarko, Jackie Samuelson after April 6, 2025 and Yvonne Yakopovich after April 7, 2025. In response to shut down discovery, Plaintiff claimed that she would file a declaration that she has fully complied. She has not complied. See Exhibit E, email from Devin Davis, concerning Coopriders and this case which caused Mr. Davis to cease communications with the Defense -- another example of manipulating witnesses and a communication that Plaintiff has withheld.

Defendant requests that the issues of Plaintiff refusing to produce communications after April 7, 2025 and concerning her September 2025 miscarriage be heard. Defendant further requests sanctions for receiving discovery after the Motion to Compel was filed. Finally, Defendant requests that a mirror image of Ms. Davis's cell phone be taken to preserve the evidence held by Plaintiff.

Plaintiff's Statement: Ms. Davis has attached a declaration attesting that she has fully complied with each component of RFP No. 2. *See* Exhibit 2. Ms. Davis also contends that none of the issues mentioned in paragraphs 1–6 of Ms. Klein's list (Exhibit 6) are properly before the Court. Mr. Coopriders' attorneys never conferred with Mr. Mitchell about these any of these supposed "missing communications" before filing their motion to compel on March 27, 2026. *See* Fed. R. Civ. P. 37(a)(1); Mitchell Decl. ¶¶ 7–10 (attached as Exhibit 1). The only discovery that Mr. Coopriders' attorneys had claimed was missing during their previous conferrals with Mr. Mitchell involved: (1) Ms. Davis's text messages with Mr. Coopriders; (2) Ms. Davis's text messages with Jackie Samuelson; and (3) Ms. Davis's text messages with Yvonne Yakopovich. *Id.* at ¶ 8. In addition, Mr. Coopriders' attorneys did not mention or discuss any of these issues in their motion to compel, or in the status report that they filed on April 7, 2026.

Dated: April 14, 2026

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Attorney-in-Charge
Texas Bar No. 24075463
S.D. Tex. Bar No. 1133287
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

Counsel for Plaintiff

/s/ Mikal C. Watts
MIKAL C. WATTS
Attorney-in-Charge
Texas Bar No. 20981820
Watts Law Firm LLP
811 Barton Springs #725
Austin, Texas 78704
(512) 479-0500 (phone)
(512) 479-0501 (fax)
mikal@wattslp.com

Counsel for Defendant
Christopher Coopriider

CERTIFICATE OF SERVICE

I certify that on April 14, 2026, I served this document through CM/ECF upon:

MIKAL C. WATTS
Watts Law Firm LLP
811 Barton Springs #725
Austin, Texas 78704
(512) 479-0500 (phone)
(512) 479-0501 (fax)
mikal@wattslp.com

BETH KLEIN
Beth Klein, P.C.
350 Market Street, Suite 310
Basalt, Colorado 81621
(303) 448-8884 (phone)
beth@bethklein.com

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 the parties' joint status report of April 14, 2026.

4. After Ms. Clancy e-mailed the parties on April 10, 2026, to inform us that the Court requested us to submit a joint status report by April 14, 2026, I promptly e-mailed Mr. Coopriders' attorneys to request a time to confer. An authentic copy of the e-mail that I sent on April 10, 2026, is attached to the joint status report as Exhibit 3.

5. When Mr. Coopriders' attorneys failed to respond to this e-mail, I e-mailed them again on April 11, 2026, and wrote: "Counsel: We need to submit a joint status report by Tuesday. Please let us know when you're available to confer about it." An authentic copy of this e-mail is attached to the joint status report as Exhibit 4.

6. On April 11, 2026, at 7:03 P.M. central time, Ms. Klein wrote back and said: “Attached is our list of issues to include in the status report.” An authentic copy of that e-mail is attached to the joint status report as Exhibit 5. Authentic copies of each of the attachments to Ms. Klein’s e-mail of April 11, 2026, e-mail are attached to the joint status report as Exhibits 6, 7, 8, and 9.

7. Mr. Coopriders’ attorneys never conferred with me about these any of these supposed “missing communications” listed in paragraphs 1–6 of Ms. Klein’s list (Exhibit 6) before filing their motion to compel on March 27, 2026.

8. The only discovery that Mr. Coopriders’ attorneys had claimed was missing during their previous conferrals with me involved: (1) Ms. Davis’s text messages with Mr. Coopriders; (2) Ms. Davis’s text messages with Jackie Samuelson; and (3) Ms. Davis’s text messages with Yvonne Yakopovich.

9. Mr. Coopriders’ attorneys had never indicated, either in spoken or written communication, that there were any problems or deficiencies with Ms. Davis’s discovery responses regarding the individuals mentioned in paragraphs 1–6 of Ms. Klein’s list.

10. Mr. Coopriders’ attorneys still have not conferred with me about any of these issues, even though I have sent e-mails asking to arrange a time to meet and confer about the outstanding discovery issues.

11. If Mr. Coopriders’ attorneys had conferred with me about these issues, I would have told them that there are no “missing communications” with any of the individuals that appear on Ms. Klein’s list, and that Ms. Davis has fully complied with Request for Production No. 2 in each of the following respects:

- a. Ms. Davis has produced all responsive communications between herself and Casey Pyle. The only text messages between Ms. Davis and Casey Pyle that concern Mr. Coopriders or her pregnancies occurred between April 6, 2025, and April 8, 2025. Ms. Davis’s remaining text messages with Casey Pyle are not responsive because

they do not concern Mr. Cooprider or Ms. Davis's pregnancies. *See* Davis Decl. ¶ 4 (attached as Exhibit 2).¹

- b. Ms. Davis has produced all responsive communications between herself and Melissa Madrigal. *See* Davis Decl. ¶ 5. Ms. Davis's remaining text messages and e-mails with Melissa Madrigal are not responsive because they do not concern Mr. Cooprider or Ms. Davis's pregnancies. Neither Ms. Klein nor any of Mr. Cooprider's attorneys have explained to Mr. Mitchell or this Court how Ms. Davis's document production with respect to Ms. Madrigal is "incomplete."
- c. Ms. Davis has never discussed Mr. Cooprider or her recent pregnancies with Devin Davis, so she has no responsive communications with Mr. Davis. *See* Davis Decl. ¶ 6.
- d. Ms. Davis has no responsive communications with Marshall Bowling, because both she and Mr. Bowling have intentionally avoided discussing Mr. Cooprider or her pregnancies over text message, e-mail, or any other medium that would produce discoverable documents. *See* Davis Decl. ¶ 7.
- e. Ms. Davis has never discussed Mr. Cooprider or her recent pregnancies with Ami Amoroso, so she has no responsive communications with Ms. Amoroso. *See* Davis Decl. ¶ 8.
- f. Ms. Davis has never discussed Mr. Cooprider or her recent pregnancies with Mary Anna Ziarko, so she has no responsive communications with Ms. Ziarko. *See* Davis Decl. ¶ 9.
- g. Ms. Davis ceased communications with Jackie Samuelson after April 6, 2025, and she has already produced every single text message that she has ever exchanged with Ms. Samuelson. *See* Davis Decl. ¶ 10.
- h. Ms. Davis did not discuss Mr. Cooprider or her pregnancies with Yvonne Yakopovich after April 7, 2025, so she has no responsive communications with Ms. Yakopovich after that date. *See* Davis Decl. ¶ 11.

1. To the extent that Mr. Cooprider's attorneys requested Ms. Davis's communications "concerning YOU," *i.e.*, Ms. Davis herself, Ms. Davis objected to that request as overbroad, and Mr. Cooprider is not asking the Court to overrule Ms. Davis's objection.

12. We told Mr. Coopriders attorneys on January 19, 2026, when we served our responses and objections to Request for Production No. 2, that Ms. Davis had no responsive communications with Ami Amoroso, Devin Davis, Marshall Bowling, or Mary Anna Ziarko in her possession, custody, or control. An authentic copy of the responses and objections that Ms. Davis served on January 19, 2026, is attached to the joint status report as Exhibit 10.

13. Mr. Coopriders attorneys never contested our claim that Ms. Davis had no responsive communications with Ami Amoroso, Devin Davis, Marshall Bowling, or Mary Anna Ziarko and never said a word about it to me until Ms. Klein e-mailed her list on April 11, 2026.

14. Mr. Coopriders attorneys still have not conferred with me about any of these issues, even though I have sent e-mails asking to arrange a time to meet and confer about the outstanding discovery issues. *See* Exhibits 3–4.

15. When Ms. Klein e-mailed me her list of “issues to include in the joint status report” on April 11, 2026, I immediately wrote back and told her that the issues numbered as (1) through (6) on her list were not properly before the Court because they had never conferred with us as required by Rule 37(a)(1) and because they had never mentioned or discussed these issues in their motion to compel or the subsequent status report that they filed on April 7, 2026. An authentic copy of this e-mail is attached to the join status report as Exhibit 11. Ms. Klein has not responded to this e-mail.

16. Ms. Kleins claim that we produced 13,000 text messages between Ms. Davis and Mr. Coopriders “after” Ms. Klein filed her motion to compel is false. I e-mailed all of those text messages to Ms. Klein, in the precise format requested by Mr. Coopriders lawyers, at 2:58 P.M. central time on March 27, 2026, before Ms. Klein filed her motion to compel at 3:00 P.M. later that day. An authentic copy of the e-mail

producing those text messages is attached to the joint status report as Exhibit 12. The time stamp on the e-mail is in pacific time, not central time.

17. Ms. Klein’s claim that she demanded “all communications from *all witnesses* listed in RFP 2” during our conferrals is also false. Ms. Klein knows full well that her request in RFP 2 demanded only communications concerning Ms. Davis, Mr. Coopriider, Ms. Davis pregnancies, and the termination of Ms. Davis. She also knows that we objected to her request to including all communications concerning Ms. Davis as overbroad, and she is not asking this Court to overrule that objection.

