

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

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

Defendants.

PLAINTIFF'S STATUS REPORT

Ms. Davis's attorneys have spoken to Damon O'Connell at Array LLC, the company where forensics expert Russell Chozick works, and Mr. O'Connell assured Mr. Mitchell that Array LLC has no prior relationship with any of the parties or attorneys in this case. Ms. Davis is therefore willing to consent to Array LLC's serving as the court-appointed forensics expert in this case.

On June 11, 2026, at 4:41 P.M. central time, Mr. Mitchell circulated a draft stipulation to Mr. O'Connell and Mr. Coopriders's legal team. Mr. Mitchell attached both redlined and clean copies of edits that he had made to a draft stipulation that Mr. Moscovitz had proposed on June 9, 2026. In his e-mail circulating the proposed stipulation, Mr. Mitchell wrote:

Counsel:

Attached are my edits to the draft stipulation that Barry circulated on June 9. I have attached both redline and clean versions. Comments and proposed edits are welcome.

I have cc'd Damon O'Connell of Array (Mr. Chozick's company) on this e-mail. Damon, you are welcome to offer edits in redline to the proposed stipulation.

Exhibit 1. The redlined version of the draft stipulation that Mr. Mitchell circulated on June 11, 2026, is attached as Exhibit 2, and the clean version is attached as Exhibit 3.

On 5:54 P.M. central time on June 11, 2026, Ms. Klein wrote back and said:

We need a paragraph on how Ms. Davis will provide access to her iCloud which contains 54 GB of text data. She has a two-step security policy in place. The Apple tool to download this text data doesn't work. Several attempts have been made to download this data and all have failed. There is a help ticket with Apple but the desk hasn't been helpful.

Exhibit 4. Mr. Mitchell wrote back and said:

What more do you need from us? We've provided the password. If the Apple tool to download the data isn't working that's not Ms. Davis's fault.

Exhibit 5. Ms. Davis replied and wrote:

If the iCloud data cannot be accessed, then it has been effectively destroyed.

At this time Ms. Davis is the only person who can access the data. Merely proving passwords is insufficient with a two-step verification process as you know.

She will need to be present with an investigator to allow access to the iCloud data she transferred to her iCloud to obstruct discovery. It cannot be done remotely.

Damon may have a suggestion.

Exhibit 6.

On June 12, 2026, at 12:12 P.M. central time, Damon O'Connell replied to all counsel in response to Mr. Mitchell's e-mail of June 11, 2026, and wrote:

Jonathan,

Thank you for sharing the edits to the draft stipulation. After reviewing, my only suggestion would be to remove Russell Chozick's name and instead use Array, LLC as the company. This adjustment helps clarify

that there are several team members involved who will be handling the matter, rather than a single individual.

Please let me know if you have any questions or need further input.

Exhibit 7. Mr. Mitchell made those suggested revisions and, circulated a new redline and clean copy at 5:39 P.M. central time on June 12, 2026. In his e-mail to counsel and Mr. O'Connell, he wrote:

Thanks Damon. I have made that change in the attached redline and clean copies.

Counsel: Please let me know if I have your approval to file this as a stipulated agreement. I asked the Court in the status report that I filed on June 9 to allow us to continue negotiating through today, so we should file something with the Court before midnight tonight.

If I do not hear from you by 11:00 P.M. tonight I will file my own status report and ask the Court to enter this as an order of the Court.

Exhibit 8. The redlined version of the draft stipulation that Mr. Mitchell circulated on June 12, 2026, is attached as Exhibit 9, and the clean version is attached as Exhibit 10. Mr. Coopriders attorneys have not responded to the e-mail that Mr. Mitchell sent at June 12, 2026, at 5:39 P.M. central time.

Ms. Davis respectfully asks the Court to adopt the proposed order attached at the end of this status report as an order of the Court. The issues regarding access to Ms. Davis's iCloud data can be resolved later, and they are no reason to delay the transfer of data from Mr. Vasiliou to Array LLC. Mr. Coopriders attorneys raised no other objections to the draft stipulations that Mr. Mitchell circulated in his e-mails of June 11, 2026, and June 12, 2026. The parties have reached agreement on a new forensics expert and the Court should enter an order appointing Array LLC to that role.

