

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 MOTION TO FILE EXHIBIT UNDER SEAL**

Plaintiff Liana Davis respectfully asks this Court for permission to file Exhibit 40 from her deposition under seal. Exhibit 40 is a “forensic examination report” of Ms. Davis’s iPhone that George Vasiliou prepared and provided to Mr. Coopriders’s legal team before Ms. Davis’s deposition of May 28, 2026. This report contains content from the Notes app on Ms. Davis’s iPhone, including verbatim excerpts of notes that Ms. Davis had written and kept on that app. Mr. Vasiliou and Mr. Coopriders’s attorneys obtained these data and produced this report in violation of the Court’s order of May 14, 2026, so neither they nor the public should have access to this private information on Ms. Davis’s phone. Ms. Davis respectfully asks the Court to seal this exhibit.

Respectfully submitted.

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Dated: June 2, 2026

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on June 2, 2026, I served this document through CM/ECF upon:

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