18. Mr. Coopriider has no basis for requesting sanctions under Rule 37(a)(5)(A) because Ms. Davis she has produced all responsive documents that Mr. Coopriider has sought in Request for Production No. 2, and she produced them before Mr. Coopriider filed his motion to compel on March 27, 2026. So Mr. Coopriider has no basis for requesting sanctions under Rule 37(a)(5)(A).

19. If the Court denies the motion to compel, we recommend that the Court consider ordering Mr. Coopriider’s attorneys to show cause why sanctions should be imposed under Rule 37(a)(5)(B) for their efforts compel discovery that Ms. Davis has already produced, and for falsely accusing Ms. Davis of withholding “missing communications” without first conferring with Ms. Davis’s attorney.

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

Dated: April 14, 2026


JONATHAN F. MITCHELL

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 LIANA DAVIS

1. My name is Liana Davis. 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 am the plaintiff in this litigation, and I submit this declaration alongside the plaintiff’s status report of April 9, 2026.

4. I have produced all of my responsive communications with Casey Pyle. My only text messages with Casey Pyle that concern Mr. Coopriders or my pregnancies were exchanged between April 6, 2025, and April 8, 2025. My remaining text messages with Casey Pyle are not responsive because they do not concern Mr. Coopriders or my pregnancies.

5. I have produced all of my responsive communications with Melissa Madrigal. My remaining text messages and e-mails with Melissa Madrigal are not responsive because they do not concern Mr. Coopriders or my pregnancies.

6. I have never discussed Mr. Coopriders or my recent pregnancies with Devin Davis, so I have no responsive communications with Mr. Davis.

7. I have no responsive communications with Marshall Bowling, because on the advice of counsel Mr. Bowling and I have intentionally avoided discussing Mr. Cooprider or my pregnancies over text message, e-mail, or any other medium that would produce discoverable documents. In addition, Mr. Bowling and I talk in person a lot so there is no need for us to communicate about these issues over text message or e-mail.

8. I have never discussed Mr. Cooprider or my recent pregnancies with Ami Amoroso, so I have no responsive communications with Ms. Amoroso.

9. I have never discussed Mr. Cooprider or my recent pregnancies with Mary Anna Ziarko, so I have no responsive communications with Ms. Ziarko.

10. I ceased communications with Jackie Samuelson after April 6, 2025, and I has already produced every single text message that I have ever exchanged with Ms. Samuelson.

11. I did not discuss Mr. Cooprider or my pregnancies with Yvonne Yakopovich after April 7, 2025, so I have no responsive communications with Ms. Yakopovich after that date.

12. I have produced all audio recordings of Christopher Cooprider that are in my possession, custody, or control.

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

Dated: 4/14/2026

Signed by:

330405A4518E41A...
LIANA DAVIS

From: Jonathan Mitchell jonathan@mitchell.law
Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference
Date: April 10, 2026 at 4:11 PM
To: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattsllp.com, bmoscowitz bmoscowitz@thompsoncoe.com, Talcott Franklin tal@tfpc.me, Taylor Aguila taylor@wattsllp.com, Cindy Wilson cindy@wattsllp.com

Counsel:

We should set up a time to confer this weekend or on Monday about the contents of this joint status report. Please let us know what times you are available to confer.

You have not explained in your filing of April 7 how Ms. Davis has failed to comply with RFP No. 2, nor have you explained in that filing what discovery responses you are seeking to “compel” from Ms. Davis.

Please tell us what responsive discovery remains outstanding, from your point of view. We have explained to you many times that Ms. Davis has fully complied with RFP No. 2, and she has submitted a declaration under penalty of perjury attesting to that.

The redacted pictures in the text messages between Davis and Coopriider are not responsive or relevant to any party's claim or defense, and you are not entitled to those pictures under Rule 26(b)(1). Ms. Davis also has no responsive or relevant communications with Yvonne Yakopovich apart from the messages that she produced between April 1, 2025, and April 7, 2025, and she has said so in her sworn declaration. If you disagree with that, please tell us so I can explain our respective positions in the joint status report.

—Jonathan

On Apr 10, 2026, at 1:01 PM, Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov> wrote:

Counsel,

The Court understands the concerns regarding travel to Corpus Christi on the morning of April 15th. Accordingly, the Court will allow Plaintiff's counsel to attend via Zoom and extends that courtesy to Defendant Coopriider's counsel, as well. The Court further excuses Ms. Davis from attending this hearing.

The Court will move forward with the discovery hearing on April 15, 2026, at 10:30 a.m. The parties, their counsel, and their witnesses are permitted, but not required, to attend in person. The Court requests the parties file a joint status report, not to exceed two pages, regarding what discovery remains outstanding and requires the Court's resolution **on or before April 14, 2026, at 12:00 p.m.**

Below is the link to use for the hearing:

Join ZoomGov Meeting

<https://www.zoomgov.com/j/1615444251?pwd=R3g5ZnBwdVpvVkFCUIBVS211UXZ4QT09>

Dial by your location

+1 669 254 5252 US (San Jose)

+1 646 828 7666 US (New York)

Meeting ID: 161 544 4251

Password: 020679

Thank you,

<image001.png>

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Friday, April 10, 2026 1:45 PM

To: Beth Klein <beth@bethklein.com>

Cc: Mikal Watts <mikal@wattsllp.com>; Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; bmoscowitz <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattsllp.com>; Cindy Wilson <cindy@wattsllp.com>

Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

CAUTION - EXTERNAL:

Ms. Clancy:

My client cannot attend in person or on Zoom on April 15 because she is teaching class all morning. Mr. Coopriider's lawyers indicated to me over e-mail that they will not insist on Ms. Davis's in-person attendance, but my understanding is that Judge Morales still wants her to attend in person.

I can attend the hearing over Zoom if it is held on the morning of April 15 and I working to determine whether I can attend in person. I reside in the pacific northwest and I need to be at Stanford the morning of April 16 for a moot court in a pending Supreme Court case. I am handling this case pro bono and traveling to and from Corpus Christi requires an entire day of travel with layovers at considerable cost. If Judge Morales and Mr. Coopriider's lawyers are willing to allow my attendance over Zoom, I would be grateful.

As we noted in the status report that we filed last night, Ms. Davis has produced every single responsive document that Mr. Coopriider's lawyers have sought in RFP No. 2, and Ms. Davis has attested to this in declarations submitted under penalty of perjury. The redacted pictures in the text messages between Davis and Coopriider are not responsive or relevant to any party's claim or defense. Ms. Davis also has no responsive or relevant communications with Yvonne Yakopovich apart from the messages that she produced between April 1, 2025, and April 7, 2025, and she has said so in her sworn declaration. Mr. Coopriider's attorneys do not deny or contest any of this in the written submission that they

nited on April 7.

We therefore do not believe it is necessary for Ms. Davis to attend the hearing, as she has fully complied with RFP No. 2 and Mr. Coopriders attorneys do not argue otherwise. If the hearing proceeds on April 15, we respectfully ask the Court and Mr. Coopriders attorneys to excuse her attendance.

—Jonathan

On Apr 10, 2026, at 10:07 AM, Beth Klein <beth@bethklein.com> wrote:

I will appear in person. Thank you kindly.

Beth Klein
Mobile response

From: Mikal Watts <mikal@wattslp.com>
Sent: Friday, April 10, 2026 11:05:16 AM
To: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Beth Klein <beth@bethklein.com>; Jonathan Mitchell <jonathan@mitchell.law>
Cc: bmoscowitz <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattslp.com>; Cindy Wilson <cindy@wattslp.com>
Subject: Re: Davis v. Coopriders, No. 2:25-cv-00220 Request to Schedule Discovery Conference

I'll be there in person on the 15th. Thank you.

From: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>
Date: Friday, April 10, 2026 at 10:30 AM
To: Beth Klein <beth@bethklein.com>, Jonathan Mitchell <jonathan@mitchell.law>
Cc: Mikal Watts <mikal@wattslp.com>, bmoscowitz <bmoscowitz@thompsoncoe.com>, Talcott Franklin <tal@tfpc.me>, Taylor Aguila <taylor@wattslp.com>, Cindy Wilson <cindy@wattslp.com>
Subject: RE: Davis v. Coopriders, No. 2:25-cv-00220 Request to Schedule Discovery Conference

Thank you, but I've already been given instructions to reset to Wednesday, April 15, 2026 at 10:30 am. The notice has just been docketed on CMECF.

Thank you,

<image001.png>

From: Beth Klein <beth@bethklein.com>
Sent: Friday, April 10, 2026 10:06 AM
To: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Jonathan Mitchell <jonathan@mitchell.law>
Cc: Mikal Watts <mikal@wattslip.com>; Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattslip.com>; Cindy Wilson <cindy@wattslip.com>
Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

CAUTION - EXTERNAL:

Mr. Watts confirms he can cover 4/23 in the morning

Beth Klein
Mobile response

From: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>
Sent: Friday, April 10, 2026 8:00:05 AM
To: Jonathan Mitchell <jonathan@mitchell.law>
Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslip.com>; Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>
Subject: RE: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

Counsel,

Mr. Mitchell, in response to your question of filing a motion to compel before the discovery hearing, the Court's response is no. We will follow the Court's instructions in the scheduling order and have the hearing first, then motion filing, if still necessary.

Because of the Court's limited time available on Tuesday, April 14th and the expanding discovery issues in this case, the Court believes moving the hearing to next week would be beneficial. The Court has availability on Wednesday, April 22, morning or afternoon and on Thursday morning, April 23. Please let me know your availability for these times for an in-person setting.

Respectfully,

<image001.png>

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Friday, April 10, 2026 2:15 AM
To: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>
Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattsllp.com>;
Moscowitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin
<tal@tfpc.me>
Subject: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule
Discovery Conference

CAUTION - EXTERNAL:

Dear Ms. Clancy:

The parties in this case have reached a discovery impasse, this time with respect to a discovery request that Ms. Davis has served on Mr. Coopriider.