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
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S.D. Tex. Bar No. 1133287
Mitchell Law PLLC
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jonathan@mitchell.law

Dated: June 12, 2026

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 12, 2026, I served this document through CM/ECF upon:

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*Counsel for Defendant
Christopher Coopriider*

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



From: Jonathan Mitchell jonathan@mitchell.law 
Subject: revised proposed draft stipulation
Date: June 11, 2026 at 2:41 PM
To: Moscovitz, Barry BMoscowitz@thompsoncoe.com, Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com
Cc: damon.oconnell@trustarray.com

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—Jonathan



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Defendants.

PARTIES' STIPULATION AND PROPOSED ORDER

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

1. The parties agree and recommend to the Court that Russell Chozick ~~of Array~~ be appointed by the Court to serve as a neutral custodian of the previously collected and still to-be-collected electronic data evidence.¹ The data previously collected by forensics expert George Vasiliou has all been preserved as collected, and Mr. Vasiliou is sending the imaged data to Austin, Texas so that the transfer to Mr. Chozick may be immediately facilitated once the Court has approved. Mr. Coopridier's attorneys will bear the costs, if any, incurred by the need to transfer these data.
2. Mr. Chozick will report directly to the Court and will secure and securely hold the data evidence as a custodian for the duration of the case or until ~~he is~~ released by the Court. At the conclusion of the case, which is defined as either: (a) the moment a final judgment or final decision of this Court becomes final either by the conclusion of appellate review or when the time for seeking appellate review expires; or (b) the moment at which the parties dismiss all pending claims and/or counterclaims as part of a settlement or a voluntary withdrawal of the claims. Mr. Chozick will destroy all of the data evidence and passwords and will provide a certification of destruction.
3. The parties or their attorneys or representatives may communicate with the court-appointed forensics expert about scheduling the transfer of data

1. Mr. Chozick's firm is located in Austin, Texas and has no prior relationship with the parties in this case.

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Deleted: The agreed upon forensics expert

Deleted: such time as

Deleted: or she

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Deleted: a final appealable Order from this Court or a final Order from either the Fifth Circuit Court of Appeals or the United States Supreme Court

Deleted: the agreed upon forensics expert

Deleted: agreed upon

Deleted: and was selected as convenient for Ms. Davis to travel in order to be present and facilitate access to the data maintained in her cloud-based services. Due to Ms. Davis's device and Apple security settings, no remote downloads can be performed without her physical presence...

from George Vasiliou, arranging for the collection of electronic devices, or other procedural matters related to the transfer of data or collection of electronic devices provided counsel of record are copied on any such communication, but they must include opposing counsel and the Court on all such communications.

Deleted: .

4. Under no circumstance may the parties or their attorneys or representatives communicate with the court-appointed forensics expert or his company unless the opposing party's counsel and the Court are notified and included on the communications and the Court approves the proposed communication in advance.

5. Under no circumstance may the court-appointed forensics expert examine or search the data evidence unless he: (a) receives a signed ESI order of the Court; and (b) notifies the Court and counsel for each party before examining or searching any of the data evidence pursuant to a signed ESI order of the Court.

Deleted: 4
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6. Under no circumstance may the parties or their attorneys or representatives access or attempt to access the data evidence held by the court-appointed forensics expert unless the opposing party's counsel and the Court are notified and the Court approves the requested access in advance. The court-appointed forensics expert must notify the Court and counsel for each party if anyone accesses or attempts to access the data evidence in his possession, custody, or control.

Deleted: ¶

7. Ms. Davis will provide to the agreed upon forensics expert the cell phone used to record Mr. Coopriider on the night of April 5, 2025. Ms. Davis will provide this phone, and any other device containing potentially relevant electronic data, images, information, metadata, etc. within seven (7) days of this Order.

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Deleted: all containing potentially relevant electronic data, images, information, metadata, etc., including but not limited to
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Deleted: 7. → Ms. Davis will cooperate fully and timely in accommodating the parties' reasonable requests to provide the agreed upon forensics expert with the necessary passwords, two-step security protocol approvals, and so forth to access, retrieve, mirror, secure, and securely hold all potentially relevant data stored on any cloud-based accounts including social media sites, email service providers, data storage providers, etc. ¶
8. → Ms. Davis and Ms. Davis's attorneys and representatives must provide certification by June 12, 2026 that they have completed a full search of all Ms. Davis's devices to identify, preserve, and produce all such devices containing discoverable electronic data, under the penalty of sanctions.² ¶

Dated: June 8, 2026

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
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S.D. Tex. Bar No. 1133287
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Counsel for Plaintiff

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Counsel for Defendant
Christopher Coopridner

CERTIFICATE OF SERVICE

I certify that on June 12, 2026, I served this document through CM/ECF upon:

Deleted: June 11, 2026

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Counsel for Defendant
Christopher Coopridner

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

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Dated: June 12, 2026

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*Counsel for Defendant
Christopher Coopriider*

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

From: Beth Klein beth@bethklein.com
Subject: Re: revised proposed draft stipulation
Date: June 11, 2026 at 3:54 PM
To: Jonathan Mitchell jonathan@mitchell.law, Moscovitz, Barry BMoscovitz@thompsoncoe.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com
Cc: damon.oconnell@trustarray.com

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From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Thursday, June 11, 2026 11:41:02 PM
To: Moscovitz, Barry <BMoscovitz@thompsoncoe.com>; Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Dupen, Craig <CDupen@thompsoncoe.com>
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From: Jonathan Mitchell jonathan@mitchell.law

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Date: June 11, 2026 at 4:05 PM

To: Beth Klein beth@bethklein.com

Cc: Moscowitz, Barry BMoscowitz@thompsoncoe.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com, damon.oconnell@trustarray.com



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Subject: Re: revised proposed draft stipulation
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To: Jonathan Mitchell jonathan@mitchell.law
Cc: Moscowitz, Barry BMoscowitz@thompsoncoe.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com, damon.oconnell@trustarray.com

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From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Friday, 12 June 2026 01:05:17
To: Beth Klein <beth@bethklein.com>
Cc: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Dupen, Craig <CDupen@thompsoncoe.com>; damon.oconnell@trustarray.com <damon.oconnell@trustarray.com>
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PRIVILEGED AND CONFIDENTIAL — ATTORNEY-CLIENT COMMUNICATION / ATTORNEY WORK PRODUCT

Jonathan F. Mitchell
Mitchell Law PLLC

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Austin, Texas 78701

(512) 686-3940 (phone)

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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: Damon O'Connell Damon.OConnell@trustarray.com

Subject: RE: revised proposed draft stipulation

Date: June 12, 2026 at 10:12 AM

To: Jonathan Mitchell jonathan@mitchell.law, Moscowitz, Barry BMoscowitz@thompsoncoe.com, Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Dupen, Craig CDupen@thompsoncoe.com

Cc: Russell Chozick Russell.Chozick@trustarray.com

Jonathan,

Thank you for sharing the edits to the draft stipulation. After reviewing, my only suggestion would be to remove Russell Chozick's name and instead use Array, LLC as the company. This adjustment helps clarify that there are several team members involved who will be handling the matter, rather than a single individual.

Please let me know if you have any questions or need further input.

Best regards,
Damon



Damon O'Connell
VP of Business Development
M [512.653.7387](tel:512.653.7387)
trustArray.com

This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 USC 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This communication may contain confidential and privileged material for the sole use of the intended recipient and receipt by anyone other than the intended recipient does not constitute a loss of the confidential or privileged nature of the communication. Any review or distribution by others is strictly prohibited. If you are not the intended recipient, please contact the sender by return electronic mail and delete all copies of this communication.