Ms. Davis is seeking to obtain location data from Mr. Coopriider's android for the time period after midnight on April 6, 2025, after Mr. Coopriider left Ms. Davis's house to pick up her mother but never returned and abandoned both Ms. Davis and her mother while Ms. Davis was losing her pregnancy.

We are also seeking to obtain Mr. Coopriider's internet search history with respect to abortion pills from any personal computers, tablet computers, and smartphones that he owned.

Ms. Davis served a discovery request on October 5, 2025, asking Mr. Coopriider to turn over his computers, tablets, and smartphones. But Mr. Coopriider objected on the ground that this would allow Ms. Davis to access all of his personal data including privileged communications.

So Ms. Davis's attorneys proposed a compromise in which Mr. Coopriider would turn over his devices to a mutually agreeable forensics expert, who would then extract and provide to us only the information that we are seeking from his devices that is relevant to this lawsuit, such as his location data on the night of April 5, 2025, and his internet-search history related to abortion and abortion pills between January 2025 and May 2025,

Mr. Coopriider's attorneys rejected this compromise, leaving the parties at loggerheads.

We would like to discuss this impasse with Judge Morales at the hearing scheduled for April 14, 2026. Should I file a motion to compel before the hearing or should I ask for the hearing of April 14, 2026, to be treated as a discovery conference on this issue?

Thank you for considering this.

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

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CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

Jonathan F. Mitchell
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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PRIVILEGED AND CONFIDENTIAL — ATTORNEY–CLIENT COMMUNICATION / ATTORNEY WORK PRODUCT

From: Jonathan Mitchell jonathan@mitchell.law

Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

Date: April 11, 2026 at 4:46 PM

To: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, bmoscowitz bmoscowitz@thompsoncoe.com, Talcott Franklin tal@tfpc.me, Taylor Aguila taylor@wattslp.com, Cindy Wilson cindy@wattslp.com

JM

Counsel:

We need to submit a joint status report by Tuesday. Please let us know when you're available to confer about it.

Also please send us the audio and video recordings that you intend to introduce into evidence at next week's hearing.

—Jonathan

On Apr 10, 2026, at 4:11 PM, Jonathan Mitchell <jonathan@mitchell.law> wrote:

Counsel:

We should set up a time to confer this weekend or on Monday about the contents of this joint status report. Please let us know what times you are available to confer.

You have not explained in your filing of April 7 how Ms. Davis has failed to comply with RFP No. 2, nor have you explained in that filing what discovery responses you are seeking to "compel" from Ms. Davis.

Please tell us what responsive discovery remains outstanding, from your point of view. We have explained to you many times that Ms. Davis has fully complied with RFP No. 2, and she has submitted a declaration under penalty of perjury attesting to that.

The redacted pictures in the text messages between Davis and Coopriider are not responsive or relevant to any party's claim or defense, and you are not entitled to those pictures under Rule 26(b)(1). Ms. Davis also has no responsive or relevant communications with Yvonne Yakopovich apart from the messages that she produced between April 1, 2025, and April 7, 2025, and she has said so in her sworn declaration. If you disagree with that, please tell us so I can explain our respective positions in the joint status report.

—Jonathan

On Apr 10, 2026, at 1:01 PM, Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov> wrote:

Counsel,

The Court understands the concerns regarding travel to Corpus Christi on the morning of

April 15th. Accordingly, the Court will allow Plaintiff's counsel to attend via Zoom and extends that courtesy to Defendant Coopriders' counsel, as well. The Court further excuses Ms. Davis from attending this hearing.

The Court will move forward with the discovery hearing on April 15, 2026, at 10:30 a.m. The parties, their counsel, and their witnesses are permitted, but not required, to attend in person. The Court requests the parties file a joint status report, not to exceed two pages, regarding what discovery remains outstanding and requires the Court's resolution **on or before April 14, 2026, at 12:00 p.m.**

Below is the link to use for the hearing:

Join ZoomGov Meeting

[https://www.zoomgov.com/j/1615444251?](https://www.zoomgov.com/j/1615444251?pwd=R3g5ZnBwdVpvVkFCUIBVS211UXZ4QT09)

[pwd=R3g5ZnBwdVpvVkFCUIBVS211UXZ4QT09](https://www.zoomgov.com/j/1615444251?pwd=R3g5ZnBwdVpvVkFCUIBVS211UXZ4QT09)

Dial by your location

+1 669 254 5252 US (San Jose)

+1 646 828 7666 US (New York)

Meeting ID: 161 544 4251

Password: 020679

Thank you,

<image001.png>

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Friday, April 10, 2026 1:45 PM

To: Beth Klein <beth@bethklein.com>

Cc: Mikal Watts <mikal@wattslp.com>; Arlene Clancy

<Arlene_RodriguezClancy@txs.uscourts.gov>; bmoscowitz

<bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila

<taylor@wattslp.com>; Cindy Wilson <cindy@wattslp.com>

Subject: Re: Davis v. Coopriders, No. 2:25-cv-00220 Request to Schedule Discovery Conference

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Ms. Clancy:

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I can attend the hearing over Zoom if it is held on the morning of April 15 and I working

to determine whether I can attend in person. I reside in the pacific northwest and I need to be at Stanford the morning of April 16 for a moot court in a pending Supreme Court case. I am handling this case pro bono and traveling to and from Corpus Christi requires an entire day of travel with layovers at considerable cost. If Judge Morales and Mr. Coopriders' lawyers are willing to allow my attendance over Zoom, I would be grateful.

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Beth Klein
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We would like to discuss this impasse with Judge Morales at the hearing scheduled for April 14, 2026. Should I file a motion to compel before the hearing or should I ask for the hearing of April 14, 2026, to be treated as a discovery conference on this issue?

Thank you for considering this.

—Jonathan

Jonathan F. Mitchell
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jonathan@mitchell.law
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From: Beth Klein beth@bethklein.com 
Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference
Date: April 11, 2026 at 5:03 PM
To: Jonathan Mitchell jonathan@mitchell.law, Mikal Watts mikal@wattslp.com, bmoscowitz bmoscowitz@thompsoncoe.com, Talcott Franklin tal@tfpc.me, Taylor Aguila taylor@wattslp.com, Cindy Wilson cindy@wattslp.com

BK

Attached is our list of issues to include in the status report.

I am in the process of preparing my exhibit and witness lists. All recordings have previously been provided to you. Here are the identifiers: March 21, 2025 Spoliation Recording Answer Exhibits 23 and 24. CR0000001. My FRE Rule 1006 Summaries are Attached.

I will be in depositions all day on Monday, and my flight to Corpus leaves at 7:30 am on Tuesday morning.

Please add your issues to the Status Report, and I will need to review Monday.

Thank you.

Beth Klein

303-448-8884

beth@bethklein.com

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621

BETH  KLEIN

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Saturday, April 11, 2026 5:46 PM
To: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; bmoscowitz <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattslp.com>; Cindy Wilson <cindy@wattslp.com>
Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

Counsel:

We need to submit a joint status report by Tuesday. Please let us know when you're available to confer about it.

Also please send us the audio and video recordings that you intend to introduce into evidence at next week's hearing.

—Jonathan

On Apr 10, 2026, at 4:11 PM, Jonathan Mitchell <jonathan@mitchell.law> wrote:

Counsel:

We should set up a time to confer this weekend or on Monday about the contents of this joint status report. Please let us know what times you are available to confer.

You have not explained in your filing of April 7 how Ms. Davis has failed to comply with RFP No. 2, nor have you explained in that filing what discovery responses you are seeking to “compel” from Ms. Davis.

Please tell us what responsive discovery remains outstanding, from your point of view. We have explained to you many times that Ms. Davis has fully complied with RFP No. 2, and she has submitted a declaration under penalty of perjury attesting to that.

The redacted pictures in the text messages between Davis and Coopriider are not responsive or relevant to any party's claim or defense, and you are not entitled to those pictures under Rule 26(b)(1). Ms. Davis also has no responsive or relevant communications with Yvonne Yakopovich apart from the messages that she produced between April 1, 2025, and April 7, 2025, and she has said so in her sworn declaration. If you disagree with that, please tell us so I can explain our respective positions in the joint status report.

—Jonathan

On Apr 10, 2026, at 1:01 PM, Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov> wrote:

Counsel,

The Court understands the concerns regarding travel to Corpus Christi on the morning of April 15th. Accordingly, the Court will allow Plaintiff’s counsel to attend via Zoom and extends that courtesy to Defendant Coopriider’s counsel, as well. The Court further excuses Ms. Davis from attending this hearing.

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Dial by your location

+1 669 254 5252 US (San Jose)

+1 646 828 7666 US (New York)

Meeting ID: 161 544 4251

Password: 020679

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**Issues for April 15
2026 Hearing.docx**



**EX __ Manipulating
Witnesses and...**



**EX __ Missing
Screaming Audio Fil...**



**EX __ Summary of
Texts Deleting...**



A. Missing Communications

RFP No. 2 witnesses:

1. The text messages on Ms. Davis's phone between Davis and Casey Pyle other than April 6-8, 2025 have not been produced. Mr. Pyle was present at the ER on April 6, 2025 bringing Davis a phone charger, and Devin's texts confirm Pyle was active in Davis's life. The text messages from April 6, 2025 indicate that Pyle was aware of Davis's pregnancy.
2. Texts and emails between Davis and Magistrate Madrigal are incomplete.
3. Devin Davis (Liana Davis's husband) and Davis texts from Davis's phone with video and images have not been produced. Mr. Davis forwarded a copy of a text from Liana Davis in January 2026 stating that Ms. Davis and her lawyers have been "holding back on paperwork" for the "sake of the children, but now they will be sending "a variety of documents."
4. "Marshall" (Marshall Allen Bowling) is the man who impregnated Davis in May 2025, within weeks after her miscarriage. The first Marshall/Davis pregnancy ended in a miscarriage in September 2025. Marshall impregnated Davis again during the Fall on 2025. No communications have been produced.
5. Ami Amoros, Davis's sister no communications have been produced.
6. Anna Ziarko, Davis's mother no communications have been produced.
7. Davis's communications with Jackie Samuelson after April 6, 2025 have not been produced.
8. Davis's communications with Yvonne Yakopovich after April 7, 2025 have not been produced.