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Thursday, June 11, 2026 4:41 PM

To: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>; Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Dupen, Craig <CDupen@thompsoncoe.com>

Cc: Damon O'Connell <Damon.OConnell@trustarray.com>

Subject: revised proposed draft stipulation

You don't often get email from jonathan@mitchell.law. [Learn why this is important](#)

Counsel:

Attached are my edits to the draft stipulation that Barry circulated on June 9. I have attached both redline and clean versions. Comments and proposed edits are welcome.

I have cc'd Damon O'Connell of Array (Mr. Chozick's company) on this e-mail. Damon, you are welcome to offer edits in redline to the proposed stipulation.

—Jonathan

Jonathan F. Mitchell
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From: Jonathan Mitchell jonathan@mitchell.law

Subject: Re: revised proposed draft stipulation

Date: June 12, 2026 at 3:39 PM

To: Damon O'Connell Damon.OConnell@trustarray.com

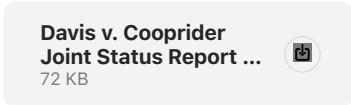
Cc: Moscowitz, Barry BMoscowitz@thompsoncoe.com, Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Talcott Franklin tal@tfpc.me, Jimenez, Victoria VJimenez@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com,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

Thanks Damon. I have made that change in the attached redline and clean copies.

Counsel: Please let me know if I have your approval to file this as a stipulated agreement. I asked the Court in the status report that I filed on June 9 to allow us to continue negotiating through today, so we should file something with the Court before midnight tonight.

If I do not hear from you by 11:00 p.m. tonight I will file my own status report and ask the Court to enter this as an order of the Court.

—Jonathan



On Jun 12, 2026, at 10:12 AM, Damon O'Connell <Damon.OConnell@trustarray.com> wrote:

Jonathan,

Thank you for sharing the edits to the draft stipulation. After reviewing, my only suggestion would be to remove Russell Chozick's name and instead use Array, LLC as the company. This adjustment helps clarify that there are several team members involved who will be handling the matter, rather than a single individual.

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Cc: Damon O'Connell <Damon.OConnell@trustarray.com>
Subject: revised proposed draft stipulation

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I have cc'd Damon O'Connell of Array (Mr. Chozick's company) on this e-mail. Damon, you are welcome to offer edits in redline to the proposed stipulation.

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

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' STIPULATION AND PROPOSED ORDER

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

1. The parties agree and recommend to the Court that Array LLC be appointed by the Court to serve as a neutral custodian of the previously collected and still to-be-collected electronic data evidence.¹ The data previously collected by forensics expert George Vasiliou has all been preserved as collected, and Mr. Vasiliou is sending the imaged data to Austin, Texas so that the transfer to Array LLC may be immediately facilitated once the Court has approved. Mr. Coopridier's attorneys will bear the costs, if any, incurred by the need to transfer these data.
2. Array LLC will report directly to the Court and will secure and securely hold the data evidence as a custodian for the duration of the case or until he is released by the Court. At the conclusion of the case, which is defined as either: (a) the moment a final judgment or final decision of this Court becomes final either by the conclusion of appellate review or when the time for seeking appellate review expires; or (b) the moment at which the parties dismiss all pending claims and/or counterclaims as part of a settlement or a voluntary withdrawal of the claims, Array LLC will destroy all of the data evidence and passwords and will provide a certification of destruction.
3. The parties or their attorneys or representatives may communicate with the court-appointed forensics expert about scheduling the transfer of data from George Vasiliou, arranging for the collection of electronic devices,

1. Array LLC is located in Austin, Texas and has no prior relationship with the parties in this case.

Deleted: Russell Chozick

Deleted: approved

Deleted: Mr. Chozick

Deleted: The agreed upon forensics expert

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Deleted: such time as

Deleted: or she

Deleted: either

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Deleted: a final appealable Order from this Court or a final Order from either the Fifth Circuit Court of Appeals or the United States Supreme Court

Deleted: the agreed upon forensics expert

Deleted:

Deleted: agreed upon

Deleted: Mr. Chozick's firm

Deleted: and was selected as convenient for Ms. Davis to travel in order to be present and facilitate access to the data maintained in her cloud-based services. Due to Ms. Davis's device and Apple security settings, no remote downloads can be performed without her physical presence...

or other procedural matters related to the transfer of data or collection of electronic devices provided counsel of record are copied on any such communication, but they must include opposing counsel and the Court on all such communications.