B. Limitations

Davis will not produce communications after April 7, 2025 and will not produce communications regarding her May 2025 – September 2025 miscarriage.

C. Sanctions for producing only after a Motion to Compel was Filed

D. Preservation of Ms. Davis's cell phone data due to spoliation and manipulation of evidence.

— EXHIBIT —

Davis: Deletion of Evidence • Coaching • Recordings

SMS: Davis → Jackie Samuelson | January – March 2025

34 messages

01. DISCOVERY / LEGAL PROCESS 1/2/2025 9:07 PM

(Just be careful of what's put in text message here, in case this divorce case enters "discovery"):

At the end of the 2nd (and last) time he and I "hung out," and I mean RIGHT at the end if you know what I mean, Maggie shit herself in my bedroom. It couldn't have been more perfectly or unfortunately timed. It was like a bad gag comedy. All of a sudden the room just smelled god-awful at the worst possible moment, and I had to go launching to bring her and her bedding downstairs and clean up. I made as light of it as I could and moved on like it's no big deal. He's been really nice to Maggie the two times he's been over and understands she's an old dog, even carrying her up the stairs at night because she can't walk up the stairs anymore. But can you imagine?

- **NOTE:** Davis explicitly warns Jackie to be careful what she puts in texts "in case this divorce case enters discovery"

02. DISCOVERY / LEGAL PROCESS 1/28/2025 8:15 AM

I am catastrophizing right now, but do you think he would try to get back at me for "ruining" his relationship by testifying against me if this divorce/custody case goes to trial?

- **NOTE:** Davis worries Chris would testify against her if divorce/custody goes to trial

03. DISCOVERY / LEGAL PROCESS 1/28/2025 8:29 AM

I assume all of our text messages would be subpoenaed in discovery, and it would look really really bad on me.

- **NOTE:** Davis acknowledges all text messages would be subpoenaed in discovery and "it would look really really bad on me"

04. DELETING / HIDING EVIDENCE 1/23/2025 7:41 AM

I woke up to realize that I accidentally audio recording the whole thing last night.

I. Am. Screaming.

I'm gonna

delete this later but not before listening to it out of curiosity.



- **NOTE:** Davis accidentally recorded Chris, states she is "gonna delete this later"

05. EVIDENCE / RECORDINGS

1/25/2025 1:59 PM

In any case, it weirdly makes me happy that if he ever tries to screw me over in some way, I now have a second piece of info against him in writing lol. The first being evidence of his sexcapades.

- **NOTE:** *Davis notes she has "evidence against him in writing" as leverage*

06. DISCOVERY / LEGAL PROCESS

2/6/2025 7:16 PM

Just FYI, I got served with discovery today. I will have to spend the next two weeks working around the clock to produce an even more impossible mountain of documents, essays, responses, and information than I had to back in November. It's another instance where even if I had a staff of 8 people working on this 24 hours per day, it's insurmountable. And this is while I work and take care of children until late in the night.

- **NOTE:** *Davis discloses she was served with discovery — describes it as "an impossible mountain of documents"*

07. EVIDENCE / RECORDINGS

2/7/2025 4:47 PM

It's against standing orders to check each other's emails or other accounts, so he's not even allowed to do that. If he did, the stuff he found would not be admissible in court.

- **NOTE:** *Davis notes evidence found by Devin illegally would not be admissible*

08. DISCOVERY / LEGAL PROCESS

2/7/2025 5:01 PM

Focus on the interrogatories. We can ask for an extension for the request for production closer to the deadline.

- **NOTE:** *Davis shares her attorney's instruction: "Focus on the interrogatories"*

09. DISCOVERY / LEGAL PROCESS

2/11/2025 2:25 PM

Just talked to my therapist who has experience testifying in family law cases, and she said that these discovery questions I was served with are a bigger deep dive than what she is used to seeing. She said the family violence questions and stuff about money is normal, but she has never heard of itemizing everything in the house, getting all the records of all of our doctors appointments, and certainly not having to produce the legal theories behind it. She made a good point, which is doctors offices have 45 days to produce records, so they would not even do it in that timeframe.

- **NOTE:** *Davis's therapist says the discovery questions are unusually deep — itemizing everything in the house, all doctor records*

10. DISCOVERY / LEGAL PROCESS 2/12/2025 7:26 PM

Omg! I just found the discovery paperwork that my attorney's office plans to serve to Devin in my junk mail. They sent it to me yesterday, so I would like to reply as soon as possible. Sorry in advance for a bunch of screen shots that look a lot like what he served me with. Hoping for your input on these:

- **NOTE:** *Davis shares discovery paperwork her attorney plans to serve on Devin, solicits Jackie's input*

11. DISCOVERY / LEGAL PROCESS 2/13/2025 2:08 PM

I really do have to go, I now have 50 minutes to send all my discovery questions. But say everything you are thinking, and I will respond to it later.

- **NOTE:** *Davis has 50 minutes to send discovery questions — still hasn't started*

12. DISCOVERY / LEGAL PROCESS 2/13/2025 2:26 PM

I can't handle this right now. Like even if Chris didn't exist, I can't handle this just because I have so many fears and worries with the divorce, custody, and discovery. He showed me on his phone that the email went to his email address, and it was addressed to him. So I saw that much. It's not like he sent it to my email address.

- **NOTE:** *Davis panicking about discovery and Chris simultaneously*

13. DISCOVERY / LEGAL PROCESS 2/15/2025 6:35 PM

So he told me I was just going to have to trust him to bring everything, and I replied with two excellent points: 1) that I will have access to all of his tax documents on my H&R Block account bc the first thing they do is scan them in, and 2) I casually mentioned that I am about to get access to all of these records during the discovery process. It was the first time I have mentioned "discovery" in his presence. He had nothing to say back to this because he knows I'm right, and I bet as usual he is surprised at how matter-of-factly I am handling the crap he throws at me in this divorce process.

- **NOTE:** *Davis reveals she told Devin about discovery as a veiled warning/threat*

14. EVIDENCE / RECORDINGS 2/16/2025 8:37 PM

And right before discovery when I have a renewed interest in documenting everything. Is he dumb?

- **NOTE:** *Davis states she has "renewed interest in documenting everything" right before discovery deadline*

15. DISCOVERY / LEGAL PROCESS 2/17/2025 6:28 PM

Nope, haven't even gotten that far. I've literally answered three of the interrogatories out of 19, and that is it. Have not touched the 20 something requests.

- **NOTE:** *Davis admits she has only answered 3 of 19 interrogatories and hasn't touched the 20+ requests for production*

16. EVIDENCE / RECORDINGS 2/19/2025 7:29 PM

I listened back to last night's recording (I literally record everything now, for paranoid reasons) and I can't stop shaking my head about how SUUUUuuuper "prepared" his gf is and how this apparently didn't matter with me at all.

- **NOTE:** *Davis states "I literally record everything now, for paranoid reasons"*

17. DELETING / HIDING EVIDENCE 2/19/2025 9:02 PM

Promise you'll delete all of these?

- **NOTE:** *Davis asks Jackie to "Promise you'll delete all of these" after sending audio recordings of Chris*

18. DELETING / HIDING EVIDENCE 2/19/2025 9:03 PM

Tell me, you will delete all of these and not save them to some cloud or server

- **NOTE:** *Davis instructs: "Tell me you will delete all of these and not save them to some cloud or server"*

19. DELETING / HIDING EVIDENCE 2/19/2025 9:04 PM

*Tell me you will delete all of these

- **NOTE:** *Reiteration: "Tell me you will delete all of these"*

20. DELETING / HIDING EVIDENCE 2/19/2025 9:09 PM

And promise you'll delete all recordings! Lol

- **NOTE:** *Davis: "promise you'll delete all recordings"*

21. DELETING / HIDING EVIDENCE 2/19/2025 9:10 PM

You can delete individual messages. You just swipe or hit select or edit and then choose what to delete.

- **NOTE:** *Davis instructs Jackie how to delete individual messages*

22. DELETING / HIDING EVIDENCE 2/19/2025 9:16 PM

I will show you how to delete individual messages next time I see you. We figured it out on Chris's android.

- **NOTE:** Davis: "I will show you how to delete individual messages next time I see you. We figured it out on Chris's android"

23. DELETING / HIDING EVIDENCE 2/23/2025 8:14 PM

Funny you used the word destroy, because that is exactly the word I used.

- **NOTE:** Davis says: "Funny you used the word destroy, because that is exactly the word I used"

24. COACHING / SCRIPTING 2/23/2025 8:44 PM

I just don't want you to worry yourself for one second about me, because as we move toward mediation, I don't know if the amicus attorney will be reaching out to you again or if you will be called to testify or what. But I would want you doing nothing but singing my praises as a mother because that has not slipped up at all.

- **NOTE:** Davis coaches Jackie to only speak positively about her as a mother if contacted by amicus or called to testify

25. EVIDENCE / RECORDINGS 2/28/2025 6:03 PM

He did good. And I took pictures of everything since I'm going to need it for discovery

- **NOTE:** Davis takes pictures of something "for discovery"

26. COACHING / SCRIPTING 3/5/2025 11:44 AM

Chris is LOSING HIS SHIT. He thinks it's WAAAAY too far out and he's wanting me to lie to my doc and say I think I'm having a miscarriage so that I can be seen sooner.

- **NOTE:** Davis reports Chris wants her to lie to her doctor about having a miscarriage

27. COACHING / SCRIPTING 3/5/2025 6:35 PM

He and I just talked on the phone. Apparently that day that he filled out a report saying he couldn't fly because he didn't get enough sleep, he told them it was because he was with a lady who was having an abortion and it worked. He literally lied.

- **NOTE:** Davis reveals Chris lied to his military superiors, falsely claiming she had an abortion

28. DELETING / HIDING EVIDENCE 3/6/2025 7:51 AM

Devin didn't mention it this morning so I'm wondering if he was asleep when all of this went down. I deleted the ring footage of course.


- **NOTE:** Davis states: "I deleted the ring footage of course" after police incident at Chris's

29. DISCOVERY / LEGAL PROCESS 3/7/2025 8:08 PM

Regarding dates of intimate contact for the Discovery stuff that is due next week, my attorney told me to put the days that the kids were with the ex. I obviously have to say yes to intimate sexual encounters now and can't put "N/A" anymore.

- **NOTE:** Davis's attorney instructs her what to disclose in discovery about dates of intimate contact

30. DISCOVERY / LEGAL PROCESS 3/7/2025 8:10 PM

One question I didn't get to ask my attorney is when or if I should tell Devin about this pregnancy myself, or if I should just let him find out through these discovery submissions. Because the second I submit this discovery stuff next week, I am going to spend every single day for months wondering if Devin knows yet. 


- **NOTE:** Davis discusses whether Devin will learn of her pregnancy through discovery submissions

31. EVIDENCE / RECORDINGS 3/10/2025 4:08 PM

I learned in the past few days that Chris has recorded EVERY single hangout and conversation we've ever had. Many hours worth of audio. He downloaded apps specifically for this just like Devin did. Yes, I am positive because he played parts of them for me and I heard it. All of those deep late night heart-to-hearts for the past month as we figured out what to do with this pregnancy? Recorded. Me talking about incredibly sensitive medical history, like my first unintended pregnancy when I was a doctoral student? RECORDED. Me disclosing all of my trauma from Devin and what he has done to our family, details about my legal case, etc.? EFFING RECORDED. I thought I was bad for taking a few souvenir photos of him- he could RUIN me with the stuff he has.

- **NOTE:** Davis discovers Chris has recorded every conversation they've had — "Many hours worth of audio"

32. EVIDENCE / RECORDINGS 3/10/2025 4:10 PM

I guarantee you- GUARANTEE  that he recorded the entire conversation that you and him had today. That is a promise. And he backed it up on an app and on Google Drive. If you do choose to talk to him again (not about me, because I'm requesting that you don't), be careful. He records more than I do, and I am little miss recorder reporter

- **NOTE:** Davis warns Jackie that Chris records everything and has backed it up on Google Drive

33. EVIDENCE / RECORDINGS

3/10/2025 4:13 PM

So him recording me at the front door when I went to his place on Wednesday when he wasn't answering his phone was absolutely not the first time he has recorded me. He's been doing this for at least a month. That was just the first I saw of it.

- **NOTE:** *Davis confirms Chris has been recording her for "at least a month"*

34. EVIDENCE / RECORDINGS

3/10/2025 4:25 PM

Regarding your conversation that I know he would've recorded today, it would only be fair to tell you he's probably going to play it for me the next time we talk in an effort to hurt my feelings and make me feel alone in this world. If there's anything that was said that you would like to provide some context for or just give me a heads up about so that I am prepared for it and not bamboozled/crushed, I'd appreciate it.

- **NOTE:** *Davis tells Jackie that Chris will likely play their recorded phone conversation back to Davis to hurt her*

EXHIBIT _____

Davis: The Missing Recording

SMS: Davis → Jackie Samuelson | January – March 2025

15 selected messages

Summary

On the night of January 22–23, 2025, Davis accidentally left her phone recording during a sexual encounter with Chris Cooperider. Rather than deleting the recording as she initially stated she would, Davis retained it, listened to it repeatedly, and later sent copies to Jackie Samuelson — while simultaneously instructing Jackie to delete those copies. Davis also acknowledged recording subsequent visits, stating she "literally record[s] everything now, for paranoid reasons." Separately, Davis told Chris to delete messages from his Android phone and offered to teach Jackie how to delete individual messages.

I woke up to realize that I accidentally audio recording the whole thing last night. 🐱 I. Am. Screaming. 😂 I'm gonna delete this later but not before listening to it out of curiosity. 😏



01. 1/23/2025 7:41 AM SMS: Davis → Jackie Samuelson

I woke up to realize that I accidentally audio recording the whole thing last night. I. Am. Screaming. I'm gonna delete this later but not before listening to it out of curiosity. 😏

► **Significance:** Davis discovers she accidentally recorded her sexual encounter with Chris the previous night. States she intends to **DELETE** the recording — but only after listening to it.

02. 1/23/2025 7:42 AM SMS: Davis → Jackie Samuelson

*recorded

► **Significance:** Correction to prior message (typo fix).

03. 1/23/2025 10:47 AM SMS: Davis → Jackie Samuelson

Well I think I went to record him talking about he is apparently a professional pickleball player with sponsors bc I couldn't believe what I was hearing and wanted to hear it again sober. He gets free stuff and is competing in tournament this weekend. And then I forgot to turn it off. 😏

► **Significance:** Davis explains the recording was started intentionally to capture Chris talking about his pickleball career — then she forgot to stop it, capturing the entire sexual encounter.

04. 2/3/2025 11:41 AM SMS: Davis → Jackie Samuelson

Sry if this is TMI, but that accidental audio recording sounded like a weapons-grade porno.

► **Significance:** *Davis confirms she listened to the recording — describing it graphically. Contradicts her 1/23 statement that she would delete it. The recording was retained for at least 11 days.*

05. 2/3/2025 11:41 AM SMS: Davis → Jackie Samuelson

When I listened to it I was shriek-laughing in amusement/semi-horror and wondering how I'm not in the hospital lmao

► **Significance:** *Davis describes her reaction to listening to the recording in detail. Confirms she retained and listened to it well after stating she would delete it.*

06. 2/3/2025 11:51 AM SMS: Davis → Jackie Samuelson

I legit checked my bed after listening to that to make sure it was still structurally sound. 😂😂😂 Ok I'll stop. But really, that man is...in shape.

► **Significance:** *Further commentary on the recording. Davis retained and listened to this recording repeatedly.*

07. 2/19/2025 7:29 PM SMS: Davis → Jackie Samuelson

I listened back to last night's recording (I literally record everything now, for paranoid reasons) and I can't stop shaking my head about how SUUUUuuper "prepared" his gf is and how this apparently didn't matter with me at all.

► **Significance:** *Nearly a month later, Davis states "I literally record everything now, for paranoid reasons" — confirming a pattern of intentional recording of Chris during visits.*

08. 2/19/2025 9:02 PM SMS: Davis → Jackie Samuelson

Promise you'll delete all of these?

► **Significance:** *After sending Jackie audio recordings of Chris, Davis asks Jackie to delete them — while simultaneously retaining her own copies.*

09. 2/19/2025 9:03 PM SMS: Davis → Jackie Samuelson

Tell me, you will delete all of these and not save them to some cloud or server

► **Significance:** *Davis instructs Jackie specifically not to save to cloud or server — demonstrating awareness of digital evidence preservation while attempting to have Jackie destroy copies.*

10. 2/19/2025 9:04 PM SMS: Davis → Jackie Samuelson

*Tell me you will delete all of these

► **Significance:** *Reiteration/correction of deletion demand.*

11. 2/19/2025 9:09 PM SMS: Davis → Jackie Samuelson

And promise you'll delete all recordings! Lol

► **Significance:** *Fourth request for Jackie to delete the recordings Davis sent her.*

12. 2/19/2025 9:10 PM SMS: Davis → Jackie Samuelson

You can delete individual messages. You just swipe or hit select or edit and then choose what to delete.

► **Significance:** *Davis provides step-by-step instructions for deleting individual messages — facilitating destruction of evidence.*

13. 2/19/2025 9:16 PM SMS: Davis → Jackie Samuelson

I will show you how to delete individual messages next time I see you. We figured it out on Chris's android.

► **Significance:** *Davis states she already helped Chris delete messages from his Android phone — and offers to do the same for Jackie in person.*

14. 3/10/2025 4:08 PM SMS: Davis → Jackie Samuelson

I learned in the past few days that Chris has recorded EVERY single hangout and conversation we've ever had. Many hours worth of audio. He downloaded apps specifically for this just like Devin did. Yes, I am positive because he played parts of them for me and I heard it.

► **Significance:** *Davis discovers Chris has been recording her — mirroring her own behavior. She acknowledges hearing the recordings firsthand.*

15. 3/10/2025 4:10 PM SMS: Davis → Jackie Samuelson

I guarantee you- GUARANTEE 🍀 that he recorded the entire conversation that you and him had today. That is a promise. And he backed it up on an app and on Google Drive.

► **Significance:** *Davis warns Jackie about Chris's recording practices — specifically noting backup to Google Drive, demonstrating her understanding of digital evidence preservation.*

Davis's own texts that she bated stamped and produced in discovery and audio recordings of her voice proves she destroyed evidence — while under oath saying she did not.

The March 17 text: "When I deleted all of our texts, that unfortunately deleted my record of the first day of my last period." **DAVIS 4534**

3/17/2025 10:15 PM
iPhone (14122957136)

When I deleted all of our texts, that unfortunately deleted my record of the first day of my last period. That'll be another "uhhh."