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4. Under no circumstance may the parties or their attorneys or representatives communicate with the court-appointed forensics expert or his company unless the opposing party's counsel and the Court are notified and included on the communications and the Court approves the proposed communication in advance.

5. Under no circumstance may the court-appointed forensics expert examine or search the data evidence unless he: (a) receives a signed ESI order of the Court; and (b) notifies the Court and counsel for each party before examining or searching any of the data evidence pursuant to a signed ESI order of the Court.

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6. Under no circumstance may the parties or their attorneys or representatives access or attempt to access the data evidence held by the court-appointed forensics expert unless the opposing party's counsel and the Court are notified and the Court approves the requested access in advance. The court-appointed forensics expert must notify the Court and counsel for each party if anyone accesses or attempts to access the data evidence in his possession, custody, or control.

Deleted: ¶

7. Ms. Davis will provide to the agreed upon forensics expert the cell phone used to record Mr. Coopridier on the night of April 5, 2025. Ms. Davis will provide this phone, and any other device containing potentially relevant electronic data, images, information, metadata, etc. within seven (7) days of this Order.

Deleted: 6
Deleted: all containing potentially relevant electronic data, images, information, metadata, etc., including but not limited to
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Deleted: 7. → Ms. Davis will cooperate fully and timely in accommodating the parties' reasonable requests to provide the agreed upon forensics expert with the necessary passwords, two-step security protocol approvals, and so forth to access, retrieve, mirror, secure, and securely hold all potentially relevant data stored on any cloud-based accounts including social media sites, email service providers, data storage providers, etc. ¶
8. → Ms. Davis and Ms. Davis's attorneys and representatives must provide certification by June 12, 2026 that they have completed a full search of all Ms. Davis's devices to identify, preserve, and produce all such devices containing discoverable electronic data, under the penalty of sanctions.² ¶

Dated: June 8, 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

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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 June 12, 2026, I served this document through CM/ECF upon:

Deleted: June 11, 2026

MIKAL C. WATTS
Watts Law Firm LLP
811 Barton Springs #725
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mikal@wattslp.com

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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-220

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

Defendants.

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1. Array LLC is located in Austin, Texas and has no prior relationship with the parties in this case.

or other procedural matters related to the transfer of data or collection of electronic devices provided counsel of record are copied on any such communication, but they must include opposing counsel and the Court on all such communications.

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Dated: June 12, 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
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jonathan@mitchell.law

Counsel for Plaintiff

/s/ Mikal C. Watts
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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 June 12, 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@wattsllp.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 Coopriider; 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 in support of the plaintiff's status report of June 12, 2026.

4. The documents attached as Exhibits 1 through 10 to this motion are authentic copies of e-mails that I sent or received between May 28, 2026, and June 12, 2026.

5. The factual assertions made in the status report are truthful and within my personal knowledge.

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



JONATHAN F. MITCHELL

Dated: June 12, 2026

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

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

Defendants.

ORDER

The Court ORDERS as follows:

1. The Court appoints Array LLC to serve as a neutral custodian of the previously collected and still to-be-collected electronic data evidence. The Court orders George Vasiliou to transfer all previously collected electronic data Array LLC. Mr. Coopriders's attorneys will bear the costs, if any, incurred by the need to transfer these data.
2. Array LLC will report directly to the Court and will secure and securely hold the data evidence as a custodian for the duration of the case or until he is released by the Court. At the conclusion of the case, which is defined as either: (a) the moment a final judgment or final decision of this Court becomes final either by the conclusion of appellate review or when the time for seeking appellate review expires; or (b) the moment at which the parties dismiss all pending claims and/or counterclaims as part of a settlement or a voluntary withdrawal of the claims, Array LLC will destroy all of the data evidence and passwords and will provide a certification of destruction.
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Dated: _____

DAVID S. MORALES
UNITED STATES DISTRICT JUDGE