The March 11 text: "Good point! My phone must have done a scheduled back-up. I will re-delete." **DAVIS 4361**

3/11/2025 9:58 PM
iPhone (14122957136)

Here is a screenshot of what I already sent you last week. Nothing has changed.

3/11/2025 9:59 PM

Chris Coopriider
[Next Door]
(7208408617)

Weird you still have messages saved even though you told me they were deleted.....

3/11/2025 10:00 PM

iPhone (14122957136)

Good point! My phone must have done a scheduled back
will re-delete.

The March 21 exchange: "we just deleted those texts for the second time today."

DAVIS4624

3/21/2025 5:51 PM

Chris Coopriider [Next
Door] (7208408617)

Here's where you asked me for booze.....

3/21/2025 5:51 PM

iPhone (14122957136)

First of all, I did not manipulate anyone,
second of all, we just deleted those texts for the
second time today. Not sure where you are
getting them from, so you can go ahead and
explain? Third of all, I'm going on a walk with
Alex with a fever, so you can knock it off. We
had a good day.

The February 7 instruction: "make it a habit to routinely delete our text thread. I
will do the same." DAVIS3429

2/7/2025 1:09 AM

iPhone (14122957136)

I promptly decided that it's going to be near impossible not to text you about stuff, so just talk to me like normal and just make it a habit to routinely delete our text thread. I will do the same. It's not like our conversations aren't retrievable through Verizon if someone was really intent on obtaining them, so no need to make our lives harder by talking in code.

Then on April 9, 2026 she swears under penalty of perjury: "I have never destroyed or spoliated evidence on Christopher Coopriider's phone." The distinction she is drawing — that she instructed him to delete his own phone while she deleted hers — does not cure the spoliation.

But more importantly, the March 21 audio recording has her physically present that she is wiping herself out of Coopriider's phone.

Liana

(32:22) Like, nothing. (32:25) You're about to fuck that up. (32:28) You're wonderful.

(32:29) I like you a lot. (32:32) ***I had to wipe you out wipe myself out of your phone.***

Liana

(32:34) ***I'm gonna wipe you out of all my devices. (32:36) I have you like, evidence of you in at least two devices because, again, what, like, those screen oh my god.*** (32:42) Put it in the head. (32:43) The screenshots I sent you, this is round one. (32:45) They're gonna dig deeper.

Exhibit 7-23 Audio and 7-24 Transcript.

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

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

Defendants.

**Plaintiff Liana Davis’s Second Amended Objections and Responses to
First Set of Requests for Production of Documents**

REQUEST FOR PRODUCTION NO. 1: ALL COMMUNICATIONS between YOU and any third person, whether it be by letter, memo, document, text, email, social media or communications platform, relating to:

- (a) CHRISTOPHER COOPRIDER;
- (b) YOUR interactions with CHRISTOPHER COOPRIDER;
- (c) YOUR pregnancy(ies) between November of 2024 to the present;
- (d) YOUR acquisition of PRODUCTS to end your pregnancy(ies) between November of 2024 to the present;
- (e) The termination of YOUR pregnancy(ies) between November of 2024 to the present, whether real or suspected; and
- (f) Any reports to third parties concerning one or more of the subjects enumerated above.

RESPONSE: Ms. Davis objects to this request to the extent it requests communications relating to any of her pregnancies apart from the pregnancy or pregnancies at issue in this lawsuit, as communications relating to any future pregnancies that she might have are not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested communications will be produced.

Responsive communications between Ms. Davis and the Corpus Christi Police Department can be found at Davis000157–245.

Responsive communications between Ms. Davis and Casey Pyle can be found at Davis001122–1133.

Responsive communications between Ms. Davis and Melissa Madrigal can be found at Davis001134–1188.

Responsive communications between Ms. Davis and Jackie Samuelson can be found at Davis001189–1219.

Responsive communications between Mr. Mitchell and third parties can be found at Davis000246–1121.

Responsive communications between Ms. Davis and LCDR Andrew Knott can be found at Davis 001220–1234.

REQUEST FOR PRODUCTION NO. 2: ALL COMMUNICATIONS between YOU and the following individuals between November 1, 2024 and the present:

- (a) Ami Amoroso;
- (b) CHRIS COOPRIDER;
- (c) Devan Davis;
- (d) Melisa Madrigal;
- (e) Your present or past boyfriend named “Marshall”;
- (f) Casey Pyle;
- (g) Jackie Samuelson;
- (h) Kyle Yakopovich;
- (i) Yvonne Yakopovich; and
- (j) Anna Ziarko;

concerning YOU, YOUR pregnancy(ies), the termination thereof—whether real or suspected, and/or CHRIS COOPRIDER.

RESPONSE: Ms. Davis objects to this request to the extent it requests all communications between Ms. Davis and these individuals “concerning YOU [Ms. Davis],” because a request for communications of that scope is far overbroad and is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested communications will be produced.

Ms. Davis has no responsive communications with the individuals mentioned in subsections (a), (c), (e), (h), (i), (j) in her possession, custody, or control.

Responsive communications between Ms. Davis and Casey Pyle can be found at Davis001122–1133.

Responsive communications between Ms. Davis and Melissa Madrigal can be found at Davis001134–1188.

Responsive communications between Ms. Davis and Jackie Samuelson can be found at Davis001189–1219. Ms. Davis is continuing to gather her communications with Jackie Samuelson, and the remaining responsive communications between Ms. Davis and Ms Samuelson will be produced at a later date.

REQUEST FOR PRODUCTION NO. 3: ALL COMMUNICATIONS between YOU and the following individuals between November 1, 2024 and the present:

- (a) Jana Pinson and/or any member of her staff at Pregnancy Center of Coastal Bend;
- (b) Mark Lee Dickson and/or any member of his staff at:
 - (1) Right to Life of East Texas, Inc.;
 - (2) Right to Life Across Texas; and/or
 - (3) Sanctuary Cities for the Unborn Initiative.
- (c) Senator Bryan Hughes and/or any member of his legislative staff;
- (d) Representative Jeff Leach and/or any member of his legislative staff;
- (e) Texas Attorney General Kenneth Paxton and/or any member of his staff;
- (f) Amy Snow Hilton and/or any member of her staff;
- (g) Texas Governor Greg Abbott and/or any member of his staff

concerning YOU, YOUR pregnancy(ies), the termination thereof—whether real or suspected, and/or CHRIS COOPRIDER.

RESPONSE: Ms. Davis objects to this request to the extent it requests all communications between Ms. Davis and these individuals “concerning YOU [Ms. Davis],” because a request for communications of that scope is far overbroad and is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested communications will be produced.

A responsive e-mail communication between Mr. Mitchell and Amy Snow Hilton can be found at Davis000407–418. Ms. Davis does not have any other responsive communications in her possession custody, or control.

REQUEST FOR PRODUCTION NO. 4: ALL COMMUNICATIONS between YOU and the following individuals or entities between November 1, 2024 and the present:

- (a) Christine, Canterbury, M.D., and/or any member of her staff;
- (b) Corpus Christi Bay Area Medical Center, and/or any member of its staff;
- (c) Corpus Christi Women’s Clinic, and/or any member of its staff;
- (d) CVS Pharmacy and/or any member of its staff;
- (e) Pregnancy Center of the Coastal Bend and/or any member of its staff;

(f) Any other healthcare provider,

concerning YOU, YOUR pregnancy(ies), the termination thereof—whether real or suspected, and/or CHRIS COOPRIDER.

RESPONSE: Ms. Davis objects to this request to the extent it requests all communications between Ms. Davis and these individuals “concerning YOU [Ms. Davis],” because a request for communications of that scope is far overbroad and is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1).

Ms. Davis does not have any responsive communications in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 5: ALL COMMUNICATIONS between YOU and the following individuals or entities between November 1, 2024 and the present:

- (a) Corpus Christi Police Department;
- (b) Nueces County District Attorney’s Office;
- (c) Texas Attorney General’s Office;
- (d) Naval Criminal Investigative Service;
- (e) Marine Judge Advocates within the United States Marine Corps;
- (f) United States Attorney’s Office for the Southern District of Texas; and
- (g) United States Department of Justice;

concerning YOU, YOUR pregnancy(ies), the termination thereof—whether real or suspected, and/or CHRIS COOPRIDER.

RESPONSE: Ms. Davis objects to this request to the extent it requests all communications between Ms. Davis and these individuals “concerning YOU [Ms. Davis],” because a request for communications of that scope is far overbroad and is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested communications will be produced.

Communications from Ms. Davis to Detective Manzano at CCPD can be found at Davis000157–235.

Communications from Detective Manzano at CCPD to Ms. Davis can be found at Davis000236–245.

Communications between Mr. Mitchell and the entities described in subsections (a)–(e) can be found at Davis000246–1121.

Responsive communications between Ms. Davis and LCDR Andrew Knott can be found at Davis 001220–1234.

Ms. Davis does not have any responsive communications with the entities described in subsections (f) or (g) in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 6: ALL COMMUNICATIONS between YOU and the following individuals or entities between November 1, 2024 and the present:

- (a) Texas A&M Corpus Christi;
- (b) Any other employer of YOURS;

concerning YOU, YOUR pregnancy(ies), the termination thereof—whether real or suspected, and/or CHRIS COOPRIDER.

RESPONSE: Ms. Davis does not have any responsive communications in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 7: ALL CONTENT INTERACTIONS between November 1, 2024 and the present from or to you on SOCIAL MEDIA or COMMUNICATIONS applications, including, but not limited to, FACEBOOK, GOOGLE, INSTAGRAM, TWITTER, TIK-TOK, WHATSAPP, YOUTUBE and any other means of electronic communication used by YOU, concerning YOU, YOUR pregnancy(ies), the termination thereof—whether real or suspected, and/or CHRIS COOPRIDER.

RESPONSE: Ms. Davis does not have any responsive content interactions in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 8: ALL HEALTHCARE RECORDS, MEDICAL RECORDS, INSURANCE RECORDS, and PHARMACY RECORDS between November 1, 2024 and the present concerning YOU.

RESPONSE: Ms. Davis objects to this request to the extent it requests healthcare records, medical records, insurance records, and pharmacy records that have no relevance the pregnancy or pregnancies at issue in this lawsuit, as records of that sort are not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested records can be found at Davis000001–000140.

REQUEST FOR PRODUCTION NO. 9: ALL BLOOD TEST records between November 1, 2024 and the present concerning YOU.

RESPONSE: Ms. Davis objects to this request to the extent it requests blood-test records that post-date the pregnancy or pregnancies at issue in this lawsuit, as blood-test records of that sort are not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested blood-test records can be found in Ms. Davis’s medical records, which have been produced and appear at Davis000001–000143.

REQUEST FOR PRODUCTION NO. 10: ALL examination records of any kind (whether documentary, digitally or otherwise) concerning YOU between November 1, 2024 and the present, including any ultrasounds or other examination of YOU or your unborn child(ren).

RESPONSE: Ms. Davis objects to this request to the extent it requests examination records that post-date the pregnancy or pregnancies at issue in this lawsuit, as examination records of that sort are not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested examination records can be found in Ms. Davis’s medical records, which have been produced and appear at Davis000001–000143.

REQUEST FOR PRODUCTION NO. 11: ALL Photographs taken by or of you and/or CHRIS COOPRIDER between November 1, 2024 and the present.

RESPONSE: Ms. Davis objects to this request to the extent it requests all photographs taken “by” her between November 1, 2024 and the present, as well as photographs “of” her between November 1, 2024 and the present, as a request for photographs of that scope is far overbroad and is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). Ms. Davis does not have photographs taken “by” Mr. Coopridier in her possession, custody, and control. Ms. Davis is producing photographs “of” Mr. Coopridier in her possession, custody, and control, which can be found at Davis000144–146.

REQUEST FOR PRODUCTION NO. 12: ALL materials and DELETED CONTENT that was DELETED by YOU or another concerning YOU, YOUR unborn child(ren) and/or CHRIS COOPRIDER between November 1, 2024 and the present.

RESPONSE: Ms. Davis does not have any responsive materials or content in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 13: ALL audio, visual and/or digital files concerning YOU, YOUR unborn child(ren) and/or CHRIS COOPRIDER between November 1, 2024 and the present.

RESPONSE: Ms. Davis objects to this request to the extent it requests all “audio, visual and/or digital files concerning YOU [Ms. Davis],” because a request for files of that scope is far overbroad and is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1).

Responsive audio, visual, and/or digital files can be found at Davis000144–146, Davis000156, Davis000352–356, Davis000564–569, Davis000627–628, and Davis001174.

REQUEST FOR PRODUCTION NO. 14: ALL counseling, diagnostic, treatment, psychological, psychiatric and/or medical records concerning YOU for a period from 2015 to the present.

RESPONSE: Ms. Davis objects to this request to the extent it requests counseling, diagnostic, treatment, psychological, psychiatric and/or medical records going back to 2015, as a request for records of that scope is far overbroad and is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). Ms. Davis further objects to this request to the extent it requests counseling, diagnostic, treatment, psychological, psychiatric and/or medical records that have no relevance the pregnancy or pregnancies at issue in this lawsuit, as records of that sort are not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). The other requested counseling, diagnostic, treatment, psychological, psychiatric and/or medical records will be produced.

REQUEST FOR PRODUCTION NO. 15: All employment records concerning YOU for a period from 2015 to the present.

RESPONSE: Ms. Davis objects to this request because is not “relevant to any party’s claim or defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1).

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Texas Bar No. 24075463
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

Dated: January 19, 2026

Counsel for Plaintiff Liana Davis

CERTIFICATE OF SERVICE

I certify that on January 19, 2026, I served this document by e-mail upon:

MIKAL C. WATTS
Watts Law Firm LLP
811 Barton Springs #725
Austin, Texas 78704
(512) 479-0500 (phone)
(512) 479-0501 (fax)
mikal@wattsllp.com

BETH KLEIN
Beth Klein, P.C.
350 Market Street, Suite 310
Basalt, Colorado 81621
(303) 448-8884 (phone)
beth@bethklein.com

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



From: Jonathan Mitchell jonathan@mitchell.law
Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference
Date: April 11, 2026 at 5:24 PM
To: Beth Klein beth@bethklein.com
Cc: Mikal Watts mikal@wattslp.com, bmoscowitz bmoscowitz@thompsoncoe.com, Talcott Franklin tal@tfpc.me, Taylor Aguila taylor@wattslp.com, Cindy Wilson cindy@wattslp.com

Beth:

You did not confer with us about any the issues that you list in (1) – (6) before filing your motion to compel. You also did not mention any of the issues in (1) – (6) in your motion to compel.

You have never once told us that you thought our productions of Ms. Davis’s communications with any of individuals listed in (1) – (6) was incomplete until this e-mail that you sent today.

You are not permitted to raise these issues at the hearing because you violated Rule 37(a)(1) by failing to confer in good faith about these issues before filing your motion to compel. You also omitted any mention of these issues in the motion to compel and the subsequent status report that you filed on April 7. We will object if you attempt to raise any of these issues at the hearing.

—Jonathan

On Apr 11, 2026, at 5:03 PM, Beth Klein <beth@bethklein.com> wrote:

Attached is our list of issues to include in the status report.

I am in the process of preparing my exhibit and witness lists. All recordings have previously been provided to you. Here are the identifiers: March 21, 2025 Spoliation Recording Answer Exhibits 23 and 24. CR0000001. My FRE Rule 1006 Summaries are Attached.

I will be in depositions all day on Monday, and my flight to Corpus leaves at 7:30 am on Tuesday morning.

Please add your issues to the Status Report, and I will need to review Monday.

Thank you.

Beth Klein
303-448-8884
beth@bethklein.com
[Documentary Website](#)
350 Market Street, Suite 310 Basalt CO 81621
<Outlook-rpbeveg0.png>

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Saturday, April 11, 2026 5:46 PM
To: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; bmoscowitz <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattslp.com>; Cindy Wilson <cindy@wattslp.com>
Subject: Re: Davis v. Coopriider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

Counsel:

We need to submit a joint status report by Tuesday. Please let us know when you’re available to confer about it.

Also please send us the audio and video recordings that you intend to introduce into evidence at next week’s hearing.

—Jonathan

On Apr 10, 2026, at 4:11 PM, Jonathan Mitchell <jonathan@mitchell.law> wrote:

Counsel:

We should set up a time to confer this weekend or on Monday about the contents of this joint status report. Please let us know what times you are available to confer.

You have not explained in your filing of April 7 how Ms. Davis has failed to comply with RFP No. 2, nor have you explained in that filing what discovery responses you are seeking to “compel” from Ms. Davis.

Please tell us what responsive discovery remains outstanding, from your point of view. We have explained to you many times that Ms. Davis has fully complied with RFP No. 2, and she has submitted a declaration under penalty of perjury attesting to that.

The redacted pictures in the text messages between Davis and Coopriders are not responsive or relevant to any party's claim or defense, and you are not entitled to those pictures under Rule 26(b)(1). Ms. Davis also has no responsive or relevant communications with Yvonne Yakopovich apart from the messages that she produced between April 1, 2025, and April 7, 2025, and she has said so in her sworn declaration. If you disagree with that, please tell us so I can explain our respective positions in the joint status report.

—Jonathan

On Apr 10, 2026, at 1:01 PM, Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov> wrote:

Counsel,

The Court understands the concerns regarding travel to Corpus Christi on the morning of April 15th. Accordingly, the Court will allow Plaintiff's counsel to attend via Zoom and extends that courtesy to Defendant Coopriders' counsel, as well. The Court further excuses Ms. Davis from attending this hearing.

The Court will move forward with the discovery hearing on April 15, 2026, at 10:30 a.m. The parties, their counsel, and their witnesses are permitted, but not required, to attend in person. The Court requests the parties file a joint status report, not to exceed two pages, regarding what discovery remains outstanding and requires the Court's resolution **on or before April 14, 2026, at 12:00 p.m.**

Below is the link to use for the hearing:

Join ZoomGov Meeting

<https://www.zoomgov.com/j/1615444251?pwd=R3p5ZnBwdVpvVkFCUIBVS211UXZ4QT09>

Dial by your location

+1 669 254 5252 US (San Jose)

+1 646 828 7666 US (New York)

Meeting ID: 161 544 4251

Password: 020679

Thank you,

<image001.png>

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Friday, April 10, 2026 1:45 PM

To: Beth Klein <beth@bethklein.com>

Cc: Mikal Watts <mikal@wattslp.com>; Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; bmoscowitz

<bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattslp.com>; Cindy Wilson <cindy@wattslp.com>

Subject: Re: Davis v. Coopriders, No. 2:25-cv-00220 Request to Schedule Discovery Conference

CAUTION - EXTERNAL:

Ms. Clancy:

My client cannot attend in person or on Zoom on April 15 because she is teaching class all morning. Mr. Coopriders' lawyers indicated to me over e-mail that they will not insist on Ms. Davis's in-person attendance, but my understanding is that Judge Morales still wants her to attend in person.

I can attend the hearing over Zoom if it is held on the morning of April 15 and I working to determine whether I can attend in person. I reside in the pacific northwest and I need to be at Stanford the morning of April 16 for a moot court in a pending Supreme Court case. I am handling this case pro bono and traveling to and from Corpus Christi requires an entire day of travel with layovers at considerable cost. If Judge Morales and Mr. Coopriders' lawyers are willing to allow my attendance over Zoom, I would be grateful.

As we noted in the status report that we filed last night, Ms. Davis has produced every single responsive document that Mr. Coopriders' lawyers have sought in RFP No. 2, and Ms. Davis has attested to this in declarations submitted under penalty of perjury. The redacted pictures in the text messages between Davis and Coopriders are not responsive or relevant to any party's claim or defense. Ms. Davis also has no responsive or relevant communications with Yvonne Yakopovich apart from the messages that she produced between April 1, 2025, and April 7, 2025, and she has said so in her sworn declaration. Mr. Coopriders' attorneys do not deny or contest any of this in the written submission that they filed on April 7.

We therefore do not believe it is necessary for Ms. Davis to attend the hearing, as she has fully complied with RFP No. 2 and Mr. Coopriders' attorneys do not argue otherwise. If the hearing proceeds on April 15, we respectfully ask the Court and Mr. Coopriders' attorneys to excuse her attendance.

—Jonathan

On Apr 10, 2026, at 10:07 AM, Beth Klein <beth@bethklein.com> wrote:

I will appear in person. Thank you kindly.

Beth Klein
Mobile response

From: Mikal Watts <mikal@wattslp.com>
Sent: Friday, April 10, 2026 11:05:16 AM
To: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Beth Klein <beth@bethklein.com>; Jonathan Mitchell <jonathan@mitchell.law>
Cc: bmoscowitz <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattslp.com>; Cindy Wilson <cindy@wattslp.com>
Subject: Re: Davis v. Cooprider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

I'll be there in person on the 15th. Thank you.

From: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>
Date: Friday, April 10, 2026 at 10:30 AM
To: Beth Klein <beth@bethklein.com>, Jonathan Mitchell <jonathan@mitchell.law>
Cc: Mikal Watts <mikal@wattslp.com>, bmoscowitz <bmoscowitz@thompsoncoe.com>, Talcott Franklin <tal@tfpc.me>, Taylor Aguila <taylor@wattslp.com>, Cindy Wilson <cindy@wattslp.com>
Subject: RE: Davis v. Cooprider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

Thank you, but I've already been given instructions to reset to Wednesday, April 15, 2026 at 10:30 am. The notice has just been docketed on CMECF.

Thank you,

<image001.png>

From: Beth Klein <beth@bethklein.com>
Sent: Friday, April 10, 2026 10:06 AM
To: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Jonathan Mitchell <jonathan@mitchell.law>
Cc: Mikal Watts <mikal@wattslp.com>; Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>; Taylor Aguila <taylor@wattslp.com>; Cindy Wilson <cindy@wattslp.com>
Subject: Re: Davis v. Cooprider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

CAUTION - EXTERNAL:

Mr. Watts confirms he can cover 4/23 in the morning

Beth Klein
Mobile response

From: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>
Sent: Friday, April 10, 2026 8:00:05 AM
To: Jonathan Mitchell <jonathan@mitchell.law>
Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>
Subject: RE: Davis v. Cooprider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

Counsel,

Mr. Mitchell, in response to your question of filing a motion to compel before the discovery hearing, the Court's response is no. We will follow the Court's instructions in the scheduling order and have the hearing first, then motion filing, if still necessary.

Because of the Court's limited time available on Tuesday, April 14th and the expanding discovery issues in this case, the Court believes moving the hearing to next week would be beneficial. The Court has availability on Wednesday, April 22, morning or afternoon and on Thursday morning, April 23. Please let me know your availability for these times for an in-person setting.

Respectfully,

<image001.png>

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Friday, April 10, 2026 2:15 AM
To: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>
Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>
Subject: Davis v. Cooprider, No. 2:25-cv-00220 Request to Schedule Discovery Conference

CAUTION - EXTERNAL:

Dear Ms. Clancy:

The parties in this case have reached a discovery impasse, this time with respect to a discovery request that Ms. Davis has served on Mr. Coopridier.

Ms. Davis is seeking to obtain location data from Mr. Coopridier's android for the time period after midnight on April 6, 2025, after Mr. Coopridier left Ms. Davis's house to pick up her mother but never returned and abandoned both Ms. Davis and her mother while Ms. Davis was losing her pregnancy.

We are also seeking to obtain Mr. Coopridier's internet search history with respect to abortion pills from any personal computers, tablet computers, and smartphones that he owned.

Ms. Davis served a discovery request on October 5, 2025, asking Mr. Coopridier to turn over his computers, tablets, and smartphones. But Mr. Coopridier objected on the ground that this would allow Ms. Davis to access all of his personal data including privileged communications.

So Ms. Davis's attorneys proposed a compromise in which Mr. Coopridier would turn over his devices to a mutually agreeable forensics expert, who would then extract and provide to us only the information that we are seeking from his devices that is relevant to this lawsuit, such as his location data on the night of April 5, 2025, and his internet-search history related to abortion and abortion pills between January 2025 and May 2025,

Mr. Coopridier's attorneys rejected this compromise, leaving the parties at loggerheads.

We would like to discuss this impasse with Judge Morales at the hearing scheduled for April 14, 2026. Should I file a motion to compel before the hearing or should I ask for the hearing of April 14, 2026, to be treated as a discovery conference on this issue?

Thank you for considering this.

—Jonathan

Jonathan F. Mitchell
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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<Issues for April 15 2026 Hearing.docx><EX __ Manipulating Witnesses and Evidence.pdf><EX __ Missing Screaming Audio File.pdf><EX __ Summary of Texts Deleting Messages.pdf>

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(512) 686-3940 (phone)
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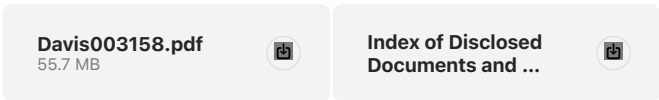


From: Jonathan Mitchell jonathan@mitchell.law
Subject: Re: Davis v. Coopriider Discovery Dispute/Court Order for Production DEADLINE 3:00 PM TODAY
Date: March 27, 2026 at 12:58 PM
To: Beth Klein beth@bethklein.com
Cc: Mikal Watts mikal@wattslp.com, Moscovitz, Barry bmoscowitz@thompsoncoe.com, Talcott Franklin tal@tfpc.me

Beth:

All text messages between Davis and Coopriider with embedded images are attached and bates stamped.

—Jonathan



On Mar 27, 2026, at 6:49 AM, Beth Klein <beth@bethklein.com> wrote:

Jonathan,

Thank you for your follow up. We must receive copies of all the texts with the imbedded images. All the screen shots, photos, and videos have been stripped from the texts, and what we received is a very sanitized spreadsheet. Ms. Davis is familiar with Decipher which will provide texts with images as we discussed please see Davis001297. She was required to use this program in her divorce proceedings. <https://deciphertools.com/decipher-textmessage.html> The Court just ordered a deadline of 3:00 pm today for your client to comply.

Below is a screenshot of a text between Kyle Yakopovich to Ms. Davis. We want all the texts between Ms. Davis and the Yakobovich's.

<image004.png>

You asked me about Request for Production No. 19(d), First Set. All responsive documents in the possession, custody or control of my client have been produced.

Beth Klein
303-448-8884
beth@bethklein.com
[Website](#) Documentary
350 Market Street, Suite 310 Basalt CO 81621
<image001.png>

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Thursday, March 26, 2026 9:25 PM
To: Beth Klein <beth@bethklein.com>
Cc: Mikal Watts <mikal@wattslp.com>; Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>
Subject: Re: Yakopovich Conversations - these have our bate stamp number, date and time.

Beth:

Thank you for your call earlier today. I have discussed the issues that you raised with Ms. Davis.

- (1) Ms. Davis does not have any responsive communications with her sister, Ami Amoroso, and you have not shown or told us anything that would indicate otherwise.
- (2) Ms. Davis has never communicated directly with Kyle Yakopovich. The communications that you sent me earlier today are screenshots from Yvonne Yakopovich that her husband had texted HER and that she passed along to Ms. Davis.
- (3) Ms. Davis does not have that conversation with Yvonne Yakopovich in her possession, custody, or control. This is a friend who lives halfway across the country and whom she has not seen in at least 13 years.

We have therefore produced all responsive documents in Ms. Davis's possession, custody, or control. If you disagree with that assessment, please let me know right away.

—Jonathan

On Mar 26, 2026, at 9:53 AM, Beth Klein <beth@bethklein.com> wrote:

588	Received	Apr 1, 2025 8:37:30 PM	Liana Davis (+14122957136)	Liana Davis	Also, I was talking to my friend (also a PhD- super smart girl) whose husband is a C130 pilot in the Marine Corps
589	Sent	Apr 1, 2025 8:38:09 PM	Liana Davis (+14122957136)		Lovely...
589	Received	Apr 1, 2025 8:38:24 PM	Liana Davis (+14122957136)	Liana Davis	? What's wrong with that?
589	Received	Apr 1, 2025 8:38:48 PM	Liana Davis (+14122957136)	Liana Davis	This is the friend who sent me a dozen cupcakes from Smallcakes when I got promoted. Anywho..
589	Received	Apr 1, 2025 8:39:20 PM	Liana Davis (+14122957136)	Liana Davis	Do you have Tricare?
589	Received	Apr 1, 2025 8:39:39 PM	Liana Davis (+14122957136)	Liana Davis	She told me that the baby should go on your health insurance. I have good insurance, but Tricare benefits beat most.
589	Received	Apr 1, 2025 8:39:57 PM	Liana Davis (+14122957136)	Liana Davis	So that's another thing you will need to be cooperative about when the time comes, and promptly.
770	Received	Apr 7, 2025 9:43:30 AM	Liana Davis (+14122957136)	+14122957136	Kyle Yakopovich - Text
771	Received	Apr 7, 2025 9:43:30 AM	Liana Davis (+14122957136)	Liana Davis	My Marine friend with 17 years experience says what you did is premeditated murder and a felony under the UCMJ.

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